



Alan C Scott  
National Planning Policy Framework  
Department for Communities & Local Government  
Zone 1/H6, Eland House  
Bressenden Place  
London SW1E 5DU

14 October 2011

Dear Mr Scott

**Consultation draft National Planning Policy Framework (NPPF)  
New Forest National Park Authority response**

The New Forest National Park Authority welcomes the opportunity to comment on the Government's draft National Planning Policy Framework (NPPF). The Authority endorses the submissions made by the English National Park Authorities Association (ENPAA) and the Campaign for National Parks (CNP) but as one of the most densely populated National Parks, which is subject to significant development pressures, the Authority also wishes to submit its own representations on the draft Framework.

The *English National Parks and the Broads Circular 2010* confirms that, "...the town and country planning system is a key instrument in the achievement of [the statutory National] Park purposes." (para. 136) It is from this perspective, as a planning authority dealing with over 1,000 applications a year, that the Authority is responding. Set out below is a summary of the main points in the Authority's response, followed by the more detailed comments.

In summary, the Authority:

- Supports the aspiration to simplify national planning policy to create a planning system that is more accessible to local communities.
- Calls for further clarification over the process for gaining a 'Certificate of Conformity' for recently adopted Development Plan Documents.
- Recommends that the presumption in favour of developing brownfield land before greenfield sites is explicitly retained within the NPPF.
- Welcomes the Government commitment to protecting National Parks, and proposes that this commitment is explicitly stated within the Framework.
- Recommends additional policy wording on National Parks to refer to the conservation of their natural beauty and the protection of their setting.
- Seeks recognition of the role of National Parks as exemplars of sustainable development in delivering the statutory purposes and duty.
- Raises concerns over the potential impacts of the NPPF on the delivery of much needed local affordable housing within the National Park.

**New Forest National Park Authority**

South Efford House, Milford Road, Lyminster, Hampshire SO41 0JD  
Telephone 01590 646672 Fax 01590 646666 Email [steve.avery@newforestnpa.gov.uk](mailto:steve.avery@newforestnpa.gov.uk)  
[www.newforestnpa.gov.uk](http://www.newforestnpa.gov.uk)

## General Comments

The Authority supports the Government's overall aspiration for a simpler, quicker and more accessible planning system that positively engages communities in the planning of their area. Linked to this aim, the Authority welcomes the statement that Local Plans should be based on a proportionate evidence base (para. 27) and related assessments and appraisals (para. 36). From our recent experiences of progressing a Development Plan Document through to successful adoption (as well as being involved as a statutory consultee in the preparation of surroundings authorities' plans), it is clear that the current Local Development Framework system is very resource intensive.

## Conformity with the NPPF

The Authority would welcome greater clarity over the statement in paragraph 26 that, "*It will be open to local planning authorities to seek a certificate of conformity with the Framework.*" As currently drafted, this suggests that seeking a 'certificate of conformity' is optional. The National Park Authority adopted its *Core Strategy & Development Management Policies DPD* in December 2010, an important milestone that involved significant resources through more than three years of public consultation and independent examination in public. The Authority requests that the Government takes a pragmatic approach to issue of 'conformity' to ensure that authorities with recently adopted plans are not prejudiced by the publication of the NPPF.

## Presumption in favour of sustainable brownfield development

The Authority notes the Government's aim of giving greater flexibility to decide the most suitable locations for housing by removing the 60% brownfield target. However, as is recognised within the *Draft National Planning Policy Statement Impact Assessment* (July 2011), there are strong environmental grounds for seeking to re-use previously developed land. The Authority therefore recommends that the NPPF is revised to explicitly support the presumption in favour of brownfield development before greenfield sites are considered.

## National Planning Policy on National Parks

The Authority welcomes the Government's positive commitment to maintaining the protection afforded to National Parks through the NPPF. However, in seeking to simplify national planning policy into a single, succinct document, some important aspects of existing national and regional planning policy have not been retained. The Authority notes that paragraph 167 of the NPPF is essentially a summary of paragraphs 21 - 23 of PPS7. While the main headlines of the existing policy have been retained (e.g. major development test) the Authority recommends the following aspects are also included to ensure National Parks continue to receive appropriate protection.

- Current Government policy (para. 21, PPS7) clearly states that, "*Nationally designated areas comprising National Parks, the Broads, and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the*

*Government as having the highest status of protection in relation to landscape and scenic beauty.*” This long established planning principle is unfortunately omitted from the draft NPPF and we would strongly urge the Government to reinstate it to reaffirm their commitment to National Parks.

- Current national planning policy (para. 21, PPS7) also confirms that, “...*the conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policy and development control decisions in these areas.*” The ‘natural beauty’ of our National Parks is a key criterion in their designation (as set out in the *National Parks & Access to the Countryside Act 1949*) and it is this natural beauty that the first statutory Park purpose seeks to conserve and enhance. The Authority would therefore support the reinstatement of the existing national policy on conserving natural beauty within the NPPF.
- Finally, in accordance with the statement submitted by the Campaign for National Parks (CNP), the Authority would welcome clear national policy recognition of the need to protect the setting of National Parks. Section 62(2) of the Environment Act 1995 requires all relevant bodies to have regard to the statutory purposes in exercising any functions that may affect National Parks. To reflect this, Policy C1 (New Forest National Park) in the *Regional Spatial Strategy of the South East* states that, “...*Planning decisions should also have regard to the setting of the [New Forest National] Park.*” With Regional Spatial Strategies due to be abolished through the Localism Bill, the NPPF provides the ideal opportunity to protect the setting of all National Parks in accordance with the Section 62(2) duty. This is particularly important in the New Forest, as a lowland National Park with significant development pressures in the adjoining areas of South Hampshire, South Wiltshire and South East Dorset.

There are other aspects of the draft NPPF that are supported and should assist the Authority in protecting the special qualities of the New Forest. For example, reference to limiting the impact of light pollution (para. 175) is welcomed, as is the requirement to identify and protect areas of tranquillity that are prized for their recreational value (para. 173). Consultation undertaken by the Authority in 2007 revealed that 93% of people perceive tranquillity to be either an important or very important quality of the New Forest, and this reference in the NPPF potentially provides a useful hook for National Park Authorities to develop policies to protect this special quality.

#### Definition of ‘Sustainable Development’

The *English National Parks and the Broads Circular 2010* confirms that National Parks are important models for sustainable development (para. 28). The principles of sustainable development as they relate to the National Park context are reflected in the statutory Park purposes and related socio-economic duty. Within the New Forest National Park, for example, over £1 million has been allocated to local communities and businesses through the Sustainable Development Fund since 2006 to support projects that bring environmental,

economic and community benefits, as well as furthering at least one of the two statutory Park purposes.

It is noted that there have been calls for a definition of sustainable development to be included within the NPPF. However, the Authority hopes that the NPPF will provide sufficient flexibility to allow National Park Authorities to define 'sustainable development' for their specific areas. Within National Parks, this means development that focuses on local community needs (rather than wider demands); on protecting and encouraging people to enjoy the special qualities of the Park; and recognising that sustaining a high quality environment is essential for the economic prosperity of National Parks. The presumption in favour of sustainable development is clearly a central element of the NPPF, and the Framework would be strengthened by confirming that development that conflicts with the statutory National Park purposes would be considered unsustainable under the NPPF.

### Development Viability

Given the challenges of generally high land values, low average wages, and low levels of development, National Park Authorities have always sought innovative ways to meet local needs for affordable housing. In the case of the New Forest, the Authority's recently adopted Core Strategy sets a target of at least 50% affordable housing on all development sites within the larger villages, with appropriate rural exceptions sites supported in the rest of the Park. The Authority is therefore concerned at the statements in the NPPF that:

- (i) To ensure viability, the costs of any requirements placed on development (e.g. affordable housing) should still ensure an acceptable return to a willing developer (para. 39);
- (ii) Local Plans should ensure that the full requirements for housing are met (para. 109); and
- (iii) The requirement for authorities to consider allowing some open market housing on rural exceptions sites (para. 112).

In combination, these requirements could significantly reduce the Authority's ability to maximise the delivery of local affordable housing in accordance with our statutory duty to foster the socio-economic well-being of local communities. Meeting the full demands for housing within the Park would result in unsustainable development and the Authority would strongly recommend that the existing rural exceptions policy, which encourages new housing development for local people in perpetuity, is retained. The NPPF should allow National Park Authorities to take a different approach where this is appropriate for a nationally protected area to support the delivery of the two statutory National Park purposes and associated duty.

I hope this response is helpful in considering ways in which the draft NPPF can be further improved and please do not hesitate to contact me should you require any further information on the points made in the Authority's response.

Yours sincerely

Steve Avery  
Director of Park Services  
New Forest National Park Authority

Tel: 01590 646659

Email: [steve.avery@newforestnpa.gov.uk](mailto:steve.avery@newforestnpa.gov.uk)