

New Forest National Park Local Plan 2016 – 2036

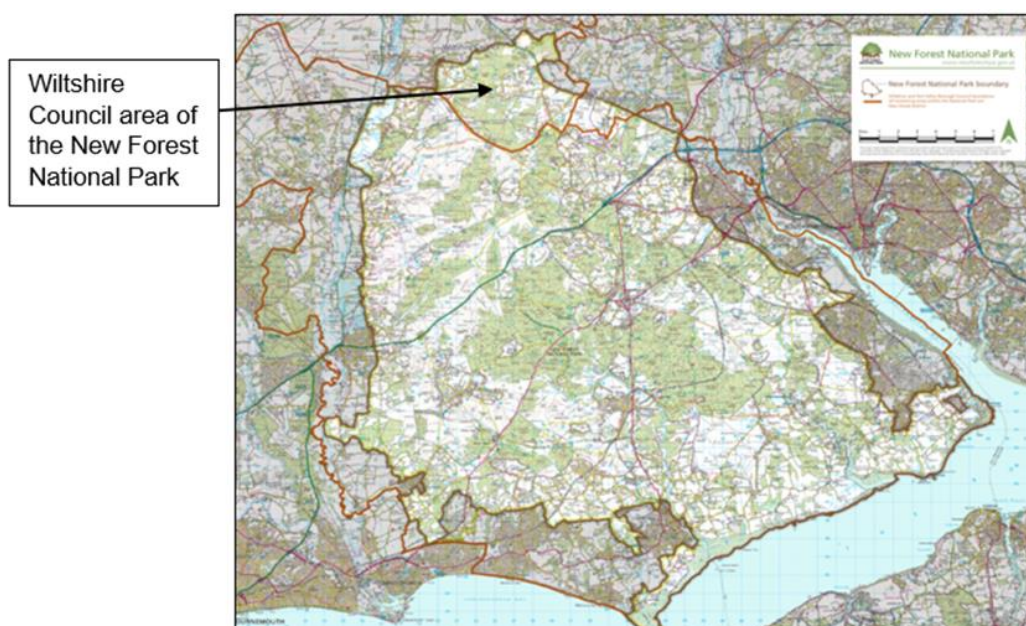
Statement of Common Ground between the New Forest National Park Authority and Wiltshire Council May 2018

1. Introduction

- 1.1 The *Localism Act 2011* places a legal duty on planning authorities and other prescribed bodies to cooperate with each other on strategic planning matters throughout the preparation of their development plan documents. It is expected that engagement and cooperation will be constructive, active and ongoing.
- 1.2 Both the National Park Authority and Wiltshire Council are required to publish 'Duty to Cooperate Statements' setting out how this legal duty has been fulfilled in the preparation of their respective Local Plans. This separate 'Statement of Common Ground' focuses on the main areas of agreement and has been prepared following the publication of the amendments to national planning practice guidance in March 2018, which include the requirement for Statements of Common Ground. It has been jointly agreed by the National Park Authority and Wiltshire Council and should be read in conjunction with the Duty to Cooperate Statement that accompanies the National Park Authority's Submission draft Local Plan.

2. The administrative areas covered by the Statement of Common Ground

- 2.1 Approximately 5% of the New Forest National Park lies within Wiltshire Council, amounting to circa 30 square kilometres. This is illustrated below.



2.2 Since 2006 the National Park Authority has been the sole planning authority for the whole of the New Forest National Park, including the 30 square kilometres of southern Wiltshire that lies within the National Park. Wiltshire Council is the planning authority for the rest of Wiltshire that lies outside the National Park. Wiltshire Council is the statutory education, highways and housing authority for the whole of Wiltshire, including the area within the National Park.

3. The key strategic matters being addressed by the Statement

3.1 The NPPF (2012) states that the Government expects joint working on areas of common interest and paragraph 156 of the Framework sets out a number of strategic priorities. Of particular relevance to the New Forest, these priorities include the homes and jobs needed in an area; and the conservation and enhancement of the natural environment, including landscape.

3.2 The National Park Authority and Wiltshire Council agree that the following are the key strategic matters for the two planning authorities.

- Meeting objectively assessed housing needs
- Habitat mitigation measures
- The 'duty of regard' to the statutory National Park purposes

(i) Meeting objectively assessed housing needs

3.3 The Government published their proposed standardised methodology for calculating housing needs in September 2017. The standardised methodology was subsequently included in updates to national planning practice guidance published in March 2018. It is common ground between the National Park Authority and Wiltshire Council that the standardised methodology for calculating housing needs, as currently proposed, does not apply within the New Forest National Park.

3.4 Consequently the best available evidence of housing needs in the New Forest National Park is the assessment of housing needs, Justin Gardner Consulting (October 2017). This establishes a housing need in the National Park of 1,260 additional dwellings between 2016 – 2036; equating to 63 dwellings per annum.

3.5 Paragraph 115 of the NPPF states that great weight should be given to conserving the landscape and scenic beauty of National Parks. In addition, the Park contains extensive designations to protect irreplaceable habitats (NPPF paragraph 118). These specific policies of the Framework indicate that development should be restricted (NPPF paragraph 14). The National Park Authority's Submission draft Local Plan 2016 – 2036 (January 2018) proposes the delivery of 800 additional dwellings in the National Park over the Plan-period. This figure represents an unmet need for housing within the National Park of 460 dwellings over the Plan-period to 2036 (or 23 dwellings per annum).

3.6 Wiltshire Council welcomes the publication of the Authority's Submission draft Local Plan and the positive approach taken planning for housing within the National Park to contribute towards meeting identified need, including the

allocation of sites. Recognising the significant market pressures on the existing housing stock, the National Park Authority and Wiltshire Council agree new housing within the National Park should be focused towards affordable housing. As the statutory housing authority for the Wiltshire area of the National Park, Wiltshire Council supports draft Policy SP27 (Affordable Housing Provision within the Defined Villages and on Allocated Sites) that proposes a lower threshold than the Government's Planning Practice Guidance.

3.7 It is common ground between the National Park Authority and Wiltshire Council that the Salisbury Housing Market Area includes a small part of the north of the New Forest National Park. This is reflected in the assessments of Objectively Assessed Need for the local authority areas of Wiltshire and Swindon carried out by Opinion Research Services (2017); and the work undertaken for the National Park Authority by Justin Gardner Consulting (2017). Wiltshire Council is at an early stage in the process of reviewing its Local Plan but it will address those housing needs arising from within the small part of the Salisbury HMA that lies within the National Park by virtue of the fact that the Wiltshire assessment of need has used a best fit study area snapped to the Wiltshire Council administrative boundary.

(ii) Habitat Mitigation Measures

3.8 Over 50% of the New Forest National Park area is designated as being of international importance for nature conservation. It is common ground between the National Park Authority and Wiltshire Council that development in the National Park and adjacent areas of south Wiltshire has the potential to impact on the New Forest's Natura 2000 sites.

3.9 The National Park Authority and Wiltshire Council are currently working with neighbouring authorities (and Natural England) to develop a strategic approach to deliver planned housing in the area around the New Forest while protecting the integrity of its habitats. Following a successful funding bid to the Ministry of Housing, Communities and Local Government (MHCLG) in early 2018, the two authorities are working in partnership with others to develop and ultimately implement a co-ordinated, cross-boundary approach to habitat mitigation for the New Forest's protected habitats.

3.10 The National Park Authority and Wiltshire Council are also party to the draft Memorandum of Understanding relating to the River Avon Special Area of Conservation (SAC) and the need for 'phosphate neutral' development. The National Park Authority and Wiltshire Council have agreed (with New Forest District Council, the Environment Agency, Natural England and Wessex Water) on a precautionary approach to development within the River Avon catchment and to put in place effective and proportionate measures to remove, mitigate or off-set the phosphate load from development.

(iii) The 'duty of regard' to the statutory National Park purposes

3.11 Section 62(2) of the Environment Act 1995 makes it a duty for all relevant bodies (including neighbouring planning authorities) to have regard to the two statutory

National Park purposes when carrying out their duties or making decisions that could affect the National Park. This legal duty recognises that the delivery of the two statutory National Park purposes rests with a wide range of bodies, not just national park authorities.

- 3.12 The statutory 'development plan' for the Wiltshire Council area (Wiltshire Core Strategy, January 2015) recognises this legal duty of regard through Core Policy 25 and its supporting text. In reviewing its own Local Plan, Wiltshire Council will ensure that the duty of regard is an appropriate part of the statutory development plan for Wiltshire and properly taken into account.

4. Governance arrangements for the cooperation process

- 4.1 Wiltshire Council directly appoints two of the National Park Authority's 22 members and the Council delivers a range of statutory functions for the area of the National Park that lies within Wiltshire. Wiltshire Council is also represented on the National Park Partnership Plan Leadership Group and as a result there are existing channels at both officer and member/councillor level for cooperation between the two authorities.
- 4.2 This Statement of Common Ground has been prepared and agreed at officer level between the two authorities. It is anticipated that a similar statement will be prepared as Wiltshire Council progresses with its own Local Plan review and this would provide an opportunity to update this Statement where appropriate.

5. Distribution of housing need in the area as agreed through the plan-making process

- 5.1 As outlined in section 3 of this Statement of Common Ground, the best available information on local housing needs arising in the New Forest National Park is the assessment of housing needs undertaken by Justin Gardner Consulting (October 2017). Against this assessed need, the proposals within the National Park Authority's Submission draft Local Plan 2016 – 2036 (January 2018) result in an under provision of housing amounting to 460 dwellings over the Plan-period.
- 5.2 It is common ground between the two authorities that the Salisbury Housing Market Area extends into the north of the National Park. Paragraphs 2.42 - 2.44 (including table 2.8) of the Justin Gardner Consulting assessment (2017) conclude that, "*...the analysis suggests a negative need in the Test Valley/Wiltshire area...The finding of a negative need in the National Park outside of the [New Forest] District boundary (in data modelling terms) is driven by this area having a notably older population structure than the rest of the National Park... This older population structure means that the number of deaths is projected to exceed the number of births significantly; even projecting for there to be a notable level of net in-migration does not provide a positive level of population or household growth.*"

6. A record of where agreements have (or have not) been reached on key strategic matters

- The two authorities agree that planned new housing provision within the National Park should be focused towards affordable housing for local people.
- The Government’s draft standardised methodology for calculating housing needs does not apply within the National Park. Therefore, the Justin Gardner Consulting assessment (2017) provides the best available evidence of housing needs for the National Park planning area.
- Against this assessed housing need, there is a planned under provision of circa 460 dwellings in the National Park over the Plan period to 2036. In the light of the findings of the Justin Gardner Consulting assessment (2017) as set out above, the evidence points towards there being no justification to address unmet need in the Wiltshire area.
- It is recognised by both authorities that development in the National Park and adjacent areas in south Wiltshire has the potential to impact on the internationally protected habitats. The National Park Authority and Wiltshire Council are therefore committed to working in partnership with neighbouring authorities and Natural England to deliver strategic habitat mitigation measures for the New Forest and Rover Avon Natura 2000 sites.

7. Other matters

7.1 Wiltshire Council is the statutory housing authority for the area of the National Park that lies within Wiltshire. It is common ground between the National Park Authority and Wiltshire Council that any affordable housing development that does take place within the Wiltshire area of the New Forest National Park should reflect the relevant standards as set out in Wiltshire Council’s affordable housing local connections criteria. This is reflected in a proposed minor modification to the National Park Authority’s Submission draft Local Plan.

8. Signatories

Signed on behalf of the New Forest National Park Authority		
Name and position	Signature	Date
David Illsley, Policy Manager		25 May 2018

Signed on behalf of Wiltshire Council		
Name and position	Signature	Date
Georgina Clampitt-Dix, Head of Spatial Planning		25 May 2018