

RESPONSE TO TEST VALLEY BOROUGH COUNCIL ISSUES AND OPTIONS CONSULTATION FOR THE NEXT LOCAL PLAN

1. PURPOSE OF REPORT

- 1.1 To agree the Council's response to the Test Valley Borough Council's 'Issues and Options' consultation relating to the preparation of its Local Plan review. The closing date for comments is 14th September 2018.

2. BACKGROUND

- 2.1 Test Valley Borough immediately adjoins the New Forest District and includes a small area of the New Forest National Park. Test Valley Borough Council (TVBC) adopted its current Local Plan covering the period 2011 – 2029 in January 2016. The Borough Council is at an early stage in undertaking a review of its Local Plan and is consulting on an "Issues and Options" document between 6 July and 14 September 2018. The document does not contain any initial policies or proposals, but seeks views on key issues which will help shape the preparation of its new local plan which will cover the period up to 2036.

3. KEY ISSUE

- 3.1 The key issue for New Forest District Council regarding the Test Valley Local Plan review relates to addressing objectively assessed (housing) need (OAN).
- 3.2 This Council's Local Plan Review has been prepared under the previous National Planning Policy Framework (2012). The Council's view is that its proposals to plan for 10,500 dwellings (525 dwellings per annum) meet the housing need during the plan period, using a methodology for calculating OAN in accordance the NPPF 2012 and its accompanying guidance. To reach this figure 1500 new homes are proposed within the Green Belt within the plan area.
- 3.3 On 27 November 2017, New Forest District Council wrote to Test Valley Borough Council and while not at that stage seeking assistance from neighbouring authorities in addressing 'unmet' housing need arising in the Council's Plan Area, asked the following:

"... in the event that this methodology is confirmed and considered an appropriate basis for establishing OAN for New Forest District, we need you to consider what assistance your authority may be able to offer to help meet the housing need we are unable to address in our plan area. This could be for a very significant number of dwellings (est. 5,000-6,000)..". (Full letter in Appendix 1)

The letter also asked whether there is any non-Green Belt land within Test Valley administrative area which would be available and suitable to address unmet housing needs of New Forest district as an alternative to the release of Green Belt land. The response letter indicated an inability to assist.

- 3.4 For Local Plans submitted to the Secretary of State after 24th January 2019, the new standard method of calculating the minimum annual local housing need figure has now been introduced by the revised NPPF published in July 2018. Using the standardised revised methodology (at September 2017) the Government estimated that the 'indicative assessment of housing need based on the new formula' (2016 – 2026) for New Forest District would be 965 dwellings per annum (while acknowledging that 86% of the district is land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest). The consequence of the introduction of the new standardised methodology in July 2018, is that the assessed housing need figure for New Forest District (including the National Park) increases by a further 400 dwellings per annum.
- 3.3 Given the extensive work this Council has undertaken to establish capacity for new residential development within the Plan Area outside the National Park, this Council has strong evidence to support its view that there is no realistic prospect that this Council would be able to further increase housing provision within its Plan Area above that proposed in its Local Plan Review Submission document. It is anticipated that there is likely to be a 'shortfall' of housing provision within New Forest District (District Council and National Park Authority Planning Authority Areas) of some 8000 dwellings between 2016 and 2036 (400 dwellings per annum).
- 3.4 The National Planning Policy Framework, paragraph 60 states that "In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." Accordingly, as a neighbouring authority this Council is in a position to give early notice to Test Valley Borough Council, that in preparing its local plan review, Test Valley Borough Council should explore capacity within their plan area to address unmet housing needs arising beyond their administrative boundary (in New Forest District) in addition to addressing housing needs arising from within their plan area.

4. ENVIRONMENTAL IMPLICATIONS

- 4.1 Accommodating new development has an impact on the environment. It is important that those impacts are minimised or mitigated by locating development in the most sustainable locations.

5. FINANCIAL, EQUALITY & DIVERSITY and CRIME & DISORDER IMPLICATIONS

- 5.1 None

6. RECOMMENDATION

- 6.1 It is recommended that Test Valley Borough Council be informed that New Forest District Council:
- i. Welcome the early opportunity to comment on the matters to be considered by Test Valley Borough Council in its review of the Local Plan for the Borough; and
 - ii. Advise Test Valley Borough Council that under the new methodology for housing need assessments introduced by Government in July 2018, this District will not be able to accommodate the full extent of local housing need within its boundary and considers that as part of the preparation of the Test Valley Local Plan

review, Test Valley Borough Council should consider opportunities to deliver increased levels of housing to address unmet housing need arising from neighbouring areas.

8. PORTFOLIO HOLDER DECISION

I agree to the recommendations of this report that in relation to the Test Valley 'issues and options' consultation.

Signed: E J HERON

Date: 20 August 2018

For further information contact:

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Background Papers:

Published documents¹

Date on which notice given of this Decision – Monday, 20 August 2018

Last date for call-in – Tuesday, 28 August 2018

¹ <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/issues-and-options-consultation-for-the-next-local-plan>

Appendix 1: Letter from Chief Executive New Forest District to Test Valley Borough Council (and other Authorities)

Chief Executive

Bob Jackson

My Ref: BJ/LE/DL

Your Ref:

Date: 27 November 2017

The Chief Executives of:
Southampton City Council
Test Valley Borough Council
Eastleigh Borough Council
Winchester City Council
Fareham Borough Council
Christchurch and East Dorset Councils
Bournemouth Borough Council
Borough of Poole
Wiltshire Council

Dear Colleague

NEW FOREST DISTRICT (OUTSIDE THE NATIONAL PARK) LOCAL PLAN REVIEW 2016 -2036

New Forest District Council is reaching an advanced stage in the preparation of its Local Plan Review, which will cover the period from 2016 to 2036. The geographical area of plan coverage is New Forest District Council's area excluding the area within the National Park.

In reviewing the Local Plan, the most significant issue this Council has had to address is achieving a step change in housing growth compared with previous regional planning policies for development restraint in this area. The Council's position is that it wishes to plan positively to address the need for new housing development within its planning area as far as it is able to do so. With the evidence base nearing completion we are now in a position where it has become clear the extent to which the housing needs of the plan area can be met.

From an early stage in our plan preparation we have been aware of the potential difficulties of addressing the full extent of 'objectively assessed (housing) needs' within a plan area that is subject to very significant environmental and planning constraints, including Green Belt. This issue, along with other cross-boundary issues, has been discussed at various officer liaison meetings with other local authorities, including your authority, within our shared housing market areas from an early stage of plan preparation. Most recently, I am grateful for your authority's participation in a series of meetings with my officers and officers from the National Park Authority to informally discuss the work undertaken within New Forest District and National Park to establish the levels of new housing development that could be delivered within the District to 2036. At these meetings, in respect of New Forest District outside of the National Park, we informed your officers that this Council expected to be able to make provision for around 10,000 new dwellings between 2016 and 2036. To provide for this level of housing development, the District Council will include proposals to release land from the Green Belt for housing development in its plan. However, even with the release of Green Belt land for development, the provision figure represented a shortfall against the assessment of 'objectively assessed need' in the New Forest Strategic Housing Market Assessment published in 2014. (This shortfall would be in the order of some 2750 dwellings in relation to New Forest District outside the National Park). We therefore had expected to have to make a formal request to your Council for assistance in meeting a potential shortfall of housing supply within our Plan Area.

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Page Two

However, over the past few weeks we have been able to review our position. The Council (again with the New Forest National Park Authority) has commissioned an updated assessment of Objectively Assessed Housing Need (OAN) for the area (October 2017). On the basis of the analysis carried out, it is concluded that the OAN is for 521 dwellings per annum (over the period 2016 to 2036) in the New Forest District outside the National Park; a total of 10420 dwellings over the twenty year plan period. (This study can be viewed on the Council's web site at: <http://www.newforest.gov.uk/CHttpHandler.ashx?id=35575&p=0>). With the further and more detailed assessment of potential site allocations we are currently undertaking, and on the assumption that the 2017 assessment of OAN for the District and National Park is accepted as an appropriate methodology for assessing OAN for this area (and an appropriate basis for establishing the housing requirement of the Local Plan Review), there is now the prospect that this Authority will be in the position of submitting a Local Plan which is on target to address the identified level of housing need within its plan area. This being the case there would not be a need, under the Duty to Co-operate, for this Authority to seek assistance from your Authority in meeting unmet housing requirements arising from our Plan Area.

There are however, two caveats to the above position. As you will be aware, in September 2017 the Government consultation paper "Planning for the right homes in the right places" proposed a new standardised methodology for assessing OAN for housing. While the consultation paper recognised that available data does not allow local housing needs to be calculated using the standard method where local planning authorities do not align, such as in areas with National Parks, it nonetheless published a calculation for New Forest District estimating that under the proposed new formula there would be a requirement for 965 dwellings per annum in New Forest District between 2016 and 2026, a very significant increase. We consider there are significant issues relating to the proposed methodology. However, in the event that this methodology is confirmed and considered an appropriate basis for establishing OAN for New Forest District, we need you to consider what assistance your authority may be able to offer to help meet the housing need we are unable to address in our plan area. This could be for a very significant number of dwellings (est. 5,000-6,000). As we have already stated above, in seeking to plan for a target of 521 dwellings per annum, this Authority will have already maximised the extent to which housing provision can be made in this district without causing significant adverse environmental impacts.

Further, as stated earlier in this letter, the Council is proposing a number of sites within the Green Belt for housing development, which will in total accommodate around 1400 dwellings. It needs to be recognised that the Government have reiterated its intention to maintain existing strong protections for the Green Belt, and has clarified that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements. The White Paper published in February 2017, 'Fixing our broken housing market' stated in para.1.39 that: "...authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:exploring whether other authorities can help to meet some of the identified development requirement." We therefore need to ask your Authority to consider whether there is any non-Green Belt land within your administrative area which would be available and suitable to address unmet housing needs of New Forest district as an alternative to the release of Green Belt land.

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Page Three

This letter has focused on the issue of Local Plan housing provision. However, I am aware that our officers have also been collaborating on a number of other cross-boundary issues, dealing with matters such as mitigation of the impacts of development on European nature conservation sites, especially the New Forest Natura 2000 site and River Avon water quality issues, and infrastructure. I hope that our authorities will be able to prepare a Statement of Common Ground regarding these matters.

I would welcome your Authority's comments on this letter and, in particular:

- a.) Your views on this Council promoting a strategy based on the Objectively Assessed Housing Need Study 2017 by JG Consulting, which includes an assessment that the objectively assessed housing need figure for this plan area should be 521 dwellings per annum over the period 2016 to 2036.
- b.) Your views on the potential assistance your Authority may be able to provide in terms of helping to address 'unmet housing needs' from this area, either to avoid the release of Green Belt land for development, or to address a housing requirement set higher than 521 dwellings per annum, for example by application of the proposed national standardised methodology.

I would appreciate a response to this letter by 20th December. If it would help, please do not hesitate in contacting myself or my Local Plan Team if you would like to discuss this letter further before responding.

Yours sincerely

Bob Jackson
Chief Executive