



New Forest National Park Local Plan 2016 – 2036 Submission draft (Regulation 19)

Housing Topic Paper



Affordable Housing Scheme, Bransgore,
New Forest National Park

Jan 2018

Topic Paper – Housing

- 1.1 This topic paper sets out the background to the housing policies in the Authority's Submission draft Local Plan 2016 – 2036, published in January 2018. The paper provides more detail that would be appropriate to include within the draft Local Plan, including: (i) the relevant national policy context for the delivery of housing within the New Forest National Park; (ii) a summary of the evidence base studies that have informed the draft Plan; and (iii) an outline of the consultation undertaken.

Introduction

- 1.2 The New Forest National Park is home to 35,000 residents and the local need for housing remains a pressing issue. The Authority's current *Core Strategy & Development Management Policies DPD* (December 2010) requires an additional 220 dwellings to be built within the National Park between 2006 and 2026. This equates to an annualised average of 11 dwellings per annum. The housing requirement for the National Park has been re-assessed as part of the Authority's Local Plan Review process in line with the requirements of national planning policy which have changed in the years since the adoption of the Core Strategy in 2010.
- 1.3 At just over 220 square miles, the New Forest is the UK's second smallest National Park (after the Broads) and is under significant development pressures. The rail and road network in southern England means the New Forest is within 90 minutes of London, Bournemouth, Portsmouth, Salisbury and Southampton and this accessibility, allied to its outstanding natural beauty, makes it a desirable location to live.
- 1.4 The New Forest is also the second most densely-populated National Park in England (with nearly twice as many people per square kilometre than the third most densely populated, Dartmoor, and more than 30 times more densely-populated than Northumberland National Park). This population density, allied to the New Forest's position in the south of England, means that the challenges and pressures facing the area differ from those experienced in many other National Parks.
- 1.5. There are approximately 15,000 existing dwellings within the New Forest National Park. The Authority is not a housing authority, but as the planning authority for the National Park the Authority's role is to manage development in accordance with the two statutory National Park purposes. The constituent local authorities (New Forest District, Wiltshire Council and Test Valley Borough) remain the housing authorities for their respective areas of the National Park.
- 1.6 Affordable housing for people is a significant issue for the review of the Local Plan. Affordability in the New Forest has progressively worsened in recent years and changes to national policy relating to affordable housing provision on smaller sites within the main villages has presented a further challenge to delivery. The New Forest has the highest average house price of all of the UK's National Parks (around £560,000 in 2017)

and an average property price around 15 times higher than average annual earnings. However, residential development on a scale sufficient to reduce open market house prices substantially would be incompatible with the statutory National Park purposes, and the Authority must therefore seek alternative measures to address local needs.

2. National Policy Context

- 2.1 There is a range of national legislation, planning policy and guidance relating to National Parks and the delivery of housing that is relevant to the Authority's Local Plan Review. Set out below is a summary of the main areas of national policy and legislation

Environment Act 1995

- 2.2 The Environment Act 1995 sets out the statutory National Park purposes and related duty. Section 62(1) states that in pursuing the two purposes, National Park Authorities, "...shall seek to foster the economic and social well-being of local communities within the National Park, but without incurring significant expenditure in doing so, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park."

- 2.3 This socio-economic 'duty' is not a third National Park purpose and the Authority's main objectives relate to conservation and the enjoyment of the Park's special qualities. However, although the need to conserve and enhance the National Park takes precedence, meeting local housing needs can contribute to the economic and social well-being of communities and to maintaining the unique New Forest landscape. The two National Park purposes and related duty form the basis for the strategic objectives in the Submission draft Local Plan and they remain unaltered by changes in national planning policy and guidance.

English National Parks & the Broads: UK Government Vision and Circular (2010)

- 2.4 The Circular provides policy guidance on National Parks and is relevant to those bodies with statutory functions within the Parks. The Circular calls for National Park Authorities to renew their focus on achieving the purposes and reaffirms the Government's position that National Park designation confers the highest status of protection as far as landscape and scenic beauty is concerned. The Circular is cross-referenced in both the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) resource and remains extant.
- 2.5 The Circular recognises that the planning system is a key instrument in the achievement of National Park purposes. Planning legislation has a major impact on the form and location of development; is a vital tool for managing the impact of development on landscape and biodiversity; and is a key part of conserving and enhancing the built heritage in National

Park settlements. For these reasons Government has made all National Park Authorities the sole local planning authorities for their areas.

- 2.6 Paragraph 31 of the Circular confirms that major development in or adjacent to the boundary of a National Park can have a significant impact on the qualities for which they were designated. Government planning policy is that major development should not take place within a National Park except in exceptional circumstances (NPPF, para. 116).
- 2.7 Rather than accommodating major development, the Circular emphasises the delivery of affordable housing within National Parks to meet local needs. Paragraphs 78 & 79 state that National Park Authorities, “...have an important role to play as planning authorities in the delivery of affordable housing...they should include policies that proactively respond to local housing needs. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services. The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term.”
- 2.8 This clear Government policy on the delivery of housing is reflected in the updated *New Forest National Park Partnership Plan 2015-2020*. This forms the Management Plan for the New Forest National Park and was produced by a range of partner organisations in the New Forest including the three housing authorities covering the National Park – New Forest District Council, Wiltshire Council and Test Valley Borough Council. The Partnership Plan includes a priority action to support communities through the provision of affordable housing for local people. Action LC5 outlines the aim of identifying possible sites for affordable housing and agreeing new schemes designed for local people which are of high quality and are in keeping with the character of the area.

National Planning Policy Framework (2012)

- 2.9 The National Planning Policy Framework (NPPF) was published in 2012 and consolidated existing national planning policy into a single succinct document. The NPPF constitutes guidance for local planning authorities and decision makers in drawing up Local Plans. Set out below is a summary of the main areas of the NPPF that relate to National Parks and the delivery of housing through Local Plans.

(i) Sustainable Development

- 2.10 The NPPF’s presumption in favour of sustainable development (paragraph 14) means that Local Plans should meet objectively assessed needs unless specific policies in the Framework indicate development should be restricted. Footnote 9 confirms that this includes

policies relating to sites protected under the Birds & Habitats Directives, SSSIs and National Parks. In addition to the New Forest's National Park status, over 50% of the area is designated as being of international importance for nature conservation and so clearly there is a strong national planning policy position confirming that the New Forest is an area of development restraint.

(ii) *Delivery of Housing*

- 2.11 Paragraph 47 of the NPPF confirms that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed housing needs in the housing market area, *as far as is consistent with the policies set out in the NPPF*. This reflects the guidance in paragraph 14 and the acknowledgement that there are parts of the country where development should be restricted.
- 2.12 Paragraph 48 states that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to historic windfall delivery rates and future trends. This guidance is relevant in the planning context of the New Forest National Park, where housing land has not be allocated for several decades and housing delivery has been solely on windfall sites. The Authority's Submission draft Local Plan 2016 – 2036 (January 2018) include a windfall allowance of 20 dwellings per annum.
- 2.13 In rural areas, the NPPF confirms that local planning authorities should plan housing development to reflect local needs, particularly for affordable housing, including appropriate rural exceptions sites where appropriate (paragraph 54). The Submission draft Local Plan supports rural exception sites and the policy wording and requirements have been informed by the whole-Plan viability assessment undertaken in 2017. The NPPF also confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities (paragraph 55). This is reflected in the settlement hierarchy and proposed housing allocations in the Submission draft Local Plan, which focus new housing to the larger settlements in the New Forest and areas where a range of services and employment opportunities are (or will become) available.
- 2.14 The NPPF also provides guidance on the need for local planning authorities to plan for a range of housing needs. Paragraph 50 states that planning authorities should plan for a mix of housing to deliver a wide choice of homes. The Local Plan plays an important role in identifying the size of housing required in the National Park, reflecting local demands. This is set out in Policy SP21 of the Submission draft Local Plan which restricts the size of net new dwellings (on windfall sites and allocations) to ensure that the development that does take place in the National Park is focused on local needs.

(iii) *Protection Afforded to National Parks*

- 2.15 The NPPF reaffirms the Government's commitment to protecting National Parks. Paragraph 115 confirms that, "...great weight should be given to conserving the landscape and scenic beauty of National Parks, which have the highest status or protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations and should be given great weight in National Parks." This statement of national policy – which reflects the statutory National Park purposes - forms the basis of the local planning policies for the National Park in the Submission draft Local Plan.
- 2.16 Paragraph 116 outlines the Government's position on major development in National Parks, and is consistent with the wording in the National Parks Circular highlighted above. The Framework states that planning permission should be refused for major developments in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of the scope for developing elsewhere outside the designated area. This long standing national policy position on major development in National Parks is reflected in Chapter 4 of the Authority's Submission draft Local Plan 2016 – 2036.

(iv) *Local Plan preparation*

- 2.17 Local Plans are required to plan positively for the development required and allocate sites to promote development and flexible use of land. Paragraph 159 of the NPPF confirms that local planning authorities should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. This process was undertaken in the New Forest in 2014 with a detailed SHMA jointly commissioned by the Authority and New Forest District Council. Following the publication of updated Government household projections, the Authority and District Council commissioned an updated assessment of the housing needs arising in the combined New Forest area in 2017. This updated report (Justin Gardner Consulting, 2017) is summarised is below.

National Planning Practice Guidance (NPPG)

- 2.18 In 2014 the Government launched its National Planning Practice Guidance (NPPG) online resource. The NPPG supports the NPPF and provides more detailed planning policy guidance on a wide range of areas, including the protection of the natural environment (including National Parks) and the delivery of housing to meet identified needs.
- 2.19 One of the core principles in the NPPF is that the planning system should recognise the intrinsic character and beauty of the countryside (including designated landscapes such as National Parks). The NPPG references the National Parks Circular (2010) and confirms that planning authorities should have regard to National Park Management Plans in preparing their local plans.

- 2.20 In relation to meeting local housing needs, the NPPG states that the objective assessment of housing needs in an area should be based on facts and unbiased evidence. National planning policy is clear that planning authorities should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. The NPPG clarifies that “...*these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans...*” and this is particularly pertinent within the New Forest National Park given its range of landscape and habitat designations.
- 2.21 The NPPG also confirms that local planning authorities are required undertake an assessment of land availability to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. “*Plan makers should issue a call for potential sites and broad locations for development, which should be aimed at as wide an audience as is practicable...The comprehensive list of sites and broad locations derived from data sources and the call for sites should be assessed against national policies and designations to establish which have reasonable potential for development.*” In response to this, the Authority undertook a ‘Call for Sites’ process in 2015/16, the main conclusions of which can be found within the separate Strategic Housing Land Availability Assessment.
- 2.22 The NPPG also includes detailed guidance on the delivery of affordable housing and the use of planning obligations. Following the legal decision in the case of the Secretary of State vs West Berkshire District Council & Reading Borough Council (May 2016), the NPPG was updated to state that developer contributions could no longer be sought from development of 10 dwellings or less (net). In National Parks (and some other rural areas), the local planning authorities could opt to seek financial contributions from developments of 6 or more dwellings (net). It should be noted that the Court of Appeal decision in the Reading and West Berkshire case¹ confirmed that local planning authorities could seek to justify a lower site size threshold where appropriate,
- “...*although it would normally be inappropriate to require any affordable housing or social infrastructure contributions on sites below the thresholds stated, local circumstances may justify lower (or no) thresholds as an exception to the national policy...if in future any Local Planning Authority (LPA) submits for examination local plan policies with thresholds below those in the national policy, the Inspector will consider whether the LPA’s evidence base and local circumstances justify the LPA’s proposed thresholds. If he concludes that they do and the local plan policy is adopted, then more weight will be given to it than to the new national policy in subsequent decisions on planning applications.*”

¹ Neutral Citation Number: [2016] EWCA Civ 44, Case No: C1/2015/2559: *Secretary of State for Communities & Local Government vs West Berkshire District Council and Reading Borough Council*, May 2016

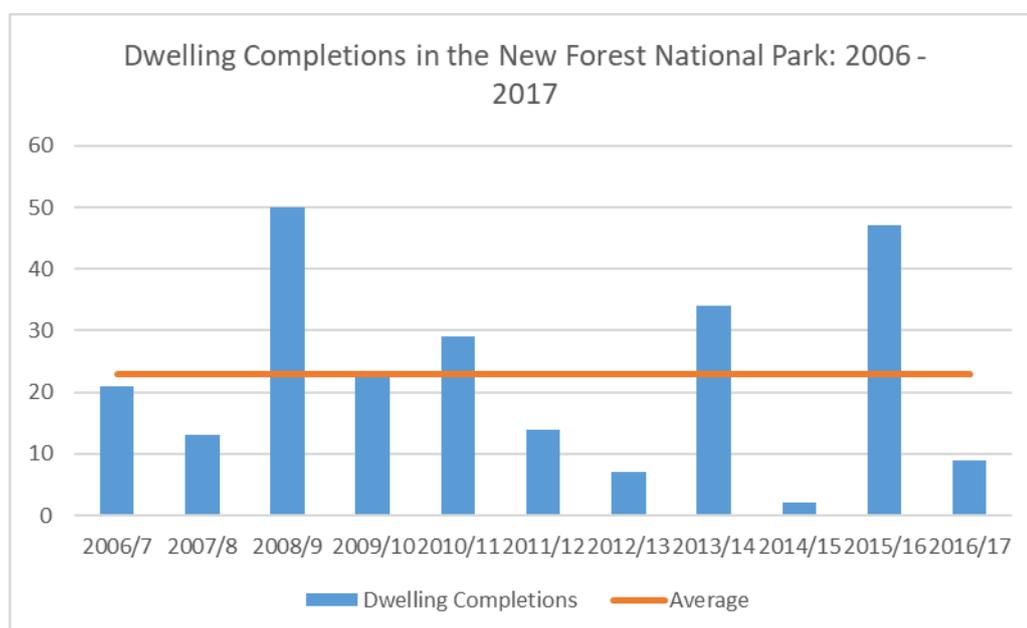
2.23 Set out in the following section is an outline of the Authority’s evidence base that justifies a lower site-size threshold for seeking affordable housing than that set out in the NPPG.

3. Evidence Base

Annual Monitoring Report data

3.1 All local planning authorities are required to publish information at least annually that shows progress with Local Plan preparation; activity relating to the duty to cooperate; and the implementation of Local Plan policies. In response to this, the National Park Authority has since 2006 published an Annual Monitoring Report setting out a range of information on the implementation of the local planning policies in the National Park, including data on dwelling completions.

3.2 The Annual Monitoring Reports set out annual dwelling completions in the National Park. Since the Authority assumed its planning powers in April 2006, a total of 249 new dwellings have been completed within the National Park (up to 31 March 2017) without the allocation of land for housing. This equates to an average of around 23 net additional dwellings per annum within the National Park. Set out below is an illustration of these dwelling completions, highlighting the annual fluctuations. For example, 2 dwellings were completed in the 2014/15 reporting year, followed by 47 dwellings in 2015/16.

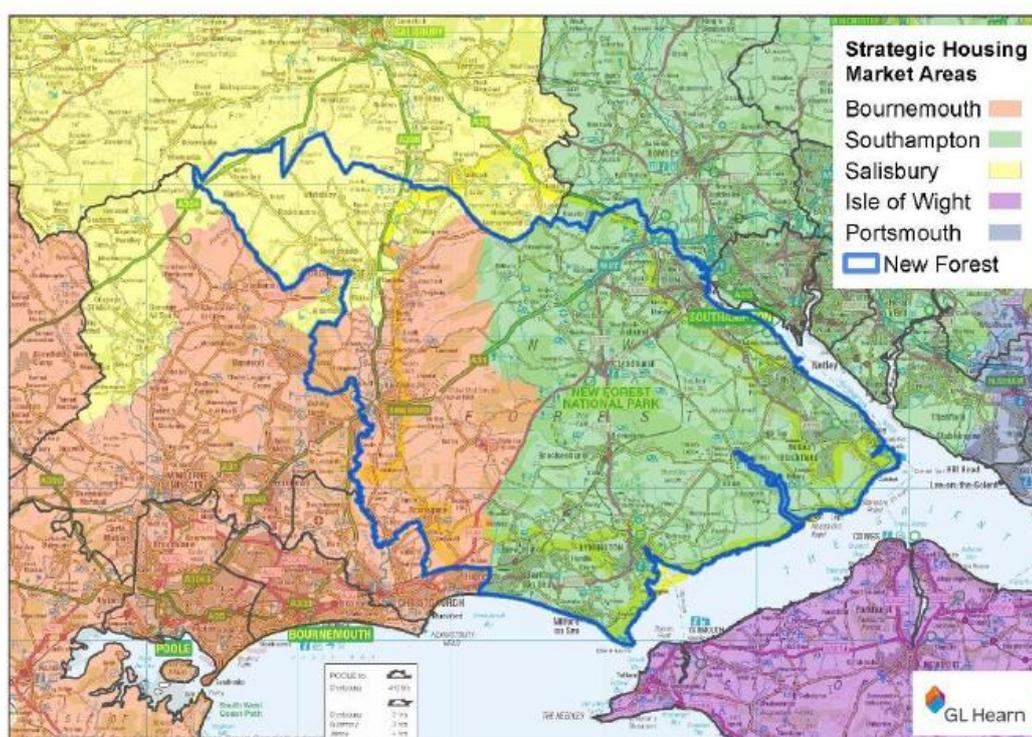


3.3 These net new dwellings have been delivered on sites within the four defined villages of Ashurst, Brockenhurst, Lyndhurst and Sway; on rural exception sites in the National Park; and through specialist housing for agricultural workers and commoners. In addition to these dwelling completions, there are a total of nearly 100 net dwellings within the New Forest National Park with extant planning permission (as at 31.03.17).

New Forest Strategic Housing Market Assessment (2014)

- 3.4 In response to the requirements of national policy which states that the starting point for preparing plans should be an assessment of the housing needs of an area, the Authority and New Forest District Council jointly commissioned a Strategic Housing Market Assessment covering the whole of the National Park and New Forest District in 2014.
- 3.5 The assessment concluded that 'the New Forest' (National Park and District) falls principally within the Southampton-focused Housing Market Area, although parts of the New Forest also have functional links to the Bournemouth and Salisbury Housing Market Areas – as illustrated below. The study states that these cross-boundary Housing Market Area relationships should be considered through the Duty to Co-operate when developing housing policy for the New Forest.

Figure 4: CLG-defined Strategic Housing Market Areas



- 3.6 Government guidance is clear that the assessment of housing need should not take account of development constraints – such as those relating to infrastructure, environmental constraints, or land availability. These factors are however relevant in translating assessment of need into local planning policy, and particularly in the New Forest which includes broad range of landscape and habitat designations.
- 3.7 The SHMA assessed housing needs in the New Forest in accordance with the approach set out in the NPPF and the NPPG. This is based on demographic projections covering official population and household projections. Set out below are the main conclusions of the Assessment that are relevant to the Authority's Submission draft Local Plan.

- The affordability of housing in the New Forest has worsened over the 2001-11 period. House prices in parts of the New Forest are considerably higher than the Hampshire and South East averages for all house types.
 - There are just under 15,000 existing dwellings within the National Park and 80% of these are owner occupied (well above the regional average). Social rented households make up 7% of the existing dwelling stock in the National Park.
 - The dwelling stock within the National Park is significantly skewed towards detached properties which account for 67% of the total stock, while semi-detached properties account for another 19%. The National Park currently has a very low proportion of smaller property types (such as terraces or flats) compared to other parts of the District. The existing housing stock in the National Park has a strong focus toward larger properties, with 75% of homes having three bedrooms or more.
 - The National Park experiences high levels of ‘under-occupation’ (85% of the existing dwelling stock), well above the Hampshire average (75%). Policies could help to ensure there is appropriate housing available for households who might wish to downsize.
 - The SHMA (2014) concluded that the full need for market and affordable housing within the New Forest National Park between 2011 and 2031 was around 3,000 additional dwellings over the Plan period. This equates to around 150 dwellings per annum. This was an objective, policy off analysis and took no account of land supply or development constraints, such as the Forest’s National Park status and areas subject to European nature conservation designations (which cover over 50% of the National Park).
 - In terms of dwellings sizes, the SHMA analysis concludes that the overwhelming need within the New Forest is for 1 – 3 bed properties. The Assessment states that, “...*in areas where the level of housing development might be restricted, particularly within the National Park, consideration might be given to focusing delivery of market housing towards smaller properties to assist local households to get on the housing ladder; and to support downsizing of older households, releasing stock for other groups.*”
- 3.8 The SHMA (2014) formed an important part of the evidence base for the review of the Authority’s Local Plan at the start of the process. In response to the conclusions of the SHMA (2014) it was clear that the revised Local Plan would need to consider: (i) an increase in the quantum of new housing to be delivered within the National Park from the current Core Strategy target; and (ii) a policy restriction on the size of new dwellings in the National Park, reflecting the fact that the existing housing stock is skewed towards larger properties and that the overwhelming local need is for 1 - 3 bedroom dwellings.

Objectively Assessed Housing Need: A Report for New Forest District Council and the New Forest National Park Authority, October 2017

- 3.9 Following the publication of updated national household projections, the National Park Authority and New Forest District Council jointly commissioned an updated assessment of housing needs arising in the combined New Forest area (National Park and District). This updated assessment by Justin Gardner Consulting forms a key part of the evidence base for the housing policies contained within the Authority's Submission draft Local Plan (January 2018). It defines the full objectively assessed need for market and affordable housing in line with the requirements of national planning policy and provides a starting point for considering policies for housing provision.
- 3.10 In line with the NPPG, this updated assessment of housing needs in the National Park uses the starting point of the Government's demographic projections and assumptions regarding household formation rates. Consideration is also given to economic growth, market signals and affordable housing need. The main conclusions in the updated assessment of housing need are:
- The housing need (OAN) in the New Forest National Park over the 2016 – 2036 period amounts to 1,260 new dwellings, or 63 net new dwellings per annum. This is the final conclusion having projected (trend-based) demographic needs and adding on 15% to take account of market signals.
 - The estimated level of affordable housing need in the National Park is slightly higher than the Objectively Assessed Housing need figure at 71 dwellings per annum. This affordable need includes a need from existing households due to a mismatch of tenure.
- 3.11 In September 2017 the Government launched a consultation on their proposed standardised methodology for assessing housing needs. The Government recognises under the subtitle '*Deviation from the new method*' (page 17) that where local planning authorities do not align with local authority boundaries – for example in National Parks – that available data does not allow housing needs to be calculated using the standard methodology. In these cases, the Government proposes that authorities should continue to identify a housing need figure locally, having regard to the best available information. Given this, the updated assessment of housing need in the National Park (Justin Gardner Consulting, 2017) identifies an Objectively Assessed Need figure for the National Park area that is locally derived and one that will remain relevant after the 31 March 2018 (or revised NPPF deadline), as National Park Authorities will not be bound by the Government's proposed standardised methodology. It is this 2017 housing need figure that has formed the basis of the Authority's Submission draft Local Plan (January 2018) and discussions with neighbouring authorities under the Localism Act's duty to cooperate on the issue of unmet housing need.

Whole Plan Viability Assessment, Three Dragons 2017

- 3.12 The NPPF makes it clear that Local Plan policies should not result in development being unviable due to the planning policy requirements placed on it being unduly onerous. This is tested through a whole-Plan viability assessment as per the requirements of para. 173 of the NPPF.
- 3.13 In 2017 the Authority commissioned a detailed whole-Plan, affordable housing and CIL viability assessment from the consultants Three Dragons. The assessed focused on the viability of the Submission draft planning policies on dwellings sizes, on-site affordable housing provision and rural exceptions sites. The viability assessment was prepared in consultation with the development industry and followed the relevant regulations and guidance and is in line with the NPPF.
- 3.14 The testing undertaken used the standard residual value approach, whereby the residual value of development (total value less all development and policy costs, including planning obligations) is compared to a land value benchmark and the scheme is said to be viable if the residual value exceeds the benchmark. To test the viability of residential development, the assessment focused on a number of case studies which reflected the type of sites likely to be come forward, reflecting the Local Plan policies and historic patterns of development.
- 3.15 Affordable housing was tested at 75% affordable rent and 25% shared ownership. The viability assessment also factored in the proposed policy restriction on the size of net new dwellings of 100 square metres. Representations received on the consultation draft New Forest National Park Local Plan (October 2016) sought confirmation that this modelling would be undertaken to inform the Submission draft Local Plan in 2018.
- 3.16 The key findings of the whole-Plan viability assessment were:
- All of the windfall sites tested and most of the potential site allocations were viable at a full draft Local Plan policy position (i.e. 50% on-site affordable housing and restriction on dwellings sizes).
 - A policy requiring 50% affordable housing on sites of 3 or more units is generally achievable.
 - Extra care schemes were not viable where tested with a 50% affordable housing requirement. This is a result of the higher costs and sales period associated with extra care homes as well as the low net to gross associated with the location of these particular sites. Schemes became viable when the affordable housing element was reduced to around 20-30% of all units.
 - Rural Exception Sites were able to deliver 100% affordable units where intermediate tenures such as shared ownership or discount market sale were part of the scheme, although not where all units were rented. Unfettered open market housing was not necessary to achieve delivery of Rural Exception Sites.

- The assessment indicates good general viability across the National Park and suggests that there is some potential to collect a CIL, should the Authority decide to charge a levy.

3.17 The findings of this viability assessment has directly informed the preparation of the Authority's Submission draft Local Plan. The planning policies contained within Chapter 7 restricting the size of net new dwellings; seeking 50% affordable housing on developments of 3 or more dwellings; and the policy approach to rural exceptions sites whereby no open market housing is supported are all justified through the whole-Plan viability assessment.

Gypsy, Traveller & Travelling Showpeople Accommodation Assessment (ORS, 2017)

3.18 National planning policy for traveller sites was updated in August 2015. The *Planning Policy for Traveller Sites* sets out the Government's planning policy for traveller sites and should be read in conjunction with the NPPF. The overarching aim of the policy is to ensure fair and equal treatment for travellers. To achieve this, the Government requires local planning authorities to make their own assessment of need; development fair and effective strategies to meet needs; include fair, realistic and inclusive policies; and increase the number of sites in appropriate locations with planning permission. The updated policy also revised the definition of a gypsy or traveller.

3.19 Government policy also states that, "...If a local planning authority cannot demonstrate an up to date 5 year supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission. The exception is where the proposal is on land within a National Park..." (paragraph 27).

3.20 In response to the requirements of national planning policy (which changed in 2012 – previously the requirement to assess traveller needs had fallen on local housing authorities, not planning authorities) the National Park Authority jointly commissioned an updated gypsy, traveller and travelling showpeople accommodation assessment with six other planning authorities in Hampshire. The published report (Opinion Research Services, May 2017) concluded that one additional gypsy or traveller pitch was required within the New Forest National Park in the period 2016 – 2036 for households that meet the planning definition. For travelling showpeople, the updated assessment identifies a need for 21 additional plots for households that meet the planning definition.

4. Consultation to date

Reg. 18 consultation on the issues & scope of the Local Plan Review

4.1 The Authority launched an initial consultation on the scope of the Local Plan Review in 2015 (this represented Regulation 18 in the

Government's Planning Regulations). The review commenced with information on the Authority's stand at the New Forest Show in July 2015, where visitors were invited to vote on the key planning issues that they felt were important. One of the main issues raised by the public in response to this consultation was how to address the need for affordable housing for local people.

- 4.2 In September 2015 an initial consultation document was sent to a wide range of consultees inviting feedback on the key planning issues identified by the Authority. During the 6-week public consultation in September – October 2015, responses were received from a range of interest groups, local residents and town and parish councils on the topic of housing delivery within the National Park. Set out below is a summary on the responses received to each of the main points raised in the Regulation 18 Local Plan consultation document on housing.

Issue: Delivering new housing at an appropriate scale, mix and tenure in a way that helps address local housing needs, while at the same time ensuring development does not compromise the delivery of the two statutory purposes.

- The New Forest Association outlined their view that the SHMA figure is so high that it is meaningless. Instead the true need as being for affordable homes in an area of high environmental protection.
- Other respondents called for new development to be restricted to smaller units to provide a better balanced housing stock to meet local needs.
- A number of the New Forest Estates called for greater support for Estate worker housing within the National Park.
- Some public support for implementing a local occupancy clause on all new builds, which would have the effect of reducing their open market value

Issue: Reconsidering the established settlement hierarchy within the National Park, whereby new development is primarily focused on the villages of Ashurst, Brockenhurst, Lyndhurst and Sway where a range of services can be provided close together

- Sway Parish Council felt that the benefits of maintaining Sway as a defined village outweighed abandoning the designation
- The Keep Ashurst & Colbury Green Group stated that the defined village boundary of Ashurst should be maintained in its current position. New development should be confined to the four defined villages, preferably on brownfield sites. Concern regarding any development that reduces the gap between Ashurst and the Totton urban area.
- Brockenhurst Parish Council stated that the defined village boundary should be maintained unless significant benefit could be justified by its amendment. The Friends of Brockenhurst also supported retaining the approach of four defined villages.
- Some respondents felt that other larger villages should become defined villages and have boundaries (e.g. Cadnam, Landford, Burley, Beaulieu).
- The Hinton Admiral Estate suggested that Bransgore could be seen as a defined New Forest village given the tightness of the National Park boundaries that wrap around it.

Issue: Reviewing the Commoners' Dwelling Scheme (CDS)

- The CDS must ensure that commoners have sufficient land to look after their stock. The Authority were urged to find more back up grazing land for commoners as so much land has been lost to horse-culture.
- Others felt that since the CDS was set up in 1991 the situation has changed completely with increases of more than 50% in both numbers of commoners and animals turned out. Calls for the Authority to help by either facilitating access to affordable housing or by facilitating access to affordable back up grazing land.
- Concerns were raised that although commoners' dwellings are limited in size, there are no restrictions on the size of related outbuildings. This should be rectified in the Local Plan review.
- The Commoners' Defence Association (CDA) considered that the CDS makes a vital contribution to the long term survival of the Forest. Given the importance of the Scheme, the CDA believe the CDS policy should stand outside the affordable housing policy which has different objectives.

Issue: Assessing the current approach of seeking to reduce the landscape impact of new development and safeguard the stock of smaller dwellings through limiting the size of extensions, replacement dwellings & outbuildings

- Godshill Parish Council offered strong support for retaining the existing policy aim of safeguarding of the stock of smaller dwellings through limiting the size of extensions, replacement dwellings and outbuildings.
- A number of planning consultants objected to the policy approach of restricting the size of replacement dwellings and extensions which they considered to be out of step with Permitted Development Rights.
- Sway Parish Council called for the introduction of sensible limits on the extent of outbuildings.
- Minstead Parish Council called for a policy on basements as these are becoming increasingly common.
- The Friends of Brockenhurst called for the "30% rule" to be retained and to also apply within the defined villages to retain the stock of small dwellings.

Issue: Considering how to address the national policy requirement for planning authorities to identify gypsy and traveller sites to meet local needs.

- It was highlighted that between 2006 and 2014 no planning permissions for Travelling Showpeople's sites have been granted. The Authority should fulfil its statutory requirements and identify sites to meet the established need in the area.

Local Plan Review – Topic-Based Workshops - Spring 2016

- 4.3 Following consideration of the responses received during the initial Regulation 18 Local Plan consultation in Autumn 2015, the Authority held a series of meetings in Spring 2016 with relevant groups to inform the drafting of the Local Plan. A number of these meetings including discussions around housing in the National Park, summarised below.

(i) *Neighbouring Authorities Meeting – March 2016*

- 4.4 In response to the housing need identified within the National Park through the New Forest SHMA (2014), the Authority convened a meeting with its five neighbouring planning authorities to discuss the delivery of housing in the Housing Market Areas covering the New Forest. At this meeting the Authority confirmed that given the level of protection afforded to the landscape and habitats of the New Forest, a significant step change upwards in the scale of housing delivery to meet the figures outlined in the SHMA was unlikely to be consistent with the two statutory National Park purposes.
- 4.5 The local planning authorities present recognised the significant challenges in meeting the Objectively Assessed Housing needs figures identified for the various Housing Market Areas covering the area. The local authorities agreed that cross-boundary liaison and co-operation must continue, with a number of authorities unlikely to be able to accommodate the full scale of housing required due to a variety of constraints and designations. It was acknowledged that this may necessitate planning authorities making representations on each other's Local Plans as they are developed.

(ii) *Estates Meeting – May 2016*

- 4.6 During the initial public consultation on the Local Plan review, a number of the larger Estates in the New Forest made representations on the delivery of housing for local people and suggested a meeting to discuss the future role of the New Forest's Estates. A meeting was convened in May 2016 between the Authority and representatives of nine of the larger Estates in the New Forest, as well as the Country Land & Business Association (CLA). At this meeting the Estates highlighted the changing position in relation to Estate workers meaning that the existing planning policy approach of enabling agricultural workers dwellings was increasingly outdated. The general consensus of the Estates was that the existing, narrow definition of an 'agricultural worker' needed to be broadened to reflect modern practices.
- 4.7 The general move away from agriculture also meant that some Estates had a significant stock of redundant agricultural buildings that could be put to more viable uses, including the provision of housing for local people. This would enable communities across the Forest to grow; support local facilities and services; and ensure Estates could continue to attract employees as they would have somewhere to live. These discussions led to the inclusion of a proposed policy supporting the production of comprehensive Estate Plans as an avenue through which proposals for Estate worker's housing would be considered.

(iii) *Defined Villages Meeting – June 2016*

- 4.8 The Authority has regular liaison meetings with the Town and Parish Councils in the National Park through the Parish Quadrant meetings held

throughout the year. In addition to these, the Authority met with the Parish Councils for Ashurst, Brockenhurst, Lyndhurst and Sway in June 2016 to discuss the draft Local Plan. This meeting covered the review of the defined village settlement boundaries (which date back to the 1980s and 1990s); and the detail development control policies relating to residential development within the National Park. The main outcomes of the meeting included:

- A recognition from the Parish Councils of the need for the four defined village boundaries to be reviewed. There was also a consensus that any suitable sites identified adjoining the four defined villages should be brought forward through specific Plan allocations rather than amendments to the settlement boundary.
- A call for the Authority to consider allocations elsewhere in the National Park to supplement development within the main villages.
- The current Core Strategy was considered to have performed well, but changes in Permitted Development Rights and the pressures on the National Park meant that the detailed policies relating to residential extensions, replacement dwellings, outbuildings and changes of use should be considered as part of the review.
- It was suggested that the Authority should consider a policy limiting the size of net new dwellings to encourage the development of smaller dwellings to meet the identified local housing need.

4.9 In response to these discussions, the Local Plan Review process has included: (i) proposed housing allocations on the edge of the defined villages; (ii) consideration of allocations within a number of the other larger settlements elsewhere in the National Park; (iii) detailed development control policies relating the other forms of residential development; and (iv) a proposed limit on the size of net new dwellings across the National Park.

Consultation draft New Forest National Park Local Plan (October 2016)

4.10 The Authority took the decision to publish a non-statutory draft Local Plan in Autumn 2016. This on the basis that it was felt that the step from the Regulation 18 consultation stage on the issues and options to be considered in the Local Plan Review to the publication of the Regulation 19 Submission draft Local Plan was too great to do in one stage.

4.11 A detailed draft Local Plan was published in October 2016 for an 8-week period of public consultation, which was undertaken in line with the guidance in the Authority adopted Statement of Community Involvement (2013) and the Government's relevant planning regulations. A full summary of the consultation responses received was made available on the Authority website in early 2017. The 'Consultation Statement' (January 2018) that accompanies the Submission draft Local Plan sets out in more detail the main point raised during this consultation. For the

purposes of this topic paper, set out below is a summary of the pertinent points raised in Autumn 2016 relating to the local Plan's approach to housing in the National Park.

Summary of comments made	NPA response in preparing Submission draft Local Plan
Objections to any house building in the National Park.	National policy supports small scale development in National Parks to meet local needs. The Submission draft Plan includes a limited number of allocations.
The Plan fails to meet the needs of older people in the National Park. It needs to acknowledge and address the ageing population.	The Submission draft Local Plan includes a new section and policy on addressing the needs of an ageing population within the National Park.
A policy that helps households who might wish to downsize should be included.	The Submission draft Local Plan supports the provision of smaller dwellings, which will help provide a stock of dwellings for people looking to downsize.
The Fawley Power Station should be allocated for redevelopment in the respective NFDC and NFNPA Local Plans.	The NFNPA's Submission draft Local Plans include policies to guide the comprehensive redevelopment of the site.
There is no general restriction in principle or within National Policy which prohibits the extension of neighbouring urban areas across the National Park boundary.	The principle of neighbouring settlements extending into the National Park has been considered. The NPA has significant concerns regarding how such development would meet the needs of communities living within the National Park.
The SHMA (2014) does not take into account the Government's latest household projections and should be updated.	An updated assessment of housing needs arising in the National Park was undertaken in Autumn 2017 to inform the Submission draft Plan.
New accommodation for elderly people should meet demands from within the communities of the National Park, rather than catering for external demands.	A new policy has been included in the Submission draft Plan that ensures the occupancy of new C2 development is tied to people with a local connection.
Some support for seeking a lower site size threshold for affordable housing, with many respondents highlighting the need for viability testing.	A Local Plan viability assessment has informed the Submission draft Local Plan policies on affordable housing on windfall sites; allocations; and rural exceptions sites.

<p>General support for policies on replacement dwellings; extensions to dwellings and outbuildings, with some calls for these policies to be more restrictive.</p>	<p>The inclusion of detailed policies on replacement dwellings, extensions and outbuildings in the Submission draft Local Plan is considered justified in light of development pressures on the National Park.</p>
<p>Detailed representation on the proposed housing allocations, with objectors raising concerns regarding the precedent of allocating sites; impacts on protected habitats and lack of infrastructure.</p>	<p>All of the proposed site allocations have been through the SFRA process, HRA process and viability assessment. In some cases sites have been deleted; and on other sites the specific policy criteria has been amended in the Submission draft Local Plan.</p>

4.12 The representations received during this 8-week consultation period helped to inform the preparation of the Authority's Submission draft Local Plan during 2017. The representations received prompted a series of follow up meetings and assessments. This included the 'duty to cooperate' meetings with neighbouring planning authorities; a further 6-week public consultation on potential alternative housing sites; the 'Call for Brownfield Sites' launched in early 2017; and the detailed assessment of the emerging policies and site allocations through the Strategic Flood Risk Assessment; Habitats Regulations Assessment; Sustainability Appraisal / SEA; and whole-Plan viability assessment.

Consultation on potential alternative housing sites (June 2017)

4.13 Representations received on the consultation draft Local Plan (October 2016) included those highlighting the potential impacts of development close to the nationally and internationally protected habitats of the New Forest. The Authority therefore initiated further liaison with Natural England officers on this issue and in May 2017 Natural England subsequently updated their advice to the Authority. This updated advice essentially stated that Natural England did not feel that potential urban edge impacts on the integrity of the New Forest Special Protection Area (SPA) could be ruled out from new residential allocations located within 400 metres of the New Forest Special Protection Area (SPA).

4.14 A consequence of this May 2017 advice was that no greenfield site allocations within 400 metres of the New Forest SPA would be considered within the Authority's Local Plan review. This had significant implications for the draft Local Plan, which had in October 2016 identified potential development sites at East Boldre and Sway that lay within 400 metres of the New Forest Special Protection Area (SPA). It should also be noted that a significant number of the sites received through the 'Call for Sites' process were also affected by this advice.

4.15 With a number of potential housing sites being ruled out, the Authority took the decision to hold a further six-week non-statutory public

consultation between June and July 2017 on potential alternative housing sites to inform the preparation of the Regulation 19 Submission draft Local Plan.

4.16 The potential alternative housing sites were (i) brownfield land at the Ashurst Hospital site put forward by the NHS; (ii) land adjoining the village of Calshot put forward by the landowner as part of proposals to regenerate the area; (iii) land adjacent to the former Fawley Power Station site which would form part of the wider, comprehensive redevelopment of the 50 hectare brownfield former Power Station site; and (iv) a small area of land in Cadnam which had been proposed for development to meet of the identified local housing need.

4.17 More detail on the consultation undertaken on these potential housing sites in June and July 2017 can be found within the Authority's separate 'Consultation Statement' (January 2018). Set out below is a high level summary of how the feedback received on these potential alternative housing sites has informed the Submission draft Local Plan.

- *Ashurst Hospital site*

There was general support for the principle of redeveloping this brownfield site, although other responses highlighted the issues around the proximity of protected habitats to the site and legal issues around covenants.

The Authority has continued to liaise with the landowner regarding this site. It is felt that given current uncertainties around the future of the Hospital site, it would be premature to allocate the site for future housing use in the Submission draft Local Plan.

- *Land at Calshot Village*

There was some support for a limited amount of new dwellings to benefit the socio-economic well-being of the village and diversify its housing stock. Concerns were raised regarding the relationship with the consented cemetery and the lack of services.

In response, the Authority has liaised with the landowner to understand their plans for the site. An indicative layout has been prepared showing how the cemetery use and housing can be accommodated. The site is allocated within the Authority's Submission draft Local Plan.

- *Land adjacent to Fawley Power Station*

There were a range of views expressed on this site. Some respondents saw it as an opportunity to support a major brownfield regeneration opportunity. Other respondents felt that development within the National Park could only be supported in exceptional circumstances.

In response, the Authority has liaised closely with New Forest District Council on the site. A site-specific viability assessment has been

undertaken that has established the form of development necessary in the National Park to support the delivery of the wider scheme. The site is allocated within the Authority's Submission draft Local Plan.

- *Land at Uncle Tom's Cadnam, Romsey Road, Cadnam*

While recognising the local housing need, many respondents highlighted concerns regarding surface water flooding in the area of the proposed development.

In response, the Authority has now received the results of the Strategic Flood Risk Assessment (SFRA) which confirms the site is at risk from surface water flooding. It is therefore not proposed for allocation in the Submission draft Local Plan.

5. Conclusions

- 5.1 The delivery of housing within the New Forest National Park should be assessed within the context of the two statutory Park purposes (and associated duty) and national planning policy as set out in the NPPF and the NPPG. The Authority's Local Plan Review must consider the quantum of new housing development in the National Park and how this can be directed towards meeting identified local needs arising within the 35,000 people who live there.
- 5.2 The NPPF confirms that National Parks continue to have the highest status of protection in relation to landscape and scenic beauty. In addition, the Framework's presumption in favour of sustainable development recognises National Parks as areas where development will be restricted (paragraph 14, footnote 9).
- 5.3 National policy is also clear that the starting point for considering housing provision in the review of local plans is an objective, 'policy-off' assessment of housing needs. In the context of the New Forest, an initial Strategic Housing Market Assessment (SHMA) was jointly commissioned by the National Park Authority and New Forest District Council in 2014. This assessment was updated in 2017 (Justin Gardner Consulting) on the basis of the most up to date information and identified a housing need of 1,260 new dwellings between 2016 – 2036 in the National Park at an annualised average of 63 dwellings per annum.. This figure is significantly above the current level of development in the National Park and would represent a circa 8.5% increase in the dwelling stock of the National Park.
- 5.4 In accordance with national policy, the Objectively Assessed Housing need (OAN) figure for the National Park forms the starting point for considering housing delivery. This 2017 assessment forms the basis of the Authority's Submission draft Local Plan and will continue to provide the evidence base on housing need even after the Government's standardised methodology is in place. The NPPF and NPPG are clear that considerations such as environmental designations will need to be

factored in when developing policies in the development plan on housing delivery. This guidance is particularly pertinent within the New Forest National Park as it has a greater proportion of its Local Plan area covered by national and international landscape and habitat designations than any other planning authority area in the country.

- 5.5 The Authority's Local Plan Review has included a 'Call for Sites' and 'Call for Brownfield Sites' process and an assessment of the defined village boundaries. However, given the wealth of landscape and habitat designations covering the New Forest National Park – allied to the updated advice received in May 2017 from Natural England regarding the potential impacts of residential development close to protected habitats – the Authority will be unable to meet the full objectively assessed housing need in the Park. To meet the full housing need within a protected landscape would risk undermining the legal purposes behind the area's designation as a National Park. Consequently discussions have taken place throughout the Local Plan review process with neighbouring planning authorities under the 'duty to cooperate'.
- 5.6 Over the last decade dwelling completions within the National Park have averaged just under 25 dwellings per annum. To help communities grow and to contribute towards meeting the housing need identified within the Park, the Authority is proposing to allocate housing land within the National Park for the first time since it was designated in 2005. The sites have all been assessed through the SFRA, HRA, Sustainability Appraisal/SEA and whole-Plan viability assessment process to ensure they are deliverable and suitable.
- 5.7 As well as the quantum of new development, the review of the Local Plan provides an opportunity to include policies on the type of new housing delivered. In response to feedback received during the initial consultation on the scope of the Local Plan Review (Regulation 18 consultation, Autumn 2015), the draft Local Plan includes policies covering Estate Worker's Housing and commoner's dwellings which have been devised through liaison with the Estates of the New Forest and representatives of the commoning community.
- 5.8 The delivery of affordable housing within the National Park is a major issue for the Local Plan, with average house prices in the New Forest the highest of any UK National Park. In response to these changes, the Authority is looking to restrict the size of net new dwellings in the National Park to ensure that, although not 'affordable' in the legal sense of the word, the new dwellings completed within the National Park go towards meeting the identified local housing needs.
- 5.9 The planning policies in the Submission draft Local Plan on affordable housing delivery (either through site allocations, windfall sites, or on rural exceptions sites) have been informed by a detailed viability assessment (Three Dragons, 2017). This has demonstrated that development remains viable within the National Park with the policy requirements

placed on development through the Local Plan. The Submission draft Local Plan proposes a lower site size threshold for the delivery of affordable housing than that set out in the NPPG and the viability evidence provides the evidence base for that approach.

- 5.10 In conclusion, the Submission draft Local Plan seeks to respond to the various requirements of national policy and local needs in a way that is consistent with the legal framework for planning within National Parks.