



## Self-Assessment of Soundness

New Forest National Park Authority Local Plan Review 2016 – 2036

May 2018

***This format of this self-assessment is based on that prepared by AMEC and URS on behalf of the Planning Advisory Service (2014). It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework.***

**In summary – the key requirements of plan preparation are:**

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

### **The Tests of Soundness at Examination**

The starting point for the examination is the assumption that the National Park Authority has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’”, namely that it is:

#### **1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements**

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

#### **2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence**

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

**3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities**

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the National Park Authority has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

**4. Consistent with national policy: enabling the delivery of sustainable development**

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal.gov.uk](http://www.planningportal.gov.uk)). If you are not using this model policy, the National Park Authority will need to provide clear and convincing reasons to justify its approach.

The following tables set out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> </ul>	<p>Chapter 2 of the Submission draft Local Plan sets out the profile of the New Forest National Park, highlighting the characteristics of the Park.</p> <p>This leads to Chapter 3 of the Local Plan which sets out the Vision; key planning challenges likely to affect the National Park over the Plan-period; and nine strategic objectives. The relevant objectives are listed at the start of each Chapter of the Plan, to indicate which policies will help deliver the objectives.</p> <p>Chapter 3 in the Plan also sets out how the planning policies in the Plan derive from the nine strategic objectives, and importantly how they relate to the two statutory National Park purposes and related duty.</p> <p>The Authority considered reasonable alternatives for a range of policy approaches. Initial feedback on alternatives was sought as part of the Reg. 18 consultation in late 2015; and a series of policy alternatives were also posed in the consultation draft Local Plan (2016); and/or considered through the Sustainability Appraisal process (e.g. alternative options to the proposed settlement hierarchy).</p>

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		<p>The Submission draft Local Plan includes an implementation and monitoring section which sets out how the policies in the Local Plan will be reported in the Authority’s Annual Monitoring Report (AMR).</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i>  Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.  Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:  —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or  —specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> <li>• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>Policy SP1 sets out the Authority’s approach to sustainable development in the National Park. In achieving sustainable development, policy SP1 requires proposals to demonstrate that they are consistent with the statutory Park purposes (enshrined in primary legislation). Given these legal purposes, it is not possible to necessarily have complete flexibility.</p> <p>The evidence base has established the development needs of the Plan area for different forms of development (e.g. housing, employment).</p> <p>The need for housing in the housing market areas that cover the New Forest has been objectively assessed and recently updated. This is evidenced in the Strategic Housing Market Assessment (2014), updated assessment of housing needs (2017) and the housing topic paper (2018). The Consultation Statement (January 2018) sets out the Plan-preparation process dating back to 2015 and how</p>

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		the proposed land allocations have been identified and consulted on.
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	<p>Policy SP1 clearly sets out the Authority’s approach to sustainable development in the National Park. This is consistent with the NPPF’s guidance on sustainable development (paragraph 14) which recognises National Parks as areas where development may be restricted (footnote 9).</p> <p>Policy SP1 varies from the model policy on sustainable development and this variation reflects the legal framework within which planning in National Parks takes place. The Government has recognised that sustainable development is at the heart of National Park Authorities’ decision making. Following debate about the framework created in National Parks by their two statutory purposes, in May 2012 DEFRA reported in their Structural Reform Plan that, “We do not consider that there is a problem with how National Park Authorities (NPAs) currently deliver sustainable development. Sustainable development is already at the heart of their decision making.”</p>
<p><i>Objectively assessed needs</i></p>	<ul style="list-style-type: none"> <li>Background evidence papers demonstrating requirements based on population forecasts, employment projections and community</li> </ul>	<p>The economic, social and</p>

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<p>The economic, social and environmental needs of the authority are addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<p>needs.</p> <ul style="list-style-type: none"> <li>• Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	<p>environmental needs of the National Park have been assessed in a variety of ways, including the updated assessment of housing needs in the New Forest (2017); and the commercial property market assessment (2017). More details on the evidence base on local needs is set out in the relevant Local Plan topic papers.</p> <p>The Duty to Cooperate paper sets out the cross-boundary liaison that has taken place during the preparation of the Local Plan.</p>
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>Chapter 8 of the Submission draft Local Plan set out the planning policies that will help to deliver the strategic objective of developing a diverse and sustainable local economy that contributes to the well-being of local communities (linked to the Authority's socio-economic duty). The Authority's planning policies have delivered a strong local economy, with the National Park home to over 2,500 businesses and an area where unemployment has not been higher than 1.5% of the last decade. In</p>



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		<p>addition, the Government’s National Parks Circular (2010) recognises that the delivery of the two statutory Park purposes itself results in economic benefits.</p> <p>Although not the lead authority for economic development, the Authority has worked closely with the economic development team at New Forest District Council during the preparation of the Local Plan. This has included a joint business needs survey (2014) and the joint commissioning of evidence base studies.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>	<p>Following the business needs survey (2014), the Authority jointly commissioned a Commercial Property Market Assessment (2017) with New Forest District Council which has informed the Submission draft Local Plan policies. The NPA statutory remit does not include economic development, but the Authority has liaised with the economic development team at New Forest District Council during the Plan-preparation process.</p> <p>The Local Plan does not allocate employment sites, as the evidence shows there is not the need to allocate sites, rather the emphasis is</p>

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		<p>on safeguarding existing employment sites. This should ensure that a supply of land is available for prospective businesses and minimises the need for, and avoids the cost and complication of developing new sites of which there is a limited supply.</p> <p>The Local Plan policies support the redevelopment of existing employment sites for a range of uses to support the local economy. Further detail is provided in the ‘Economy Topic Paper’.</p>
<p><b>2. Ensuring the vitality of town centres (paras 23-37)</b></p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> <li>The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>	<p>Although there are no designated ‘town centres’ in the National Park – none of the settlements have more than 3,500 residents and all are considered to be villages – the Local Plan does identify a simple settlement hierarchy based around the four ‘defined villages’. This is set out in policy SP4 (Spatial Strategy) and the supporting text. The Submission draft Local Plan supports appropriate residential, employment and retail development in these defined villages and the majority of the proposed housing allocations are on the edge of these defined villages. Policy SP39 supports the retention of existing</p>

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		<p>community facilities and the provision of new community facilities where they will directly benefit local communities.</p> <p>The Local Plan also includes policies seeking to protect the retail role of the defined villages. Defined shopping frontages are identified in each of the four defined villages and planning policies seek to retain the vitality of these designated areas.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<ul style="list-style-type: none"> <li>• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>• Primary and secondary shopping frontages identified and allocated.</li> </ul>	<p>The focus of the Submission draft Local Plan policies for retail is on safeguarding the existing stock of retail premises and enabling modest scale provision. The Submission draft Local Plan defines local shopping frontages within each of the defined villages and includes policies aimed at protected their retail role. These shopping frontages were reviewed as part of the Local Plan process.</p> <p>The policies in chapter 8 of the Local Plan support appropriate tourism development (Policy SP46). As outlined above, policy SP39 supports the provision of new community facilities and the Local Plan also supports new residential development within the four defined villages of the National Park.</p>

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<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> <li>• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.</li> </ul>	<p>Chapter 8 of the Submission draft Local Plan sets out a series of local planning policies to deliver the strategic objective of developing a diverse and sustainable economy that contributes to the well-being of local communities in the Park. The delivery of the Authority’s socio-economic duty is an important element in the Submission draft Local Plan.</p> <p>Detailed planning policies aim to support the land based economy of the New Forest (policy SP48) and deliver the strategic objective of encouraging land management that sustains the special qualities of the National Park.</p>
<p><b>4. Promoting sustainable transport (paras 29-41)</b></p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural</p>	<ul style="list-style-type: none"> <li>• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>• Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> </ul>	<p>Chapter (Transport and Access) of the Local Plan sets out the proposed policy approach to reduce the impacts of traffic on the special qualities of the National Park and provide a range of sustainable transport alternatives within the Park.</p> <p>Additional new or improved transport infrastructure is not needed to service</p>

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<p>areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work</p>	<ul style="list-style-type: none"> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>the level of development proposed within the National Park. Consequently the expansion of the existing road network will not be supported within the National Park.</p> <p>Policy SP4 (Spatial Strategy) seeks to secure new development within the defined villages where local services, facilities and employment are located which can help to minimise the need to travel. Where appropriate, the Authority will also seek contributions towards transport measures to mitigate the impacts of development, building on the approach adopted over the last 7 years. The proposed housing site allocations are focused on the defined villages of the Park or adjacent to where major development is proposed outside the Park which will improve the accessibility of the area. All of the proposed housing site allocations either are within walking distance of local schools, or will be once the development is complete.</p> <p>Given the impact of the car on the character of the New Forest (and associated issues such as a verge damage), the inclusion of local parking standards in the Local Plan is considered justified.</p>

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<p>on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>Outside the Local Plan, the New Forest National Park Partnership Plan 2015 – 2020 includes a range of actions aimed at supporting sustainable travel within the Park. This includes access improvements; and the New Forest Tour and Beach Bus which operate in the peak summer months to reduce the impacts of private car movements on the special qualities of the Park. Both of the local transport authorities (Hampshire and Wiltshire Councils) are represented on the Partnership Plan Leadership Group and are the lead authorities for a number of transport initiatives in the New Forest.</p>
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>Recent changes in national policy mean that a significant amount of telecommunications development is now either permitted development, or is dealt with through the prior notification route.</p> <p>Paragraphs 8.13 and 8.14 of the Submission draft Local Plan set out the Authority’s support for the roll-out of superfast broadband and the issues to be considered when assessing proposals for telecommunications infrastructure. These paragraphs,</p>

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		allied to the relevant policies in the Local Plan (e.g. policy SP7 on landscape character); and national policy in the NPPF and NPPG, provide the framework for assessing any proposals.
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> <li>• Identification of:                             <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>• A SHLAA</li> </ul>	<p>The Government's National Parks Circular (2010) recognises that National Parks are not appropriate locations for unrestricted housing and therefore does not give them a housing requirement. This is reflected in paragraph 14 and footnote 9 of the NPPF which confirms that National Parks area areas where development should be restricted.</p> <p>Given the local housing needs identified in the New Forest, the Submission draft Local Plan includes a number of proposed housing allocations for the first time since the National Park was designated by the Government in 2005. These have been brought forward following the 'Call for Sites', 'Call for Brownfield Sites' and SHLAA processes.</p> <p>The Local Plan includes a proposed windfall allowance of 20 dwellings per annum. There is a good record of</p>

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		<p>windfall delivery within the Park and over the last decade all of the dwellings completed in the National Park have been delivered through the windfall route. This is common in National Parks, where in many cases housing land is not allocated. The Submission draft Local Plan windfall allowance of 20 dwellings per annum is slightly below the level of annual windfall completions in the years since the Park was designated in 2005.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>A number of proposed housing allocations are included in the Submission draft Local Plan. Dwelling completions on these sites are likely to come forward over the period 2020 (e.g. Calshot Village) to around 2029/30 (e.g. land to the south of Fawley Power Station) and therefore delivery should be phased over the Local Plan period.</p> <p>It should also be recognised that in a nationally protected landscape with a limited number of proposed allocations, housing completions are likely to fluctuate depending on when key sites come forward.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five</p>	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	<p>Chapter 10 of the Local Plan sets out the proposed monitoring approach. The National Park Authority publishes</p>



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<p>year supply will be maintained. (47)</p>		<p>an Annual Monitoring Report every year and will continue to monitor the level of residential permissions and completions per annum. Given the context of planning within a nationally protected landscape, it is anticipated that dwellings completions will fluctuate based on when the limited number of key sites come forward.</p> <p>The proposed site allocations include sites that are likely to come forward early in the Plan period; and those (e.g. Fawley Power Station) that will deliver dwellings towards the latter part of the Plan period.</p>
<p>Set out the authority’s approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	<p>Policy DP34 sets out the planning policy approach to residential development within the defined villages and the need to conserve their character. The policy confirms that the density of development proposals should reflect the strong built heritage of the villages and their location within a nationally protected landscape. The policy also recognises that some villages centres are characterised by higher density development and that new development should reflect this local character where appropriate.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and</p>	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and</li> </ul>	<p>The Submission draft Local Plan has</p>

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<p>needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<p>housing for older people</p> <ul style="list-style-type: none"> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>been informed by the New Forest SHMA (GL Hearn, 2014) and the updated assessment of housing needs (Justin Gardner Consulting, 2017). The latter report is based on the most up to date Government household projections. In the absence of a housing needs figure for the New Forest National Park in the Government’s proposed standardised OAN methodology (September 2017), this updated assessment provides the evidence for the Local Plan.</p> <p>The Submission draft Local Plan includes a policy on supporting the housing needs of the ageing population (Policy SP20) and the SHMA evidence confirms this in an important issue in the New Forest given its demographics.</p> <p>The SHMA evidence has also informed the Local Plan policy on dwellings sizes. In line with the approach taken in a number of adopted National Park Local Plans, the Plan seeks to limit to size of new dwellings to ensure that new dwelling provision is focused on the area of greatest local needs (1 – 3 bed dwellings). This approach ensures that the New Forest National Park has a range of dwellings and will help to diversify the existing stock which is</p>

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		<p>heavily skewed towards larger dwellings.</p> <p>The Submission draft Local Plan includes detailed policies on the delivery of affordable housing. The Government’s National Parks Circular (2010) confirms that the focus of new housing in the Park should be on meeting local affordable housing needs. This national policy framework - allied to the finite land supply in the New Forest and the profile of development which is characterised by small sites – justifies the proposed Local Plan approach of lower site size thresholds for the delivery of affordable housing than those set out in the NPPG. Importantly the proposed policy thresholds have been tested through the Viability Assessment (Three Dragons, 2017) and have been found to be economically viable.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>Policy SP28 sets out the Authority’s planning policy approach to rural exception sites. The consultation draft Local Plan (October 2016) highlighted the options available for rural exception site delivery in line with paragraph 54 of the NPPF. The feedback received in 2016 was split on the principle of enabling a small</p>

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		<p>element of open market housing.</p> <p>The whole-Plan viability assessment subsequently concluded that open market housing was not necessary to ensure the viability of rural exceptions sites in the New Forest and this assessment informed policy SP28.</p> <p>Policy DP34 sets out the planning policy approach to residential development within the defined villages and the need to conserve their character.</p>
<b>7. Requiring good design (paras 56-68)</b>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> <li>• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	<p>The Submission draft Local Plan places a strong emphasis on the design of new development in the National Park (e.g. policy DP2, SP17 and DP18). These Local Plan policies are supplemented by the Park-wide Design Guide, a range of adopted Village Design Statements and the Authority's annual Building Design Awards which were launched in 2015.</p>
<b>8. Promoting healthy communities (paras 69-77)</b>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with</li> </ul>	<p>The proposed housing allocations are focused in areas where a range of services and facilities can be accessed,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
developments (69).	<p>each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>either now or as a result of the development (e.g. Calshot and Fawley). The proposed allocations at Ashurst, Lyndhurst and Sway are close to the village centres and local schools. Where appropriate, reference is also made within the site allocations policies to pedestrian improvements.</p> <p>The Local Plan safeguards existing open space provision (e.g. Policy DP10); supports new provision (e.g. Policy SP24 and SP25); or the enhancement of existing areas (e.g. Policy SP22).</p>
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</li> </ul>	<p>Linked to the Authority’s duty to foster the socio-economic well-being of local communities within the Park, the Submission draft Local Plan includes a range of policies aimed at delivering the strategic objective of strengthening the well-being and sustainability of local communities.</p> <p>Chapter 7 on ‘Vibrant Communities’, policy SP39 supports the retention of existing community facilities throughout the National Park; and the development of essential new local community facilities.</p> <p>The proposed housing site allocations are focused on the more sustainable</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		settlements of the Park where new development will either have access to existing services and facilities (the defined villages); or will through new provision made as part of the development (Calshot and Fawley).
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	Policy DP10 in the Submission draft Local Plan protects existing public open spaces and sets out the required level of new open space provision in new developments. This is based on an assessment of open space needs in the New Forest area.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</li> </ul>	The consultation draft Local Plan (October 2016) invited submissions on sites to be considered for Local Green Space designation. A couple of sites were put forward and the NPA liaised with those that made these representations. Ultimately neither of the representors chose to maintain their Local Green Space suggestions, partly on the basis that they considered National Park status for the area meant that Local Green Space designation would not add further protection.
<b>9. Protecting Green Belt land (paras 79-92)</b>		
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to:</li> </ul>	Not applicable as there is no Green Belt land within the New Forest

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul>	<p>National Park.</p>
<p><b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b></p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> <li>● Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>● Support for energy efficiency improvements to existing building.</li> <li>● Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95))</li> </ul>	<p>Chapter 5 of the Submission draft Local Plan addresses the challenges of climate change under the strategic objective of planning for the likely impacts of climate change on the special qualities of the New Forest. This chapter includes: Policy DP8 on safeguarding and improving water resources (including restrictions on water usage); Policy SP11 on climate change which supports the sustainable design and construction of buildings (including improved water</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>and energy efficiency); and Policy DP12 on flood risk.</p> <p>The evidence base for the Local Plan includes a detailed Strategic Flood Risk Assessment (SFRA, 2017), which has taken into account tidal, fluvial and surface water flood risk and the implications of climate change.</p> <p>Outside the Local Plan process, the NPA is also working on a New Forest National Park Climate Change Adaptation Plan which will also contribute towards addressing the challenges of climate change.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</li> </ul>	<p>The Submission draft Local Plan supports renewable energy proposals through policy SP14. All forms of small scale energy production will be supported where they meet the criteria set out in Policy SP14, which includes the consideration of impacts on the landscape character of the Park. A previous assessment of the renewable energy potential of the New Forest indicates that the most appropriate forms of renewable energy production in the New Forest are likely to be solar and biomass. The National Park Authority has taken a positive approach to renewable energy development proposals in the</p>



Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Park that do not conflict with the statutory National Park purposes.</p> <p>Paragraph 97 of the NPPF states that local planning authorities should “consider” identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources. The Government’s <i>Overarching National Policy Statement for Energy (EN-1)</i> reiterates the protection afforded to the landscape and scenic beauty of National Parks (paragraph 5.9.9). This protection, allied to the fact that additionally over half of the New Forest National Park is designated as being of international importance for nature conservation (where development will not be supported), means the Local Plan focuses on small-scale renewable energy proposals aimed at meeting local community energy needs, rather than identifying areas for potential renewable energy development.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>Policy SP11 sets out the Authority’s planning policy support for proposals to mitigate climate change and adapt to the impacts of climate change. Outside the Local Plan process, the Authority is also preparing a Climate</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Change Adaptation Plan which will set out further measures through which the impacts of climate change on the New Forest will be addressed.</p> <p>The Submission draft Local Plan has been informed by a Level 1 Strategic Flood Risk Assessment. Other than the land to the south of the Fawley Power Station site (which is covered by its own site specific flood risk assessment as part of the wider redevelopment proposals for the site), none of the proposed site allocations are in areas at risk from flooding. Policy DP12 sets out the Authority’s proposed planning policy approach to flood risk.</p>
<p>Take account of marine planning (105)</p>	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	<p>The MMO are a statutory consultee on the Authority’s Local Plan review and have been consulted at each stage in the Plan-making process dating back to 2015, including the Regulation 18 consultation (2015); the draft Local Plan consultation (October 2016); and the consultation on potential alternative housing sites (June 2017).</p> <p>In January 2017 the NPA responded to the consultation on the South Marine Plan and awaits the publication of the final Plan in due course. The NPA recognises that the draft South Marine</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Plan is a material planning consideration in the development of the Authority’s revised Local Plan. Policy SP7 specifically refers to the seascape character of the National Park, which includes 26 miles of coastline. The final section of this Self-Assessment sets out in more detail the links between the NPA’s Submission draft Local Plan (2018); the Marine Policy Statement (2011); and the draft South Marine Plan (2016)</p> <p>The UK Marine Policy Statement (2011) confirms in paragraph 2.6.5.4 that for any development proposed within or relatively close to nationally designated areas (such as National Parks), the marine plan authority should have regard to the specific statutory purposes of the designated areas. Chapter 5 of the Local Plan includes policy reference to the seascape character of the Park (Policy SP7) coastline of the New Forest (policy DP13) and these policies provide a consistent link between the MPS and the Local Plan.</p>
<p>Manage risk from coastal change (106)</p>	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where</li> </ul>	<p>The coastline of the New Forest National Park is largely undeveloped and therefore the scale of any future development is likely to be small. None of the ‘defined villages’ are</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	appropriate.	<p>located on the coast and other than the proposals for the former Fawley Power Station site (straddling the Park boundary with New Forest District), no site allocations are proposed on the coast. On this basis, no Coastal Change Management Areas have been designated within the Local Plan.</p> <p>Policy DP13 sets out the Authority's proposed approach to coastal development and the Local Plan also include cross-references to the appropriate sections in the North Solent Shoreline Management Plan.</p>
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</li> </ul>	<p>The protection afforded to the New Forest's landscape by virtue of its National Park designation is the golden thread running throughout the Local Plan. It is reflected in the Local Plan Vision, Strategic Objectives and planning policies. The Submission draft Local Plan includes a new planning policy specifically on the New Forest's Landscape Character (SP7) which emphasises the weight given to protecting the landscape of the National Park. In addition, paragraph 115 of the NPPF and the statutory National Park purposes form a clear framework for protected the New</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Forest’s landscape.</p> <p>Chapter 5 of the Local Plan also includes a number of policies on biodiversity (reflecting the hierarchy of international, national and local designations that over a significant part of the National Park); and support for green infrastructure provision (Policy SP9).</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> <li>• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	<p>Paragraph 5.66 and 5.67 in the Local Plan summarise the approach to reducing the impacts of pollution.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	<p>The Submission draft Local Plan contains a range of policies aimed at delivering the strategic objective to protect, maintain and enhance the natural environment of the National Park, including the natural beauty of the landscape and the range of habitats and species. In line with the requirements of the NPPF, the Local Plan includes policies on the hierarchy of international, national and local designations. Policy SP6 also includes reference to the Authority’s Biodiversity Action Plan.</p> <p>The Submission draft Local Plan was informed by a Habitats Regulations Assessment (HRA) which assesses the potential impacts of the Local Plan</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		(alone and in combination) on the protected habitats and species within the Park and in neighbouring areas.
<b>12. Conserving and enhancing the historic environment (paras 126-141)</b>		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>Chapter 6 of the Submission draft Local Plan sets out the Authority’s positive strategy for the conservation and enjoyment of the National Park’s rich historic environment. This links to the first statutory Park purpose and delivers the strategic objective of conserving and enhancing the cultural heritage and historic environment of the National Park, especially the wealth of individual characteristics that contribute to its local distinctiveness.</p> <p>A well as the planning policies set out in the Local Plan, the Authority’s positive strategy for the historic environment of the Park includes the detailed Conservation Area Character Appraisals (that form part of the Local Plan evidence base) and also the New Forest ‘Our Past, Our Future’ Heritage Lottery Funded project.</p>
<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>		
It is important that there is a sufficient supply of material to provide the infrastructure,	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international	The New Forest National Park

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Authority has full mineral and waste planning powers and works with other Hampshire authorities (Hampshire County Council, Portsmouth &amp; Southampton City Councils and the South Downs NPA) on minerals and waste matters.</p> <p>The relevant development plan policies can be found in the separate Hampshire Minerals &amp; Waste Plan and related Supplementary Planning Documents and therefore there is no coverage of minerals matters in the Authority’s Submissions draft Local Plan.</p>
<p><b>Justified:</b> <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be ‘justified’ a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>The Submission draft Local Plan is accompanied by a detailed Consultation Statement (January 2018) setting out the consultation undertaken during the Local Plan review process which commenced in Summer 2015. This has included public drop in sessions held across the National Park at each of the main stages in the process.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The consultation has been undertaken in line with the requirement of the relevant Regulations and the commitments in the Authority’s adopted Statement of Community Involvement (2013). The main stages leading up to the publication of the Reg. 19 Local Plan have included:</p> <ul style="list-style-type: none"> <li>(i) Regulation 18 consultation on the scope of the Local Plan review and the main issues (Autumn 2015);</li> <li>(ii) consultation on the full (non-statutory) draft Local Plan (October – November 2016); and</li> <li>(iii) consultation on potential alternative housing sites (June – July 2017).</li> </ul> <p>The Consultation Statement highlights how the representations received have influenced the Submission draft Local Plan. As well as the stages outlined above, the NPA has held topic based workshops and used existing forums such as the Parish Quadrant meetings and the New Forest Consultative Committee to provide updates on the progress on the Local Plan Review.</p>



Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> <li>• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	<p>The Submission draft Local Plan has been informed by a wide range of evidence base studies. These include:</p> <ul style="list-style-type: none"> <li>- Sustainability Appraisal / SEA</li> <li>- Habitats Regulations Assessment</li> <li>- Strategic Housing Market Area Assessment</li> <li>- Strategic Housing Land Availability Assessment</li> <li>- Strategic Flood Risk Assessment</li> <li>- Commercial Property Assessment</li> <li>- Gypsy and Traveller Accommodation Assessment</li> <li>- Whole Plan Viability Assessment</li> <li>- Tranquillity Study</li> <li>- New Forest Renewable Energy Study</li> </ul> <p>At each stage in the Plan-making process, reports have been considered at the public National Park Authority meetings. These updates have included:</p> <ul style="list-style-type: none"> <li>- Reg. 18 Local Plan paper</li> <li>- Consultation draft Local Plan (October 2018)</li> <li>- Consultation on potential alternative housing sites</li> <li>- Local Plan update and LDS (October 2017)</li> </ul>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>A Sustainability Appraisal has been undertaken at each of the main stages in the Local Plan review process and the findings published alongside the Local Plan at each of the key stages.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	<p>The Authority’s consultation draft Local Plan (October 2016) included arrange of questions and alternatives for some key areas including the approach to affordable housing and rural exceptions sites for example.</p> <p>The consultation on potential alternative housing sites (June – July 2017) illustrates the options considered by the Authority for site allocations in a transparent manner. The alternative development options in the National Park are limited by the large parts of the New Forest covered by Natura 2000 designations which reduced the potential development areas.</p> <p>The Sustainability Appraisal (January 2018) highlights the consideration of alternatives to matters such as the spatial strategy.</p>
<p><b><i>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></b></p> <p>To be ‘effective’ a DPD needs to:</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	<p>Chapter 3 of the Submission draft Local Plan sets out which planning policies deliver each of the Plan’s nine strategic objectives. At the beginning of each chapter, the Plan sets out which objectives will be fulfilled by the policies in that section.</p> <p>The Submission draft Local Plan has been subject to a number of assessments which consider the internal consistency of the document, including the HRA and whole Plan viability assessment. The HRA ensures that the policies in Plan do not impact on the integrity of protected habitats in the Park – to do so would be inconsistent with the objective of Chapter 5 to protect the natural environment. Likewise, the whole-Plan viability assessment ensures that the policies are internally consistent (e.g. policy SP21 on the size of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>dwellings and policy SP27 on affordable housing) and will not make new development unviable.</p> <p>In terms of the proposed housing allocations, the NPA has worked with the site promoters to assess the development capacity of the sites and ensure there are no obstacles to the sites coming forward. This ensures that this key aspects of the Local Plan is deliverable.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>The Submission draft Local Plan is accompanied by an Infrastructure Delivery Plan (IDP). The consultation undertaken with statutory bodies and providers during the Local Plan preparation process has not highlighted any major new infrastructure required as a result of the scale of development proposed. Policy SP38 sets out the planning policy approach to infrastructure provision and developer contributions (including CIL).</p> <p>The Submission draft Local Plan has been subject to a whole-Plan viability assessment (Three Dragons, November 2017) which demonstrates that the policies will deliver viable development.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>Policies which seek to pull together different policy objectives</li> <li>Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>The Submission draft Local Plan highlights the linkages between the Plan and other relevant strategies. These include strategies published by the NPA – for example the Landscape Action Plan, Biodiversity Action Plan, the emerging Recreation Management Strategy update, and the updated Habitats Mitigation Scheme – and also those prepared by partners such as the Solent Mitigation Framework which is due to be endorsed by the NPA in January 2018.</p> <p>The Plan also refers to ongoing strategy work such as the Green Halo and many of these are included within the National Park Partnership Plan 2015 – 2020 which outlines the actions being taken forward by a range of bodies to deliver the two statutory Park purposes. As highlighted by its title, the delivery of the two Park purposes relies on a wide range of organisations working in partnership and the Local Plan contributes to this.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>Does the DPD include the remedial actions</li> </ul>	<ul style="list-style-type: none"> <li>Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</li> </ul>	<p>The Implementation and Monitoring section of the Local Plan (Chapter 10) sets out how the performance of the policies will be monitored. The NPA publishes an Annual Monitoring Report in January each year and this</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>that will be taken if the policies need adjustment?</p>	<ul style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.</li> </ul>	<p>provides an assessment of trends. The Annual Monitoring Report is supplemented by the New Forest ‘State of the Park Report’ which reports on wider matters affecting the National Park.</p> <p>The New Forest National Park Local Plan will be reviewed within 5 years and the monitoring undertaken will highlight areas where changes are required in this future Local Plan review.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>• Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A ‘tick box’ approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</li> <li>• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</li> </ul>	<p>The Submission draft Local Plan is supported by a ‘Duty to Cooperate Statement’ (January 2018) which outlines the co-operation undertaken since the Local Plan review commenced in 2015. This includes (i) the joint commissioning of evidence base studies with neighbouring local authorities; (ii) the NPA’s engagement in sub-regional work such as the mitigation strategy for the Solent coastline; (iii) formal consultation at the relevant stages in the Plan-making process; and (iv) the input of specialist officers in partner organisations to inform the drafting of Local Plan policies.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The NPA has also worked closely with other bodies on matters such as habitat mitigation, with the preparation of the NPA’s updated habitat mitigation scheme having benefitted from the input of partner organisations including the RSPB and Natural England.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>• Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>• Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out indicators, targets and milestones</li> <li>• Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>• Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>• Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	<p>The Implementation and Monitoring section of the Local Plan (Chapter 10) sets out how the performance of the policies will be monitored. The NPA publishes an Annual Monitoring Report in January each year and this provides an assessment of trends. The Annual Monitoring Report is supplemented by the New Forest ‘State of the Park Report’ which reports on wider matters affecting the National Park.</p>
<p><b><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></b></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> </ul>	<p>The Local Plan complies with national policy but in a number of cases an alternative approach has been taken, reflecting the National Park’s status and the specific circumstances in the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>anything to existing national guidance? If so, why have these been included?</p>	<ul style="list-style-type: none"> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	<p>National Park.</p> <p>The Submission draft Local Plan succinctly summarises the relevant guidance in the NPPF and NPPG. The NPA’s Local Plan must also reflect the statutory framework for planning in National Parks which is established through primary legislation. Consequently there are areas – including the quantum of development proposed in the Park when compared to the objectively assessed housing need; and the proposed site-size threshold for the delivery of affordable housing – which depart from national policy. The rationale for these policy positions is set out in the Local Plan and further evidence is contained with the relevant evidence base studies and background papers (e.g. SHLAA, Whole-Plan Viability Assessment).</p> <p>The Consultation Statement (January 2018) sets out who has been consulted at each of the main stages in the Plan-preparation process; summarises the main points raised; and highlights how the representations received to date have influenced the content of the Submission draft Local Plan.</p>



## Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy A: Using evidence to plan positively and manage development (para 6)</b></p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	<p>The NPA commissioned an updated assessment of gypsy and traveller needs as part of the Local Plan review. This updated assessment has been produced in line with the latest Government guidance and reflects the Government’s updated definition of gypsies and travellers. The production of this assessment included liaison with representatives of the gypsy and traveller community and interviews with gypsies and travellers living within the study area (including the National Park).</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	<p>The NPA jointly commissioned an updated GTAA with a consortium of local planning authorities in Hampshire in 2017 to ensure the Local Plan was informed by an up to date evidence base. The consortium of appointing planning authorities consisted of around 12 authorities, highlighting the</p>

Policy Expectations	Possible Evidence	Evidence Provided
		<p>collaborative working across the Hampshire planning authorities.</p> <p>The 2017 study included face to face interviews with the gypsy and traveller community (including those currently living within the National Park) to identify local needs.</p>
<p><b>Policy B: Planning for traveller sites (paras 7-11)</b></p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <li>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 11</li> </ul>	<p>The Submission draft Local Plan includes a proposed site allocation for gypsy use (policy SP33) which would ensure the identified need for further gypsy sites in the recently updated GTAA (2017) is met.</p> <p>The NPA acknowledges the identified need for additional plots for travelling showpeople. The identification of a site following the ‘Call for Sites’ process and the consideration of representations on the draft Local Plan has not proved possible. The Submission draft Local Plan therefore includes a</p>

Policy Expectations	Possible Evidence	Evidence Provided
		<p>criteria based policy to support the delivery of additional travelling showpersons plots through the development control route.</p>
<p><b>Policy C: Sites in rural areas and the countryside (para 12)</b></p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>The proposed single pitch gypsy site contained within policy SP33 is located on the edge of the community of Landford and it is not considered that one additional gypsy pitch will ‘dominate’ the settled community.</p> <p>Policy SP33 also includes criteria to inform the assessment of any further proposals for gypsy and traveller use in the Park and this confirms that the site should not detrimentally affect surrounding occupiers in the National Park.</p>
<p><b>Policy D: Rural exception sites (para 13)</b></p>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where</p>	<ul style="list-style-type: none"> <li>• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	<p>The Submission draft Local Plan includes a proposed site</p>

Policy Expectations	Possible Evidence	Evidence Provided
viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.		allocation for gypsy use (policy SP33) which would ensure the identified need for further gypsy sites in the recently update GTAA is met.
<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> <li>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	<p>There is no Green Belt within the New Forest National Park and therefore this policy is not relevant.</p>
<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> <li>Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	<p>The Submission draft Local Plan includes a proposed site allocation for gypsy use (policy SP33) which would ensure the identified need for further gypsy sites in the recently update GTAA is met.</p>

Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy G: Major development projects (para 19)</b>		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> <li>Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</li> </ul>	There are no proposals within the Authority’s Submission draft Local Plan for major development that would result in the permanent or temporary relocation of a traveller site.

## Soundness Self-Assessment Checklist

### Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all<sup>1</sup> public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions<sup>2</sup>

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

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<sup>1</sup> Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

<sup>2</sup> For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.



Policy Expectations	Possible Evidence	Evidence Provided
<b>Key requirements under the Duty to Co-Operate</b>		
<p>Consistency between marine and terrestrial policy documents and guidance</p>	<ul style="list-style-type: none"> <li>• Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans)</li> <li>• Proof of collaborative working with the MMO and that the MPS has been taken into account.</li> </ul>	<p>The MMO is a statutory consultee in the preparation of the NPA’s Local Plan review and have been consulted at each stage of the Plan making process dating back to 2015.</p> <p>The UK Marine Policy Statement (2011) confirms in paragraph 2.6.5.4 that for any development proposed within or relatively close to nationally designated areas (such as National Parks), the marine plan authority should have regard to the specific statutory purposes of the designated areas.</p> <p>The Vision set out in the draft South Marine Plan (November 2016) emphasises the natural beauty of the area covered by the Plan, which includes two National Parks with coastlines (the South Downs and New Forest). This draft Vision is reflected in the NPA’s</p>

Policy Expectations	Possible Evidence	Evidence Provided
		<p>Submission draft Local Plan Vision which recognises the importance of the Solent coastline to the unique and recognisable sense of place.</p> <p>The importance of the coastal areas of the National Park are reflected in a number of policies in the Submission draft Local Plan, including: (i) Policy SP5 which protects internationally designated habitats (including the Solent and Southampton Water coastline); (ii) Policy SP7 which seeks to protect the character of the landscape and seascape of the National Park; and (iii) Policy DP13 which aims to protected the character of the New Forest’s largely undeveloped coastline.</p> <p>In addition, the HRA of the Submission draft Local Plan considered potential impacts from the Plan on the integrity of the range of protected habitats of the Solent and Southampton Water coastlines.</p>

Policy Expectations	Possible Evidence	Evidence Provided
<p>Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages</p>	<ul style="list-style-type: none"> <li>• Early and effective policy development engagement undertaken, including discussions with the MMO</li> <li>• Evidence of iteration of policies and plans as a result of engagement with the MMO</li> <li>• Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	<p>The MMO is a statutory consultee in the preparation of the NPA’s Local Plan review and have been consulted at each stage of the Plan making process dating back to 2015.</p> <p>A number of the draft Local Plan policies link directly to policies in the draft South Marine Plan, Policy S-CC-3 in the draft South Marine Plan, for example, ensures that development proposals do not exacerbate coastal change. This draft policy is reflected in the NPA Policy DP13(a) in the Submission draft Local Plan which similarly states that coastal development in the Park should not impact on coastal processes. Likewise policy S-SCP-1 in the South Marine Plan outlines the need to consider the impact of proposals on the seascape of the area due to the prevalence of protected landscapes along the south coast (including the 26 miles of coastline of the New Forest National Park). This draft Marine Plan policy is reflected</p>

Policy Expectations	Possible Evidence	Evidence Provided
		in policy SP7 in the NPA's Submission draft Local Plan which seeks to conserve the seascape character of the Park.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> <li>• Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review</li> <li>• Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS</li> <li>• Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans</li> </ul>	<p>The NPA responded during the public consultation on the draft South Marine Plan which was published in November 2016.</p> <p>The MMO has been consulted as each stage in the Local Plan preparation process dating back to 2015.</p> <p>The NPA's Submission draft Local Plan makes direct reference to the Marine Planning Statement, the role of the MMO and the draft South Marine Plan (November 2016) in chapter 5 on the natural environment.</p>
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>3</sup></b>		

<sup>3</sup> As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Sections 2.1 -2.2: The UK vision for the marine environment</b></p>		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> <li>• Reference in DPD where appropriate to UK vision for the marine environment</li> <li>• Contribution to the vision through local plan policies and supporting text</li> </ul>	<p>Chapter 5 of the Submission draft Local Plan includes a range of policies that contribute towards the achievement of the Marine Policy Statement Vision. This includes the policy protection for internationally designated sites (which include the Solent and Southampton Water coastlines); the enhancement of seascape character; and policy coverage of coastal development proposals.</p>
<p><b>Section 2.4: Considering benefits and adverse effects in marine planning</b></p>		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> <li>• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal</li> </ul>	<p>The sustainability appraisal objectives seek to conserve and enhance the seascape; and enhance water quality. All of the policies in the Submission draft Local Plan were assessed against these sustainability appraisal objectives.</p>

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Section 2.5: Economic, social and environmental considerations</b></p>		
<p>Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)</p>	<ul style="list-style-type: none"> <li>• Reference to relevant EU Directives in DPD and sustainability appraisal</li> <li>• Consideration of contribution of DPD policies to the objectives of relevant EU Directives</li> </ul>	<p>Policy DP8 on safeguarding and improving water resources seeks to avoid harm to the quality and yield of water resources (including coastal waters) in line with the Water Framework Directive. Policy DP8 also sets out the requirements for new development to meet water efficiency standards requires development proposals in line with the Directive.</p>
<p><b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b></p>		
<p><b>3.1 Marine Protected Areas</b></p>		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<ul style="list-style-type: none"> <li>• Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s)</li> <li>• Consideration of impacts of policy and/or terrestrial development on those areas and features of importance</li> <li>• Measures to mitigate, monitor and manage negative impacts on those areas and features of importance</li> </ul>	<p>Policy SP5 in the Submission draft Local Plan sets out the policy protection for internationally designated nature conservation sites. These include the range of designations covering the Solent and Southampton Water coastlines. The HRA of the Local Plan assessed potential impacts on the integrity of these sites.</p>

Policy Expectations	Possible Evidence	Evidence Provided
		<p>The NPA has since 2014 sought developer contributions towards mitigating the impacts of development on the Solent coastline and will continue to do so in accordance with the updated Solent mitigation framework (paragraphs 5.13 – 5.15).</p>
<p><b>3.4 Ports and shipping</b></p>		
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<ul style="list-style-type: none"> <li>• Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector</li> <li>• Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector</li> </ul>	<p>There are no major ports within the National Park. The Port of Southampton lies close to the north eastern boundary of the Park and paragraphs 4.11 – 4.14 set out the range of factors to be considered land owned by the Port at Dibden Bay on the edge of the New Forest come forward for development during the Plan period.</p> <p>Proposals for the former Fawley Power Station site (the brownfield element of the site lies outside the National Park and within New Forest District Council’s planning remit) are likely to include provision for</p>

Policy Expectations	Possible Evidence	Evidence Provided
		marine industry. The NPA's Submission draft Local Plan supports the delivery of this development subject to various requirements being met.
<b>3.8 Fisheries</b>		
Consider potential economic, social and environmental impacts of other developments on fishing activity	<ul style="list-style-type: none"> <li>Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture</li> </ul>	Chapter 8 of the Submission draft Local Plan seeks to deliver the strategic objective of to develop a diverse and sustainable economy that contributes to the well- being of local communities. This links to the NPA's socio-economic duty and any proposals relating to fisheries along the New Forest coastline and estuaries would be considered against these policies.
<b>3.9 Aquaculture</b>		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> <li>Where relevant, evidence that the benefits of aquaculture industry development have been considered</li> </ul>	Chapter 8 of the Submission draft Local Plan seeks to deliver the strategic objective of to develop a diverse and sustainable economy that contributes to the well- being of local communities. This links to



Policy Expectations	Possible Evidence	Evidence Provided
		the NPA's socio-economic duty and any proposals relating to aquaculture would be considered against these policies.
<b>3.10 Surface water management and waste water treatment and disposal</b>		
<p>Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment</p>	<ul style="list-style-type: none"> <li>Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location</li> </ul>	<p>Given the low level of development proposed in the National Park, the main consideration of waste water infrastructure has been through liaison with the statutory water companies; and the HRA of the Submission draft Local Plan which has considered issues relating to water quality. Where appropriate these inputs have informed the policy wording. For example, a number of the proposed site allocation policies refer to waste water connections.</p>
<b>3.11 Tourism and recreation</b>		
<p>Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and</p>	<ul style="list-style-type: none"> <li>Where relevant, reference to marine tourism and recreation</li> <li>Evidence that the potential for marine tourism and recreation has</li> </ul>	<p>Chapter 8 in the Submission draft Local Plan takes forward the strategic objective to</p>

Policy Expectations	Possible Evidence	Evidence Provided
local communities	been recognised in plan-making	<p>support development which encourages sustainable tourism and recreation, and provides opportunities for enjoying the Park's special qualities (including its undeveloped coastline). Policy SP46 provides the policy framework against which proposals for marine tourism and recreation will be considered against.</p> <p>The NPA (working with other statutory organisations) is also in the process of updating the New Forest National Park Recreation Management Strategy (RMS). The RMS will include coverage of water based tourism in the New Forest, including on the Solent coastline.</p>

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur	Colchester	Horsham	Northumberland
Allerdale	Copeland	Hounslow	Norwich
Arun	Cornwall	Huntingdonshire	Poole
Babergh	County Durham	Ipswich	Preston
Barking and Dagenham	Dartford	Isle of Wight	Purbeck
Barrow-in-Furness	Doncaster	Isles of Scilly	Redcar and Cleveland
Basildon	Dover	Kensington and Chelsea	Richmond upon Thames
Bassetlaw	East Cambridgeshire	King's Lynn and West Norfolk	Rochford
Bexley	East Devon	Lake District National Park	Rother
Blackpool	East Lindsey	Lambeth	Scarborough
Boston	East Riding of Yorkshire	Lancaster	Sedgemoor
Bournemouth	Eastbourne	Lewes	Sefton
Broadland	Eastleigh	Lewisham	Selby
Broads Authority	Exeter	Liverpool	Shepway
Canterbury	Exmoor National Park	Maidstone	South Cambridgeshire
Carlisle	Fareham	Maldon	South Downs National Park
Castle Point	Fenland	Medway	South Gloucestershire
Chelmsford	Fylde	Middlesbrough	South Hams
Cheshire West and Chester	Gateshead	New Forest	South Holland
Chichester	Gloucester	New Forest National Park	South Lakeland
Chorley	Gosport	Newark and Sherwood	South Norfolk
Christchurch	Gravesham	Newcastle upon Tyne	South Ribble
City of London	Great Yarmouth	Newham	South Somerset
City of Brighton and Hove	Greenwich	North Devon	South Tyneside
City of Bristol	Halton	North East Lincolnshire	Southend-on-Sea
City of Kingston upon Hull	Hambleton	North Lincolnshire	Southwark
City of Peterborough	Hammersmith and Fulham	North Norfolk	Stockton-on-Tees
City of Plymouth	Hartlepool	North Somerset	Stroud
City of Portsmouth	Hastings	North Tyneside	Suffolk Coastal
City of Southampton	Havant	North York Moors National	Sunderland
City of Westminster	Havering	Park	Swale

Taunton Deane  
Teignbridge  
Tendring  
Test Valley  
Thanet  
Thurrock  
Tonbridge and Malling  
Torbay  
Torridge  
Tower Hamlets  
Wandsworth  
Warrington  
Waveney  
Wealden  
West Devon  
West Dorset  
West Lancashire  
West Lindsey  
West Somerset  
Weymouth and Portland  
Winchester  
Wirral  
Worthing  
Wyre  
York