

NEW FOREST NATIONAL PARK AUTHORITY

AUTHORITY MEETING – 11 DECEMBER 2008

**RESPONSE TO THE NEW FOREST DISTRICT COUNCIL
CORE STRATEGY SUBMISSION DOCUMENT CONSULTATION**

Report by: Richard Lemon, Director of Strategy and Planning

Summary:

New Forest District Council (the Council) is consulting on its Core Strategy Submission Document, which sets out the policies to 2026 for the planning of the three areas of the District **outside the National Park**. Representations which relate to the soundness of the document, as defined in government guidance, will be considered by an independent Inspector at a public examination in summer 2009. If approved, this Report will form the basis of the Authority's case at the examination.

The Core Strategy builds on the Council's earlier work on the 'Issues and Options', and 'Preferred Options' stages, on which the Authority commented (see NFNPA 222/07). Liaison with the Council during preparation has included discussions at the Joint Members Advisory Group and specialist technical support by Authority staff.

A number of changes have been made in light of concerns raised at the Preferred Options stage and many aspects of the Submission Document are supported. However some significant concerns remain over the extent to which the purposes of the National Park have been taken into account, and the scale of housing and employment development proposed. The recommended responses on these issues are consistent with the Authority's representations at the previous consultation stage. There are also a number of detailed changes that the Authority would welcome.

Recommendations:

- 1 To approve the main Report as the Authority's response to the New Forest District Council Core Strategy Submission Document consultation.**
- 2 To authorise the Director of Strategy and Planning to make any minor amendments to the Report in advance of submitting it to the District Council by the deadline of 19 December 2008.**

Resources:

Routine

Paper:

NFNPA 279/08: Cover paper
NFNPA 279/08: Annex 1 - NFDC Core Strategy Submission Document (**circulated separately to members**)

Background Papers:

- PPS12: Local Spatial Planning (DCLG June 2008)
- The Secretary of State's Proposed Changes to the Regional Spatial Strategy for the South East (DCLG/GOSE July 2007)
- Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads (Defra 2005)

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1. Introduction

- 1.1 New Forest District Council (the Council) has published its Core Strategy Submission Document for consultation. This sets out the proposed spatial strategy, to 2026, for the three areas of the District outside the National Park – Totton and Waterside, Coastal Towns and Villages, and Ringwood, Fordingbridge, Avon Valley and Downlands.
- 1.2 The Core Strategy will be a key part of the Council's Local Development Framework and will set out the strategic spatial policies that guide development. The previous consultation stages – the Issues and Options stage (December 2006 to January 2007) and the Preferred Options stage (October 2007 to December 2007) - have informed the final Submission document.
- 1.3 Since the decision in June 2007 that the Council and the Authority would prepare separate Core Strategies for their respective areas, joint working has continued. In particular, the Authority has provided specialist technical support on the Council's Sustainability Appraisal and Habitats Regulations Assessment. Close co-ordination in the development of the Core Strategies for the respective planning areas is needed to ensure that as far as possible they are complementary. Co-ordination has been achieved both through a Joint Members Advisory Group and officer contact.
- 1.4 The Authority provided detailed comments on the Council's Core Strategy Preferred Options document in December 2007 (see NFNPA 222/07). That response supported some aspects of the draft document, but also raised significant concerns at the level of development proposed above the emerging South East Plan requirements. The recommended responses in this paper on the Submission document are consistent with the representations made by the Authority in December 2007. They also reflect the changing regional planning position following the publication of the *Secretary of State's Proposed Changes to the South East Plan* (July 2008).

2. Tests of 'Soundness' and the Examination process

2.1 Planning Policy Statement 12¹ sets out the criteria that will form the basis of the independent examination of the Core Strategy, expected in the summer of 2009. Any submissions to the examination by the Authority will be based on the content of this Report and therefore the response focuses on the following PPS12 criteria:

- consistency with National Policy
- conformity with Regional Spatial Strategy, and
- the appropriateness of the Strategy when considered against reasonable alternatives.

2.2 Additional comments are made on employment provision, tourism, traffic and transport, and the Habitats Regulations Assessment.

3. Consistency with National Policy

3.1 Under Section 62(2) of the Environment Act 1995, the Council must have regard to the two National Park purposes in making decisions which may affect the National Park. This legal duty acknowledges that the delivery of the statutory purposes relies on positive engagement from a range of stakeholders and ensures that the purposes are an "**essential consideration**"² in reaching decisions that impact on National Parks. Given their knowledge of the New Forest and planning experience prior to National Park designation in 2005, it is hoped that the District Council would lead on demonstrating due regard has been given to this duty. This would be expected to include the consideration of impacts from the scale of development proposed, impacts on the setting of the Park from site specific allocations, and cumulative impacts on the National Park in terms of traffic generation and recreational pressures.

3.2 Defra guidance³ confirms that where their decisions may affect National Parks, relevant authorities, "...**should be able to clearly show how they have considered the purposes of these areas in their decision making.**" The relationship between the District and the National Park is central to the Core Strategy and although the duty is referred to in paragraph 3.1.11, the Core Strategy contains no assessment of how the National Park purposes have been taken into account, either generally in the setting of Objectives, or in relation to key policy areas such as the impacts of the scale and location of additional housing or economic development.

3.3 The Core Strategy acknowledges the range of benefits the Park provides for District residents and states that, "...*the relationships*

¹ *Local Spatial Planning*, DCLG, 2008

² Paragraph 8: *Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads*, Defra, 2005

³ Paragraph 9: *Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads*, Defra, 2005

with the adjoining areas have been key considerations in drawing up this Core Strategy document and will need to be given proper attention in its implementation...” – paragraph 3.1.7. However no information is provided on how this relationship has been considered in drawing up the Strategy and the links are not illustrated on the Key Diagram (Figure 1). The Diagram includes ‘key interactions’ with adjacent authorities but not the National Park. Over 90% of the New Forest National Park lies within New Forest District, and the designated National Park occupies approximately 70% of the District Council’s administrative area. At the Preferred Options stage the Authority recommended that the recognition of this relationship could have been strengthened by more positive references in the objectives and issues. (The inclusion of a policy designed to ensure that development proposals should take account of their full impact on the Park was also recommended but it is accepted that a combination of National Planning Policy and Policy C1 of the Regional Spatial Strategy serves this purpose and, provided that the guidance is followed, should not need to be duplicated).

3.4 Both the Key Issues and the Objectives recognise the need to build positively on the inter-relationships between the District and the National Park and this is **supported**. However the Authority is concerned with Key Issue 8 and Objective 8 which aim to avoid any “*significant harmful impacts...*” on the National Park. Avoiding only *significant* harm over a 20 year period would be expected to lead to progressive and therefore substantial erosion of many of the special qualities of the Park, including the statutory international, European and national nature conservation designations that are sensitive to cumulative and in-combination impacts. Any impact on the Park, positive or negative, needs to be assessed in the development of the Strategy and during its implementation.

3.5 Landscape issues, for example, are barely mentioned when one of the principal common factors of the three sub-areas is that they immediately adjoin a nationally protected landscape. Policy C1 in the South East Regional Spatial Strategy⁴ confirms that, “...*planning decisions should also have regard to the setting of the Park...*”, yet no mention is made of the New Forest District Landscape Character Assessment, which should have a key role in considering locations for future development and be referred to in the Core Strategy. Reference to the context of the European Landscape Convention should also be an integral part of the Strategy.

⁴ Policy C1: New Forest National Park – *Secretary of State’s Proposed Changes to the South East Plan* (July 2008)

Proposed Response – Consistency with National Policy

The Authority objects that:

- The Council's Core Strategy is not based on an explicit assessment of the relationship between the Core Strategy and the statutory National Park purposes, or how impacts on the National Park (e.g. landscape setting, cumulative impacts, and traffic) have been considered in formulating the Strategy. The Environment Act 1995 places a duty on relevant authorities to have regard to the Park purposes in exercising their functions. Subsequent Defra guidance (2005) confirms that the two statutory National Park purposes are an "*essential consideration*" in taking decisions which may affect National Parks;
- the key relationship between the three sub areas and the National Park is not illustrated on the Key Diagram;
- Key Issue 8 and Objective 8 both refer to the avoidance of '*significant harmful impacts*' which does not accurately reflect the level of protection afforded to National Parks within national guidance (paragraph 21 of PPS7) and the statutory framework they operate within (Environment Act 1995). Over 50% of the National Park consists of sites of international, European and national nature conservation importance that are sensitive to cumulative and in-combination harmful impacts over time; and
- the impacts on the landscape setting of the National Park are not acknowledged and the New Forest District Landscape Character Assessment or European Landscape Convention are not referred to in the Core Strategy or referred to as a key determinant for decisions over locations for development in subsequent DPDs.

4. Conformity with Regional Spatial – the South East Plan

- 4.1 The Council's Core Strategy is required to be in general conformity with the South East Regional Spatial Strategy. Since the Council's Preferred Options document was published (2007), the *Secretary of State's Proposed Changes to the draft South East Plan* (July 2008) have been published and both the Authority and the Council must respond to these changes. The key proposals that affect the Strategy are summarised at paragraph 2.4 of the Submission Document. The Authority's comments on the Strategy's conformity relate to the following policies in Regional Spatial Strategy:

- Policy H1 Regional Housing Provision 2006-2026
- Policy H3 Affordable Housing, and
- Policy C1 New Forest National Park.

Policy H1 – Regional Housing Provision 2006 -2026

4.2 The *Secretary of State's Proposed Changes to the South East Plan* requires 3,920 additional dwellings between 2006 – 2026 for New Forest District – specifying that this relates to the area outside the National Park. This equates to a requirement of 196 houses a year. The only change to this figure compared with the draft South East Plan submitted by the Regional Assembly and the recommendations of the Panel Report is a reduction of 220 houses (11 per year) which has been allocated to the National Park Authority. (*Previously the National Park did not have a specific requirement*). This contrasts with most areas of the region where housing figures have been substantially increased either by the Panel or the Government. The housing requirement for the District was already informed by the overall policy of increasing housing provision nationally, regionally and in the South Hampshire conurbation following the uplift in the delivery of housing promoted with the designation of Partnership for Urban South Hampshire (PUSH) area as a New Growth Point.

4.3 Since 1996/7 dwelling completions in New Forest District have averaged over 450 dwellings a year, with approximately 75% of this development taking place on brownfield sites. The South East Plan housing requirement therefore represents a significant step-change **downwards**, reflecting the particular designations and environmental assets of the area, including the National Park designation in 2005, part of an Area of Outstanding Natural Beauty and the extent of national and European nature conservation sites. Technical studies undertaken by the PUSH authorities as part of the South East Plan sub-regional studies, tested at the Examination in Public and used in support of the New Growth Point status for part of the District, justify this level of housing for the District in the Regional Spatial Strategy.

4.4 In response, although Core Strategy Objective 3 aims to provide for additional housing to conform with the Regional Spatial Strategy, the Council's Submission Document proposes an **additional 4,770 dwellings**, 850 above the Government's requirement. The table below summarises the proposals, based on Table 2 in the Core Strategy.

Development in existing urban areas (Policy CS10)	New greenfield housing Allocations (Policy CS11)	Additional 'local need' sites (Policy CS12)
3,670 dwellings Based on existing permissions and allocations and a cautious estimate of brownfield delivery	250 dwellings to make up the SE Plan target 150 dwellings at Ringwood and 100 dwellings at Totton.	Up to 850 dwellings To include land at Totton, Marchwood, Hythe, Lymington, New Milton, Fordingbridge

- 4.5 This would result in the draft South East Plan housing target being exceeded by over 20%, even based on, "...a cautious approach towards redevelopments and 'windfall sites'..." – paragraph 7.3.7 – suggesting that 4,770 dwellings is a conservative estimate of housing delivery, rather than an upper limit. The cautious approach to urban capacity and the increase in housing provision above the regional spatial strategy results in proposals for over 1,000 dwellings on greenfield sites. There may be justification for a modest adjustment above this figure but exceeding the requirement by over 20%, allied to the cautious estimates of urban capacity, is too great a margin in the circumstances and represents unnecessary risk to the special qualities of the National Park. The appraisals and assessment undertaken for the Core Strategy highlight the potential impacts on the National Park (e.g. traffic in Lyndhurst forecast to increase by up to 11%, and the need for a range of measures to mitigate the impacts of increased recreational pressures), resulting from the scale of development proposed.

Proposed Response: Housing Issues (CS10, CS11 and CS12)

The Authority:

- Objects to the Core Strategy because it does not conform with policy H1 of the Regional Spatial Strategy. The Core Strategy proposes 4,770 dwellings (2006-26) for the District compared with the Regional Spatial Strategy requirement of 3,920 dwellings. Evidence suggests that the level of development proposed will result in increased traffic congestion within the Park and increased recreational pressures on protected habitats. The Authority also has concerns regarding the impact of the greenfield development proposed on the setting of the Park.
- Considers the figure of 3,920 dwellings to be an appropriate requirement because it is based on technical studies taking account of the environmental factors, including the proximity of the New Forest National Park, used to inform the draft South East Plan and which has been endorsed by the Examination in Public Panel and the Secretary of State.
- Considers that the level of housing proposed in the Core Strategy is a significant (at least 20%) increase above the Regional Spatial Strategy requirement which represents an unnecessary risk of harm to the environmental assets of the area, particularly the special qualities of the National Park.

Policy H3 – Affordable Housing

- 4.6 The main justification in the Core Strategy for the increased level of housing referred to above is that it is required to meet local housing needs and deliver affordable homes. Regional Spatial Strategy Policy H3 states that local planning authorities should deliver a substantial

increase in the amount of affordable housing, and the Panel Report stated that, "...it is not simply a case of building your way out of this crisis." (paragraph 1.11). Maximising the number of affordable homes is therefore **supported** as a key priority of the Core Strategy in conformity with this Policy and the Council's proposed affordable housing policies are supported. The Council has been at the forefront of developing planning policies to address local affordable housing needs for many years and the Core Strategy builds on this. The Council also has a robust evidence base to support its affordable housing policies, including the economic viability study.

- 4.7 However there is no justification arising from the Regional Spatial Strategy for the inclusion of 850 additional dwellings over the housing requirement to meet a local affordable housing need. This should not be considered as an additional requirement to Policy H1 of Regional Spatial Strategy *but delivered within the overall requirement*.
- 4.8 The affordable housing policies in the Core Strategy (CS14 and CS15) require all new residential developments to make a contribution to affordable housing, either through on-site provision or through payment of a contribution/tariff. The affordable housing target ranges between 40% and 50% across the Plan area. The approach of applying this policy to all new housing is **supported** given the particular local circumstances, where affordability is a major issue, and where development is characterised by smaller urban infill developments. The evidence presented in the economic viability study suggests that all sites can sustain a contribution towards affordable housing and the Council is **supported** in its policies to deliver affordable housing through the development process.

Proposed Response: Affordable Housing (CS14 and CS15)

The Authority:

- Objects to the inclusion of 850 houses above the requirement set out in Regional Spatial Strategy on the basis of meeting local needs as this is not justified or in conformity with Policy H3 of the Regional Spatial Strategy. The Core Strategy Submission document provides no evidence to justify the figure of 850 dwellings when balanced against the impacts of this additional development on the environmental assets of the area.
- Supports the proposed affordable housing policies, CS14 and CS15, which are considered to be reasonable and based on robust evidence. The 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.

Policy C1 - The New Forest National Park – the Rural Economy

- 4.9 Policy C1 in the Regional Spatial Strategy emphasises the importance of the rural economy to the National Park, stating that the Authority and partners should 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*” to support the Park purposes.
- 4.10 The Core Strategy acknowledges that parts of the District support the traditional commoning practice by providing back up grazing land and dwellings for commoners (paragraph 7.8.5). Policy CS21 (Rural Economy) commits the Council to working with the Authority and other neighbouring authorities to protect essential back up grazing land and this is **supported**.
- 4.11 The existing New Forest District Local Plan First Alteration (2005) contains policies to protect back-up grazing land (NF-E3), and to enable the development of commoners’ dwellings (NF-H8) as part of the ‘rural exceptions policy’. This existing planning policy support for commoners’ dwellings is not carried through to Core Strategy policies CS21 (Rural Economy) or CS22 (Affordable housing for rural communities). Given the clear acknowledgement at both the Regional and District level of the contribution land outside the Park makes to the commoning economy, the issue of commoners’ housing in the District should be included in the Core Strategy.

Proposed Response – Rural Economy (CS21)

The Authority:

- Welcomes Policy CS21 which supports commoning in the New Forest National Park through the protection of essential back up grazing land in the District and which is in conformity with Policy C1 in Regional Spatial Strategy.
- Questions the omission of the existing local plan policy support for commoners’ dwellings, an essential element of the overall strategy of sustainable land management in support of commoning set out in Policy C1 of the Regional Spatial Strategy, from the Core Strategy. This could be rectified through direct support for appropriate commoners’ dwelling schemes in policy CS21 or policy CS22.

5. Employment and Economic Development

- 5.1 As is acknowledged in paragraph 7.1.16 of the Submission document, assessing how much employment land is needed over the period to 2026 is not easy. Economic forecasts are currently uncertain and the Council must ensure flexibility to respond to

changing economic needs over the plan period. The South East Plan does not give a quantitative requirement for additional employment land within New Forest District and following a review of employment sites, the Council's Core Strategy retains the 37 hectares of employment allocations identified in the existing Local Plan (2005).

- 5.2 A further 12 hectares of employment land is identified adjoining Totton, New Milton and Ringwood (Policy CS18), bringing the total employment land allocation to 49 hectares. In addition, policy CS18 proposes an additional 16,000 square metres of office floorspace in Totton and the Waterside, and an additional 10,000 square metres of warehousing floorspace.
- 5.3 The Authority's response at the Preferred Options stage (NFNPA 222/07) raised concerns at this approach given the following factors (many acknowledged by the Core Strategy in paragraph 7.1.17):
- the lack of any strategic employment requirement for the District in the draft South East Plan;
 - the low rate of unemployment within New Forest District. In October 2008 unemployment in the District stood at 1.2% (up from 0.8% in October 2007), compared with the current national figure of 5.8%.
 - the significantly reduced housing requirement for the District over the period to 2026 (less than 200 dwellings per annum);
 - the large scale employment development opportunities within a short distance of the District's boundaries (e.g. 80 hectares at Bournemouth Airport);
 - the projected 5% decline in the District's population (down approximately 8,000 by 2026 compared with 2006 levels); and
 - the significant decline projected in the economically active population over the Plan period (-10%), reflecting the fact that the proportion of the Plan area's population over 65 is expected to rise from the current level of 25% to 33% by 2026.
- 5.4 Clearly the local economy is a central issue in planning the future of the District, and the National Park has a positive role to play in this. Research by the Campaign for National Parks in Yorkshire and the Humber region (December 2006) highlighted the significant economic benefits that arise from not just the environmental qualities of National Parks, but also from National Park designation itself. The important contribution employment sites within the District make to the communities in the National Park is fully acknowledged, as are the genuine local employment needs. It is also acknowledged that long term economic forecasts are unclear. However, additional employment development of this scale raises concerns over the potential impacts on the National Park in terms of traffic generation, landscape impacts and impacts on the local housing market.
- 5.5 The Central Hampshire and New Forest Strategic Housing Market Assessment (November 2007) suggests that further employment

growth is likely to increase demand for housing by stimulating in-migration (paragraph 5.15): Given that unemployment is low in the District, future employment growth may well become increasingly reliant upon greater in-commuting (perhaps from urban South Hampshire). This issue is acknowledged in relation to the local housing market, but it is difficult to see how this consideration has informed the proposals.

Proposed Response: Employment issues (CS17 and CS18)

The Authority:

- Objects to the scale of employment land provision proposed, in terms of retaining all existing employment allocations and making additional provision. The Authority considers that this is not in conformity with Regional Spatial Strategy guidance, inconsistent with the projected falling working population, the potential implications for the housing market, and environmental sensitivities of the area, and that too much weight has been placed on continuing past development rates and retaining existing allocations.
- Has concerns that, in the light of the findings of the Central Hampshire and New Forest Strategic Housing Market Assessment, development of further employment sites at a time when the economically active population of the District is forecast to decline could result in additional in-commuting from surrounding areas of housing growth.

6. Tourism

- 6.1 Employment related to tourism in areas such as visitor accommodation, leisure facilities and restaurants is one of the largest employment sectors in the District, and there are clear links between the District and the National Park in terms of the tourism sector.
- 6.2 Paragraph 7.6.2 of the Core Strategy recognises that parts of the area can provide facilities and amenities which can complement and relieve visitor pressures on the National Park. This is carried through into policy CS19 which seeks to support the local tourism industry by, among other factors, “...*supporting measures in the Plan area which would relieve tourist pressure on the most sensitive areas of the New Forest National Park and which would protect and enhance vulnerable habitats and landscapes.*” – criterion (d).

Proposed Response: Tourism (CS19)

The Authority supports Policy CS19, and in particular criterion (d) – relieving pressures on the most sensitive areas of the New Forest National Park. The tourism industry clearly works across administrative boundaries and Policy CS19 complements and supports initiatives by the National Park Authority.

7. Traffic and Transport

- 7.1 The Submission document is supported by a Transport Assessment, (Background Paper 31) updated in July 2008. This states that the most significant impact **of the development proposed within New Forest District** occurs on the A337 south of Lyndhurst, the A35 east of Lyndhurst and the A326 Waterside road, with traffic levels forecast to increase between 5 – 11%, which has obvious implications for the Air Quality Management Area in Lyndhurst High Street (declared 2005). The District and National Park are also significantly affected by traffic generated in the surrounding sub-regions.
- 7.2 While it is accepted that the District Council has a strategic housing requirement of 3,920 additional dwellings that must be met, it is clear that the scale of development proposed will generate additional traffic on New Forest roads. At the Core Strategy Preferred Options stage in 2007, the Authority welcomed the commitment from the District Council to work with others to, “...mitigate adverse traffic impacts on the New Forest National Park...” – Policy Outline CS10. This commitment does not appear in the Submission document.
- 7.3 Given the predicted increase in traffic in the National Park from development within the District (the congestion problem in Lyndhurst for example, is acknowledged in paragraph 7.9.20, and the Transport Assessment describes the increase in vehicle movements resulting from the Core Strategy proposals), the Authority would welcome a clear reference in Policy CS24 or CS25 that developer contributions could be used to address transport issues within the National Park resulting from development within New Forest District. 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.

Proposed Response – Traffic and Transport Issues (CS24/25)

The Authority:

- Objects to the omission of Policy Outline 10 of the Preferred Options from the Core Strategy which included reference to the commitment from the District Council to work with others to “...mitigate adverse traffic impacts on the New Forest National Park...”
- Would welcome a reference in Policy CS24 or CS25 that developer contributions could be used to address transport issues within the National Park resulting from development within New Forest District.

8. Impacts on protected habitats (Habitats Regulations)

- 8.1 A Habitats Regulations Assessment Screening Statement and Appropriate Assessment has been undertaken for the Core Strategy Submission document, involving close working with the Authority and Natural England. The Assessment focuses on the potential impacts of the Core Strategy on European protected habitats.
- 8.2 Three policies in the Submission document were identified as having uncertain effects in-combination with other plans and proposals with regard to increased recreational pressures on the New Forest SAC, SPA and Ramsar site. The Appropriate Assessments undertaken for the South East and South West Plans both highlight the 'in-combination' impacts from increased recreational pressures arising from development on the New Forest SAC, SPA and Ramsar. Policy NRM5 in the draft South East Plan encourages local authorities to set buffer zones around sensitive sites and provide alternative recreation land as mitigation for any possible adverse impact.
- 8.3 Policy CC8 in the draft regional plan states that local authorities should work together to provide networks of accessible greenspace with the primary aim of improving biodiversity, but also delivering recreational benefits. The successful provision of green infrastructure is particularly important in the urban fringe and in areas, "*...close to sites of international ecological importance...*" such as the New Forest. Policy CC8 seeks to ensure that connected networks of green spaces around new built development are treated as integral to the planning process.
- 8.4 Research commissioned by the Authority, New Forest District Council, the Forestry Commission and Natural England (Footprint Ecology 2008) predicts that housing development within 50 kilometres of the New Forest will result in an additional 1.05 million person visits per annum by 2026. Of this, an estimated 764,000 will come from within 10 kilometres of the National Park boundary.
- 8.5 Following further liaison with the Authority and Natural England since the Preferred Options stage, a number of policies have been introduced into the Submission document in response to potential impacts. These include amendments to policy CS1 to seek to avoid development in areas of high conservation value and policy CS7 where provision of public open space and a commitment to help produce a Green Infrastructure Strategy for the South Hampshire sub-region (led by the PUSH authorities) is included. A draft Green Infrastructure Strategy was published for consultation in January 2008, but there were a number of deficiencies identified that need to be addressed before adoption.

Proposed Response: Impact on protected habitats

The Authority:

Objects to the omission from Policy CS7 of proposals for a new country park in the District as advocated by the PPG17 study (2007) to mitigate the impact of development **within New Forest District.**

Supports reference to the New Forest Biodiversity Action Plan (BAP) in policy CS3(g) and hopes to continue working in partnership with the Council in preparing the BAP. The Core Strategy could however be improved through the inclusion of a firm commitment to adopt and support the implementation the New Forest BAP.

Supports the amendments to policy CS1 with regard to avoiding areas of high conservation value and policy CS7 which increases the minimum public open space standard to 3.5 hectares per 1,000 population, although it is noted that this is a lower figure than recommended in the PPG17 Study (2007) and the Preferred Options document (2007).

Supports the recognition through paragraph 8.4 and policy CS25 that mitigation for recreational impacts may require contributions. Paragraph 8.4 should be improved by amending the wording of the twelfth bullet point to refer to, "*nature conservation and wildlife mitigation measures, including in relation to the National Park and European designated nature conservation sites.*" This clarification adds weight to the policy's Appropriate Assessment mitigation.

Considers that, following the Appropriate Assessment identification of the requirement for a range of measures to mitigate the impacts of increased recreational pressures to ensure compliance with the Habitat Regulations, further partnership working is required to establish the necessary mitigation framework. In the event of the current PUSH work not providing a robust Strategy, the Council must remain committed to addressing the need for recreational mitigation within their planning area.

9. Reasonable alternatives

9.1 The 'soundness' tests in PPS12 require consultees to consider whether the proposals within the Core Strategy represent the most appropriate strategy when considered against reasonable alternatives. The appraisals and assessments undertaken during the preparation of the Council's Core Strategy have highlighted:

- the potential landscape impacts from the greenfield development proposed on the setting of the National Park;

- the need for a range of measures to mitigate the 'in-combination' recreational pressures on the Forest's protected habitats; and
- the projected increase in traffic in the National Park (particularly Lyndhurst) resulting from the scale of development proposed.

9.2 The District Council must plan to provide its regional housing requirement and a number of mitigation measures have been put into the Core Strategy to support the level of development proposed above the regional requirement. However, a reasonable alternative approach to that taken in the Core Strategy Submission document would be for the Council to plan for the level of housing and economic development consistent the Regional Spatial Strategy, which would reduce these potential impacts on the National Park.

Proposed Response: Reasonable alternative approaches

The Authority is concerned that the Submission Document does not set out how consideration of the purposes of the National Park have been taken into account and considers that the Strategy has not reached the right balance between housing and economic development, and conservation of the special qualities of the National Park. The Authority has two particular objections:

- The level of housing development proposed, which is inconsistent with the requirement of the Regional Spatial Strategy.
- The level of employment development proposed which is inconsistent with approach in the Regional Spatial Strategy, the projected falling working population, and the potential implications for the housing market.

Proposed Alternative Approach: Housing

The Authority considers the draft South East Plan figure of 3,920 dwellings to be an appropriate requirement, within which meeting local housing needs should be a high priority but not an additional figure. The Authority suggests an alternative approach would be for the Council to continue to monitor housing completions and to only release greenfield sites if the Regional Spatial Strategy was demonstrably unlikely to be met through brownfield development (which has averaged approximately 340 dwellings per annum since 1996/7, well in excess of the draft South East Plan housing requirement of 196 dwellings per annum in the period to 2026).

Proposed Alternative Approach: Employment

The Submission document proposes retaining all undeveloped employment allocations from the adopted Local Plan (2005) and allocating a further 12 hectares. The Authority considers a more realistic alternative approach would be to scale back existing allocations if there are particular locational advantages to bringing forward the additional sites identified (Policy CS18).