



## **Duty to Cooperate Statement**

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

**May 2018**

#### **1. Introduction**

- 1.1 The New Forest National Park Authority is undertaking a review of the local planning policies covering the National Park – currently contained within the *Core Strategy & Development Management Policies DPD* (adopted December 2010). This review is in response to changes in national policy and the experiences of applying the adopted planning policies. The review will result in the adoption of a revised Local Plan covering the whole of the National Park.
- 1.2 The revised Local Plan will form a key part of the statutory ‘development plan’ for the National Park and will ultimately guide decisions on planning applications submitted within the National Park. The Local Plan will set out how the planning system can contribute towards the vision for the New Forest National Park in 2036 and will include detailed planning policies and allocations that seek to deliver the two statutory National Park purposes and related socio-economic duty.
- 1.3 The National Park Authority is also the minerals and waste planning authority for the whole of the New Forest National Park. The Authority works in partnership with the other minerals and waste planning authorities in Hampshire to prepare the planning policy framework for minerals and waste development within the National Park, including the adopted *Hampshire Minerals & Waste Plan* (2013). With this in place, the Authority’s Submission draft Local Plan (January 2018) does not include any coverage of minerals and waste planning matters.

#### **2. The ‘Duty to Cooperate’**

- 2.1 The Localism Act 2011 introduced a legal requirement for local authorities to plan strategically across boundaries. This ‘duty to cooperate’ is enshrined in law through amendments to the *Planning and Compulsory Purchase Act 2004* and is also included within the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). The duty applies to all local authorities, National Park authorities and county councils in England, as well as other public bodies including the Environment Agency and Natural England. The duty requires authorities to “*engage constructively, actively and on an on-going basis to develop strategic policies*” and to consider joint approaches to plan-making.
- 2.2 The NPPF confirms that planning authorities (including National Park authorities) will be expected to demonstrate how they have effectively cooperated on cross boundary issues when their Local Plan is submitted for examination. The NPPF states that cooperation should be a continuous process of engagement from initial

thinking through to implementation. This Statement has been prepared in order to set out the work done by the Authority in response to the requirements of the duty.

- 2.3 The NPPF sets out the strategic issues where cooperation might be appropriate. This can include where strategic policies are required in order to deliver the homes and jobs needed in the area; climate change mitigation and adaptation; and the conservation and enhancement of the natural and historic environment (including landscape). A number of these are reflected in this Statement.

### 3. Planning within the context of the New Forest National Park



 New Forest National Park boundary

- 3.1 The New Forest National Park was designated in 2005 and covers 220 square miles of land within New Forest District, Test Valley Borough, the unitary authority of Wiltshire, and the county of Hampshire. The National Park Authority is the statutory planning authority for the whole of the National Park and this covers development control, enforcement, minerals & waste planning and planning policy. Other functions – including economic development, housing, transport, social care, environmental health and education – remain the responsibilities of the district, borough, county and unitary authorities within the National Park. Co-operative working is therefore particularly important within the National Park given the responsibilities of these different organisations.

#### 4. Mechanisms for co-operative working

4.1 By virtue of its role, the National Park Authority has established close links and works co-operatively with other local authorities and organisations in and around the New Forest. Cross-boundary working and engagement with stakeholders is central to the work of the Authority and this is illustrated by:

- (i) The **membership of the National Park Authority** which includes members from each of the local authorities covering the National Park area. This consists of 5 members appointed by Hampshire County Council; 4 appointed by New Forest District Council; 2 appointed by Wiltshire Council; and 1 appointed by Test Valley Borough Council – reflecting the respective geographical areas of the New Forest National Park covered by each constituent authority. Between them, these 12 members make up over half of the 22 strong membership of the National Park Authority and this enables a strong connection with other authorities at a member/councillor level. In addition, the Authority's membership also includes 4 members elected by town and parish councils within the National Park, enabling good links to be established between the Authority and the lowest tier of local Government.
- (ii) The liaison and co-ordination that is required to prepare, implement and monitor the **New Forest National Park Partnership Plan 2015 – 2020**. The Government has described Management/Partnership Plans as the most important plans covering National Parks and they have a key role in co-ordinating the work of a wide range of partners in delivering the two National Park purposes and related duty. Although the work on the New Forest National Park Partnership Plan 2015 – 2020 was led by the Authority, it was overseen by a group of key statutory bodies in the New Forest including the Forestry Commission, the Verderers of the New Forest, Hampshire County Council, New Forest District Council, Wiltshire Council, Test Valley Borough Council, Natural England and the Environment Agency. This 'Leadership Group' continues to meet regularly to monitor the progress made on the Partnership Plan and this has resulted in a positive working relationship between the Authority and the other bodies.
- (iii) **Section 62(2) of the Environment Act 1995** makes it a legal duty for all relevant authorities to have regard to National Park purposes when coming to decisions or carrying out their work. This includes neighbouring authorities and illustrates the fact that the delivery of the two statutory National Park purposes rests with a wide range of organisations – not just the National Park Authority. The duty means that the Authority has well established relationships with a range of other local and public bodies. The Authority is a statutory consultee on neighbouring authorities' plans and proposals and regular makes representations on emerging Local Plans.

4.2 In addition to the above, the National Park Authority is an active member of a number of local and county-wide groups that help to facilitate working across administrative boundaries. These include:

- (i) The **Hampshire Development Plan Officer Group meetings** which take place at least 4 times per annum. The Group brings together planning policy representatives from the 16 planning authorities in Hampshire to discuss

relevant matters including Local Plan progress; the scope for shared evidence base studies; and cross boundary matters of interest. For example, in 2017 seven planning authorities represented on the Group (including the National Park Authority) jointly commissioned an updated gypsy, travellers and travelling showpeople's needs assessment to address a cross-boundary planning issue and deliver a co-ordinated approach to identifying needs across a wider than local area. In addition, the National Park Authority works with the other minerals and waste planning authorities in Hampshire – Hampshire County Council, Southampton City Council, Portsmouth City Council and the South Downs National Park Authority - on a joint minerals and waste planning framework.

- (ii) The National Park Authority has a **positive working relationship with its main neighbour – New Forest District Council**. Over 90% of the National Park falls within New Forest District and the District Council remains the planning authority for much of the area immediately surrounding the National Park. There are well established monthly officer level meetings between the two planning authorities (extended quarterly to include Christchurch & East Dorset Councils); and a Joint Member Advisory Group in place with member/councillor representatives from the Authority and District Council. Although the authorities are producing separate development plans, the respective Local Plan reviews are working to broadly similar timetables. The Authority and District Council have jointly commissioned a range of evidence base studies on cross-boundary planning issues including a joint Strategic Housing Market Area Assessment; and a joint Strategic Flood Risk Assessment. These joint studies recognise the close links between the National Park and surrounding areas of the District. The two planning authorities have also co-operated closely on the proposals for the comprehensive redevelopment of the former Fawley Power Station site which straddles the District Council and National Park Authority boundary.
- (iii) The New Forest has a history of liaison and partnership working through the role of the **New Forest Consultative Panel**. This independent panel is made up of representatives of over 80 organisations and bodies in the New Forest, including all of the main statutory bodies (including Hampshire County Council, the National Park Authority, Natural England, the Forestry Commission and New Forest District Council); all of the town and parish councils within the Forest; and representative groups covering conservation, recreation and business groups. The Panel meets quarterly and provides a forum for sharing a wide range of issues with a broad range of Forest bodies. The Authority has given regular updates on the review of the Local Plan for the National Park to the Panel throughout 2015 - 2017.

## 5. Cooperation in the New Forest National Park Local Plan Review

5.1 Set out below is a summary of the liaison on cross-boundary issues that has taken place with the Authority's main partner organisations leading up to the publication of the Submission draft Local Plan 2016 – 2036 in January 2018. The three main stages of consultation undertaken since 2015 and culminating in the preparation of the Submission draft Local Plan have been:

- Regulation 18 consultation: Scope of the Local Plan Review: September 2015
- Consultation on the draft New Forest National Park Local Plan: October 2016
- Consultation on potential alternative housing sites: June 2017

5.2 In addition to these consultation stages, liaison has taken place through the Authority's Local Plan Working Groups in 2016; regular officer and member liaison meetings; and the duty to cooperate discussions initiated with neighbouring authorities in the three Housing Market Areas of Southampton, Bournemouth / Poole and Salisbury by the National Park Authority and New Forest District Council in Summer 2017. Set out below is a summary of the co-operation undertaken between the Authority and a range of key partners during the Local Plan review.

Organisation	Summary of liaison and co-operation
Hampshire County Council (HCC)	<ul style="list-style-type: none"> <li>▪ HCC appoints 5 of the NFNPA's 22 members.</li> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ HCC provides a number of statutory functions within much of the National Park, including education and highways.</li> <li>▪ Represented on the Leadership Group for the <i>New Forest National Park Partnership Plan 2015 – 2020</i>.</li> <li>▪ HCC and NFNPA work closely on the separate joint <i>Minerals &amp; Waste Local Plan</i> (adopted 2013) and related planning framework.</li> <li>▪ HCC responded to the Regulation 18 NFNPA Local Plan consultation; the consultation on the (non-statutory) draft Local Plan in Autumn 2016; and the Regulation 19 Submission draft Local Plan consultation. Their responses highlighted that the level of development proposed in the National Park is likely to result in around 30 primary pupils per year group across the National Park. Secondary schools in the area have capacity. HCC also made representations on the Reg. 19 Submission draft Local Plan on matters including the historic environment and transport.</li> <li>▪ HCC were an important partner in the cross-boundary gypsy &amp; traveller needs assessment which was updated in 2017.</li> <li>▪ Attended the 'Neighbouring Authorities Local Plan Workshop' held in Spring 2016 where it was agreed that liaison should continue.</li> </ul> <p><b>Summary:</b> <i>HCC has a statutory role for a range of functions within the National Park. Joint work between the NFNPA and HCC on addressing gypsy and traveller needs feed into the Local Plan review. The NFNPA has proposed a number of minor amendments to the Submission draft Local Plan following consideration of HCC's representations.</i></p>
New Forest District Council (NFDC)	<ul style="list-style-type: none"> <li>▪ NFDC appoint 4 of the NFNPA's 22 members.</li> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> </ul>

- Provide a number of statutory functions within much of the Park, including housing, economic development & environmental health.
- Represented on the Leadership Group for the *New Forest National Park Partnership Plan 2015 – 2020*.
- NFDC input into the Regulation 18 NFNPA Local Plan consultation; the (non-statutory) Local Plan in Autumn 2016; the consultation on potential alternative housing sites in Summer 2017; and the Reg. 19 Submission draft Local Plan consultation.
- In these representations the District Council highlighted the close liaison between NFDC and the NPA on housing need, habitat mitigation and assessing flood risk. NFDC support the approach to housing provision within the Submission draft Local Plan, including the identification of housing site allocations and the proposed policy approaches to affordable housing and rural exception sites.
- In their representations in November 2016, NFDC acknowledged the important planning reasons why a policy of restraint may be appropriate within the National Park, but queried whether options for cross-boundary liaison on the future of the former Fawley Power Station site has been fully explored. These comments have informed the Authority's Submission draft Local Plan.
- The NFDC response to the Authority's consultation on potential alternative housing sites (June 2017) supported the consistent approach being taken to potential site allocations within 400m of the SPA, while also recognising the significant impact of this on the search for sites in the National Park. NFDC also supported the identification of land adjacent to the former Fawley Power Station site and Calshot village as suitable development sites in the Reg. 19 Submission draft Local Plan (January 2018).
- NFNPA and NFDC continue to liaise closely on a range of cross boundary issues including housing needs, habitat mitigation and flood risk. This has included the joint commissioning of evidence base studies and regular officer and member liaison meetings.
- Joint methodology developed for the qualitative assessment of existing employment sites in the District and National Park area.
- NFDC officers attended the 'Neighbouring Authorities Local Plan Workshop' held by the NFNPA in Spring 2016 where it was agreed that liaison should continue on co-ordinated habitat mitigation work and on addressing housing needs identified for the Southampton, Bournemouth and Salisbury Housing Market Areas.
- The two authorities have liaised closely to prepare aligned Local Plan policies to guide the comprehensive redevelopment of the former Fawley Power Station site to deliver 1,500 homes.
- The NFNPA and NFDC initiated a round of 'duty to cooperate' meetings with neighbouring authorities in Summer 2017 and gave presentations on the respective Local Plan reviews at the workshop in September 2017.
- The NFNPA and NFDC have, to date, jointly designated five Neighbourhood Areas in parishes that straddle the National Park and District Council boundary. The two authorities have worked collaboratively to support the emerging Neighbourhood Plans.

	<ul style="list-style-type: none"> <li>▪ The NFNPA and NFDC are part of the partnership of local authorities and Natural England working on a strategic approach to habitat mitigation measures for development close to the New Forest's Natura 200 sites.</li> </ul> <p><b>Summary:</b> <i>Although a decision has previously been made not to develop a joint Local Plan for the combined NFDC and NFNPA areas, the two authorities liaise closely at both officer and member level. Work on strategic cross boundary issues including the redevelopment of the Fawley Power Station site; meeting housing needs; and habitat mitigation measures and has included the joint commissioning of evidence base studies.</i></p>
Wiltshire Council (WC)	<ul style="list-style-type: none"> <li>▪ WC appoint 2 of the NFNPA's 22 members.</li> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ WC provide a number of statutory functions within part of the National Park, including housing, education and highways.</li> <li>▪ Represented on the Leadership Group for the <i>New Forest National Park Partnership Plan 2015 – 2020</i>.</li> <li>▪ NFNPA officers attended WC workshop in January 2016 on the Council's updated Strategic Housing Market Area Assessment. The Salisbury Housing Market Area extends into the National Park.</li> <li>▪ WC officers attended the 'Neighbouring Authorities Local Plan Workshop' held by the NFNPA in Spring 2016 where it was agreed that liaison should continue on co-ordinated habitat mitigation work and on addressing housing needs identified for the Southampton, Bournemouth and Salisbury Housing Market Areas.</li> <li>▪ WC and NFNPA attend the meetings convened by Natural England to discuss cross-boundary mitigation measures to protect the New Forest's Natura 2000 sites. Both authorities are part of the partnership of planning authorities awarded funding by the MHCLG in early 2018 to develop a strategic approach to habitat mitigation.</li> <li>▪ NFNPA made representations on the draft Wiltshire Core Strategy and the Downton Neighbourhood Plan in south Wiltshire highlighting these issues and the need to consider the setting of the New Forest National Park.</li> <li>▪ WC made representations on the Reg. 19 Local Plan in which they broadly supported the approach to housing allocations and affordable housing provision. Detailed comments were made on the local connections criteria for the allocation of affordable housing and the NFNPA has responded to this through a proposed minor modification to the Submission draft Local Plan.</li> </ul> <p><b>Summary:</b> <i>WC is represented within the membership of the NFNPA and officer liaison between the two authorities is continuing on the two main issues of the housing needs identified for the Salisbury Housing Market Areas (which extends into the National Park), and developing a co-ordinated approach to habitat mitigation measures. A number of minor amendments are proposed to the Submission draft Local Plan in response to the representations made by Wiltshire Council.</i></p>
Test Valley Borough Council	<ul style="list-style-type: none"> <li>▪ TVBC appoint 1 of the NFNPA's 22 members.</li> </ul>

(TVBC)	<ul style="list-style-type: none"> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ TVBC provide a number of statutory functions (including housing) within a small part of the National Park.</li> <li>▪ Represented on the Leadership Group for the <i>New Forest National Park Partnership Plan 2015 – 2020</i>.</li> <li>▪ NFNPA made representations on the TVBC Local Plan (adopted January 2016) highlighting the Council's Section 62(2) responsibilities and liaison over the approach to habitat mitigation from residential developments in southern Test Valley.</li> <li>▪ TVBC officers attended the 'Neighbouring Authorities Local Plan Workshop' held by the NFNPA in Spring 2016 where it was agreed that liaison should continue on co-ordinated habitat mitigation work and on addressing housing needs identified for the Southampton, Bournemouth and Salisbury Housing Market Areas. TVBC also attending the duty to cooperate workshop held jointly with NFDC in September 2017.</li> <li>▪ TVBC submitted comments on the Authority's draft Local Plan (October 2016); on the potential alternative housing sites (June 2017); and on the Reg. 19 Submission draft Local Plan (January 2018). In these comments, TVBC confirmed their willingness to continue to engage positively on preparation of the NPA's Local Plan and on habitat mitigation measures to protect European nature conservation sites. TVBC also supported the NFNPA and NFDC in commissioning and update assessment of housing needs.</li> <li>▪ TVBC and NFNPA attend the meetings convened by Natural England to discuss cross-boundary mitigation measures to protect the New Forest's Natura 2000 sites. TVBC led the successful bid to the MHCLG in early 2018 for funding to develop a strategic, cross-boundary approach to habitat migration measures for the New Forest's Natura 2000 sites.</li> <li>▪ NFNPA and TVBC have jointly designated a Neighbourhood Area for the parish of West Wellow which straddles the Park boundary.</li> </ul> <p><b>Summary:</b> <i>TVBC is represented within the membership of the NFNPA and officer liaison between the authorities continues on the two main issues of the housing needs identified for the Southampton Housing Market Areas (which extends into Test Valley and the Park), and developing a co-ordinated approach to habitat mitigation measures. TVBC and NFNPA are working (with other partners) on developing a cross boundary strategic approach to habitat mitigation.</i></p>
Christchurch & East Dorset Councils (C&EDC)	<ul style="list-style-type: none"> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ NFNPA made representations on the Christchurch &amp; East Dorset Joint Core Strategy (adopted 2014) highlighting the Council's Section 62(2) responsibilities and making representations on the proposed urban extension north of Christchurch for circa 1,000 homes close the National Park boundary.</li> <li>▪ C&amp;EDC officers attended the 'Neighbouring Authorities Local Plan Workshop' held by the NFNPA in Spring 2016 where it was agreed that liaison should continue on co-ordinated habitat mitigation work and on addressing housing needs identified for the Southampton, Bournemouth and Salisbury Housing Market Areas.</li> </ul>



	<ul style="list-style-type: none"> <li>▪ NFNPA, NFDC and C&amp;EDC officers have quarterly liaison meetings to discuss Local Plan progress, evidence base studies and cross boundary issues.</li> </ul> <p><b>Summary:</b> <i>The NFNPA has regular liaison meetings with C&amp;EDC at officer level which focus on potential development sites close to the respective administrative boundaries of neighbouring authorities, habitat mitigation measures and potential joint evidence base studies. The NFNPA also made representations on the Christchurch &amp; East Dorset Joint Core Strategy prior to its adoption.</i></p>
Southampton City Council (SCC)	<ul style="list-style-type: none"> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ NFNPA made representations on the SCC Local Plan Reg. 18 consultation highlighting the City Council's Section 62(2) responsibilities; the proposed habitat mitigation measures; and confirming that the NFNPA would not be able to meet the full housing need identified in the National Park.</li> <li>▪ SCC and NFNPA work closely on the separate joint <i>Minerals &amp; Waste Local Plan</i> (adopted 2013) and related planning framework</li> <li>▪ SCC officers attended the 'Neighbouring Authorities Local Plan Workshop' held by the NFNPA in Spring 2016 where it was agreed that liaison should continue on co-ordinated habitat mitigation work and on addressing housing needs identified for the Southampton, Bournemouth and Salisbury Housing Market Areas. SCC also attending the duty to cooperate workshop held jointly with NFDC in September 2017.</li> <li>▪ SCC made representations on the Authority's consultation draft Local Plan (October 2016). SCC supported the vision for the National Park and the need for a shared understanding of the creational pressures on the New Forest; agreed that the National Park is not an appropriate location for major housing development; and that therefore there will be an unmet housing need arising from the National Park. SCC asked for the unmet need to be quantified and also confirmed that given the ambitious housing plans, the City Council cannot deliver more housing than is already planned.</li> <li>▪ SCC also sought a more comprehensive reference to the framework for the future of the Dibden Bay site and this has been included in the Authority's Submission draft Local Plan.</li> <li>▪ SCC and NFNPA attend the meetings convened by Natural England to discuss cross-boundary mitigation measures to protect the New Forest's Natura 2000 sites.</li> </ul> <p><b>Summary:</b> <i>The NFNPA and SCC work closely on the separate minerals and waste planning framework. SCC officers have taken part in a number of 'duty to cooperate' meetings focusing on the issues of meeting identified housing needs and habitat mitigation across administrative boundaries. The NFNPA has also made representations on the SCC Local Plan Review on these points.</i></p>
Natural England (NE)	<ul style="list-style-type: none"> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ The Government's statutory advisor on nature conservation and landscape so work closely with the NPA.</li> <li>▪ As a statutory consultee, NE has input into the Sustainability</li> </ul>

	<p>Appraisal/SEA and Habitats Regulations Assessment work.</p> <ul style="list-style-type: none"> <li>▪ Represented on the Leadership Group for the <i>New Forest National Park Partnership Plan 2015 – 2020</i>.</li> <li>▪ Work with the NFNPA and other planning authorities in the Solent on the Solent Recreation Mitigation Project which the NPA contributes to. The updated Solent Mitigation Strategy was adopted by the National Park Authority in January 2018.</li> <li>▪ NE are part of the NPA’s habitat mitigation steering group which oversees the use of developer contributions from new development in the National Park towards habitat mitigation measures.</li> <li>▪ NE input into the Regulation 18 NFNPA Local Plan consultation; consultation on the draft Local Plan (October 2016); the consultation on potential alternative housing sites (June 2017); and the Reg. 19 Submission draft Local Plan (January 2018).</li> <li>▪ NE continue to convened meetings of the planning authorities around the New Forest to discuss cross-boundary mitigation measures to protect the New Forest’s Natura 2000 sites. In early 2018 this joint working received a significant boost with the award of funding from the MHCLG to support the development of a strategic cross boundary approach to habitat mitigation measures.</li> </ul> <p><b>Summary:</b> <i>As the Government’s statutory advisor on landscape matters, the NFNPA and NE have a close working relationship. NE and the NFNPA are both involved in the cross-boundary Solent Recreation Mitigation Partnership work. NE are working with the NFNPA and others to develop a consistent approach to mitigating the impacts of new development on the protected habitats of the National Park.</i></p>
Environment Agency (EA)	<ul style="list-style-type: none"> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ Represented on the Leadership Group for the <i>New Forest National Park Partnership Plan 2015 – 2020</i>.</li> <li>▪ EA input into the Regulation 18 NFNPA Local Plan consultation; the non-statutory draft Local Plan in Autumn 2016; the consultation on potential alternative housing sites in Summer 2017; and the Reg. 19 Submission draft Local Plan consultation.</li> <li>▪ As a statutory consultee, EA has input into the Sustainability Appraisal/SEA and Habitats Regulations Assessment work.</li> <li>▪ EA involved in the modelling inputs for the New Forest Strategic Flood Risk Assessment (SFRA) which covers the combined administrative areas of NFNPA and NFDC.</li> <li>▪ The EA’s main representation on the Reg. 19 Submission draft Local Plan focused on land adjacent to the former Fawley Power Station site. The NFNPA has proposed a minor modification to the Submission draft Local Plan in response to the EA’s comments.</li> </ul> <p><b>Summary:</b> <i>The EA is a statutory consultee on the NFNPA Local Plan Review and the accompanying Sustainability Appraisal / SEA process. The EA were also involved in the New Forest SFRA work.</i></p>

Historic England (HE)	<ul style="list-style-type: none"> <li>▪ A statutory consultee on the emerging NFNPA Local Plan.</li> <li>▪ The Government’s statutory advisor on the historic environment so work closely with the NFNPA.</li> <li>▪ As a statutory consultee, HE also has input into the Sustainability Appraisal/SEA for the NFNPA Local Plan Review.</li> <li>▪ Attended the Local Plan workshop run by the NFNPA in Spring 2016 on the built and historic environment and provided a positive input into the preparation of the Submission draft Local Plan. HE’s representations on the Reg. 19 Submission draft Local Plan support the approach taken to the historic environment.</li> </ul> <p><b>Summary:</b> <i>HE has an important role as a consultee given the wealth of built and historic environment designations in the National Park. Statutory consultee on the Local Plan Review and have input into the draft Plan through their participation in the Spring 2016 Local Plan workshops and the representations received on the consultation draft Local Plan (October 2016).</i></p>
Enterprise M3 LEP	<ul style="list-style-type: none"> <li>▪ Although not a statutory consultee, the LEP is identified in the regulations as a body that those covered by the duty ‘should have regard to’ when preparing local plans and other related activities.</li> <li>▪ The NFNPA actively participates in the work of the LEP.</li> <li>▪ Presentation given the LEP Rural Action Group in September 2015 on the NFNPA Local Plan Review.</li> <li>▪ LEP responded to Reg. 18 Local Plan consultation and a further workshop was held with the LEP in Lyndhurst in Spring 2016 on the economic policies and vision in the Local Plan Review.</li> </ul> <p><b>Summary:</b> <i>The NFNPA is an active participant in the work of the LEP. During 2015/16 this has included two meetings focused specifically on the NFNPA Local Plan review. The LEP’s strategic plans for the area recognise the economic value of a high quality environment and the important role this plays in the economy of the region.</i></p>

*Duty to Cooperate liaison during the preparation of the Submission draft Local Plan*

5.3 The National Park Authority and New Forest District Council jointly convened liaison meetings with neighbouring planning authorities in the three Housing Market Areas that include land within the New Forest in Summer 2017 to inform the preparation of the respective Submission draft Local Plans for the National Park and District planning areas. The primary focus of these officer level liaison meetings was the projected under-provision of housing in the New Forest and whether neighbouring planning authorities in the same Housing Market Areas could assist.

5.4 These duty to cooperate meetings were held between May and August 2017 with the following planning authorities:

- *Bournemouth Borough Council* (June 2017)  
Bournemouth Borough Council’s Plan-area is significantly constrained by nature conservation designations and Green Belt. Even with increased development densities in the town centre, meeting its full Objectively Assessed

Housing Need figure will be a significant challenge for the Borough Council. A Green Belt review is underway and the Borough Council has contacted neighbouring authorities to ask whether they have brownfield sites available before they consider Green Belt development. It was agreed that a Statement of Common Ground would be prepared between the Borough Council and the two New Forest planning authorities setting out the key assumptions behind development capacity and constraints for each respective Local Plan area.

- *Christchurch & East Dorset Councils (May 2017)*  
Green Belt and flooding represent major constraints in Christchurch and the SFRA and Green Belt reviews will be important evidence base documents. Much of East Dorset is designated as Green Belt or Area of Outstanding Natural Beauty (AONB). Christchurch & East Dorset Councils are due to be undertaking a high-level Regulation 18 consultation on potential housing options in 2018. Consequently the evidence base is not yet in place yet to be able to fully respond to a request for housing supply assistance.
- *Fareham Borough Council (May 2017)*  
FBC works closely with other South Hampshire planning authorities, with the whole of the borough within the Partnership for Urban South Hampshire (PUSH) area. FBC anticipates it will be able to meet the agreed housing provision for the Borough set out in the PUSH Position Statement (2016). Geographically, Fareham lies at the eastern edge of the Southampton HMA, with the New Forest forming the western edge. All parties agreed that Fareham is a less obvious location for addressing the New Forest's unmet housing needs when compared to other parts of the Southampton HMA that are geographically closer. FBC were of the view that the best route to raise the issue of unmet housing need under the Duty to Cooperate would be formally through the Partnership for Urban South Hampshire (PUSH). This was done by the Authority in writing in November 2017 and at a meeting in January 2018.
- *Poole Borough Council (May 2017)*  
The Borough of Poole's future proposals for the area include ambitious plans for the scale and density of town centre development and that the Borough includes a range of designations included Green Belt and Natura 2000 sites which constrain development capacity. It was noted that cross-boundary officer meetings already occur and that discussions would be put on a more formal basis as the position on housing becomes clearer. The next step is for the New Forest authorities to contact the Borough Council to formally request assistance in meeting housing provision shortfalls arising from the respective plan areas.
- *Southampton City Council and Eastleigh Borough Council (June 2017)*  
SCC are working in partnership to progress the Eastleigh Borough Local Plan and both authorities are taking a positive approach to planning for growth. SCC's Local Plan work will focus on maximising development densities in the city centre as there is no scope for greenfield development. The PUSH Position Statement acknowledges that Southampton City may be unable to meet the OAN figures for the area. The Eastleigh Local Plan may be able to address the PUSH Spatial Strategy figure, but officers think it is unlikely to be able to deliver more. It was agreed that the District Council and National Park Authority would write formally to SCC and EBC regarding housing supply shortfall under the duty to cooperate later in the year.

- *Test Valley Borough Council (August 2017)*  
The Government's proposed standardised methodology for calculating objectively assessed housing needs will provide the national policy context for the forthcoming review of the TVBC Local Plan. TVBC supported the NPA and NFDC's decision to commission updated work on housing needs in the Forest, having raised concerns regarding the age of the existing SHMA (2014). The NPA and TVBC agree that there would be benefits in bringing the various New Forest habitat mitigation frameworks developed by planning authorities closer together. A first step in doing this could be the agreement of a joint monitoring framework and an agreement to joint working on evidence base studies.
- *Wiltshire Council (July 2017)*  
Looking beyond the current Wiltshire Council plan cycle, it could be 2020 before the next round of development plans reach consultation stage. The South Wiltshire HMA faces a number of challenges and constraints relevant to housing supply and the duty to cooperate including extensive areas of AONB; Highways England concerns in relation to the A36 and traffic around Salisbury; the capacity of the Avon to absorb additional phosphorus load beyond current plan proposals; and the provision for military repatriation the north of the HMA. It was concluded that there would need to be a formal letter on housing under the requirements of the duty to cooperate.
- *Winchester City Council (June 2017)*  
WCC can meet their full OAN and this is reflected in their recently adopted Local Plan. WCC explained their view that Winchester is not part of the Southampton Housing Market Area, but is instead part of a Central Hampshire HMA which also includes part of Test Valley, Eastleigh, East Hants and Basingstoke. The southern end of the WCC Plan Area is covered of the PUSH work. Given WCC's view that the majority of their district lies outside the Southampton HMA, they do not consider it appropriate to consider meeting some of the unmet housing needs arising within the Southampton HMA in the remainder of Winchester District outside the Southampton HMA. NFDC, NFNPA and WCC all acknowledged that Winchester is a less obvious location to consider for addressing the New Forest's unmet housing needs when compared to parts of the Southampton HMA that are geographically closer.

5.5 Following these meetings, on 11 September 2017 the National Park Authority and New Forest District Council presented their Local Plan positions to neighbouring authorities at a workshop meeting convened at the District Council offices in Lyndhurst. The National Park Authority and District Council presentations highlighted the challenges faced by both planning authorities in finding sustainable ways to accommodate future housing growth given the wealth of landscape and habitat designations covering the New Forest. The National Park Authority's presentation included an overview of national policy and guidance relevant to National Parks; and the emerging approach to housing development in the National Park through site allocations and co-operation with the District Council on the future of the former Fawley Power Station site.

5.6 The meeting was attended by officers representing Bournemouth Borough Council, Eastleigh Borough Council, Southampton City Council, Test Valley Borough Council, Wiltshire Council, and Winchester City Council. Attendees were invited to

question the approach taken by the two planning authorities to the delivery of housing and to share with the National Park Authority and District Council their views to inform the preparation of the Submission draft Local Plans.

5.7 In accordance with the discussions held in Summer 2017 with the nine neighbouring planning authorities, prior to the publication of Regulation 19 Submission draft Local Plan 2016 – 2036 in January 2018, the Authority formally wrote to the authorities (and the Partnership for Urban South Hampshire) setting out the projected shortfall in housing provision against the objectively assessed housing need for the National Park contained within the Justin Gardner Consulting Report (October 2017). A copy of this correspondence dated November 2017 is set out in Annex 2. The housing shortfall in the National Park has been quantified at 23 dwellings per annum, or 460 dwellings over the 2016 – 2036 Plan-period. Neighbouring planning authorities and the Partnership for Urban South Hampshire were asked if they could assist in meeting this predicted housing shortfall. The following responses were received to this formal, written duty to cooperate request.

- **Bournemouth Borough Council**

5.8 Bournemouth Borough Council's response confirmed that the Authority's Local Plan review is running ahead of the Borough Council's and therefore a detailed assessment of the urban capacity of the Borough had yet to be completed. The Borough Council highlighted that the Eastern Dorset SHMA (2015) is indicating a level of need significantly beyond the current housing targets for Bournemouth. Given constraints relating to Green Belt and the coast, the Borough Council, considers it unlikely that the Bournemouth urban area will have the capacity to assist with meeting the National Park Authority's unmet need as well as meeting the higher targets emerging from the SHMA. In addition, the Borough Council highlighted that should the Government's proposed standardised methodology for calculating housing need (September 2017) be adopted, the result will be a housing target for Bournemouth of 1,458 dwellings per annum, in effect doubling the adopted local plan requirement of 730 dwellings per annum. Finally, the Borough Council concluded that there has been constructive dialogue between the two planning authorities in respect of emerging housing requirements which the Council hoped will enable further progress towards securing a sound approach in respect of the duty to cooperate for both Local Plan reviews.

- **Christchurch & East Dorset District Councils**

5.9 The Christchurch & East Dorset District Councils' response welcomed the Authority's attempts to meet the National Park's housing needs within the Park boundary. The Councils confirmed that against the Government's proposed standardised methodology for calculating housing needs (September 2017) their combined Plan area would have a housing need of 792 dwellings per annum, a significant increase from the 566 dwellings per annum which is the basis of the adopted Core Strategy. The Councils state that given the significant constraints across their Plan-area - including designated heathland, Green Belt, areas of high flood risk and AONB - fully meeting these housing needs will be very challenging. On this basis the Councils state that it is unlikely that they can fully meet their identified housing need without further Green Belt release.

Christchurch & East Dorset Councils conclude by stating that they are unable to suggest land which is likely to be surplus to their housing supply requirements which can be brought forward to meet the National Park Authority's housing need. The Councils do go on to highlight two locations where sites have been submitted to their Local Plan review which relate more closely to the New Forest area. The first site is on the edge of Bransgore (within New Forest District Council's Local Plan area) and has the potential for around 200 dwellings. The site is partly affected by flood risk and has been discussed informally with New Forest District Council. Secondly, a number of sites have been submitted around Alderholt, close to the boundary with New Forest District Council (although further from the National Park). These sites are also being discussed with the District Council due to the scale of development proposed by the District Council around Fordingbridge.

- **New Forest District Council**

5.10 The District Council's response welcomed the constructive co-operation between the two authorities over the last three years as work on the respective Local Plan reviews has taken place. The District Council commends the National Park Authority in seeking to address housing needs arising within the National Park area by the allocation of land for new housing development. The District Council's response also highlighted the joint commissioning of shared evidence base studies and joint working at both officer and member level; and the collaboration that has taken place on the former Fawley Power Station site, including an acknowledgement of the importance of enabling development within the National Park to ensure the comprehensive redevelopment of this important strategic site.

5.11 The District Council confirms that due to significant environmental constraints which severely restrict the potential to accommodate development within the District, the Council is not in a position to assist the National Park Authority by making additional housing land allocations in its own Local Plan area. However, in its capacity as Housing Authority, the District Council will work with the Authority to address local affordable housing needs within the National Park through the development of rural exception sites. The District Council has also confirmed that it will not be looking to the National Park to meet any unmet housing needs that may result from the District Council's Local Plan review.

- **Fareham Borough Council**

5.12 The Borough Council's response confirms their position that any response on the approach to addressing housing needs would be best addressed by the Partnership for Urban South Hampshire. PUSH has enabled collaboration under the 'duty to co-operate' in order to establish a Spatial Position Statement for the PUSH area (which does not include the National Park) to address housing needs up until 2034, along with addressing relevant strategic issues.

5.13 In terms of assisting with unmet housing need, the Borough Council reiterated their advice that the geographical distance between the two authorities - at opposite ends of a large Housing Market Area - means the starting point should be those authorities that are geographically closer. The Borough Council also highlighted that under the Government's proposed 'Standard Methodology', the housing need figure for Fareham would increase to 531 dwellings per annum; an increase in the region of 75% above past housing delivery in recent years. The Council therefore

itself faces significant challenges in meeting a far larger figure beyond that currently being addressed in their emerging Local Plan. The Borough Council also confirmed that they would need to have an understanding of the assessment process of potential sites undertaken by the Authority (e.g. the assessment process through the SHLAA) in seeking to address housing need within the Park.

5.14 In conclusion, the Council recognises the challenges faced by the National Park Authority and welcomes the proactive measures being taken to address need, including proposed housing site allocations. However, when considering the distance between the two authorities, the need to involve PUSH further and also the pending potential need for the Borough Council to address a significantly larger housing need in our own Borough, the Council does not consider that it is able to provide any assistance in addressing the Authority's unmet need at this juncture.

▪ **Test Valley Borough Council**

5.15 The Borough Council's responses welcomed the work which the National Park Authority has undertaken jointly with New Forest District Council in revisiting the Objectively Assessed Housing need figure arising in the combined National Park and District Plan-areas. The Borough Council also welcomed the Authority's proposed actions to bring forward residential development within the National Park.

5.16 With regards to assistance which the Council could provide in the future, the Borough Council's responses states that they are unable to provide support in meeting the shortfall in the National Park Authority's housing requirement. While the Borough Council is unable to assist in this regard, the Council sees value in continued joint working on cross boundary issues such as ecological mitigation and in the commissioning of future evidence base studies.

▪ **Southampton and Eastleigh Councils**

5.17 The joint response recognises that the Southampton Housing Market Area extends into the National Park. The Councils welcomed the on-going dialogue with the two New Forest planning authorities (including the seminar held in September 2017) and outlined their view that the National Park Authority is fully meeting its duty to cooperate obligations with Southampton and Eastleigh in preparing its Local Plan.

5.18 Southampton and Eastleigh recognise the importance of protecting the National Park as a key asset that contributes to the quality of life for the wider sub-region. The Councils also recognise the strong protection afforded to National Parks through the NPPF and the efforts made by the Authority to make provision for new housing within this national policy context. The Councils welcomed the updated assessment of housing need for the New Forest area and acknowledged that the Government's proposed standardised methodology (September 2017) does not readily translate to the National Park Authority's Plan-area. The Councils also highlighted that the National Park is covered by three Housing Market Areas and therefore any unmet need should be split three ways.

5.19 In terms of meeting housing needs, the Councils confirmed they are positively planning for growth to meet the housing targets set out in the PUSH Spatial Position Statement 2011 – 2034. Southampton City Council is planning to deliver nearly 20,000 new dwellings by 2034 through high density growth in the city centre



and the regeneration of housing estates. However, even with this the city is unable to fully meet its own housing need and therefore does not have the capacity to meet unmet needs from surrounding areas. The Eastleigh pre-submission draft Local Plan (December 2017) aims to deliver a housing figure that slightly exceeds the Borough's objectively assessed housing need and is therefore already helping to meet needs arising from the wider housing market area. Further greenfield development over and above that set out in the draft Local Plan would be inappropriate. The Councils conclude that they are unlikely to be able to help in any significant way in meeting the unmet needs arising from the National Park.

- **Winchester City Council**

5.20 The City Council welcomed the fact that the New Forest authorities have updated their work on objectively assessed needs, which has resulted in the objectively assessed need reducing in scale. The City Council's response confirms their previous view that it does not share any housing market area with the New Forest National Park Authority. The City Council states that if assistance is required from the PUSH authorities under the duty to cooperate, the National Park Authority should have participated in PUSH to assess the housing needs of the area and to plan how these can be met. The PUSH Position Statement (2016) does this and includes a requirement for the Winchester part of PUSH that is several times more than the objectively assessed need.

5.21 The City Council does not accept that any part of its District is in the same housing market area as the New Forest National Park and therefore does not propose to plan for any unmet National Park housing needs. The City Council expects to be able to make a substantial contribution to other authorities' housing needs where they are within the PUSH area, but states that as the National Park Authority has been clear that it does not wish to work with PUSH through the duty to cooperate, it has no basis for now requesting assistance.

5.22 The National Park Authority responded at officer level to these comments in December 2017, highlighting that it has never been a member of the Partnership for Urban South Hampshire (PUSH) since the Park was designated in 2005 and none of the National Park is geographically within the defined PUSH boundary.

- **Partnership for Urban South Hampshire (PUSH)**

5.23 During the face to face duty to cooperate discussions held in Summer 2017, a number of South Hampshire planning authorities suggested the National Park Authority would be better served raising the issue of unmet housing needs with the Partnership for Urban South Hampshire (PUSH), rather than with local planning authorities individually. Having written to PUSH in November 2017 on this, the Authority met with senior PUSH officers in early January 2018 to discuss the issue.

5.24 The meeting provided an opportunity for the Authority to outline the work done on delivering housing within the National Park, through the various 'Call for Sites' processes; the proposed allocation of sites adjacent to the main villages; and the co-operation with New Forest District Council on the redevelopment of the Fawley Power Station site. The PUSH representatives acknowledged the constraints on development within the protected landscape and habitats of the New Forest and confirmed that PUSH authorities would not be looking to the National Park to

address any unmet housing needs arising within the PUSH area. The timetable for the review of the PUSH Spatial Position Statement has yet to be agreed, but it was highlighted that the PUSH authorities themselves are facing significant challenges in meeting housing needs arising within the South Hampshire urban area and are unlikely to be able to assist the National Park Authority.

5.25 PUSH subsequently formally responded to the National Park Authority's letter regarding unmet housing needs. In this response PUSH welcome the production of the latest assessment of housing need (Justin Gardner Consulting, 2017) and the projected shortfall in housing. PUSH also recognised, "...the protection that the National Planning Policy Framework rightly gives to National Parks and the efforts you have made to make provision for a significant number of new homes in this context..." PUSH and its authorities recognise the importance of protecting the National Park as an important asset to the area which contributes to the quality of life for residents in the sub-region. The PUSH response highlights that some PUSH authorities are unable to fully meet their own housing needs so cannot meet further unmet needs from any surrounding areas at present. The response also highlights that the New Forest National Park is covered by three different housing areas and therefore any unmet need should be proportionately split three ways.

5.26 Poole Borough Council were formally invited to submit responses to the Authority's letter of November 2017, with a reminder sent six weeks later, but no response was received. Wiltshire Council submitted their response to the Authority's formal duty to cooperate letter (November 2018) as part of the Council's representations on the Authority's Regulation 19 Submission draft Local Plan (February 2018).

- **Wiltshire Council**

5.27 It is agreed that a small part of the Salisbury Housing Market Area extends into the north of the New Forest National Park. In their response, Wiltshire Council highlighted that Wiltshire itself has a range of environmental constraints and infrastructure capacity issues that will need to be taken into consideration in planning for additional growth. At this early stage in the Council's Local Plan review process there is the possibility for unmet need to be addressed across Wiltshire's defined Housing Market Areas *before* full consideration can be given to requests to address 'unmet housing needs' arising from outside the county.

## 6. Conclusions - Strategic Priorities for Cooperation

6.1 From the liaison that has taken place since the review of the Authority's Local Plan commenced in Summer 2015, it is clear that there are two main strategic issues that require cross-boundary co-operation. These relate to the provision of housing to meet identified needs; and habitat mitigation measures to ensure the planned level of development in the area does not affect the integrity of the protected habitats of the New Forest (including the coastline). In addition, the former Fawley Power Station site is a strategically important development site that requires cross boundary working and co-operation between the National Park Authority and New Forest District Council. In taking forward these issues under the 'duty to cooperate', there is an on-going need to work closely with neighbouring authorities on the production of a consistent evidence base to inform the respective development plans under preparation and more detail is provided below.

Strategic Priority	Evidence of Cooperation and how it has informed the NPA's Local Plan
Co-operation on joint evidence studies to provide a consistent evidence base for Local Plan production.	<ul style="list-style-type: none"> <li>▪ The NFNPA has jointly commissioned the following studies with NFDC to cover the combined administrative areas: (i) Strategic Housing Market Area Assessment (GL Hearn, 2014); (ii) Strategic Flood Risk Assessment (JBA Consulting, 2017); (iii) updated assessment of local housing need (Justin Gardner, 2017); (iv) Business Needs and Commercial Market Study (Chilmark Consulting, 2017). An assessment of existing employment sites across the National Park and District areas has been undertaken in-house using consistent methodology.</li> <li>▪ The NFNPA and NFDC have also jointly commissioned viability work (Nationwide CIL, 2017) to inform the preparation of the respective Local Plan policies for the redevelopment of the former Fawley Power Station site.</li> <li>▪ The Whole-Plan Viability Assessment of the Authority's Local Plan has involved engagement with neighbouring authorities. Wiltshire Council and New Forest District Council were represented at the NPA's Local Plan Viability Workshop in Summer 2017 and the NPA's viability consultants (3 Dragons) have liaised with the housing team at NFDC during the preparation of the whole-Plan viability assessment.</li> <li>▪ The updated Hampshire Gypsy &amp; Travellers Accommodation Assessment (ORS, 2017) was jointly commissioned by 7 planning authorities in Hampshire (including the NFNPA), working with Hampshire County Council, to provide a robust evidence base for the various local plans being reviewed.</li> </ul>
A co-ordinated approach to housing provision across Housing Market Areas, co-operating to meet identified housing needs.	<ul style="list-style-type: none"> <li>▪ The NFNPA and NFDC jointly commissioned a Strategic Housing Market Area Assessment (SHMA) in 2014. This confirmed that there is no separate 'New Forest Housing Market Area', but that the National Park and District are covered by parts of the Southampton, Bournemouth and Salisbury Housing Market Areas.</li> <li>▪ Following the publication of updated household projections,</li> </ul>

	<p>the NFNPA and NFDC jointly commissioned an updated assessment of housing needs in 2017 (Justin Gardner Consulting) to inform the respective Local Plans. The NFNPA and NFDC have co-operated on the planning policy approach to ensure the delivery of the comprehensive redevelopment of the former Fawley Power Station site, which would deliver 1,500 homes in the New Forest.</p> <ul style="list-style-type: none"> <li>▪ In line with the recommendations of the Government's Local Plan Expert Group, the NFNPA has made representations on the Southampton City Council and New Forest District Council Local Plans confirming that there is not the capacity within the National Park to meet the identified housing needs without undermining the purposes for designation.</li> <li>▪ In February 2015 the NFNPA endorsed the Isle of Wight Council's views that the Isle of Wight is a standalone housing market area. For the purpose of the Duty to Co-operate the provision of housing is therefore limited to the island.</li> <li>▪ This issue was discussed at the NFNPA Local Plan workshop with neighbouring authorities convened by the NFNPA in March 2016. This meeting highlighted the challenges in meeting identified housing needs in a sub-region that is heavily constrained by landscape and habitat designations. Housing provision within the Salisbury Housing Market Area was discussed in more detail with Wiltshire Council at a three way meeting with NFDC in July 2016.</li> <li>▪ Housing provision was the main focus of the duty to cooperate meetings initiated by NFDC and the NPA in Summer 2017 (see paragraphs 5.3 – 5.4 above) and the workshop held in Lyndhurst in September 2017 (see paragraphs 5.5 – 5.6 above).</li> <li>▪ In November 2017 the NPA formally wrote to nine neighbouring authorities under the 'duty to co-operate' to formally seek assistance in delivering housing to meet identified housing needs arising in the three Housing Market Areas that cover the National Park. The responses received acknowledge the protection afforded to the National Park through the NPPF and primary legislation and commend the efforts made by the Authority to make provision to meet local housing needs within the National Park.</li> </ul>
<p>A co-ordinated approach to habitat mitigation measures to ensure planned new development does not impact the integrity of internationally designated habitats.</p>	<ul style="list-style-type: none"> <li>▪ The NPA works with Natural England and 14 other local authorities to deliver the Solent Recreation Mitigation Project. The interim strategy has been applied in the National Park since 2014 and the NPA is represented at officer level on a number of the specific working groups. The NPA adopted the updated Solent Mitigation Strategy in early 2018 and has been applying the revised level of contributions to all development within 5.6km of the Solent coastline since April 2018. Contributions from developments within the National Park are pooled with those gathered elsewhere to deliver a</li> </ul>

	<p>range of mitigation measures.</p> <ul style="list-style-type: none"> <li>▪ The NFNPA and NFDC have both worked with the same consultants (Land Use Consultants) on the Habitats Regulations Assessment (HRA) for the two respective Local Plans. This ensures a consistent approach to habitat mitigation measures across the two authorities.</li> <li>▪ The issue of a cross boundary package of habitat mitigation measures for the New Forest Natura 2000 sites was discussed at the NPA Local Plan workshop with neighbouring authorities convened in Spring 2016. The scope for the NPA to extend the mitigation measures it currently delivers on behalf of neighbouring authorities was discussed.</li> <li>▪ The NPA continues to liaise with Natural England and participate in the meetings convened by Natural England with New Forest District Council, Eastleigh Borough Council, Southampton City Council, Test Valley Borough Council and Wiltshire Council to discuss the cross boundary approach to mitigation. The authorities agreed to share information to enable a more consistent approach. The NPA currently provides a ranger service in the National Park funded through contributions from development within New Forest District.</li> <li>▪ In early January 2018, the National Park Authority, New Forest District Council, Test Valley Borough Council, Wiltshire Council, Southampton City Council, Eastleigh Borough Council and Natural England were successful in a joint bid to the 'Joint Working Fund' element of the CLG's Planning Delivery Fund. This joint bid was led by Test Valley Borough Council and the funding received will help provide a robust evidence for future joint work on a strategic mitigation approach for development around the New Forest. This takes forward an action in the adopted National Park Partnership Plan 2015 – 2020.</li> </ul>
<p>Cross boundary co-operation regarding potential strategic development sites that could impact on more than one Plan-area.</p>	<ul style="list-style-type: none"> <li>▪ The NPA and NFDC have liaised over the potential strategic development sites at Dibden Bay and Fawley Power Station. Both of these sites lie outside the National Park but should they come forward they could include land within the Park for associated development.</li> <li>▪ Joint viability work has been commissioned with NFDC on the options for the redevelopment of the Fawley Power Station site and officers from both planning authorities are working together on guide proposals for the site.</li> <li>▪ The NPA made representations regarding the Christchurch &amp; East Dorset Joint Core Strategy allocation of circa 1,000 dwellings in the Christchurch Urban Extension. The NPA supported the broad location of the development and has since liaised closely with the Council over the related SANG (Suitable Alternative Natural Greenspace) site which would be within the National Park.</li> </ul>

- 6.2 These cross-boundary issues have been discussed in detail since the Authority's Local Plan review commenced in mid-2015 and positive progress has been made on issues including:
- (i) the development of a consistent evidence base;
  - (ii) a more co-ordinated approach to habitat mitigation measures for the Solent and New Forest habitats (which will be further progressed through the funding received from the MHCLG Planning Delivery Fund, January 2018); and
  - (iii) the approach to strategic development sites close to the National Park boundary, most notably the Fawley Power Station site.
- 6.3 Following the duty to cooperate meetings held in Summer 2017 and the follow up formal written request for assistance in meeting the projected shortfall in housing provision in the National Park (estimated at 23 dwellings per annum over the Plan-period to 2036), the Authority has not to date received offers of assistance to meet this unmet need. Neighbouring planning authorities are at different stages in their respective Local Plan reviews and the situation is also currently affected by the Government's standardised methodology for calculating housing needs, including within the updates to national planning practice guidance published in March 2018. The responses received from neighbouring authorities (summarised on pages 14 – 18 of this Statement) highlight the general acknowledgement of the protection afforded to the landscape and habitats of the National Park in national policy and primary legislation; and support for the efforts made by the Authority to address identified housing needs. The National Park Authority will continue to make representations on the development plans prepared by authorities within the same Housing Market Areas to highlight the small shortfall in planned housing provision.

## Annex 1 – Summary of the main Duty to Cooperate meetings and events

Date	Event and summary of outcomes
July 2015	<p>Update on Local Plan Review to the New Forest Consultative Panel. The update outlined the national planning policy context for the review, and the indicative timetable.</p> <p>NPA and NFDC officer meeting to discuss work on the respective local plan reviews; a review of the evidence base requirements and the potential for joint working / commissioning of work.</p> <p>Information on the Local Plan Review included on the Authority's stand at the New Forest Show. 1,200 votes were received on the key planning issues facing the Park are over the next 20 years.</p>
September 2015	<p>Regulation 18 New Forest National Park Local Plan Review document sent to over 130 consultees and widely published. The consultation ran for 6 weeks to October 2015.</p> <p>Attendance at Wiltshire Council meeting regarding their emerging Gypsy and Traveller document. Other attendees included officers from surrounding authorities in Wiltshire, Dorset and Hampshire.</p> <p>Liaison meeting between NPA – NFDC – CBC/EDDC to discuss the respective local plan reviews and cross-boundary issues. This included (i) habitat mitigation measures for the Solent, New Forest and Dorset Heathlands; and (ii) the scale of housing need across the areas and the potential for unmet needs in the New Forest to be met in East Dorset / Christchurch.</p> <p>Presentation to the Enterprise M3 Rural Action Group meeting on the Local Plan, with a particular focus on the liaison between the NPA and the LEP on the rural economy and the delivery of the Authority's socio-economic duty.</p>
November 2015	<p>Meeting with the CLA to discuss the Authority's Local Plan Review and the initial consultation comments from the CLA. Also an opportunity to discuss with the CLA what planning policy approach they feel has worked well in other National Parks.</p>
December 2015	<p>Joint Members Advisory Group meeting between NFDC and the NFNPA, including Chair and Chair of the Authority's Planning Committee; and the NFDC Planning Portfolio holder and Chair of Planning Committee. The meeting covered the scale of development facing the New Forest, the options for joint working between the two authorities; and the best ways to engage with neighbouring planning authorities.</p>
January 2016	<p>Three way officer level liaison meeting between NFDC – NFNPA and CBC / EDDC. The meeting covered specific sites with cross-boundary issues; and the potential to commission joint pieces of evidence.</p> <p>NFNPA officer attendance at the Wiltshire Council workshop to discuss the emerging findings of their Housing Market Area Assessment work. The workshop confirmed Wiltshire Council's emerging conclusions that the Salisbury Housing Market Area extends into the northern parts of the New Forest. At the workshop the NPA also clarified that as a recognised 'area of restraint' (para. 14, NPPF) this part of the Housing Market Area within the National Park is unlikely to contribute much to meeting the identified housing need.</p>

<p>March 2016</p>	<p>Regular liaison meeting between NFDC and NPA. Topics included a co-ordinated approach to habitat mitigation in areas surrounding the National Park and the potential for a joint mitigation package; and the approach to development sites put forward immediately adjacent to the National Park boundary; and evidence base updates.</p> <p>NFNPA Local Plan Review Historic Environment meeting with Historic England to review the effectiveness of existing policies, as well as looking at best practice examples from elsewhere.</p> <p>Local Plan Review Socio-Economic meeting with representatives of businesses and land management organisations to consider the effectiveness of existing socio-economic planning policies covering the Park; changes over the last 5 years; and evidence of further changes in business needs and the land based economy.</p> <p>Hampshire Gypsy &amp; Traveller Liaison meeting between 7 local planning authorities in Hampshire to discuss joint work on updating the GTAA to provide a robust joint piece of evidence to inform the production of revised Local Plans.</p> <p>Local Plan Review Neighbouring Authorities meeting with the six local authorities surrounding the Park. 'Duty to cooperate' issues including: (i) the delivery of housing to meet identified needs; (ii) mitigating the impacts of development on the New Forest's Natura 2000 sites; (iii) discussion around the need for a more detailed 'duty to cooperate' Protocol or Memorandum of Understanding.</p>
<p>April 2016</p>	<p>Regular liaison meeting between NFDC and NFNPA. Discussion around potential development sites on the boundary of the National Park and District planning areas; and the approach of the two authorities to SANG proposals linked to developments in neighbouring areas. It was agreed that the two authorities should look to work positively with neighbouring authorities to help deliver housing, but that SANG proposals needed sufficient detail to allow an assessment of their effectiveness.</p>
<p>May 2016</p>	<p>Meeting with NFDC, Natural England, RSPB, HCC, Hants &amp; Isle of Wight Wildlife Trust to discuss the emerging Local Plans for the combined New Forest area and the mitigation package that would be required to ensure the planned level of development does not impact on the integrity of the New Forest's Natura 2000 sites.</p>
<p>June 2016</p>	<p>Joint Members Advisory Group Meeting between NFNPA and NFDC. Agenda items included a detailed update on the NFDC Local Plan which will be published in July 2016 for consultation. Other agenda items included (i) a NFNPA Local Plan Review Progress Report; (ii) joint NFNPA-NFDC working on habitat mitigation; Fawley Power Station and Dibden Bay; (iii) working with other neighbouring authorities and the 'duty to cooperate'.</p>
<p>July 2016</p>	<p>Regular quarterly officer level meeting between NFNPA – NFDC and CBC/EDDC. Topics included the recently published NFDC Local Plan consultation document and joint evidence base studies. It was agreed that the SFRA work for the New Forest (to be commissioned) could be extended to cover Christchurch and East Dorset should the councils wish. Liaison meeting between officers from NFNPA, NFDC and Wiltshire Council. A wide range of topics were discussed, including (i) meeting the housing needs identified for the Salisbury HMA; (ii) the need for more formal cross-boundary working between the two New Forest authorities and Wiltshire Council.</p>



September 2016	<p>Meeting convened by Natural England with NFNPA, NFDC, Wiltshire Council, SCC and TVBC to discuss consistent habitat mitigation measures in areas surrounding the New Forest. At this meeting Natural England advised that they were not seeking a single consistent approach to be applied across all local planning authorities (as per the Dorset Heathlands, the Solent or the Thames Basin Heaths), but that there were approaches that could be shared across local planning authorities.</p>
October 2016	<p>The Authority published its consultation draft Local Plan for an 8 week period of public consultation, commencing in October 2016. All neighbouring planning authorities were directly notified of this consultation and comments under the 'duty to cooperate' were invited.</p> <p>Regular officer level liaison meeting with NFDC. Items of discussion included the District Council's legal 'duty of regard' to the two statutory National Park purposes in preparing their Local Plan and the NPA confirmed they were happy to advise on this.</p> <p>Inception meeting with NFDC and JBA Consulting on the jointly commissioned Strategic Flood Risk Assessment (SFRA).</p> <p>NPA officer attendance at the Wiltshire and Swindon Housing Market Area Assessment workshop in Chippenham. At the workshop the Council's consultants presented their emerging findings, confirming that the Salisbury Housing Market Area (HMA) extends into the National Park. The HMAs have been 'cut' the Wiltshire Council administrative area. The NPA confirmed verbally that the Salisbury HMA extends into the National Park.</p>
November 2016	<p>Following the September 2016 meeting convened by Natural England, the NPA arranged a meeting with Wiltshire Council to discuss potential cross-border habitat mitigation measures. At this meeting the NPA confirmed that it is able to deliver a range of mitigation measures on behalf of Wiltshire Council if funding is available.</p> <p>Regular officer level liaison meeting with NFDC and Christchurch &amp; East Dorset Councils. The main cross boundary issues were the former Fawley Power Station site; the likely need for Green Belt release in Dorset to meet identified housing needs; and land in Dorset adjacent to Brangore which could be supported with the support for New Forest District Council. It was also noted that JBA Consulting were undertaking the SFRAs for the New Forest and Christchurch &amp; East Dorset areas which was beneficial.</p>
December 2016	<p>Meeting with NFDC to discuss the issues around SANG provision within the National Park to provide mitigation for development outside the National Park. The District Council confirmed their preference for SANGs to be integral parts of new development and acknowledged the NPA's concerns regarding the impact of new SANG provision on the landscape character of the National Park.</p> <p>Meeting with Natural England to discuss the consultation draft NPA Local Plan and emerging HRA issues. Natural England confirmed they were comfortable with the approach of requiring all development to contribute towards habitat mitigation measures.</p>
January 2017	<p>Three-way planning liaison meeting with officers &amp; members from the New Forest National Park Authority, New Forest District Council and Christchurch &amp; East Dorset Councils. At the meeting both NFDC and Christchurch &amp; East Dorset Councils outlined their need to undertake Green Belt reviews given the identified housing needs in their area. Given the New Forest's status as a nationally protected landscape and the extent of the designated nature conservation sites, the Authority confirmed that it will be unable to meet its full housing need.</p>

February 2017	<p>Regular officer level liaison meeting with NFDC, where discussions included the on-going work on the jointly commissioned SFRA and the various Neighbourhood Plans that have been jointly designated. It was also agreed that duty to cooperate meetings would be set up to discuss the projected shortfall in housing provision in the two Local Plans; and that an updated assessment of housing needs would be on hold pending the publication of the Government's proposed standardised methodology which is due later in the year.</p>
March 2017	<p>Officer level liaison meeting with New Forest District Council to discuss the legal 'duty of regard' towards the two National Park purposes set out in Section 62 of the Environment Act 1995. It was agreed that the District Council would prepare a paper setting out how the duty has been met.</p> <p>Liaison meeting with New Forest District Council and Chilmark Consulting to discuss the emerging findings of the 'Business Needs and Commercial Property Market Assessment' which will inform both Local Plans. The work endorses the NPA's own findings on the level of employment development coming forward through supportive local planning policies.</p>
April 2017	<p>Regular officer level liaison meeting with New Forest District Council and Christchurch &amp; East Dorset Councils. It was agreed that duty to cooperate discussions would need to be formalised and Statements of Common Ground on the scale of unmet housing need will be required. Christchurch &amp; East Dorset Councils highlighted that land adjacent to Bransgore (in New Forest District) had been put forward and this could be considered when the District Council's position on land at Bransgore was determined.</p> <p>Meeting convened by the NPA with Natural England and the Hants &amp; Isle of Wight Wildlife Trust to discuss the Authority's emerging revised habitat mitigation scheme. It was agreed the NPA would have an updated draft mitigation strategy available alongside consultation on the proposed Submission draft Local Plan; and that contributions would be required from residential and visitor accommodation. The Solent work on factoring in-perpetuity funding was commended and it was agreed a similar approach would be adopted in the NPA's updated mitigation strategy.</p> <p>At the end of April 2017 the NPA convened a meeting with Natural England to discuss the emerging Local Plan and, in particular, development in close proximity to the New Forest Special Protection Area (SPA). It was recognised that there is a range of approaches adopted across the country. Natural England confirmed that they would not support new housing allocations within 400m of the SPA, but that small-scale windfall development within the defined villages was acceptable. This advice triggered the consultation launched by the Authority on potential alternative housing sites in June 2017.</p>
May 2017	<p>Regular officer level liaison meeting with NFDC where the updated advice received by the NPA from Natural England was discussed. The respective Local Plan positions on the Fawley Power Station site were discussed. It was agreed that the options for the site (including the potential for development within the National Park) would require viability testing and Nationwide CIL would be approached to undertake this work.</p> <p>Duty to cooperate meeting held with Poole Borough Council and New Forest District Council (see paragraph 5.4).</p> <p>Duty to cooperate meeting with Fareham Borough Council and New Forest District Council (see paragraph 5.4).</p> <p>Duty to cooperate meeting with Christchurch and East Dorset Councils and New Forest District Council (see paragraph 5.4).</p>

June 2017	<p>Neighbouring and other statutory consultees were all consulted as part of the Authority's 6-week public consultation on potential alternative housing sites that were being considered for inclusion in the Local Plan.</p> <p>Duty to cooperate meeting held with Bournemouth Borough Council and New Forest District Council (see paragraph 5.4).</p> <p>Duty to cooperate meeting held with Southampton City Council and Eastleigh Borough Council (see paragraph 5.4).</p> <p>Duty to cooperate meeting with Winchester City Council and New Forest District Council (see paragraph 5.4).</p> <p>Meeting with NFDC and Natural England to discuss the District Council's habitat mitigation scheme. This includes ranger provision hosted by the National Park Authority and paid for by New Forest District Council through developer contributions.</p>
July 2017	<p>The NPA convened a habitat mitigation steering group meeting with Natural England, RSPB, Hants &amp; Isle of Wight Wildlife Trust and NFDC. The meeting focused on the proposed revisions to the NPA's habitat mitigation scheme which has been in place since 2012. The main changes focused on in-perpetuity funding; ensuring all development in the National Park contributed and which of the existing measures could be scaled up.</p>
August 2017	<p>Regular officer level liaison meeting with NFDC. The meeting focused on the commissioning of an updated assessment of housing needs in the combined New Forest area to inform the preparation of the respective Submission draft Local Plans. This work was subsequently jointly commissioned from Justin Gardner Consulting in August 2017.</p> <p>Duty to cooperate meeting with Test Valley Borough Council. This meeting included discussion of the recent commissioned update to the OAN figure for the National Park and the suggestion that the NPA should approach the Partnership for Urban South Hampshire (PUSH) to discuss unmet housing needs arising in the Park. There was support for further joint working on habitat mitigation measures around the New Forest.</p>
September 2017	<p>Duty to cooperate workshop in Lyndhurst on the combined New Forest housing position held by NFDC and NFNPA. The meeting was attended by officers from Southampton, Eastleigh, Test Valley, Bournemouth, Winchester and Wiltshire. The NPA and NFDC outlined the approach taken by both planning authorities to delivering new housing against the OAN figures. The context of planning in the New Forest National Park was outlined, including the statutory Park purposes and the proportion of the Authority's Plan-area covered by Natura 2000 designations.</p> <p>Meeting convened by Natural England to discuss the approach to habitat mitigation in the area around the New Forest and attended by the NFNPA, Test Valley Borough Council, New Forest District Council, Southampton City Council and Eastleigh Borough Council. The local planning authorities outlined their respective approaches to habitat mitigation. There is already a degree of joint working taking place and it was agreed that in the longer a strategic, cross-boundary approach would be beneficial.</p>
October 2017	<p>Joint Members Advisory Group (JMAG) meeting held with officers and members from the NFNPA and NFDC. The meeting agreed the need for Statements of Common Ground to be prepared between the two planning authorities. The areas of joint work – including the updated assessment of housing need - were discussed. The NPA's assessment of the emerging proposals for the former Fawley Power Station site against the NPPF's major development test (paragraph 116) was outlined.</p>

	<p>Regular officer level liaison meeting with NFDC and Christchurch &amp; East Dorset Councils. At the meeting the Green Belt study underway for Christchurch &amp; East Dorset was discussed as well as the implications of the Government's proposed standardised methodology for calculating housing needs (September 2017). The NPA confirmed they would be using the evidence on housing need contained within the Justin Gardner Consulting Report as this was considered to be the most robust evidence on needs arising in the New Forest area.</p>
November 2017	<p>Liaison meeting with the Housing Development Officer at NFDC. It was agreed that a Memorandum of Understanding would be prepared between the NFNPA as planning authority and NFDC as housing authority. The NPA also outlined its comments on the District Council's housing strategy and agreed to share the work on the brownfield sites register with the District Council to support the search for appropriate rural exception sites.</p> <p>Meeting with NFDC to discuss their landholding at Calshot Village and how it could support the NPA's socio-economic duty through a proposed NPA Local Plan allocation.</p> <p>Liaison meeting with Natural England who confirmed that recreational impacts arising from the planned development set out in the Local Plan could be addressed through the NPA's updated habitat mitigation scheme and the cross-boundary Solent Recreation Mitigation Project. The emerging HRA findings were discussed in relation to air quality and water quality. In relation to the former Fawley Power Station site, Natural England advised they would expect detailed management proposals to be available for the future SANG areas and that the NPA's Local Plan should set out clear stipulations for the future SANG areas. Natural England also advised that the opportunity should be taken to remove the chimney as part of the Power Station redevelopment.</p> <p>Formal written duty to cooperate letters sent by the NPA to nine neighbouring planning authorities seeking assistance in meeting the projected unmet housing need arising within the National Park.</p>
December 2017	<p>The updated Solent Recreation Mitigation Partnership Strategy was approved at a Partnership for Urban South Hampshire (PUSH) Joint Committee meeting in early December 2017 attended by the NPA. The Authority's own Planning Committee endorsed the updated Mitigation Strategy on 19 December 2017 and the revised contributions will be sought from 1 April 2018 onwards.</p> <p>Regular officer liaison meeting with NFDC where it was agreed that Statement of Common Ground relating to the two respective submission draft Local Plans will be prepared in around March 2018.</p>
January 2018	<p>Duty to cooperate meeting held with PUSH officers in Eastleigh. The NPA's projected shortfall in housing was outlined and it was agreed that PUSH would formally respond to the NPA's request for assistance.</p> <p>The joint bid to the DCLG's Planning Delivery Fund to support an updated assessment of the impacts of recreational visits to the protected habitats in the New Forest was submitted by Test Valley Borough Council (working on behalf of 7 organisations, including the NPA).</p>
February 2018	<p>The final 6-week consultation on the Authority's Reg. 19 proposed Submission draft Local Plan ran from 17 January – 28 February. All statutory consultees (including neighbouring planning authorities) were directly notified of this consultation. During this 6-week period representation were received from New Forest District Council, Test Valley Borough Council, Hampshire County Council and Wiltshire Council.</p>

March 2018	Following the announcement that the bid to the DCLG's Planning Delivery Fund had been successful, the Steering Group (made up of all of the local planning authorities and Natural England) met to agree the direction for the work and to prepare an invitation to tender document.



PUSH Executive Director  
Partnership for Urban South Hampshire

21 November 2017

Dear Gloria

### **Duty to Co-operate - New Forest National Park Local Plan Review**

The National Park Authority is in the process of preparing its Regulation 19 Submission draft Local Plan which will cover the period 2016 – 2036. The final 6-week public consultation is due to commence early in the new year, prior to the submission of the draft Plan to the Secretary of State in Spring 2018.

As part of the Plan-preparation process, Authority officers met with all of the local planning authorities surrounding the National Park during the course of 2017 to discuss strategic cross-boundary matters. This included (but was not limited to) discussions around the delivery of housing to meet identified needs. The importance of these discussions has been further emphasised by the Government's recent consultation on 'Planning for the right homes in the right places' (September 2017). These consultation proposals include a standardised methodology for calculating local authorities' housing need; and details on the requirement for statements of common ground to improve how local authorities work together to meet housing and other needs across boundaries.

#### *Meeting Objectively Assessed Housing Needs*

The Government's proposals recognise under the sub-heading 'Deviation from the new method' that where local planning authorities do not align with local authority boundaries - such as National Parks - data does not allow local housing needs to be calculated using their proposed standard methodology. Paragraph 45 of the consultation document states that in these cases, planning authorities (including national park authorities) should continue to identify a housing need figure locally, having regard to the best available information on anticipated changes in households as well as local income levels.

Previous SHMA work has concluded that the New Forest National Park includes land within three Housing Market Areas focused on Southampton; Bournemouth & Poole; and Salisbury, but that there is no separate New Forest Housing Market Area. The National Park Authority – working in partnership with our neighbouring planning authority New Forest District Council – commissioned an updated review of objectively assessed housing needs arising in the combined New Forest area (District and National Park) in Autumn 2017. This updated assessment was undertaken by Justin Gardner Consulting and was based on the most recent official projections. The updated assessment concluded that the objectively assessed housing need arising in the National Park area (which includes land within New Forest District, Wiltshire Council and Test Valley Borough) is 63 dwellings per annum. This figure is based on projected (trend-based)

demographic needs, with an additional 15% to take account of market signals. This need figure equates to 1,260 additional dwellings in the National Park over the Plan period 2016 – 2036.

As part of our Local Plan review process, the Authority is proposing to allocate land for development for the first time since the National Park was designated and is also working co-operatively with New Forest District Council on the emerging proposals for the comprehensive redevelopment of the Fawley Power Station site. However, given the level of protection afforded to both the landscape of the New Forest National Park (as per paragraph 115 of the NPPF) and its habitats (over 50% of the Park is designated as being of national and/or international importance for nature conservation), it is clear that meeting the full objectively assessed housing need within the nationally protected landscape of the National Park will not be possible. This issue has been raised at various officer liaison meetings with planning authorities within the same housing market areas surrounding the National Park over the last year.

In terms of quantifying the likely extent of the shortfall in housing provision, our Regulation 19 Submission draft Local Plan 2016 – 2036 is likely to make provision for around 800 additional dwellings in the National Park over the Plan-period and this represents a marked increase from the adopted development plan housing target. However, against the latest available assessment of housing need (Justin Gardner Consulting, October 2017), there will therefore be a shortfall of around 460 additional dwellings over the period to 2036. This equates to around 23 dwellings per annum.

Following the discussions held over the summer (and the workshop on housing supply held jointly with New Forest District Council on 11 September in Lyndhurst), we are now at the stage in our Local Plan-making process where we need to formally request assistance in addressing the unmet housing need arising from the National Park. Therefore under the ‘duty to cooperate’ we would request a response from PUSH clarifying whether there is land available within the PUSH area that may be allocated for development to assist in addressing the shortfall of provision within the National Park? This request is made in the full knowledge that PUSH has established ambitious proposals through their Spatial Position Statement to deliver housing to meet identified needs in the area in the period to 2034.

To ensure alignment with our Local Plan timetable, we would request a response to this letter by the end of December 2017. Following your response we will explore with you the potential of agreeing a Statement of Common Ground on key cross boundary matters, including housing delivery. We would be happy to arrange a meeting to discuss this further if you think it would be helpful.

We look forward to hearing from you.

Yours sincerely

Steve Avery  
Executive Director (Strategy & Planning)