

NEW FOREST NATIONAL PARK AUTHORITY

AUTHORITY MEETING – 6 DECEMBER 2007

**RESPONSE TO THE NEW FOREST DISTRICT COUNCIL
CORE STRATEGY PREFERRED OPTIONS CONSULTATION**

Report by: John Clements, Head of Policy and Plans.

Summary:

New Forest District Council (the Council) is consulting on its Core Strategy Preferred Options (October 2007), which sets out the Council's draft strategy for the future planning of that part of New Forest District area outside the National Park for the next twenty years. The consultation document sets out the Council's "Preferred Options", but also refers to other options considered. Responses are invited on the full range of options and the Council's provisional preferences.

This consultation is important to the National Park Authority given the inter-relationships between the respective areas. The Authority has liaised closely with the Council in developing its Core Strategy and the Preferred Options have been worked up in part through joint working between the District Council and the National Park Authority. The Authority's response to the consultation is intended to aid the Council in refining the Core Strategy before it is submitted to the Government and subjected to Examination.

In general terms the draft Core Strategy is to be supported, and many aspects are to be commended. There are, however, some outstanding concerns from a National Park perspective, in particular the scale of housing and employment development proposed, and the detailed mechanisms for ensuring that intentions are fulfilled.

Recommendations:

- 1 To approve the proposed response to the New Forest District Council Core Strategy Preferred Options consultation.**
- 2 To authorise the Director of Strategy and Planning to make any minor amendments to the document in advance of submitting it to the District Council.**

Resources:

Routine

Paper:

NFNPA 222/07: Cover paper
NFNPA 222/07: Annex 1 - NFDC Core Strategy Preferred Options (**circulated separately**)

Background Papers:

PPS3: Housing
PPS12: Local Development Frameworks
Draft Regional Spatial Strategy: The South East Plan
Panel Report: Examination in Public of the Draft Regional Spatial Strategy:
The South East Plan

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1 Introduction

- 1.1 This report sets out a proposed Authority response to the draft Strategy to inform the Council's preparation of its submitted Core Strategy.
- 1.2 New Forest District Council (the Council) has published for consultation its Core Strategy Preferred Options document, which sets out the Council's strategy for the future planning of the area of the District outside the National Park for the next twenty years.
- 1.3. The Core Strategy will be a key part of the Council's Local Development Framework and will set out the strategic policies that will guide the planning of the District outside the National Park. The Preferred Options stage is the second of three major consultation stages in the preparation of the Strategy, with the final stage being the submission of the draft Strategy to the Secretary of State for examination.
- 1.4 Since the decision was made in June 2007 that the Council and the National Park Authority (the Authority) would prepare separate Core Strategies for their respective areas, joint working has continued between the two authorities. This has included officer level work on the Sustainability Appraisal and Strategic Environmental Assessment, the Habitat Regulations Assessment, Affordable Housing Economic Viability Study and the Strategic Flood Risk Assessment. There is also a Joint Member Advisory Group to guide the development of each of the Core Strategies.
- 1.5 The Council is to be commended on progressing its Core Strategy to the Preferred Options stage, particularly in light of continuing uncertainties accompanying the evolution of the new plan-making system. The document is based on a large volume of evidence and careful consideration of the issues facing the area.

- 1.6 The Authority has a key role as a statutory consultee in the District's planning process, as the respective areas are so functionally intertwined. There is a need for close co-ordination on the development of the Core Strategies for the respective planning areas to ensure they are complementary.

Proposed Response:

The National Park Authority welcomes the Council's Core Strategy Preferred Options and the opportunity to comment on it.

The Council is commended on progressing its Core Strategy to this stage, and thanked for its cooperation and joint working with the Authority to date.

The Authority supports the generality of the Preferred Options proposals.

2 Regional planning context

- 2.1. RPG9: Regional Planning Guidance for the South East (which has regional spatial strategy status under the transitional arrangements) provides the formal regional planning context for the planning of New Forest District. However, the emerging replacement Regional Spatial Strategy for the South East (*The South East Plan*) is a very important consideration in drawing up the Council's Core Strategy, as this provides a greater level of detail, and once finalised and adopted will form part of the development plan for the area. The Panel's Report of the Examination in Public of the draft South East Plan was received in August 2007 and the Government's response, including any resulting changes, is still awaited. In the interim the draft Regional Spatial Strategy and the Panel's Report are considered to be material planning considerations that should help guide emerging Local Development Frameworks. Until the South East Plan is finalised and adopted, its details should be treated with a degree of caution.

3 The relationship between New Forest District and the National Park

- 3.1 The importance of the relationship between New Forest District (the planning area) and the New Forest National Park is generally acknowledged in the consultation document, with the Council's duties under Section 62(2) of the Environment Act 1995 set out. The impact of proposals on the National Park is identified as one of the draft Core Strategy's key issues and features in a number of the objectives.
- 3.2 The reference to the need to consider the impacts of proposals on the National Park in the issues and objectives is supported; and it is

considered that this could be strengthened by the inclusion of a positively worded policy which ensures that development within New Forest District takes full account of potential impacts on the National Park. This would be in accordance with paragraph 12.11 and recommendation 12.3 of the Panel's Report into the draft South East Plan (August 2007) which states that the area immediately outside the Park should receive some further degree of protection from development to conserve the setting of the Park, "...particularly in view of the acute pressures of urbanisation in the area.."

- 3.3 This recommendation is echoed in the Sustainability Appraisal Report which accompanies the Core Strategy Preferred Options. The Appraisal recommends that the Core Strategy should contain policies to "...limit the environmental impact of new greenfield development, including high quality design and landscaping."
- 3.4. It is also considered that the objective and issues relating to 'Impacts on the National Park' could be more positively presented. While reference to the avoidance of harm to the special qualities of the National Park is welcomed, this presents the National Park rather negatively as predominantly a constraint. Clearly the National Park is an important contributor to the quality of life in the region, and especially the plan area. What is perhaps less widely appreciated is its contribution to the economic well-being of these areas, both directly through tourism and land management activities, and indirectly through the appeal of the areas as being attractive for business location and staff recruitment. Research by the Council for National Parks in the Yorkshire and Humber region (*Prosperity and Protection*, 2006), for instance, demonstrated that businesses in the region's National Parks and in nearby towns benefited greatly from the quality of the natural environment and from National Park designation itself. The New Forest National Park has a positive role to play in the spatial planning of the District for the next twenty years.

Proposed Response:

The National Park Authority welcomes the acknowledgement of the District Council's statutory duty under Section 62(2) of the Environment Act 1995 and the identification of the importance of the relationship between the National Park and the District within the Key Issues and Objectives to be addressed through the Core Strategy.

To strengthen this, and in accordance with recommendation 12.3 of the Inspector Panel's Report into the draft South East Plan, the Authority would wish to see these issues and objectives carried through to the inclusion of a specific policy which ensures that impacts on the National Park are given appropriate weight. In line with the recommendations in the Sustainability Appraisal Report, this should include design considerations and landscaping, and should also cover transport schemes, signage, and new infrastructure provision.

The Authority also believes that the relationship between New Forest District and the National Park could be more positively presented. Rather than the National Park being referred to principally as a constraint, greater emphasis should be placed on the positive inter-relationships between the District and the National Park. This could include complementary recreational provision, habitat links, and the potential benefits National Park designation brings to the local economy both within and outside the Park boundary (see Council for National Parks publication *Prosperity and Protection*, 2006).

4 The scale of housing development

- 4.1 The draft South East Plan proposed that the housing requirement for the 'New Forest' (District and whole of National Park combined) should be 4,140 dwellings over twenty years – an annual requirement of 207 dwellings. This figure was informed by the overall policy of increasing housing provision nationally, regionally and in the South Hampshire conurbation, and also the environmental qualities of the New Forest area. Unlike in some other areas of the South-East, the Panel supported this level of 'New Forest' housing requirement and on balance agreed that this should not be increased.
- 4.2 It is acknowledged that alongside the emerging regional housing requirement for the 'New Forest', there are a range of other factors to be taken into account in determining the appropriate planned level of development. These include local housing needs, the accessibility of services, land availability and impacts on protected habitats and

landscapes. The Council therefore has a difficult task of balancing a complex range of factors in deciding the precise scale of development.

- 4.3 The draft South East Plan housing requirement implies a 'step-change' downward in the level of development in the 'New Forest' compared with recent rates. In the period 1996/7 to 2005/6 for example, housing completions averaged 470 dwellings per annum in the District, more than double the draft annual strategic requirement for the future. The reduction required by the draft South East Plan reflects the particular designations in the area, including National Park designation in 2005, part of an Area of Outstanding Natural Beauty, national and European nature conservation sites and significant areas at risk from flooding.
- 4.4 It is important to appreciate that the additional housing does not necessarily equate with an increase in population. The key driver for housing growth in the area is the current and projected trend for smaller households. Fewer people, on average, are occupying each dwelling, creating a need for more dwellings. Over the plan period the population is projected to fall significantly. If these projections are realised, the additional housing will result in some limited geographical redistribution of population, not an increase. Over the whole lifetime of the housing the situation could potentially change markedly (as can be observed in relation to the change in patterns of occupation of different type of existing older housing), but whether, or in what way, this occurs cannot be predicted with certainty.
- 4.5 The Core Strategy Preferred Options states it would deliver "up to 4,770 dwellings" (224 per annum), even with "*very cautious*" estimates of urban capacity (paragraph 6.5). Paragraph 6.64 of the consultation document states "*...it is very likely...*" that completions within the District's towns and villages will exceed the capacity figure given in the Core Strategy for the District's existing built up areas. This figure of 4,770 dwellings would therefore appear to be a conservative estimate of housing delivery, rather than an upper limit. When added to the Core Strategy's figure for the assumed delivery within the National Park of 220 dwellings, housing delivery within the New Forest would exceed the draft South East Plan requirement by over 20%. It is also unclear what mechanisms are in place to ensure that this figure is not exceeded still further. Guidance on how the significantly lower levels of development projected within the District's urban areas will be delivered is lacking, and it is unclear how the greenfield development proposed would be brought forward.

Proposed Response:

The National Park Authority has concerns over the scale of development proposed within New Forest District in relation to the draft South East Plan housing requirement, and the mechanisms for ensuring the required step change downward in delivery, compared with recent years, is to be achieved. While acknowledging the difficulties faced in balancing the range of factors that must be taken into account in determining the appropriate level of development (including the significant local housing needs within the New Forest) the Authority considers the figure of 4,140 dwellings to be an appropriate broad target.

Though there may be some justification for a modest adjustment to this figure, the Authority remains to be convinced that the Preferred Options proposals do not exceed it by too great a margin in the circumstances. The housing target of 4,140 dwellings for the New Forest area in the draft South East Plan has been drawn up to take account of the environmental qualities of the area. To significantly exceed the target unnecessarily risks harm to the environmental assets of the area, including those in the National Park.

The Authority also has concerns that the mechanisms for delivering and controlling the release of housing sites are insufficiently robust to ensure that the chosen level of housing is met but not exceeded. The Authority would wish to see these further developed to ensure:

- that the measures by which the Council's anticipated marked slowing of redevelopment within existing built up areas will be achieved are more clearly set out and,
- that any greenfield sites should be held in reserve and brought forward only if and when a shortfall in delivery against the chosen target from within built up areas is manifest.

5 Spatial distribution of development within New Forest District

5.1 It is proposed that over 75% of the draft South East Plan housing requirement will be met within the existing built up areas of New Forest District. This is broadly in line with national and regional guidance and the Sustainability Appraisal Report recognises that locating the majority of housing and employment development within existing built up areas allows the use of alternative modes of transport to private motor vehicles. Brownfield development is also generally less likely to have direct impacts on the landscape, wildlife and special qualities of the National Park.

5.2 The Preferred Options document also proposes over 1,100 dwellings on greenfield sites within the District. Policy CS4 includes greenfield

development at Totton (120 dwellings) and Ringwood (170 dwellings), to meet the South East Plan requirement. Provision is also made for up to 850 dwellings on additional greenfield sites that would provide an exceptional contribution towards addressing local affordable housing needs (including up to 150 dwellings at Marchwood, 30 dwellings at Totton, 150 dwellings at Lymington, 200 dwellings at New Milton, and 120 dwellings at Fordingbridge).

- 5.3 While the development of sites with high proportions of affordable housing is broadly supported, given the identified local housing need, concern is raised at the scale of the greenfield development proposed. Although the Core Strategy will not allocate specific sites for development (this is the role of the Sites and Designations DPD), greenfield development in New Forest District is identified in the Sustainability Appraisal Report as having potentially adverse environmental impacts. Such development would be likely to increase pressures on back up grazing land, informal recreational opportunities and links between habitats.
- 5.4 Given the geography of the area, greenfield land is likely to include at least some that is further from town centres, transport and facilities generally, and closer to the National Park and to sites designated for their nature conservation interest. Although the proposed housing is not intended to facilitate an increase in overall population in the plan area, it will result in a redistribution of part of that population.
- 5.5 It appears that the proposals for greenfield development within New Forest District are partly driven by:
- (a) the increase in the dwellings to be built over and above the draft South East Plan requirement; and
 - (b) the cautious estimate of brownfield capacity within the District.
- 5.6 In 2005/6 for example, 87% of the 403 housing completions in the District were on brownfield sites and the Preferred Options document states it is very likely that actual future completions within the District's urban areas will exceed the figure in policy CS4 (paragraph 6.64). There is therefore a concern that the Core Strategy Preferred Options as currently drafted may represent a significant underestimate of urban capacity.

Proposed Response:

The National Park Authority broadly supports the preferred approach of focussing the majority of new residential development within the existing built up parts of the District.

The Authority is, however, concerned at the scale of greenfield development proposed in addition to this. For example, the Core Strategy Preferred Options identifies the potential for up to 420 dwellings on greenfield sites in the Waterside. The draft South East Plan Examination Panel Report, Recommendation 16.16, is set out below and indicates the intention that no new greenfield development is required in the Waterside Parishes during the Plan period to 2026.

Recommendation 16.16: Amend the supporting text to Policy SH12 to provide a fuller explanation of the basis for the housing distribution by clarifying that in accordance with the strategy, no new greenfield development (over and above existing commitments) is expected in Southampton, Portsmouth, Gosport, the part of New Forest district that lies within the sub-region, or in Fareham district outside the SDA.

The justification for the scale of greenfield development proposed, and the mechanism for the release of the identified sites, are not clear. Policy CS4 states that the greenfield sites would be, "...unlikely to be needed until towards the end of the Plan period", but policy CS16 states that, "The Preferred Option is to allow for the possible early development of the sites identified in policy CS4 as new greenfield site allocations." The National Park Authority considers that housing completions in the District should continue to be carefully monitored, with any greenfield sites identified held in reserve and released only if the South East Plan requirement was demonstrably unlikely to be met through brownfield development.

6 Relationship between National Park and District housing provision

6.1 When the Council had planning responsibility for the whole of the District, it was able to balance the small numbers and uncertainty of housing development in the most rural and sensitive areas within the scale of overall and urban housing delivery. It is appropriate to seek cooperation for this balancing to be continued across the planning authority boundaries.

6.2 The level of housing provision in the District's Core Strategy will have implications for the National Park's Core Strategy in the way it addresses the national policy expectation of a guaranteed five year supply of housing land. In order to avoid the risk of inappropriate

development it is considered preferable that the National Park Core Strategy does not include a housing 'target', for reasons set out below. In order to facilitate this potential approach, there should be a clear commitment in the District's Core Strategy to meeting the whole of the strategic housing target for New Forest, while discounting the housing numbers delivered within the National Park as they are completed.

- 6.3 The South East Plan (Regional Spatial Strategy) identifies a strategic housing allocation for each district (or unitary authority area) in the region. No separate figure is provided for the National Park, but the South East Plan explicitly states that the single figure for 'New Forest' includes the whole of the National Park. In the absence of separately identified figures or treatment in the Regional Spatial Strategy, the split of the figure between the National Park and the remainder of the District is a matter to be resolved through the respective Core Strategies. As the District's Core Strategy is now proceeding in advance of that for the National Park, it must make assumptions about the level of housing development anticipated in the National Park before this has been formally determined through the National Park Core Strategy itself.
- 6.4 In developing its figures to date, the District has been working on the basis of an assumption of a total of 220 housing units (11 per annum) being provided over the period 2006 to 2026 (5.3% of the combined New Forest District/National Park allocation of 4,140). This figure is loosely based on past levels of development in the National Park area, and was informally agreed by officers as a 'working assumption'. In order to take the District's Core Strategy forward for submission it is now desirable to ensure that its policies are complementary to the expected approach in the National Park.
- 6.5 It is common ground between the Council and the Authority both that future levels of new housing development in the National Park should be modest, but also that there will be at least some affordable housing development during the plan period. The question to be addressed is how this can best be accommodated within the framework of the two core strategies and national planning policy.
- 6.6 National planning policy generally expects each local planning authority to have a housing target specified in its Core Strategy, and the broad level at which the target is pitched to be derived primarily from the regional spatial strategy. The planning authority must ensure that at all times there is at least a five year supply of immediately developable housing land available. If at any time it is unable to demonstrate this it will be difficult to resist planning applications in locations which it may not favour.

- 6.7 However, in a number of instances national park authorities (e.g. Exmoor and Dartmoor) have successfully argued before plan inspectors that the particular local circumstances of their national park justify a different approach, and instead of a 'target', have an "estimate" of the expected scale of housing provision. That does not avoid the need for a Core Strategy to identify its housing needs, intended response, and methods and locations of delivery, but means this will be done in response to available and emerging appropriate sites and, where relevant, affordable housing funding.
- 6.8 The single figure for the 'New Forest', as set out in the South East Plan, makes the above approach feasible and logical for the New Forest National Park.

Proposed Response:

The District Council's cooperation is sought in balancing the small number and uncertainty of housing development in the National Park within the scale of overall housing delivery for the 'New Forest' area as set out in the South East Plan.

The Authority is committed to facilitating housing development within the National Park to address local needs, primarily for affordable housing including housing for commoners. The Authority will continue to develop its partnership working with the District Council (as both housing authority for the area and neighbouring planning authority) to seek to ensure delivery of housing, within the environmental constraints of the National Park, to sustain rural communities.

However, the Authority is concerned that that the application of the standard approach of a housing target and rolling five year land supply set out in PPS3 would be inappropriate for the National Park, and could potentially be harmful in the context of the environmental sensitivity and likely small scale of housing development in the National Park. The special circumstances of the New Forest National Park, viewed in relation to national park purposes and PPG7, justify an approach which provides an estimate, rather than a formal target, of housing which may be delivered in the National Park during the plan period.

Further work is to be done to determine the level at which this estimate should be set, including consultation with the Council's housing staff and planners, but the Authority believes this is unlikely to vary greatly from the 'working assumption' employed to date of 220 units over the plan period.

It is considered that this level of potential development is not of strategic significance. The resulting housing will, of course, count as delivery against the joint New Forest District/National Park target (and Regional target), but the New Forest (District and National Park) draft strategic housing allocation can comfortably be met within the District Council's current Core Strategy Preferred Options for housing development, even taking into account the Authority's comments above on an appropriate overall target for this Strategy.

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In order to facilitate this approach and ensure that housing development in the National Park can be focused on meeting local needs and development inappropriate to a National Park avoided, the Authority requests that the Council commits in its submission Core Strategy to delivering (outside the National Park) the whole of the draft South East Plan (Regional Spatial Strategy) proposed strategic allocation of 4,140 dwellings for the joint area, less the amount of housing actually produced in the National Park.

This commitment would, in theory, require the Council to provide up to 4,140, rather than 3,920, dwellings over the plan period (well within the 4,770 currently proposed), with this commitment reducing annually by the amount of housing development actually achieved in the National Park. Similarly, there would be a five year supply of land for 1,035 dwellings at any one time (also well within current proposals for 1,192), less any land available.

On this basis the Council's proposals would constitute approximately a 15%, rather than 22%, provision above the accepted target, which would make very little difference to the overall actual amount of housing delivered across the District and National Park.

7 Employment land development

- 7.1 Work on the Council's Employment Development Plan Document and Economic Strategy provides the evidence base for the Core Strategy. With the communities in the National Park to some extent dependent on employment in its hinterland, the employment opportunities in Ringwood, Lymington, and the Waterside will continue to be important for residents in both the District and the National Park.
- 7.2 In terms of the regional planning context, the draft South East Plan does not give a quantitative requirement for additional employment land within New Forest District. Following a review of employment sites within the District, the consultation document allows for over 30 hectares of already identified employment allocations to be retained for employment uses.
- 7.3 Up to a further 15 hectares of greenfield land is identified for employment development, including land at Totton, Crow Lane, Ringwood and green belt land at New Milton. This approach raises similar concerns to those given for greenfield residential development, and also:
- the lack of a strategic employment requirement for the District;
 - the low rate of unemployment within the District (less than 1%);
 - the 30 hectares already identified for employment use;
 - the projected decline in the District's population (down 7,500 by 2026 compared to 2006 levels);
 - and the significant decline projected in the economically active population over the Plan period (-10%).

- 7.4 While it is important to acknowledge the contribution employment sites within the District make to the communities in the National Park, and that there are genuine local needs and opportunities within the plan areas, additional employment development of this scale raises concerns over the potential impacts on the National Park.
- 7.5 The Central Hampshire and New Forest Strategic Housing Market Assessment suggests that further employment growth is likely to increase demand for housing by stimulating in-migration (paragraph 5.15): Given that unemployment is very low in the District, future employment growth may become increasingly reliant upon either greater in-commuting (perhaps from urban South Hampshire) or in-migration. The preferred options document notes this issue, but it is difficult to see how this consideration has informed the proposals.

Proposed Response:

The Authority welcomes the recognition of environmental quality of the area including the National Park is a significant factor in attracting visitors, but would wish to see additional emphasis placed on the wider economic benefits of the National Park in terms of business location, and attracting and retaining staff. National Parks, and the associated high level of environmental quality and protection, can result in very significant economic benefits, as highlighted by the recent work published by the Council for National Parks (Prosperity and Protection) in 2006.

The reference in paragraph 2.28 to the duty under the Environment Act is welcomed, but could more accurately state “places a duty on all public bodies, including authorities adjoining a National Park...”.

Reference to the National Park’s socio-economic duty in paragraph 2.29 should be corrected to state that the National Park Authority has a duty in pursuing the National Park purposes to seek to foster the social and economic well-being of the communities within it. This would more accurately reflect the requirements of Section 62 of the Environment Act 1995.

The Authority supports the approach of maximising the use of existing employment sites and premises. There is, however, concern at the scale of employment land provision. The Authority remains to be convinced that this is commensurate with the draft strategic guidance, projected falling working population, potential implications for the housing market, and environmental sensitivities of the area, and is concerned that perhaps too much weight has been placed on continuing past development rates and retaining existing allocations.

If there are particular locational advantages to bringing forward the additional sites identified, the National Park Authority would expect consideration to be given to commensurate scaling back of existing employment allocations.

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In particular, and in the light of the findings of the Central Hampshire and New Forest Strategic Housing Market Assessment, the Authority has concerns that the development of further employment sites at a time when the economically active population of the District is declining could result in additional in-commuting from surrounding areas of housing growth, and housing pressures which could undermine attempts to address the affordable housing issues within the New Forest.

8 Local and strategic gaps

- 8.1 The consultation document seeks to define a series of Local Gaps between a number of the Waterside settlements (e.g. Totton – Marchwood, Hythe and Fawley) and a Strategic Gap between Totton and Southampton. The gap designations seek to prevent the coalescence of settlements, and it is felt that the designations could be used as a more proactive planning tool, rather than simply to restrict inappropriate development.
- 8.2 The urban fringe location of gap land has the potential to provide environmental and health benefits. Providing the integrity and purpose of the gap would not be compromised, the Authority would encourage the use of local and strategic gaps for recreation close to where people live, habitat creation to mitigate impacts on protected habitats, and to provide important green corridors linking the National Park with the coast.

Proposed Response:

The Authority supports the preferred option of identifying local gaps between the settlements in the Waterside. This planning policy tool helps to maintain important links between the National Park and Southampton Water which are valued by local communities

The Authority would welcome proactive encouragement of the sustainable use of the land designated as gaps for environmental and health benefits.

9 Transport

- 9.1 Traffic and transport is a major issue for the New Forest, and close working between the Council and the Authority will be essential given the transport links across the respective planning areas. The draft Core Strategy Preferred Options is supported by a Transport Assessment background document, and the Council is to be commended in progressing this work to provide a more robust evidence base.

- 9.2 Reducing the impacts of traffic is a consistent theme in the development of the Authority's strategic documents. This builds on the New Forest Area Transport Strategy (2003) which sets out a range of local targets to be achieved by 2020. The Transport Assessment of the Preferred Option (Background Paper 21) states that the most significant impact of the development proposed within the New Forest area occurs on the A337 south of Lyndhurst, the A35 east of Lyndhurst and the A326 Waterside road. Traffic levels are forecast to increase between 5 – 11% and the report concludes that, "...clearly there would be some effect on the Lyndhurst Air Quality Management Area from the residential and employment allocations in the coastal towns"
- 9.3 The preferred options for development will generate additional traffic on the main roads in the National Park. While it must be accepted that the Council has a strategic housing requirement that must be met (and a significant local need for housing), it is a concern that the headline New Forest Transport Strategy targets may not be met.
- 9.4 The draft Core Strategy identifies access to the southern coastal towns (New Milton, Lymington, Milford-on-Sea) and recognises that the B3054 is one of the principal routes used to access the area. However, it has not been identified as a key traffic route and the impacts of additional trip generation have therefore not been analysed through the Transport Assessment.

Proposed Response:

It is noted that development within New Forest District will make up less than 5% of the total development proposed for the next twenty years within the South Hampshire and South East Dorset sub-regions, and that the National Park Authority and the District Council will want to continue to work with others to manage the transport impacts of this level of development.

The Preferred Option will generate additional traffic in the National Park. Policy Outline CS10 states that the District Council will work with others to 'mitigate adverse traffic impacts on the New Forest National Park'. This commitment is welcomed, but it is important that a specific strategy is drawn up to achieve this mitigation.

Given the predicted increase in traffic in the National Park from development within the District, the National Park Authority welcomes the statement in policy outline CS10 which states that developer contributions from development outside the National Park could be used to contribute towards mitigation schemes within the National Park. The Authority believes there needs to be a robust mechanism by which the contributions from development outside the National Park can be used to solve transport issues which it exacerbates within the Park.

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- 10.1 Policy C1a in the draft South East Plan states that,
“The local planning authority and other partners should also develop supportive sustainable land management policies, both inside the National Park and within the zone of ‘New Forest commoning activity’, including protection of grazing land outside the National Park which is needed to support National Park purposes.”
- 10.2 The Core Strategy Preferred Options document acknowledges that parts of the District support the traditional practice of commoning, and the importance of this in maintaining the character of the New Forest National Park in terms of back up grazing and commoners dwellings.

Proposed Response:

The National Park Authority supports preferred option policy CS22 in terms of its commitment to work with partners to protect essential back up grazing land to support commoning. This position conforms with the guidance in the draft South East Plan. The Authority hopes to work with the District Council and others in future to develop detailed policy to support and implement this.

11 Affordable housing

- 11.1 The Panel’s Report into the draft South East Plan acknowledges that affordable housing is the number one priority for many local authorities in the South East and the Panel *“...agree with many participants that it is not simply a case of building your way out of this crisis.”* – paragraph 1.11. Affordable housing is a significant issue for the New Forest District Core Strategy, and the Preferred Options document is informed by an assessment of the housing market and needs across the District, as well as an assessment of the economic viability of providing affordable housing on development sites. This provides the District Council with a robust evidence base of develop a preferred policy approach from.
- 11.2 Policy H4 (Affordable Housing) in the draft South East Plan states that local development documents will contain policies to deliver a *“substantial increase”* in affordable housing. Based on the evidence, the Council’s preferred option is to require all new residential development to contribute towards the provision of affordable housing, with a target of 40% in Totton and the Waterside and a target of 50% in the remainder of the Plan area.
- 11.3 This approach is supported in the particular circumstances in the New Forest, where affordability is a major issue, and where development is characterised by smaller urban infill developments. PPS3 sets a national indicative site threshold of 15 dwellings, but states that local planning authorities can set lower minimum site size thresholds *“where viable and practicable”* (para. 29). The Local Development Framework system is based on the presumption that a development

plan document is sound unless it can be shown otherwise as a result of evidence. The evidence presented in the Economic Viability Study (June 2007) suggests that all sites can sustain a contribution towards affordable housing and the District Council has taken a commendable approach to the delivery of affordable housing through the development process.

Proposed Response:

The National Park Authority strongly supports the preferred option for affordable housing provision (policy outline CS15). The affordable housing policy approach is considered to be reasonable, and is based on robust evidence. The National Park Authority believes the significant housing need in the District, allied to a future pattern of development that is likely to be characterised by small infill sites, justifies a lower threshold than the national indicative figure.

12 Impacts on protected habitats (Habitats Regulations)

12.1 The Habitats Regulations Assessment (which was informed by joint work carried out with National Park Authority staff) identifies a potential issue in terms of pressures on the vulnerable European habitats of the National Park, and the need for mitigation in the form of provision of alternative natural greenspace for informal recreational use. This conclusion is consistent with the Appropriate Assessment into the draft South East Plan (October 2006), which identified potential impacts from recreational pressures on the New Forest Special Areas of Conservation, Special Protection Areas and Ramsar sites.



Natura 2000 sites in the New Forest area

- 12.2 The map above illustrates the location of the Natura 2000 sites in and adjacent to the New Forest (the sites are identified in green (colour) or grey (monochrome)). Development in the southern part of the Waterside, Lymington and the Avon Valley could be located close to the Natura 2000 sites.
- 12.3 Policy NRM4 (Conservation and Improvement of Biodiversity) in the draft South East Plan states that local authorities should actively pursue opportunities to achieve biodiversity gains across the region by requiring green infrastructure to be identified, developed and implemented in conjunction with new development. The policy also encourages local authorities to set buffer zones around sensitive sites and provide alternative recreation land as mitigation for any possible adverse impact.
- 12.4 The New Forest Special Areas of Conservation, Special Protection Areas and Ramsar sites have been identified as being sensitive to the pressures of recreation, but it is unclear how the required mitigation will be brought forward in conjunction with new development. It is acknowledged that the Partnership for Urban South Hampshire work on a Green Infrastructure Strategy has been delayed, and that this on-going work could address some of these issues. The ability to deliver the required mitigation must be a central consideration in the assessment of development options.
- 12.5 The Core Strategy Preferred Options generally reflects the guidance in PPS9 (Biodiversity and Geological Conservation) and related issues. Some minor additions are proposed, including the suggestion that policy CS24 could be amended to reflect the need to enhance ecological connectivity, rather than merely protecting the existing habitat network. PPS9 also states that local planning authorities should protect the habitats of protected species through policies within their local development documents, and this should be reflected in the District's Core Strategy.

Proposed Response:

Policy CS24 (Wildlife and Nature Conservation) is generally supported and is considered to reflect the requirements of PPS9. The policy could be improved by reflecting the need to enhance ecological connectivity, rather than only protecting the existing network. This will assist the network to respond to climate change and other impacts.

PPS9 contains specific guidance referring to the protection of species from the effects of development (paragraph 16). This should be reflected in the Core Strategy, alongside a commitment to ensure suitable protection within the Development Control Policies DPD. The Core Strategy should also refer to the potential for contributions for nature conservation enhancement (as well as mitigation) within Section 8 on Developers' Contributions.

continued...

The Habitats Regulations Assessment concluded that the Core Strategy Preferred Options is unlikely to have a significant impact on the integrity of European sites. This conclusion is qualified as being dependent on the inclusion of strategic avoidance and mitigation such as the delivery of green infrastructure. *“Effective and timely delivery of mitigation is therefore key to the ability to reach this conclusion.”*

The Sustainability Appraisal Report recommended that the Core Strategy should contain policies to *“...provide additional natural greenspace to serve new and existing residential development, and help take pressures off sensitive environments of the New Forest National Park.”* The Core Strategy should provide details of how this mitigation will be delivered at the same time as, or in advance of, development to help manage recreational pressures on European sites. This could be done through clear references to the potential need for alternative natural greenspace to mitigate recreational pressures on European sites in policy CS26, and mention of the need for alternative natural greenspace in paragraph 8.4 on Developers’ Contributions. Alternative recreation opportunities should also be considered through the Sites and Designations Development Plan Document process.

13 Recreation

- 13.1 Paragraph 2.27 of the Preferred Options states that *“...while it is a National Park purpose to encourage outdoor recreation...”*. This reference should be amended to more accurately reflect the statutory National Park purposes, as set out in the Environment Act 1995.
- 13.2 As outlined above in the section on protected habitats, the Sustainability Appraisal Report concludes that the Core Strategy should contain policies to provide additional greenspace to serve new and existing residential development, and help take pressure off sensitive natural environments within the National Park. Paragraph 7.5.13 of the Core Strategy Preferred Options states that in order to relieve pressure on sensitive parts of the National Park, local access to other forms of natural green space should be improved. This includes *“...potentially the provision of a country park to the east of the National Park.”* This acknowledgement is welcomed, and the Authority would welcome further detail on how this will be taken forward through the Core Strategy or other development plan documents developed by the District Council.
- 13.3 Following an audit of open space, sport and recreation provision in the District and the National Park, the District Council’s preferred option (as set out in policy outline CS26) is to ensure new residential development makes provision for open space and play facilities to a minimum standard of 4.0 hectares per 1,000 population. This

represents an increase from the existing Local Plan standard of 2.8 hectares per 1,000 population and contributions will also be sought towards improvements to existing open space and recreation facilities. This approach is broadly supported and contributes to mitigating the impacts of increased recreational use of the sensitive habitats in the New Forest.

Proposed Response:

The Authority welcomes the acknowledgement of the importance of the National Park for recreation, and also the significant proportion of the National Park covered by national and European nature conservation interest. However, it is not strictly correct that, “...it is a *Park purpose to encourage outdoor recreation...*” and the Authority would wish to see the statutory National Park purpose to “...*promote opportunities for the understanding and enjoyment of its special qualities...*” more accurately reflected.

The Authority supports the proposed increase in the level of open space provision sought in association with new development in the District and the acknowledgement of the potential of the District to provide facilities to help relieve pressures on the National Park. The proposed increase in the level of open space sought in association with new development will contribute towards the mitigation requirements identified in the Sustainability Appraisal Report and the Habitats Regulations Assessment. The Authority would support the identification of specific sites to ensure the recreational pressures on the sensitive parts of the New Forest are mitigated.

The Authority would also like the Core Strategy to look beyond designated open spaces to enhancing recreational potential through improved foot and cycle path links and, where appropriate, access to local natural greenspace.

The National Park Authority suggests that reference is made to the Authority’s emerging Recreation Management Strategy, given the importance of the National Park to the residents of the District.

14 Conclusions

- 14.1 In conclusion, the District Council’s Core Strategy Preferred Options document is the product of a great deal of evidence gathering and detailed consideration of complex issues. The Preferred Options document raises some concerns for the National Park over the scale of housing and employment development proposed, but there is much to be commended, including the approach to affordable housing provision.

- 14.2 It is hoped that the Authority's comments will help refine the District's Core Strategy before submission to Government. The National Park Authority has been involved as a partner in a number of the background studies and will continue to work closely with the District Council in the future as both authorities develop their respective Core Strategies.

Proposed Response:

The National Park Authority acknowledges the work and careful consideration that has gone into producing the Core Strategy Preferred Options, and the choices and balances that the District Council faces. The Authority's concerns outlined above should be seen in this context.

The National Park Authority is committed to continuing dialogue and joint working with the District Council, and looks forward to providing assistance in enabling the Council to refine its Core Strategy in readiness for submission and in supporting it through the Examination process.

Recommendation:

- 1 To approve the proposed response to the New Forest District Council Core Strategy Preferred Options consultation.**
- 2 To authorise the Director of Strategy and Planning to make any minor amendments to the document in advance of submitting it to the District Council.**