



**New Forest National Park
Submission draft Local Plan 2016 – 2036**

**Strategic Housing Land Availability Assessment
(SHLAA)**



January 2018

Executive Summary

This assessment is a technical report which provides evidence of housing land availability across the New Forest National Park. In accordance with the requirements of national planning policy and guidance, the assessment considers the suitability of sites identified within the National Park for housing development and the likelihood of development coming forward (the availability and achievability of sites). In considering this Strategic Housing Land Availability Assessment it should be emphasised that:

- **The Assessment does not allocate sites to be developed and is not part of the statutory ‘development plan’ for the National Park. It is instead one of many pieces of evidence that informs the Authority’s Local Plan.** The allocation of sites for housing development will be determined through either the Local Plan 2016 – 2036; or any future Neighbourhood Development Plans prepared in the National Park.
- **The identification of potential housing sites within the SHLAA does not imply that planning permission would be granted for residential development.** The SHLAA is a high level assessment of potential housing availability. Planning applications on sites identified within the SHLAA will be determined on their merits in line with the development plan unless material considerations indicate otherwise.
- The omission of sites from the assessment does not preclude the possibility of planning permission being granted for residential development in the future. It is acknowledged that sites will come forward that may be suitable for residential development that have not been identified in this SHLAA. A number of sites identified in this SHLAA may be suitable as rural exception sites (rather than Local Plan allocations) and these are best progressed through the development control process.
- This SHLAA report is the outcome of work carried out up to December 2017. It therefore represents a snapshot in time and the status of individual sites may change over time.

In total 173 sites were considered through the Assessment process. 14 sites were identified as being suitable for housing. These are sites that relate well to the Submission draft Local Plan’s proposed settlement hierarchy and are either within the Defined Villages or are been taken forward as proposed Local Plan site allocations. The 14 sites found to have potential for housing have a theoretical capacity to provide 366 new dwellings in the National Park.

Of the remaining sites, the Assessment also notes that an additional 19 sites have the potential to be considered as rural exception sites to meet local affordable housing needs in communities outside the Defined Villages of the National Park. The potential of these 19 sites as rural exception sites is identified in the text commentary for each site and the sites have the capacity for around 125 dwellings. These sites would be progressed through the planning application route rather than Local Plan allocations.

Appendix A to this report sets out the criteria against which sites have been assessed.

Appendix B provides a summary of the sites within the National Park that are considered to be suitable for housing, available and achievable.

Appendix C provides a summary of the sites that have been rejected as either being unsuitable, unavailable or unachievable for housing development. These are grouped by parish in alphabetical order.

Introduction

- 1.1 The New Forest National Park covers an area of 220 square miles and includes land in New Forest District, Test Valley Borough, Wiltshire Council and the county of Hampshire. The Authority assumed its full planning responsibilities in April 2006, covering development management, minerals and waste, enforcement and planning policy.
- 1.2 Planning policy plays a key role in delivering the statutory National Park purposes and in fostering the socio-economic wellbeing of the 35,000 people living within the National Park. The Local Plan sets the planning framework for development within the National Park and should be based on a proportionate evidence base. The Strategic Housing Land Availability Assessment (SHLAA) forms part of the evidence base for the Submission draft Local Plan 2016 – 2036.
- 1.3 Since the Authority took on its full planning responsibilities in 2006, dwelling completions within the New Forest National Park have averaged around 23 dwellings per annum. These new dwellings have been delivered on development sites within the four Defined Villages; on rural exception sites; and through housing targeted at meeting the needs of agricultural workers and New Forest commoners. With the various assessments of housing need in the National Park (e.g. SHMA, GL Hearn, 2014; and the assessment of housing needs, Justin Gardner Consulting, 2017) indicating a housing need in the National Park higher than current completions, the Authority decided to consider housing allocations within the National Park through the Local Plan review.
- 1.4 The Government's National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) resource both confirm that the assessment of housing land availability is a key step in the preparation of Local Plans. In a New Forest National Park context, the assessment of housing land must also give full weight to the protection afforded to the landscape of the area (as per paragraphs 115 and 116 of the NPPF); and the Government's Vision and Circular for the English National Parks (2010) which confirms that National Parks are not suitable locations for unrestricted housing and new housing should be focused on meeting local affordable housing requirements.
- 1.5 This Strategic Housing Land Availability Assessment is an important part of the evidence base for the Authority's Local Plan in assessing the suitability and availability of potential housing sites against specific criteria. The NPPG suggests a standard process for undertaking a SHLAA and this report sets out how the SHLAA has been prepared in relation to the standard process in the Practice Guidance. The conclusions represent a 'snap-shot' in time and therefore some of the information contained within this report will have changed.
- 1.6 As part of the process of assessing potential development sites the Authority has undertaken a 'Call for Sites' exercise and a 'Call for Brownfield Sites' exercise and more detail on these are set out below.

2. Aims of the Assessment

2.1 The NPPF states that planning authorities should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet identified housing needs. The SHLAA forms a key component of the evidence base to underpin housing policies in the Local Plan. The NPPG confirms that the purpose of, *“an assessment of land availability is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.”* Assessments should:

- Identify sites and broad locations for development
- Assess the development potential of the sites
- Assess the suitability of the sites and the likelihood of development coming forward (the availability and achievability).

2.2 National planning policy recognises the special circumstances relating to the delivery of housing in National Parks. The NPPF confirms that National Parks are given the highest status of protection in relation to landscape and scenic beauty and that great weight is afforded to the conservation of wildlife and cultural heritage. The Government’s Vision and Circular for the English National Parks (2010) provides further detail, stating that, *“The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements...”* National Park Authorities are expected to, *“...include policies that proactively respond to local housing needs”* in their Local Plans and to prioritise affordable housing for local needs.

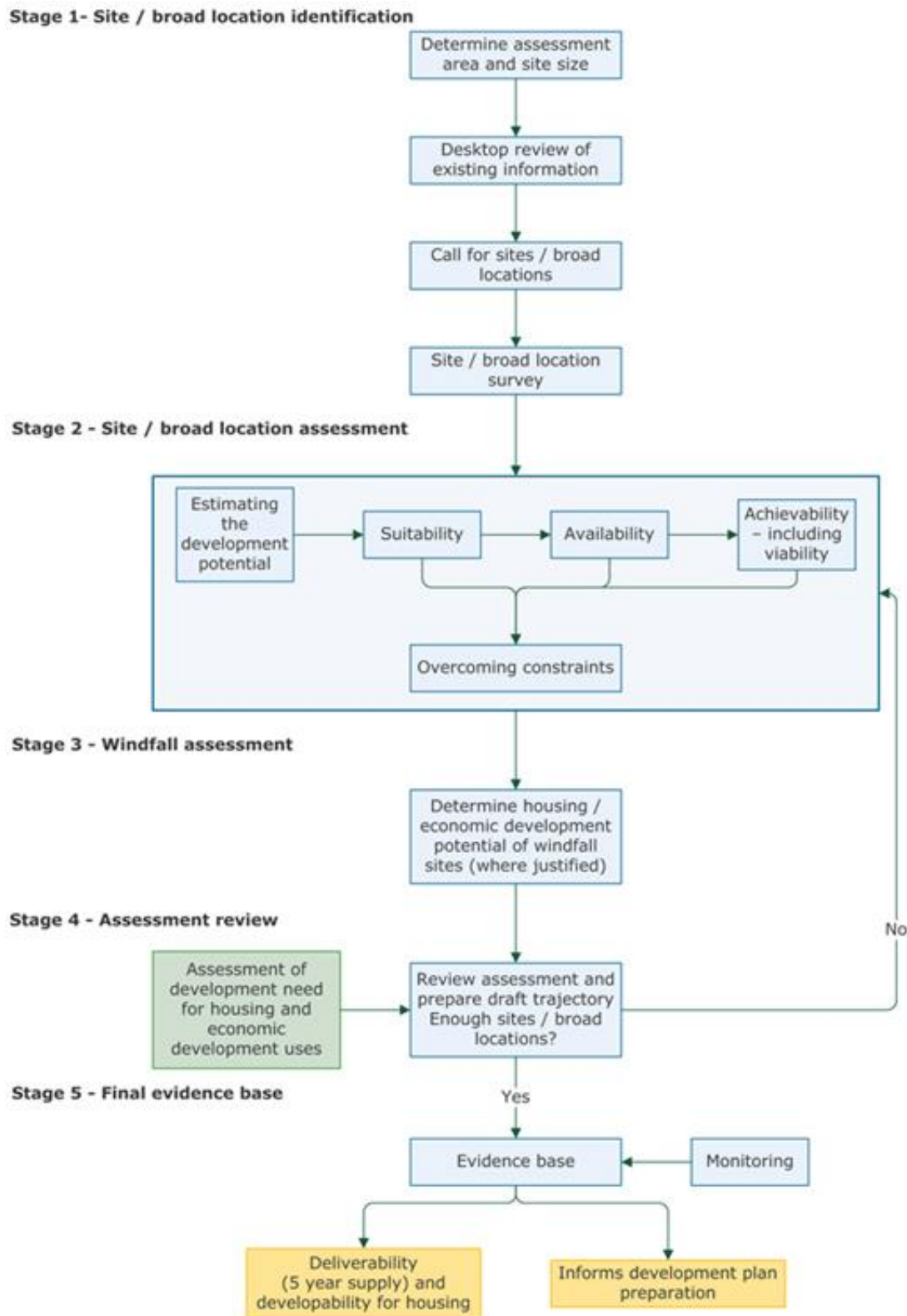
2.3 This SHLAA has been prepared within this planning context as part of the Local Plan evidence base to demonstrate that suitable and available sites exist within the National Park.

3. Methodology

3.1 Set out on the following page is a diagram summarising the process of assessing land availability (source: NPPG). The assessment of the availability of housing land within the National Park ultimately feeds into the preparation of the New Forest National Park Local Plan. The NPPG confirms that, *“...the assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.”*

3.2 It should also be emphasised that the identification of potential housing sites within the SHLAA does not imply that planning permission would

be granted for residential development. All planning applications incorporating residential development within the National Park will continue to be considered against the appropriate policies and having regard to any other material considerations.



Stage 1: Site / broad location identification

- 3.3 The geographical area covered by the assessment is the whole of the 220 square miles within the New Forest National Park. Given the specific planning policy framework established within National Parks through primary legislation (e.g. the National Parks & Access to the Countryside Act 1949); and the acknowledgement of their special circumstances in national planning policy and guidance (e.g. NPPF, NPPG, National Parks Vision and Circular, 2010), it is considered appropriate to prepare a single assessment for the National Park. This also reflects the fact that the Authority is the sole planning authority for the National Park. Separate SHLAAs have been prepared for the remaining areas of New Forest District, Test Valley Borough and Wiltshire Council outside the National Park.
- 3.4 The NPPG states that, “...*Plan makers should issue a call for potential sites and broad locations for development...The comprehensive list of sites and broad locations derived from data sources and the call for sites should be assessed against national policies and designations to establish which have reasonable potential for development.*”
- 3.5 In accordance with this guidance, the Authority has undertaken a ‘Call for Sites’ process and a ‘Call for Brownfield Sites’ process. The ‘Call for Sites’ process commenced in 2015 and the Authority continued to accept and assess site submissions up to Autumn 2017. The ‘Call for Brownfield Sites’ process was launched in early 2017 in response to the Government’s requirement for all local planning authorities to publish Brownfield Registers by the end of December 2017. All of the sites submitted through these two processes have been assessed.
- 3.6 In addition to sites submitted through these processes, the Authority also considered other sources of potential housing land, including sites subject to pre-application advice and sites within the National Park on the National Register of Public Sector Land. All of the main public sector bodies with land within the National Park were also contacted to highlight the assessment and invite submissions. Given the small-scale of existing housing development within the New Forest National Park, a decision was made at the start of the assessment that no site size limit or minimum dwelling threshold would be set. However, in assessing site suitability for allocation through the Local Plan process, it became clear that very small sites would not be considered.
- 3.7 In line with the NPPG, the first part of the assessment was to consider the suitability of the identified site against key designations/criteria where development within the National Park would not be acceptable. The NPPG states that sites which have particular policy constraints, “...*should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development.*” These key constraints are listed below and any sites put forward through the

SHLAA process that are within the areas outlined below have been assessed as not being suitable for housing as national and local policy advises against development within these areas. The only exception is where the site forms part of a major development site where the 'exceptional circumstances' tests in paragraph 116 of the NPPF apply.

<i>Sites and Areas excluded from the Assessment at Stage 1</i>
<p>Sites wholly or largely within any one of the following designations:</p> <ul style="list-style-type: none"> ▪ Ancient Woodland ▪ Sites of Importance for Nature Conservation (SINC) in Hampshire ▪ County Wildlife Sites in Wiltshire ▪ Local Nature Reserves (LNR) ▪ Sites of Special Scientific Interest (SSSI) ▪ Special Protection Area (SPA) ▪ Special Area of Conservation (SAC) ▪ Ramsar sites ▪ National Nature Reserves (NNR) ▪ Regionally Important Geological Sites (RIGS) ▪ Scheduled Ancient Monuments ▪ Sites on the Historic England Register of Historic Parks and Gardens ▪ Flood risk zone 3 as defined by the latest Environment Agency maps

3.8 The NPPG goes on to state that site assessments should be proportionate to the detail required for a robust appraisal. “*The assessment will need to be more detailed where sites are considered to be realistic candidates for development.*” On this basis, all sites that were not rule out in the first stage of the assessment against the key constraints set out in the box above were assessed in more detail.

Stage 2: Site Assessment

3.9 All of the sites which were not excluded from the assessment under the Stage 1 criteria outlined above progressed to a more detailed **Stage 2 assessment**. This covered a wider range of criteria, with the aim being to identify potential housing sites that are well related to the larger, more sustainable villages within the National Park where new housing could be provided close to services and facilities (in accordance with paragraph 55 of the NPPF). Set out below are the main criteria used during the Stage 2 assessment of potential sites and a copy of the full proforma is set out in Appendix A of this assessment.

- *Landscape character* – the site’s relationship to existing settlements and development; whether it is a brownfield or greenfield site; potential impacts on protected trees and hedgerows.
- *Biodiversity* – the proximity of the site to international (SPA, SAC, Ramsar); national (SSSI); and local (SINCs) habitat designations. Over half of the National Park is designated as being of international

importance for nature conservation and this is a major factor in the SHLAA exercise. In Spring 2017 Natural England advised against allocating housing land within 400 metres of the New Forest SPA and this has been a key criteria in the assessment of many of the identified sites given that the SPA and the 400 metre zone around it cover over two thirds of the National Park.

- *Built environment* – potential impacts from developing the site on the historic environment, including the setting of a Listed Building or Conservation Area, Scheduled Ancient Monument; sites on the Sites and Monument record; or a Historic Park and Garden.
- *Special qualities of the New Forest National Park* – the potential impact of developing the site on the levels of light pollution and/or potential impacts on particularly tranquil areas as defined by the [New Forest National Park Tranquillity Map](#); the proximity of the site to designated Air Quality Management Areas.
- *Agricultural land classification* – would the development of the site involve the loss of the best and most versatile agricultural land.
- *Access to public transport* – how well the site relates to public transport in the area, focusing mainly on the rail and bus network.
- *Access to services and facilities* – whether the site is within or adjacent to one of the ‘defined villages’; within or adjacent to a settlement with a least 5 essential services; or not related to a settlement with any services. The Submission draft Local Plan sets out a settlement hierarchy, with the larger, more sustainable settlements identified as ‘Defined Villages’. Consequently sites adjacent to these larger villages will be assessed more positively.
- *Access* - whether the site has an existing road access, proximity to existing pedestrian footpaths; links to the surrounding Public Rights of Way network.
- *Compatibility with surrounding uses* - would development for residential use be compatible with existing surrounding uses; would development result in the loss of existing employment land
- *Particular site constraints* – for example, evidence of contamination, underground or overhead services; whether the site is adequately served by existing infrastructure.
- *Open space / recreational facilities* – would the development of the site result in the loss of open space / recreational facilities; could new provision be provided as part of the development.

3.10 Appendices B & C of this assessment set out all of the sites assessed and a summary of the assessment conclusions. This includes sites that

were excluded under the first stage of the assessment due to conflict with the key constraints and designations listed on page 7 of this report.

3.11 In terms of the judgments that formed part of the assessments, it is worth highlighting the specific issues relating to: (i) rural exception sites; and (ii) sites on the periphery of the National Park that adjoin urban areas outside the National Park.

(i) *Approach to potential rural exception sites*

3.12 In accordance with Government guidance on the delivery of affordable housing for local needs in the National Park, the planning policies for the area support appropriate rural exception sites within settlements across the National Park. Rural exception sites are key to the delivery of affordable housing in National Parks and are the principal planning policy tool enabling the delivery of affordable housing for local people in the smaller settlements of the New Forest. As part of this assessment process a total of 19 sites have been identified that may have the potential to progressed as rural exception sites. These sites are typically small (with capacity for around 2 – 15 dwellings); are not located within the Defined Villages; and are better suited to delivering small scale affordable housing for local people in rural communities.

(ii) *Sites on the periphery of the National Park*

3.13 Secondly, a number of submissions were received through the 'Call for Sites' and 'Call for Brownfield Sites' processes relating to land within the National Park boundary, but adjoining larger settlements located outside the National Park (e.g. Bransgore, Hythe, Lymington and Ringwood). The general principle adopted within the assessment has been to not support the extension of neighbouring urban areas into the protected landscape of the National Park on the basis that it would:

- (a) do little to support the socio-economic well-being of communities and services *within* the National Park;
- (b) effectively reduce the land area of the National Park further at its sensitive boundaries; and
- (c) potentially do little to contribute towards meeting identified housing needs arising *within* the National Park, as affordable housing provided on these sites would be allocated to meet the needs arising in urban areas outside the National Park.

3.14 In making this judgement, the Authority would highlight that the final boundary of the New Forest National Park was established in 2005 following extensive consultation and a detailed landscape assessment. The larger urban areas that fringe the National Park such as Bransgore, Ringwood, Lymington and the Waterside were specifically excluded from the National Park just over a decade ago. It is the Authority's view that it would therefore be inappropriate for the Local Plan to support the encroachment of surrounding urban areas into a landscape that has the highest status of protection in relation to landscape and scenic beauty.

Assessing suitability for housing

- 3.15 A site is considered to be *suitable* for housing development if it offers a suitable location for development and would contribute to the creation of sustainable communities. The main factors that make a site suitable for housing are considered through the assessment process outlined above and include the potential landscape impacts and proximity to protected habitats. One of the key assessment criteria is whether the site is related to a village within the National Park with some local services and facilities. None of the settlements in the New Forest National Park have populations of more than 3,500 and many of the settlements are rural, with limited local services. Sites in the open countryside of the National Park, not within or adjoining a village, would not be assessed positively against the assessment criteria.
- 3.16 An estimate of the housing potential of each site was made. Where information on the numbers of dwellings that a site could support exists - such as from a planning application or information provided in the 'Call for Sites' submission - this figure has been used

Assessing availability for housing

- 3.17 The NPPG sets out the factors to be considered in assessing whether sites are *available*. The Guidance states that, "*A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners.*" The information submitted through the respective 'Call for Sites' processes is an important input into the assessment of site availability. All of the proposed housing site allocations included within the Submission draft Local Plan 2016 – 2036 have been put forward by the relevant landowners and are considered, in principle, to be suitable and available for development as there is a clear intention to bring the sites forward.

Assessing achievability for housing

- 3.18 The NPPG states that a site is considered *achievable* for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. "*This is essentially a judgement about the economic viability of a site.*" Likewise the NPPF emphasises the importance of viability as a key aspect of whether a site is achievable.
- 3.19 The Authority commissioned a Whole-Plan viability assessment to inform the preparation of the Submission draft Local Plan. The viability assessment (Three Dragons, 2017) tested a range of development scenarios and highlighted that there are no major viability challenges to developing housing within the National Park. Consequently, unless there are site specific factors, it is concluded that sites are economically viable (and therefore development is achievable).

Overcoming constraints

- 3.20 National guidance states that where constraints have been identified, the assessment should consider what action would be needed to remove them. For potential housing sites within the National Park, the most significant ‘constraints’ to development are impacts on the landscape of the National Park; and impacts on the protected habitats in the New Forest. These ‘constraints’ are very challenging to overcome as the protection afforded to the landscape and habitats of the New Forest is enshrined in statute. Where appropriate, the Submission draft Local Plan factors in mitigation measures in the specific site allocations through restrictions on the area of land that can be developed (e.g. land to the south of Church Lane, Sway); the requirement to protect significant trees on the site (e.g. land at Calshot Village); or the requirement for significant supporting green infrastructure as part of the development (e.g. land to the south of the former Fawley Power Station). Where potential impacts cannot be mitigated, the site was excluded from the SHLAA supply.

Stage 3: Windfall Sites

- 3.21 Windfall sites are sites that have not been allocated for housing in a development plan. They typically comprise previously-developed sites that have unexpectedly become available, but can also include greenfield sites which have not previously been identified or allocated. Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 3.22 Since the designation of the New Forest National Park, all housing completions have been through ‘windfall sites’. The Authority’s adopted Core Strategy & Development Management Policies DPD (2010) does not include any housing land allocations and indeed the development plans inherited by the Authority in 2006 prepared by New Forest District Council, Test Valley Borough Council and Salisbury District Council (as was) also did not include any housing land allocations.
- 3.23 A review of past dwelling completions in the National Park provides evidence of the record of windfall development and the justification for including a windfall allowance within the Local Plan 2016 – 2036. The table below sets out the dwelling completions on windfall sites within the National Park in each year since the Authority assumed its full planning responsibilities in April 2006. An average of 23 dwellings per annum have been completed on windfall sites in the National Park (rounded to the nearest whole number).

	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Average 2006 – 2017
Windfall dwelling completions	21	13	50	23	29	14	7	34	2	47	9	23

Stage 4: Assessment Review

- 3.24 The amount of supply identified within this SHLAA forms an input into the Local Plan review process. Ultimately it is the role of the Local Plan to set out the quantum of housing development proposed in the National Park, based on the conclusions of this SHLAA and other input such as the updated assessment of housing needs (Justin Gardner Consulting, 2017).

4. **Conclusions**

4.1 This SHLAA provides evidence that an assessment of potential sites for housing development within the New Forest National Park has been undertaken. In total, 173 sites have been identified through the various 'Call for Sites' exercises and other sources. It should be noted that the Authority received a number of duplicate submissions for some sites through the 'Call for Sites' processes. All of the sites identified have been assessed with the following conclusions:

- 9 sites were excluded from the assessment at Stage 1 and have therefore not been assessed in detail due to them being unsuitable for housing development when assessed against key criteria.
- Of the 164 sites that progressed to a more detailed assessment, a total of 14 were found to have potential for housing development (i.e. found to be suitable, available and achievable). These are sites that relate well to the Submission draft Local Plan's proposed settlement hierarchy and are either within the Defined Villages or are been taken forward as proposed Local Plan site allocations.
- The remaining 150 sites were considered to be unsuitable, unavailable or unachievable (or a combination of the three), primarily due to the proximity of protected habitats or the lack of services in the vicinity of the site meaning they were not appropriate locations for additional housing land allocations.
- Of these 150 sites, the Assessment highlights that a total of 19 (generally small sites) have the potential to be considered as rural exception sites to meet local affordable housing needs in communities outside the Defined Villages of the National Park. The potential of these 19 sites as rural exception sites is identified in the text commentary for each site and the sites have the capacity for around 125 dwellings. These sites would be progressed through the planning application route rather than Local Plan allocations.

4.2 The 14 sites found to have potential for housing have a theoretical capacity to provide 366 new dwellings in the National Park. Details of all of the sites assessed are included in Appendices B and C.

4.3 The trend based annual windfall development in the National Park is estimated as 20 dwellings per annum.