

# **Inspectors' Matters, Issues and Questions for the Independent Examination of the New Forest National Park Local Plan**

## **Submissions by New Forest District Council (NFDC)**

### **Matter 2 - Duty to Co-operate**

- 2.1 **What strategic, cross-border matters have arisen through the preparation of the Local Plan?**
- 2.11 **[Habitat Protection and Mitigation] Which cross-boundary issues have been identified and how have these been addressed?**
- 2.13 **[Fawley] What are the particular issues which have required co-operation?**
- 2.15 **[Fawley] In overall terms has the Authority engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?**
- (i) Section 3 of the May 2018 Statement of Common Ground between the New Forest National Park Authority and New Forest District Council [CD20] provides a succinct summary of the main strategic, cross-border matters between the two planning authorities, including ongoing and effective cooperative working by the two authorities on the above matters.
  - (ii) Section 4 summarises the main outcomes, with for example the Fawley aligned policies (NFNPA SP25 and Policy SS4 of the [NFDC Local Plan 2016-2036 Part 1: Planning Strategy](#); achieving planning outcomes which could not be achieved by either authority working alone (NFDC submission draft Policy SS4 is attached at Appendix 1).
  - (iii) NFDC consider that the NFNPA have fully met the requirements of the Duty to Cooperate.
- 2.5, **The New Forest falls within the three Housing Market Areas**
- 4.1 **(Southampton, Bournemouth and Salisbury). What is the basis for undertaking an assessment of OAN for the New Forest District and National Park areas, rather than part of the wider HMAs? Is this an appropriate approach?**
- (i) It was necessary (rather than desirable or preferred by NFDC and NFNPA) to prepare a New Forest SHMA and OAN update, to address gaps in SHMA coverage arising from decisions made by adjoining authorities to work to administrative rather than HMA boundaries.
  - (ii) The New Forest Strategic Housing Market Assessment (GL Hearn 2014) was prepared as a follow-on commission to the preparation of the South Hampshire Strategic Housing Market (2014) for the Partnership for Urban South Hampshire (PUSH), by the same consultants using a consistent methodology.
  - (iii) The 2014 PUSH SHMA covered the PUSH area only, rather than the full western extent of the Southampton housing market area, despite NFDC raising concerns on this boundary issue. The 2016 PUSH Objectively Assessed Need Update (GL Hearn) used the same boundary.

- (iv) The New Forest National Park Authority is not a member of PUSH and the New Forest National Park is not in the PUSH area. The PUSH area includes the Waterside sub-area of New Forest District Plan Area but not the Avon Valley and South Coastal Towns sub-areas.
- (v) At that time the 2014 New Forest SHMA was produced the then-current Dorset and Wiltshire SHMAs respectively addressed their administrative areas only, and their subsequent SHMA updating has followed the same geography.
- (vi) The report titled 'New Forest District and the New Forest National Park Authority Objectively Assessed Housing Need' by Justin Gardner Consulting [JGC, 2017: CD105] primarily updates the OAN analysis of the 2014 New Forest SHMA to take into account the latest demographic evidence available at that point in time, and to keep in step with updates elsewhere.

**2.6 Has every effort been made to accommodate elsewhere the unmet housing need from the area?**

**2.8 What is the position of other Authorities in the other HMAs and elsewhere in terms of the planned level of housing in the National Park?**

- (i) The May 2018 Statement of Common Ground between the New Forest National Park Authority and New Forest District Council sets out both authorities' shared position regarding unmet housing need arising in the NFNPA plan area and that NFDC is unlikely to be able to assist in addressing that under-provision [CD20 para 3.8].
- (ii) The examination of the NFDC local plan is anticipated to take place early in 2019 and may consider this matter further, but to provide some background to para 3.8 and section 3(i) of the Statement of Common Ground the following extracts from the submission [NFDC Local Plan 2016-2036 Part 1: Planning Strategy](#) are attached at Appendix 2 to illustrate the extent of constraints in the NFDC Plan Area
  - Appendix 2A: Chapter 2: Plan Area profile and strategic context
  - Appendix 2B: Policy 10 of entitled *Mitigating the Impacts of Development on International Nature Conservation Sites*, which sets out an extensive range of measures to mitigate, monitor and manage the impacts of proposed housing development on International nature Conservation Sites.
  - Appendix 2C: The Regulation 19 consultation response to NFDC from Natural England.

**2.7 Does the overall provision being planned in the Local Plan have any implications for other Authorities? If so, what are they and how are these being addressed?**

- (i) Beyond the outcome of this plan-making cycle under transitional arrangements, the 2018 NPPF standard methodology would generate a dramatic increase in the future starting point for considering housing need for New Forest District as a whole, relative to both the 2014 New Forest SHMA and the JGC 2017 OAN

update (CD105). In addition to unmet needs identified by the NFNPA in the current plan cycle, if the standard methodology is deemed to be the appropriate starting point for the future consideration of housing need in the New Forest area (NFDC and NFNPA) it appears very likely that there will be ongoing needs that cannot be met, that will need to be considered in the wider housing market areas. For NFDC there is some recognition of this within the 2016 [PUSH Spatial Position Statement](#), in relation to NFDC Waterside area (e.g. compare Table 1 Waterside sub area OAN 5,250 to table H1 Waterside housing distribution of 3,600).

- (ii) As an illustration the difference between the levels of housing the NFNPA and NFDC draft local plans propose, and the approximate requirement for the district boundary under the standard methodology draft figures published September 2017 (965 dwellings per annum), is in the order of 400 additional homes per annum or 8,000 additional homes over the Plans' period 2016 to 2036 (the district boundary encompasses most of the two planning authorities' combined areas, albeit the standard methodology is not applied to National Parks. National guidance does not include advice on how the standard methodology should be applied to split districts).
- (iii) For context around 68% of the land area and around 19% of the population of New Forest District fall within the planning jurisdiction of the NFNPA (thus 32% of the district area and 81% of its population are in the NFDC Plan Area). Based on the latest Travel-to-work Areas (ONS 2011) around 70% of the population of the two Plan areas live within the Southampton HMA, with most of the remainder within the Bournemouth-Poole HMA.

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## **Submissions by New Forest District Council (NFDC)**

### **Matter 4 - Objectively Assessed Need and the Housing Requirement**

- 4.2 **Was the methodology employed in the Objectively Assessed Need Report 2017 appropriate and does it provide a robust basis for establishing the OAN?**
- 4.3 **Is it justified in not using the 2014 subnational based population projections? Is the use of 10 year population trend based data justified as an alternative approach?**
- 4.4 **Are the assumptions regarding migration justified?**
- 4.5 **Are the assumptions regarding household growth justified?**
- 4.6 **Is the methodology for calculating OAN for areas within the National Park but outside New Forest District soundly based?**
- 4.7 **How have economic/jobs growth forecasts and changes to working age population been taken into account?**
- 4.8 **Is the approach of considering whether the level of housing growth would merely act as a barrier to economic growth in the New Forest justified?**
- 4.9 **How have market signals been taken into account? What do they show? What is the basis for the 15% uplift?**
- 4.10 **Given the scale of identified affordable housing need, should the OAN be increased to assist in delivering more? If so to what extent?**
- 4.11 **Is the OAN for the Study area as a whole justified?**
- (i) National Guidance is very clear that housing need assessment and housing provision in relation to need and demand should be considered differently in National Parks. NFDC fully support the approach taken by JGC (CD105) and consider that approach and the recommended OAN for the New Forest National Part Authority to be soundly based and justified by the evidence set out in CD105. NFDC support the submitted Statement on Matter 4 by the New Forest National Part Authority on the technical points relating to Inspectors' questions 4.2-4.10.
- (ii) In relation to Inspectors' Question 4.11, NFDC consider that the examiners have sufficient information to make robust judgements in relation to the National Park submission Local Plan, but that it would be more appropriate to reserve the detailed consideration of the cumulative implications of the technical matters arising from questions 4.2-4.10 for the examination of the NDFC Local Plan. It is doubtful whether the examiners will have access to all the relevant evidence to robustly answer question 4.11. To attempt to do so would amount to a premature and partial examination of key aspects of the NFDC Local Plan, which is on track to be submitted for examination at the end of October 2018, towards examination nearly in 2019.