

LOCAL PLAN REVIEW 2016-2036

THE LOCAL PLAN 2016-2036 PART ONE: PLANNING STRATEGY

1. INTRODUCTION - SCOPE, PURPOSE AND STRUCTURE OF THE REPORT

- 1.1 The purpose of this report is to seek the formal support of Cabinet, and the agreement of Council, to publish the draft **Local Plan 2016-2036 Part 1: Planning Strategy** and associated documents for statutory public consultation, and thereafter to submit the Local Plan to the Secretary of State for independent examination.
- 1.2 The report focuses on the key matters for and proposals in the Local Plan 2016-2036 Part 1: Planning Strategy, including significant changes to the ‘direction of travel’ published in the report of 7 September 2017 to Planning Committee with the Environment Overview and Scrutiny Panel¹. The report does not summarise the whole Local Plan, which is provided in full at Annex One.
- 1.3 The structure and content of the report is as follows.

Section 2	Local Plan role and review approach
Section 3	Local Plan timetable and next steps
Section 4	The draft Local Plan – key matters and proposals <ul style="list-style-type: none"> - Changes to the Policies Map - Housing need and target - Green Belt - Habitat mitigation - Housing sites - High quality development - Diversifying housing choice - Affordable housing - Business, the economy and port development - Community facilities and infrastructure
Section 5	Public consultation feedback and changes made in response
Section 6	Addressing the tests of Local Plan soundness
Section 7	Documents that will accompany the Local Plan
Section 8	Financial implications
Section 9	Crime and disorder implications
Section 10	Environment, equality and diversity implications
Section 11	Recommendations

Annex 1: The draft **Local Plan 2016-2036 Part 1: Planning Strategy** Local Plan document (committee version)

This includes all sites proposed to be allocated and an annex of current Local Plan policies proposed to be saved or deleted

Annex 2: Policies Map changes including land proposed to be removed from the Green Belt and settlement boundary changes

¹ Available here: <https://democracy.newforest.gov.uk/ieListDocuments.aspx?CId=478&MId=6511>

2. BACKGROUND - LOCAL PLAN ROLE AND REVIEW APPROACH

Role of Local Plans

- 2.1. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities and how land will be used in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They must be prepared with the objective of contributing to the achievement of sustainable development; they should be aspirational but realistic, and consistent with the National Planning Policy Framework (NPPF).
- 2.2. Local Plans are the starting point for making decisions about individual development proposals, which must be determined in accordance with the Plan unless material considerations indicate otherwise.
- 2.3. Local Planning Authorities should produce a Local Plan for their area looking ahead around 15 years, –and keep it up-to-date by review within five years².
- 2.4. The current development plan for New Forest District (outside of the National Park) primarily comprises:
 - the Local Plan Part 1: Core Strategy, adopted in October 2009
 - the Local Plan Part 2: Sites and Development Management, adopted in April 2014.

Review approach

- 2.5. At an early stage in the process it was decided to continue with a two-part Local Plan, and to start the review by updating the 2009 Core Strategy. The main reasons were:
 - To respond more quickly to the primary challenge, an almost three-fold increase in identified housing need relative to the adopted Core Strategy housing target
 - To reduce the risk of abortive work on more detailed matters in period where national planning policy is being reviewed
 - To leave room for Neighbourhood Plans to develop local policies including additional site allocations
- 2.6. It was decided that the Local Plan Part One would include the allocation of strategic development sites of 100 or more homes, to demonstrate how most of the planned homes would be delivered whilst keeping the site assessment process proportionate. Sites of 100+ homes will provide most of the additional homes to be delivered. The Local Plan Review Part 2 will allocate smaller sites and update development management policies, where Neighbourhood Plans are not already doing so.
- 2.7. National Planning Practice Guidance is that Local Plans should be based on a proportionate evidence base, stating that, "...the evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan." The Local Plan review is informed by a comprehensive evidence base.
- 2.8. The Local Plan Review has confirmed that a number of the currently adopted Local Plan policies remain relevant and can be retained or 'saved' for continued use. Saved policies that are strategic in nature are included in the draft Local Plan document for

² The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017

convenient reference³. As they are already adopted, they are not open for public consultation comment, nor will they be subject to examination.

- 2.9. Within the draft Local Plan Part 1 document attached as Annex 1 to this report, Appendix A lists all current Local Plan policies and whether they are proposed to be saved or deleted. The non-strategic saved policies are not reproduced in the draft Local Plan Part 1, and will be considered further in Part 2 of the Local Plan review process.
- 2.10. In preparing the draft Local Plan Part 1, consideration has also been given to potential changes to the National Planning Policy Framework (2012), which are due to be published this summer. Transitional arrangements will apply to Local Plans submitted within six month of the date the NPPF changes are published, as in the Council's case. In this transition period Local Plans would be examined based on the NPPF in its current form.

3. TIMETABLE AND NEXT STEPS

- 3.1. Subject to the decision by Cabinet and Council the next steps for the Local Plan review are as set out in the table below, with 'regulation 19' statutory pre-submission public consultation on the draft Local Plan commencing around the end of June, and submission for independent examination around the end of October 2018.
- 3.2. Thereafter the Planning Inspectorate set the timetable. It is estimated that the examination hearing would take place early in 2019 and subject to the outcome of the examination, that the Local Plan would be formally adopted by the end of 2019.

	Jun	Jul 2018	Aug	Sep	Oct	Nov	Dec
Cabinet and Council	6						
Finalise Local Plan material for consultation							
Reg. 19 Consultation 6 weeks							
Preparation for Submission							
Reserve Cabinet date if required					3		
Submission							
Examination statements etc							

SUBJECT TO PLANNING INSPECTORATE

	2019	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Est. Examination hearings													
Inspector's Report													
Modifications (usually required)													
Adoption													

4. THE LOCAL PLAN – KEY MATTERS AND PROPOSALS

- 4.1. This section provides an overview of selected, significant policy matters focussing on the main changes from the 2016 Initial Proposals public consultation, and the 'direction of travel' update set out in the report to Planning Development Control Committee with the Environment Overview and Scrutiny Panel on 6 September 2017⁴.

³ 'Strategic' saved policies are reproduced in italics and included in the draft Local Plan at Annex 1 so that the Local Plan can be read more conveniently as a whole. We have made factual changes to these policies where it would assist their application without changing how they apply, for example deleting or updating references to superseded documents.

⁴ <https://democracy.newforest.gov.uk/ieListDocuments.aspx?CId=478&Mid=6511>

Changes to the Policies Map

- 4.2. Annex 2 shows the proposed Local Plan Policies Map changes. Changes are required to extend the settlement (built up area) boundaries and amend Green Belt boundaries to reflect the proposed strategic site allocations.
- 4.3. In some cases the strategic site allocation boundaries include land that will remain in the Green Belt and outside the built up area boundary, forming part of the public open space and natural recreation greenspace for habitat mitigation associated with that development (consistent with Strategic Site Allocation concept masterplans). Strategic site allocation boundaries may also include existing dwellings and other uses that may remain unchanged, depending on the wishes of the occupier or owner.

Housing need and target

Objectively assesses housing need

- 4.4. Evidence of housing need taking into account the latest Government household projections is the starting point for setting a Local Plan housing target. However the calculation of 'objectively assessed housing need' (OAN) is not a precise science. The data relevant to the assessment changes over time, and there is an element of professional judgement about the appropriate assumptions to use and adjustments that might be made.
- 4.5. The latest evidence on housing need is set out in the report Objectively Assessed Housing Need by Justin Gardner Consulting (JGC 2017), commissioned by New Forest District Council and the New Forest National Park Authority. This report recommends provision of 10,420 homes in the period 2016-2036. It updates the OAN assessment in the 2014 Strategic Housing Market Assessment which informed the Initial Proposals 2016 public consultation (which identified objectively assessed housing need for 2016 - 2036 in the range of 11,740-13,740 homes).
- 4.6. The JGC 2017 report updates OAN figures using the latest household and population projections. It includes a detailed assessment of migration assumptions, concluding that the national household projections are not 'fit for purpose'⁵ in the Plan Area.
- 4.7. The revised OAN figure generated by the JGC 2017 report is lower than the national household projection starting point, despite including upwards adjustments to address market signals including housing affordability.

Unmet housing need from other Local Plan areas

- 4.8. In setting a housing target, planning authorities should consider whether they can help to meet housing needs that cannot be met by neighbouring planning authorities. The only unmet need the Council is aware of is a 460 home shortfall 2016-2036 from the New Forest National Park Authority.
- 4.9. The National Planning Policy Framework⁶ recognises that it will not always be possible for authorities to fully meet their needs, for example where there are significant environmental constraints as is the case in the Plan Area.

⁵ Objectively Assessed housing need, JGC 2017, para 27.

⁶ NPPF para. 47 and footnote 9

- 4.10. It is common ground between the two authorities that the extent of environmental and other significant constraints within the District outside the National Park means that whilst New Forest District Council will be able to meet its own need figure (as defined in the Justin Gardner Consulting report 2017), it is unlikely to be able to assist with meeting the unmet need arising from within the National Park.

The proposed standard housing need methodology

- 4.11. Government has consulted on a standard method to calculate housing need, and it is expected that this will be incorporated into national policy when updates to the NPPF are published in the summer. Under transitional arrangements this methodology will not be applied to Local Plan submitted for examination with six months of the publication of NPPF revisions. The Council expects to submit its Local Plan for examination well before the end of the transition period.

Housing target

- 4.12. The proposed Local Plan housing target is 10,500 homes 2016-2036. This fully meets the latest identified OAN requirement for the Plan Area. The target is proposed to be phased as follows:

- 1,120 homes (averaging 280 homes per annum) 2016-17 to 2019-20⁷
- 2,400 homes (averaging 400 homes per annum) 2020-21 to 2025-26
- 6,980 homes (averaging 698 homes per annum) 2026-27 to 2035-36

- 4.13. A stepped target is necessary because it will take time for new site allocations to secure planning permission and to mobilise before housing delivery can significantly increase from the current 196 homes per annum target. Based on the Council's housing trajectory, informed by discussion with site promoters and infrastructure providers, completion rates are unlikely to exceed 400 homes until the period 2021-2026.

- 4.14. The combined target for the first ten years represents a 47% increase on the average rate of completions in the Plan Area in the last decade (240 homes per annum).

Green Belt

- 4.15. A central theme of the 2016 Local Plan Initial Proposals public consultation was whether land in Green Belt should be removed from the Green Belt and allocated for housing. National policy accords high priority to protecting the Green Belt, but recognises that in exceptional circumstance where there are no reasonable alternatives, that the release of Green Belt land in sustainable locations for development may be necessary. This is a local policy choice to be made through the Local Plan process.
- 4.16. In 2016 the Council consulted on a range of housing supply scenarios depending on whether and to what extent land in potentially sustainable sites for housing were taken out of the Green Belt to build on. The higher growth scenarios consulted on required release of strongly performing Green Belt. The release of Green Belt land for housing development attracted significant levels of objections at Initial Proposals public consultation stage (see section 5).

⁷ Based on actual and projected completions before Local Plan Strategic Site Allocations start to deliver.

- 4.17. Planning Development Control Committee with the Environment Overview and Scrutiny Panel on 6 September 2017 expressed ‘fundamental concerns about the loss of Green Belt and its potential effect on the character of local communities’, but also recognised that ‘this must be balanced against the requirement to produce a plan that would be judged to be acceptable’.
- 4.18. The Council can meet the revised OAN in full provided that some weak to moderately performing Green Belt land is released from the Green Belt and allocated for housing development. Officers consider this to be the right balance between national policy objectives for protecting the Green Belt, and for delivering sufficient housing. On this specific basis the ‘exceptional circumstances’ test for the release of Green Belt land for development through the Local Plan review is considered to be met.
- 4.19. There is no longer a need to consider the release of land in stronger Green Belt, thus there are no longer ‘exceptional circumstances’ to justify releasing stronger Green Belt sites for development, and no stronger Green Belt sites are proposed to be allocated in the Local Plan. This is due to the combination of:
- The revised, lower OAN requirement.
 - The allocation for housing development of an additional large strategic housing site not in the Green Belt at Burgate, north of Fordingbridge.
 - Extensions to other proposed sites, either to include additional land not in the Green Belt, or to use land retained in the Green Belt to provide supporting open space including for habitat mitigation. This enables the developable part of the site to be used more efficiently.
 - Additional capacity on smaller sites based on an analysis of potential including public calls for sites and local assessments for emerging Neighbourhood Plans.
- 4.20. The longstanding policy approach of permitting appropriate rural exception sites to address local housing needs that could not otherwise be met, is retained. In all other respects the Green Belt will continue to be strongly protected by the Local Plan.

Habitat Mitigation

- 4.21. There is a legal duty to ensure that development and policies proposed in the Local Plan would not have an adverse effect on sites designated for their international importance as nature conservation habitats. The significant extent and ecological sensitivity of International Nature Conservation sites in and adjoining the Plan Area makes accommodation of the development a major challenge.
- 4.22. The Habitats Regulations Assessment (HRA) of the Local Plan identifies that without appropriate mitigation, planned development (either alone or in combination with development elsewhere) would be likely to have a range of significant effects on a number of International Nature Conservation sites, or that significant effects could not be ruled out.
- 4.23. Policy 10: Mitigating the impacts of development on International Nature Conservation sites sets out how developers will need to provide or contribute towards an extensive range of habitat mitigation, management and monitoring measures to ensure that harmful effects are avoided or reduced and mitigated. These measures relate to potential effects on plants and species due to traffic emissions on roads through the New Forest, water quality impacts to the River Avon and the Solent from increased discharge of phosphates or nitrates, and recreational disturbance in the Solent and New Forest arising from an increased population.

4.24. The provision of natural recreation greenspace for recreational habitat mitigation on sites of 50 or more homes typically requires 50% more land than would otherwise be needed to accommodate development, and will help to ensure that new developments are attractive places to live. The provision and ongoing maintenance of natural recreation greenspace has been taken into account in Local Plan viability testing.

Housing sites

4.25. The 18 sites proposed strategic site for allocations are set out in the table below. The main changes are:

- One new strategic site SS.18 at Burgate, north of Fordingbridge, made up of five land parcels promoted to the Council through the 2016 Initial Proposals public consultation and Call for sites.
- The reinstatement as an allocation of land north of Ringwood at Snail's Lane as SS.15. This was first consulted on in 2016 (as Initial Proposals site R). Based on an initial Masterplanning assessment it was considered that it would be unlikely to be able to accommodate 100 homes, so whilst suitable for development it would be considered for allocation as a smaller site in the Local Plan Part Two⁸. Capacity to accommodate 100 homes was confirmed after further, more detailed masterplanning work by officers.
- Allocation of SS.4 the former Fawley power station site for residential-led mixed use development based on work with the site promoters and the New Forest National Park Authority. Policy SS.4 of the draft Local Plan is aligned with draft Policy SP25 of the New Forest National Park Local Plan to bring the whole site forward in a coordinated manner that will benefit the wider Calshot area, including a significant element of employment uses, open space and community facilities.

⁸ As set out in the report to Planning Development Control Committee with the Environment Overview and Scrutiny Panel, 6 September, 2017 (site R, table A on page 5)
<https://democracy.newforest.gov.uk/ieListDocuments.aspx?CId=478&MIId=6511>

Table of Proposed Strategic Site Allocations

Strategic Site	Site Policy	Estimated minimum capacity ^a
Totton and the Waterside		
North of Totton	SS 1	900 ^b
West of Marchwood	SS 2	860 ^b
North of Marchwood	SS 3	150
The former Fawley Power Station (mixed-use)	SS 4	1380
South Coastal Towns		
South-west of Lymington	SS 5	185
South of Lymington	SS 6	100
North-east of Milford-on-Sea	SS 7	110
Central Hordle	SS 8	160
North Hordle	SS 9	100
North-east New Milton	SS 10	130
South-west New Milton	SS 11	160
Avon Valley and Downlands		
West of Bransgore	SS 12	100
South of Ringwood	SS 13	480
East of Ringwood	SS 14	270
North of Ringwood	SS 15	100
East of Ashford	SS 16	140
North-west of Fordingbridge	SS 17	330
North of Fordingbridge (Burgate)	SS 18	350

Notes:

- a. Subject to housing mix and detailed testing at planning application stage.
- b. Capacity would be higher if a school is not required on-site.

Proposed sites in flood risk zones 2 and 3

- 4.26. In identifying potential sites for the 2016 Initial Proposals consultation the Council's site sustainability assessment ruled out sites in the higher risk flood zones (zones 2 and 3) in accordance with national policy. The Council's SFRA modelling updated national flood risk mapping and identified increased flood risks on some potential allocation sites, raising doubts about whether they could be allocated for development.
- 4.27. A second stage of SFRA assessment has confirmed that these at-risk sites pass the flooding 'exception test' and can be made safe and developed without increasing flood risk nearby or downstream, so they are included as proposed Strategic Site Allocations sites SS.2 Cork's Farm, north of Marchwood; SS.12 West of Bransgore, SS.13 South of Ringwood, SS.14 East of Ringwood.

Site capacities and masterplan proposals

- 4.28. The Strategic Site Allocation policies identify an 'at least' housing capacity base on a concept masterplan which demonstrates a layout compliant with proposed Local Plan policy requirements, including the provision of natural recreation greenspace for habitat mitigation. The 'at least capacity' is subject to housing mix and detailed testing at planning application stage. It may be possible to demonstrate at full planning application stage that higher capacities can be provided in a sustainable manner that meets the policy requirements.
- 4.29. The site allocation policy concept masterplans assist developers by showing how development can be laid out in a manner that the Council is likely to support. If site promoters wish to pursue a different approach, they can do so and would need to

prepare their own masterplan and demonstrate how it meets the site allocation policy requirements and achieves sustainable development from first principles.

Other sites considered and not allocated

- 4.30. A further 18 potential or proposed strategic sites⁹ (including site extensions) have been assessed and not allocated on the basis that they are not sustainable locations for development taking into account, where relevant, impact on stronger performing Green Belt. These include seven sites (or part sites) in stronger Green Belt that were consulted on as part of the 2016 Initial Proposals public consultation. Further details are provided in the Sustainability Appraisal report, which assesses these sites as a whole (in addition to the prior sustainability appraisal assessment of their component land parcels as part of the assessment of all land parcels in the Plan Area outside of settlement boundaries).

High quality development

- 4.31. An important part of the proposed Local Plan strategy is to ensure that where growth needs to be accommodated, the new communities created are well designed, appropriate in their context and landscape setting, and achieve a net environmental gain. The design, landscape, public open space, biodiversity, habitat mitigation and site allocation policies are designed to work together to achieve this objective, supported by the forthcoming draft Strategic Site Masterplanning Supplementary Planning Document, and informed by a significant amount of site-based preparatory work with site promoters.

Diversifying housing choice

- 4.32. In response to national policy requirements to address the full spectrum of housing needs, draft Policy 16: Housing type, size and choice, seeks that all strategic housing sites include the provision of at least three of the four 'non-standard' housing forms and tenures listed below.

- Serviced plots for self and custom build homes
- Lower cost market homes including starter homes
- Homes for rent
- Bungalows, sheltered and extra-care accommodation

- 4.33. These requirements are additional to affordable housing. They have been viability tested on the basis that at least 10% of the market housing element would be in an identified diversified tenure, including around 5% of the market housing in the form of discounted entry level or 'starter' homes¹⁰.

- 4.34. The draft Local Plan provides further policy support for meeting the needs of an ageing population, including a requirement that new homes achieve at least Accessible and Adaptable homes standards under the Building Regulations (Policy 35: Development Standards).

⁹ Of at least 5 hectares thus able to accommodate 100 homes and mitigation, including by combining smaller adjoining areas of promoted land.

¹⁰ Based on a smaller 2-bedroom property offered at 75-80% of market value.

Affordable housing

- 4.35. Affordable housing encompasses provision of homes for those unable to meet their accommodation needs in the open market. Affordable housing is provided in the form of subsidised rental housing tenures and Government policy also supports provision to assist home purchase for those at the margins of being able to afford to buy (generally referred to as intermediate housing).
- 4.36. Informed by viability assessment draft Policy 17: Affordable Housing sets a policy requirement as follows:
- In Totton and the Waterside area, the requirement is for 35% of new homes to be affordable housing.
 - In the rest of the Plan Area, the requirement is for 50% of new homes to be affordable housing.
 - The tenure mix requirement is to provide 70% of affordable homes for rent, split equally between social and affordable rent, and 30% intermediate or affordable home ownership tenures including shared ownership (part rent, part buy).
- 4.37. The affordable housing policy will apply to all developments of self-contained housing providing 11 or more homes or more than 1,000 square metres of residential development, including extra care and sheltered housing.
- 4.38. Starter or entry level homes are addressed separately under Policy 16: Housing type, size and choice as they are insufficiently affordable on the basis of local incomes to qualify as affordable housing.

Business, the economy and port development

Employment land

- 4.39. To meet future needs policies protect employment land that remains suitable for employment use, including saving existing employment allocations that remain appropriate, and 18 hectares of employment land is identified within the new site allocations at North Totton, Fawley and East Ringwood (respectively Site Policies SS.1, SS.4 and SS.14).

Ports

- 4.40. Policy 24: Port development at Dibden Bay set out a constructive approach to working with Associated British Ports should they progress their published intention to seek consent for port development at Dibden Bay. Nationally Significant Infrastructure Projects (NSIP) regime would apply with proposals considered by an independent inspector reporting to the Secretary of State who takes the final decision. If port development is consented a Local Plan review may be necessary.

Community facilities and infrastructure

Introduction

- 4.41. Given that both the general public and councillors have expressed a range of concerns about the capacity of various forms of infrastructure and services, it is important to understand the limitations of the Planning system in relation to infrastructure provision.

- 4.42. The Local Plan can only seek from development provision or contributions towards infrastructure that is necessary, reasonable and proportionate in relation to the actual and specific impacts of that development. The Local Plan cannot resolve existing congestion or capacity constraints; these are the responsibility of infrastructure providers to be addressed from their operational resources. In some cases such as GP health care, capacity constraints may relate to service reorganisation, more centralised models of service provision, shortages of qualified practitioners and NHS resource limitations, all matters that are beyond the scope of the Local Plan to influence.
- 4.43. The fact that there is existing traffic congestion or constraints in the capacity of public services and infrastructure, and that development may make them worse, can only be given significant weight if evidence shows that the impact is 'severe'. The Local Plan review consultations and evidence base have not identified any strategic transport network or other infrastructure constraints that are severe, but there are localised matters that will need to be addressed.
- 4.44. Local Plan policies including site allocations, supported by the Infrastructure Delivery Plan, set out the infrastructure and services needed or likely to be needed to enable planned growth to be sustainably accommodated. Most are localised interventions to address site specific matters. For example transport measures are typically to provide safe site access including by walking and cycling, and the precise details would be agreed at planning application stage informed by a development-specific transport assessment prepared by the developer.

School capacity

- 4.45. Over than Plan Period the primary and infant school age population remains almost unchanged. However there is a declining roll in some areas, offsetting roll growth in others. And the current context is that some school are full, or likely to become full, in the short to medium term. Officers have worked closely with the Education Authority to identify how future needs can be met in this changing context. Their preference is for existing schools to be expanded where capacity is needed, funded by developer contributions. The locations where expansion would be sought have been identified. However the Education Authority has not completed the technical work to confirm that expansion can be achieved where it is needed. The draft Local Plan therefore identifies land to be reserved for three new primary and infant schools within the Strategic Site Allocations, to be reserved for school provision until it is formally confirmed that the land is not needed and can be released.
- 4.46. Developer contributions will be sufficient to address secondary school needs

Broadband, electric vehicles

- 4.47. Policy 34: Development Standards requires that new development be connected to high speed broadband services, and provision to enable the convenient installation of charging points for electric vehicles. Both these requirements have potential air quality benefits for both habitats and human health.

5. PUBLIC CONSULTATION FEEDBACK AND CHANGES MADE IN RESPONSE

- 5.1. The Local Plan review has been informed by an extensive range of formal and informal consultation and engagement with the public, statutory bodies and regulatory agencies,

development interests, infrastructure and service providers and other interested parties, including:

- Autumn 2014: public consultation on the scope of the Local Plan Review ('Regulation 18' stage) and on the scope of the sustainability appraisal
- Call for sites October-November 2015 and a further call for brownfield sites November 2016 (these have remained open for new submissions throughout)
- July-September 2016 Local Plan 'Initial Proposals' public consultation ('Regulation 18' stage) including staffed public exhibitions
- Three cycles of meetings with site promoters from autumn 2016 including cooperative working to inform the preparation of site allocation concept masterplans
- Additional informal consultations with statutory bodies and key infrastructure and service providers in Spring 2018, and a range of purpose specific meetings on particular issues
- Ongoing collaborative working with neighbouring local planning authorities on matters of joint strategic interest, in particular close working with the New Forest National Park Authority.

5.2. The Initial Proposals' public consultation was most significant in terms of public engagement. It generated 7,640 representations from 1,377 respondents, and an additional 1033 responses to an online survey. The table below summarises the main issues raised.

Issue / theme	Total comments	% Objecting
Proposed strategic sites	1,900	81%
Infrastructure/ facilities /utilities	1,433	86%
Traffic/ transport	1,411	86%
Housing including target	922	70%
Environment	864	87%
Green Belt	821	85%
Flooding and climate change	783	88%
ALL COMMENTS	7,640	80%

5.3. Following pre-submission consultation the Council will complete a Consultation Statement setting out how the Local Plan has been informed by consultation feedback. Some details are provided in the Sustainability Appraisal. Listed below is a brief summary of the main changes made to the draft Local Plan in response to consultation feedback on the main themes highlighted in the table above:

- Additions to the package of site allocations including new sites and revised site boundaries
- A related decision that stronger Green Belt land does not need to be released for development, including the decision not to allocate Initial Proposals consultation sites in stronger Green Belt
- Detailed investigation of a range of impacts or potential impacts on international nature conservation sites, resulting in a comprehensive mitigation approach to enable planned development to be accommodated
- A significant body of Masterplanning work, including joint working with site promoters, to demonstrate how high quality development could be achieved in a manner compliant with the Habitats Regulations and other Local Plan policy

requirements, and in accordance with the Council's statutory duty to have regard to the purposes of the New Forest National Park

- Detailed investigation of a range of infrastructure and utilities matters that are within the reasonable scope of the Local Plan to influence or deliver, with specific proposals to meet identified needs such as education

6. DOCUMENTS THAT WILL ACCOMPANY THE LOCAL PLAN

6.1. The following draft Supplementary Planning Documents (SPD) will be published for public consultation at the same time as the publication of the draft Local Plan, to provide further information about how certain Local Plan policies and requirements can be addressed.

- Recreational Habitat Mitigation SPD (updating the 2014 adopted Mitigation Strategy SPD)
- Masterplanning Strategic Site Allocations SPD
- Developer Contributions SPD

6.2. Our other existing Supplementary Planning Documents (SPDs) will be retained, and others may be prepared if the need arises.

7. ADDRESSING THE TESTS OF LOCAL PLAN SOUNDNESS

7.1. This section briefly sets out how the Local Plan 2016 Part One: Planning Strategy meets the requirements for a sound Local Plan. The requirements for a sound plan are that it is **positively prepared, justified, effective and consistent with national policy**.

7.2. Paragraph 182 of the National Planning Policy Framework requires that a local planning authority should submit a plan for examination which it considers to be in a form suitable for adoption, sound and fit for examination. Officers consider that the draft Local Plan meets all four requirements of the requirements of NPPF paragraph 182 as set out in turn below.

7.3. **Positively prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development**

- The draft Local Plan meets the latest figure for objectively assessed housing need in full. Specific sites are identified to deliver most of the homes required to 2036, with identified sources of supply for the residual sufficient to demonstrate that it is reasonable to rely on them. Housing policies meet as much of the various forms of affordable and other specialised housing needs as can viably be delivered.
- The New Forest National Park Authority is unable to fully meet its housing needs, but has formally accepted in a statement of common ground that they cannot sustainably be met in New Forest District outside of the National Park. No other unmet housing requirements have been identified.
- Some of the larger sites include employment uses, sufficient alongside existing reserves to meet evidenced needs.

- Development proposals include the provision of or contribution towards providing the infrastructure and services that are necessary to meet the needs or mitigate the impacts arising from the development itself. They do not and cannot fully redress past deficiencies, which are the responsibility of infrastructure and community service providers.
- No other strategic needs have been identified.

7.4. Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence

- The Local Plan is supported by a comprehensive evidence base, but proportionate in relation to the significance and complexity of the environmental and other constraints that affect the identification of land that can may be suitable for development.
- The environmental and other constraints on land in the Plan Area mean that the only realistic approach to accommodating growth is to allocate the least harmful sites in generally sustainable locations around existing towns and larger villages.
- All potential strategic sites that are or can be made sustainable, taking into account national policy for the protection of the Green Belt, have been allocated.
- Public consultation has positively influenced site selection, identifying alternative sites (including extensions to proposed sites) that have been incorporated in preference to the loss of land in stronger Green Belt.

7.5. Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

- The draft Local Plan is consistent with coordinated sub-regional approach to meeting the development needs of South Hampshire as set out in the non-statutory Spatial Position Statement published by the Partnership for Urban South Hampshire.
- The draft Local Plan is informed by joint technical working with the New Forest National Park Authority, PUSH and Wiltshire Council on a range of strategic matters such as habitat mitigation, water quality, housing and economic needs. Local Plan policies address the relevant cross boundary issues identified.
- There have been several stages of formal and informal consultation with service and infrastructure providers, including a number of meetings with key delivery partners. There are no identified infrastructure constraints that cannot be resolved.
- Development timetables for the main housing sites reflect the views and intentions of the site promoters. Officers have worked closely with landowners and developers to ensure the proposed strategic development sites are available and deliverable.

7.6. Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

- In preparing the Local Plan 2016 Part 1, the Council has taken account of national policies, in particular the National Planning Policy Framework (NPPF), the guidance within the National Planning Practice Guidance (NPPG), which have informed the preparation of locally distinctive policies.
- The Local Plan 2016 Part 1 has been informed by Sustainability Appraisal (SA) that incorporates Strategic Environmental Assessment (SEA) throughout its production to shape its policies with the object of ensuring that its policies and site proposals contribute to achieving sustainable development. This includes an assessment of

the potential sustainability of housing development on all land in the Plan Area outside settlement boundaries, and an assessment of options for the potential release of Green Belt land for development.

- The Council has also carried out a Habitats Regulations Assessment (HRA), including an Appropriate Assessment. This work demonstrates that subject to effective mitigation the policies and sites in the Local Plan 2016 Part 1 would not be likely to have a significant effect on internationally designated nature conservation sites. Mitigation measures and potential adverse effects will be monitored, and the current mitigation measures will be revised or supplemented if necessary to ensure that there would continue to be no likely adverse effects.

8. FINANCIAL IMPLICATIONS

- 8.1. Programme Costs: The Local Plan review programme costs are within existing budgets.
- 8.2. Service costs: The increased scale of growth being planned for has particular implications for Council planning services; these are being addressed by service review. Population and employment growth from planned development will incrementally increase demand for a range of other services.
- 8.3. Capital and Revenue: Increased development activity brings with it fee income for planning and other building and related services. Housing provision enabled by the Local Plan should be sufficient to achieve housing growth above the national baseline for housing growth of 0.4% increase in dwelling stock per annum. This would secure New Homes Bonus, if this form of funding continues. Additional commercial development enabled by the Local Plan would increase business rates income.
- 8.4. Where is it justified to offset the impacts of development, developer contributions may add to revenue e.g. in perpetuity funding for open space management, and to capital funding eg land or financial contributions to deliver affordable housing or infrastructure.

9. CRIME & DISORDER IMPLICATIONS

- 9.1 No direct implications.

10. ENVIRONMENTAL, EQUALITY & DIVERSITY IMPLICATIONS

- 10.1. Guidance and regulations for Local Plan preparation require that Local Plans, taken as a whole, achieve sustainable development embracing its social (including equalities), economic and environmental dimensions. Local Plan preparation is informed by a sustainability appraisal, which includes an Equalities Impact Assessment.
- 10.2. Policies proposed in the local plan seek to widen opportunities to access housing including affordable housing, employment, leisure opportunities and services. The Local Plan review is also informed by a wide range of technical evidence base studies to ensure it avoids, mitigates or manages identifies risks or impacts. These include Habitats Regulations Assessment and Strategic Flood Risk Assessment.

11. PORTFOLIO HOLDER COMMENTS

11.1 I have worked closely with Officers in the preparation of this draft Local Plan, during which there has been considerable consultation with all Members both informally and through joint meetings of the Environment Panel and Planning Committee. I believe that the proposed Plan addresses many of the concerns raised by residents during the 'Initial Proposals' public consultation held in the Summer of 2016 while meeting our requirement to address the District's housing needs. I commend this report and Plan to the Cabinet and support the recommendations.

12. RECOMMENDATIONS

It is recommended that Cabinet and Council:

- a. Approve the draft **Local Plan 2016-2036 Part 1: Planning Strategy** as set out herewith.
- b. Agree that the draft **Local Plan 2016-2036 Part 1: Planning Strategy** be published for Pre-Submission public consultation for a period of six weeks under Regulations 19 and 20 of the Town and Country Planning (Local Planning) Regulations 2012.
- c. Authorise the Service Manager (Policy and Strategy) in consultation with the Planning Portfolio Holder to submit the draft **Local Plan 2016-2036 Part 1: Planning Strategy** and associated documents, together with the summarised Pre-Submission public consultation responses, to the Secretary of State for independent examination under Regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012.
- d. Authorise the Service Manager (Policy and Strategy) in consultation with the Planning Portfolio Holder, to make minor changes and corrections to the Local Plan prior to public consultation and submission for examination.

For further information contact:

Mark Williams
Principal Policy Planner
023 8028 5588
mark.williams@nfdc.gov.uk

Background Papers:

Published documents
Evidence base

Annex 1: The draft **Local Plan 2016-2036 Part 1: Planning Strategy** Local Plan document (committee version)

Annex 2: Policies Map changes including land proposed to be removed from the Green Belt and settlement boundary changes