



**NEW FOREST NATIONAL PARK
LOCAL PLAN**

HEARING STATEMENT

ON BEHALF OF BEAULIEU ESTATE

Date: 7 September 2018

Our Ref: OXF7217

Appeal Ref (optional):

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1 HEARING STATEMENT

Introduction

- 1.1 This statement has been prepared by RPS to support the representations made on behalf of the Beaulieu Estate in relation to the New Forest National Park Local Plan 2016 – 2036 (CD01).

Background

- 1.2 The Beaulieu Estate comprises approximately 7000 acres, and includes both the bed of the Beaulieu River and an area of the foreshore to the Solent. It has over 800 years of history having originally been a royal hunting lodge and estate. From 1204 until the dissolution in the 1530s, the Estate was used as an Abbey. The Estate has subsequently been in the ownership of the Montagu family for over four centuries. Visitors have been exploring the ruins of Beaulieu Abbey since 1912. In 1952, Edward, Lord Montagu opened Palace House and Gardens to the public for the first time – making Beaulieu among the first 'stately homes' to admit visitors. For the grand opening, he displayed five Veteran cars in the entrance hall of the house as a tribute to his late father, John Douglas-Scott-Montagu, who was a motoring advocate and pioneer at the turn of the last century.
- 1.3 From these beginnings, encouraged by a new public interest in motoring heritage, the Montagu Motor Museum would develop. Supported by the British motor industry and enthusiasts, the museum continued its expansion, becoming the National Motor Museum in 1972.
- 1.4 Since 1972, the National Motor Museum has been governed by The National Motor Museum Trust, an independent charity. It boasts a world-famous collection of vehicles and associated motoring archives. Today, Beaulieu is one of the leading visitor attractions in the UK, a member of Visit England, Tourism South East, Hampshire Top Attractions, Treasure Houses of England and the Historic Houses Association.
- 1.5 It is also a large, working rural estate, with a number of residential properties and rural businesses within its grounds. The overriding aim of the Montagu family is to run the Estate as an environmentally, socially and economically sustainable entity. The principal land use is agriculture (3,200 acres) and forestry (2,000 acres). The Estate owns and manages 126 dwellings, including farm houses and 57 commercial properties. The Estate, and its operating company Beaulieu Enterprises Limited, employs approximately 150 people throughout the year, increasing to some 250 in the summer.
- 1.6 RPS has previously made representations on the Consultation and Submission drafts of the Local Plan. The Estate's previous comments in relation to Policy 45 Tourism Development were addressed in Policy 46 through recognition of the National Motor Museum as a major visitor attraction. Objections in relation to the following policies remain outstanding and are the subject of this Statement:
- SP30 New Forest Estate Workers Dwellings
 - DP32 Removal of Agricultural Occupancy Conditions

- DP47 Extensions to Holiday Parks and Camp Sites
 - DP49 Re-use of Buildings outside the Defined Villages
- 1.7 This Statement should be read in conjunction with the Estates representations dated 28 February 2018.
- 1.8 The remainder of this statement responds directly to the questions raised by the Inspector.

Matter 7: Affordable Housing

Housing outside of defined villages – Policies SP30 and DP32

Are the policies justified, effective and consistent with national policy in relation to the approach to housing development outside of Defined Villages?

- 1.9 Policy SP30 relates to development proposals - including small-scale housing through the conversion or change of use of existing buildings as the first preference, and then new build - within the larger Estates of the National Park for Estate Workers.
- 1.10 The Estate has previously expressed concern about Policy criteria c and d. Minor modification MIN-42 is welcomed and overcomes the Estate's objections to criteria c.
- 1.11 The Policy is still not considered to have been **positively prepared** in relation to criterion d. The Plan recognises in the supporting text the role large landowners play in the delivery of the two statutory National Park purposes and related socio-economic (paragraph 3.4), noting that Estates can be responsible for the housing of in excess of 30 people. As explained in the representations, the Policy as presently drafted could also have a significant impact on the business plan for the Estate, which relies on the letting of a number of properties. The Policy would have the, perhaps unintended, consequence of potentially having to remove non-Estate workers from their homes which are currently not subject to occupancy conditions to accommodate an Estate worker. Given the important role Estates play in the socio-economic profile of the National Park, it is important that those currently living in Estate-owned houses are not left vulnerable by a Policy which could see them without suitable accommodation, thus creating additional housing need. It may also have the effect of removing dwellings from the existing market supply. As a consequence, without the amendments to criterion d proposed by the Estate, the Local Plan may not be able, as a minimum, to meet the area's objectively assessed housing needs. There is also a lack of clarity in the expression "recently sold or let".
- 1.12 For these reasons, the Policy as presently drafted will also not be **effective**, as in meeting the needs of an Estate worker it will potentially be creating additional housing need from non-Estate workers. In situations where it is not possible to remove occupants from dwellings, it would leave Estate workers without suitable accommodation, as the Policy may not allow the Estate worker's need to be met in these circumstances, which is again unsound because it is not effective.
- 1.13 RPS has seen no evidence presented by the Council that would justify the approach to Estate Workers dwellings. The matter has not been addressed in the Housing Topic Paper (CD115), and it is therefore considered that the policy is not **justified**.

- 1.14 The National Planning Policy Framework (NPPF)(CD25) states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs (paragraph 77). Whilst it is acknowledged that great weight should be given to conserving and enhancing landscape and scenic beauty in National parks, it is noted also that the scale and extent of development in such Areas should be limited (paragraph 77). The scale of development likely to be required for Estate Workers where dwellings on the Estate have been recently sold or let to non-Estate workers is likely to be limited over the plan period, especially as Policy SP30 defines “small-scale housing schemes” as not exceeding a maximum of 3 units per site, and so it is not considered that there would be a conflict with paragraph 77 of the NPPF. Given that the NPPF states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs (paragraph 77), and, as noted above, given that criterion d could itself create a (presumably unintended) additional housing need, it is not considered that the Policy as presently drafted is **consistent with National Planning Policy**.
- 1.15 We are also concerned about Policy DP32, which currently only allows agricultural occupancy restrictions to be removed if the Authority is satisfied that the long-term need for the dwelling has ceased and there is no evidence of a continuing need for housing for persons employed or last employed in the locality in those categories, or commoning. This policy does not recognise that sometimes there may be benefits to removing an agricultural occupancy condition from one dwelling and placing it on another, similar, dwelling which may be better located for the need. The policy will not be effective if it does not facilitate this, as needs can often be better met by reallocating the occupancy condition. We suggested some amended wording in our representations, which would resolve this objection.

Matter 12: A Sustainable Local Economy

Sustainable Tourism (DP47)

Does Policy provide a justifiable and effective approach for the support of sustainable tourism? Is the approach consistent with national policy?

- 1.16 As explained in the original representations, the Policy as originally drafted was not sufficiently flexible to allow for the opportunities for Estates such as Beaulieu to accommodate pitches/campsites that are lost within sensitive parts of the National Park, such as on Forestry Commission Land. As currently drafted, the policy would only appear to allow relocations where the new site forms part of a specific relocation proposal, and the new site is directly linked to the site that it is replacing. It does not allow for sites within an Estate to replace other sites that have been lost where these sites have no direct relationship with the Estate. In other words, the policy as currently drafted will generally result in a reduction of camp sites within the New Forest. The removal of the phrase “adjoining an existing site” in the submission draft Local Plan was welcomed as it provides additional flexibility, but it does not remove the Estate’s objection to the Policy, as it requires a direct link between the new proposal and the site being closed. The Policy does not cater for situations where new camping sites are not relocations, but instead are new sites that are utilising capacity that has been lost where unrelated sites have closed down.

- 1.17 Whilst the loss of sites from sensitive locations would have benefits to the New Forest in terms of environmental impact, if the sites are not replaced this would see a general reduction in economic activity, which is not in line with the overall objectives in the Plan in terms of developing a diverse and sustainable economy that contributes to the well-being of local communities, and supporting development which encourages sustainable tourism and recreation, and provides opportunities for enjoying the National Park's special qualities (strategic objectives 6 and 8, paragraph 3.5). It is not considered that the Policy as presently worded would be **effective** in delivering these objectives.
- 1.18 Such a loss of provision and reduction in economic activity runs contrary to paragraph 83 of the NPPF which states in general terms that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development, and more specifically in terms of supporting a prosperous rural economy that planning policies should, among other things, enable sustainable rural tourism and leisure developments which respect the character of the countryside. This is also contrary to the Government's Tourism Policy (March 2011), which seeks to improve the sector's productivity to become one of the top 5 most efficient and competitive visitor economies in the world (section 2.2), but also to create the right environment in which the domestic tourism sector can flourish (section 2.4). As such is not considered that the policy as presently drafted is **consistent with national policy**. This is especially pertinent, when it is considered that the policy, as proposed to be amended by Beaulieu, would not have the result in increasing the number of campsites in the New Forest. It would merely maintain the same level of campsites, or slightly reduce them.
- 1.19 The only evidence put forward to justify this approach is are statistics that compare campsite provision in the National Park with other National Parks. However, given the reliance of the National Park economy on this type of accommodation – which is clearly a greater reliance than other National Parks in England – the potential economic effects of this reduction will be greater. To this end, the matter has not been addressed in the Economy and Employment Topic Paper (CD128), and it is therefore considered that the policy is not **justified**.

Land based economy (DP49)

Is the approach set out in Policy DP49 effective, justified and consistent with national policy?

- 1.20 The Estate is generally supportive of the Policy, but considers that could benefit from some refinement to ensure it is **consistent with national policy** on sustainable rural tourism, and to ensure that it is **effective** in delivering the strategic objectives of the Local Plan in terms of developing a diverse and sustainable economy that contributes to the well-being of local communities, and supporting development which encourages sustainable tourism and recreation, and provides opportunities for enjoying the National Park's special qualities (strategic objectives 6 and 8, paragraph 3.5).
- 1.21 It is noted that the supporting text (paragraph 8.35) states that the re-use of existing buildings is important for business and employment development to ensure the provision of future employment opportunities for local communities in the Park. This implies that business and employment development are acceptable alternative uses for the existing buildings, subject to the criteria in the Policy.

- 1.22 However, it is also noted that such proposals should not involve a residential use, other than the specifically identified residential uses in Policy SP19, which refers to Estate Workers dwellings permitted under Policy SP30. The Estate considers that re-use of redundant agricultural buildings for holiday lets would be an appropriate use that would support the economy of the National Park but could be classed as a residential use. The re-use of such buildings would be of benefit to the tourism economy of the National Park but would not have the same impact or place the same burden on local services and amenities.
- 1.23 The policy, or its supporting text should therefore make it clear that holiday lets are not considered to fall within a residential use and are an acceptable re-use of a non-residential building. In its present form, the Policy and supporting text does not appear to be justified, as there is no reason to prevent the conversion of suitable redundant buildings into holiday lets.