

New Forest National Park Local Plan 2016 – 2036

Examination Statement – New Forest National Park Authority

Matter 12 - A Sustainable Local Economy

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to a sustainable local economy?

Relevant policies-SP42, SP43, DP44, DP45, SP46, DP47, SP48, DP49, DP50, DP51, DP52, DP53.

Employment land requirement and provision

12.1 What is the evidence in relation to employment land and employment related development? What does it show?

1. The evidence relating to employment land and employment related development can be found in the Topic Paper: Economy and Employment (CD128), and this covers evidence including the Business Needs and Commercial Property Market Assessment, Chilmark Consulting Ltd, April 2017 (CD123), and the Enterprise M3 Commercial Property Market Study - Regeneris Consulting, July 2016 (CD160), a New Forest Business Needs Survey, 2014 (CD121), together with the long history of employment land completions for the area, which dates back to 1988.
2. Details of what this evidence shows is outlined in the Topic Paper: Economy and Employment, and the key conclusions relating to the delivery of employment land in the Business Needs and Commercial Property Market Assessment were that:
 - There is a realistic future demand projected for some 600 - 900m² of new B Use Class employment floorspace per annum.
 - There are no allocated employment sites in the National Park area in the Local Plan or in the previous Core Strategy, so new employment floorspace and sites have come forward through windfall developments and the change of use of existing buildings to form part of the B Use Class supply over time.
 - It is reasonable, in the context of the National Park's wider environmental and social objectives that future employment land and floorspace is delivered through a continuation of the windfall development approach, influenced and shaped through the Local Plan's criteria-based planning policies.

12.2 What approach has been taken to employment land and employment related development? Is this approach justified?

1. The approach taken to employment land and employment related development is set out in the Topic Paper: Economy and Employment (CD128). With the expected need for employment land remaining modest in the National Park, the overall approach taken is to encourage a range of business developments in the right locations through the set of criteria based policies outlined in Chapter 8 of the Local Plan. During the long history of new employment land development, there have been no employment land allocations in the National Park - either in the current Core Strategy for the National Park, or in the previous Local Authority Local Plans that pre-dated the National Park. The Local Plan continues this approach and does not allocate land for employment.
2. The Business Needs and Commercial Property Market Assessment outlined that provision for a future average completion rate of between 600-900 m² per annum in the National Park may be a prudent forecast of future employment floorspace demand. The Authority expects sufficient employment land development to come forward to satisfy this estimated level of need. This will be achieved in two ways. Firstly, as many of the key economic policies have not changed significantly from the Core Strategy, it is expected that the range of economic policies outlined in Chapter 8 of the Local Plan are likely to deliver a similar level of employment floorspace as in the past. The Local Plan also takes a more flexible approach to the redevelopment of existing employment sites and encourages mixed use developments on existing sites to encourage new employment opportunities. Secondly, new employment development is already in the pipeline. As at March 2017 there was 3,532m² of business floorspace available for development in the National Park, as measured by unimplemented approved planning permissions. This is equivalent of between 3.9 and 5.9 years supply of employment floorspace based on the expected range of future employment land demand.
3. The long history of employment land development, that encompasses a wide range of economic environments, shows that the average new employment floorspace development since 1988¹ in the National Park area is a little under 900 m² per annum since 1988. This trend of past employment completions demonstrates that it is reasonable to expect the rate of development of employment land to continue to bring forward new employment development at a rate consistent with the demand identified in the Business Needs and Commercial Property Market Assessment (CD123).
4. Importantly, the combination of employment policies in the Core Strategy and the windfall development of employment land in recent years have been consistent with a very low level of unemployment. Unemployment has been lower than in Hampshire, the South East and the UK for the last 10 years (see Topic Paper, CD128). Therefore, it is expected that windfall employment land development at this level will continue to be sufficient to support the Authority's

¹ Excluding an exceptional development at Tatchbury Mount Hospital.

duty to seek to foster the economic well-being of the National Park's communities.

5. To ensure that employment opportunities are appropriate in a nationally designated area, throughout the National Park the criteria based policies in the Local Plan support the re-use and extension of existing buildings; the redevelopment of existing employment sites for a wider range of employment uses; retaining existing employment sites; farm diversification; and home working. In addition, within the Defined Villages, the Local Plan will also support all types of employment development and visitor facilities and accommodation using new buildings.
6. This approach of using criteria based policies and windfall sites assumes that there will not be a significant loss of existing employment sites. Consequently, the Local Plan contains a policy to retain employment sites (Policy SP43), as it is recognised that they are under pressure from other uses, and there are limited opportunities for alternative new sites.
7. In addition to employment from Land Use Classes B1 to B8², local employment is generated in other sectors of the New Forest economy such as retailing, hotels, restaurants, leisure activities, camping, commoning, forestry and agriculture. Many businesses in these sectors are particularly important in the National Park and relate to the key rural and visitor economies. The very diverse nature of the local economy means that it does not heavily rely on the B1 to B8 Land Use Classes that need office and industrial spaces. The Local Plan contains supportive employment policies for the visitor economy, and for agriculture, forestry and commoning by supporting the land based economy.
8. A key element of the overall approach to the local economy is a focus on improving productivity – that is, growing local businesses, output, and jobs, but without using a significant amount more business space to do so. New technology and skills can help deliver this. Both the Local Enterprise Partnerships that cover the National Park (CD130, 131) and the LEADER programme (CD122) have identified improvements in productivity, aided by skills training and business support, as the key to growing the New Forest economy. This, of course, does not require additional employment land, but envisages a more productive use by workers of existing premises and spaces.

12.3 What are the inter-relationships with other authorities in terms of employment land provision and how have these been taken into account?

1. The closest inter relationship for employment land is with New Forest District, as its planning area largely surrounds the National Park. The wider economic area, and the context within which the National Park's economy operates when assessing the provision of employment land has been considered in detail in the Topic Paper: Economy and Employment (CD128). There are three key studies that have helped to assess this.

² The Town and Country Planning (Use Classes) Order 1987

2. The Enterprise M3 Local Enterprise Partnership's (LEP) produced a Commercial Property Market Study (CD160), which covered the M3 LEP area. It divided the M3 LEP commercial property market into defined market areas and identifies the New Forest (including both the National Park and most of the New Forest District) as a distinct commercial property market. This Study identified the availability, type and demand for commercial property in the New Forest and compared this against the other market areas in the LEP.
3. The Authority and New Forest District Council jointly conducted a Business Needs Survey in 2014 (CD121) to better understand the needs of local businesses throughout the National Park and New Forest District. The Survey asked about the quality of existing premises; their requirements for new space; and whether new space could be accommodated on the existing site, or whether a new location would be needed. The Survey also concluded that firms thought that the main attribute of doing business in the New Forest was the natural environment, and the high numbers of visitors attracted by the landscape.
4. These above studies were considered by the Business Needs and Commercial Property Market Assessment (2017) (CD123). This was commissioned jointly by the Authority and the New Forest District Council, and it covered the whole of New Forest District and the National Park. This Assessment analysed the employment land supply and demand and identified future employment land requirements for both the National Park and New Forest District planning areas.
5. In terms of employment land provision, it is also noted that neither the Enterprise M3 LEP's or the Swindon and Wiltshire LEP's Strategic Economic Plans (CD130, CD131) recommend new employment land requirements in the National Park to contribute to their growth plans. Indeed, most of the economic gains envisaged for the National Park's economy are through the improvement of skills, through business support and advice, and through the visitor economy.

12.4 What is the situation regarding existing commitments and any identified residual need? What is the past trend in take up rates for employment land?

1. There are no allocated employment sites in the National Park and employment land development is expected to come forward through windfall sites. The Authority does, however, monitor the amount of approved planning permissions for employment land that are waiting to be implemented. The Authority's Annual Monitoring Report 2017 shows that, as at March 2017, there was 3,532m² of business floorspace awaiting development, as measured by unimplemented approved planning permissions. As the forecasted future need for employment space is for between 600-900 m² per annum, this would be equivalent to between 3.9 and 5.9 years supply of employment floorspace.
2. The past trend in take up rates for employment land is described in the Topic Paper: Economy and Employment (CD128). This shows the trend for completions in employment land from 1988³.

³ Before the National Park was established in 2005, the data is based on the same geographic area as the current National Park. The figures for 2017 can be seen in the Annual Monitoring Report 2017.

12.5 Is the approach of relying on existing employment sites (SP43); extant planning permissions, small scale employment (windfall) development and re-use of existing buildings/sites in defined villages (SP42), as opposed to allocations, in order to meet the requirement justified and consistent with national policy?

1. The answer to this is outlined in the Topic Paper: Economy and Employment (CD128). The Authority believes that this approach can deliver the forecasted level of business floorspace needed to deliver its duty to seek to foster the economic well being of local communities for the following reasons:

- the long term employment development trend since 1988 is a similar level to the forecasted level of need, and is therefore, expected to continue and be able to satisfy future employment land needs. This approach, however, assumes that there will not be a significant loss of existing employment sites in line with Policy SP43.
- there have been no allocated employment sites in the National Park area in the past, either in the Core Strategy or in the previous three Local Authority Local Plans that covered the National Park area prior to the National Park's designation in 2005.
- previous levels of employment land development, which resulted from a similar approach taken in the Core Strategy (without employment land allocations), have been consistent with very low unemployment in recent years (lower than in Hampshire, the South East or UK);
- the Local Plan allows for more flexibility than in the Core Strategy to redevelop existing employment sites.
- The latest outstanding planning permissions for employment floorspace (Annual Monitoring Report 2017), showed there is 3,532m² of business floorspace available for development, which would be equivalent to between 3.9 and 5.9 years supply of employment floorspace using the forecasted range of employment need.
- The Enterprise M3 and Swindon and Wiltshire LEPs and the LEADER programme are not recommending new employment land allocations in the National Park – rather they focus on business support and skills training as the key for growth in the New Forest economy. The Authority expects that the local economy will be partially driven by productivity gains (rather than new space requirements) in the future;
- The New Forest Business Needs Survey (CD121) shows a low turnover of business sites which indicates that firms stay at the same location for a long time.

It is noted that in its response to the consultation of the Submission Local Plan, New Forest District Council supports Policy SP43 to retain and make the best use of existing employment sites.

2. The Business Needs and Commercial Property Market Assessment Report outlines that the levels of total floorspace and that available across all B Use Classes in the National Park area is limited given the rural and protected environment nature of the area. It states that the constrained supply position is significantly restricted by the availability of employment land opportunities and

sites due to role, function and legal purposes of the National Park and with respect to the international and national nature conservation and landscape protections placed on much of the Park's area. The Report goes on to conclude that *"it is reasonable, in the context of the National Park's wider environmental and social objectives that future employment land and floorspace is delivered through a continuation of the windfall development approach influenced and shaped through the Local Plan's criteria-based planning policies."*

3. The approach taken to delivering economic well being in the National Park, as outlined in the question, is a similar approach to that taken in the Core Strategy (CD167). The Inspector's Report of the Examination of the Core Strategy (CD168) outlined that the Core Strategy was based upon a business needs survey and identifies the rural economy as a priority theme. It states that the employment policies are permissive of small scale development and an assessment of the quality of existing employment sites supports the separate policy requirement for the retention of such sites, and this would allow for the modest expansion of existing businesses within the National Park. The Report recognised that the unimplemented planning permissions for employment land would assist in accommodating the level of growth envisaged. The Report, therefore concluded that *"these matters justify the NPA's approach of not allocating further land for employment use within this landscape which is recognised as being of national and, in the case of nature conservation interests, international importance. The Plan adequately caters for the economic well-being of the National Park."* The Authority sees no reason that this conclusion would not remain valid given the similar approach adopted in the Local Plan.
4. The answer to Question 12.6 and 12.7 demonstrate the compliance of the Authority's approach to economic development with national policy.
5. The Authority also, however, recognises that Paragraph 14 footnote 9 of the NPPF states that Local Plans should meet objectively assessed needs unless specific policies in the NPPF indicate development should be restricted, such as within a National Park. This confirms that a slightly more restricted approach of not allocating sites is consistent with the NPPF and finds the appropriate balance between supporting employment needs and providing the highest level of protection for the landscape and scenic beauty. Having no allocated sites means that employment development will only take place on brownfield land outside the defined villages, which helps to achieve the National Park's first purpose and protects the landscape and scenic beauty of the New Forest, which is, consistent with Paragraph 115 of the NPPF.
6. As noted in the response to Question 12.2, local employment is generated in sectors of the New Forest economy such as retailing, hotels, restaurants, leisure activities, camping, commoning, forestry and agriculture that do not need B1-B8 land use (see Topic Paper: Economy and Employment, CD128). The very diverse nature of the local economy means that it does not heavily rely on B1 to B8 Land Uses and this is a further reason why the Authority does not consider employment land allocations are needed.

12.6 *Is the approach set out in Policy SP42 effective, justified and consistent with national policy? Does the Policy provide effective guidance in terms of the provision and location of new business and employment development?*

1. The overall approach to sustainable development for the local economy in Policy SP42 is consistent with national policy (see the Authority's Self-Assessment of Soundness – CD13). It encourages the growth and expansion of employment and businesses in locations and in a manner which are sustainable within the National Park.
2. The Local Plan is consistent with Paragraph 28 of the NPPF by supporting the growth and expansion of all types of business and enterprise in the four defined villages – both through new buildings and the conversion or extension of existing buildings, together with the redevelopment of existing employment sites. Consistent with the Local Plan's spatial strategy, business policies are more restrictive outside these villages but still provide opportunities through the conversion or extension of existing buildings, the redevelopment of existing business use employment sites (with new buildings), farm diversification schemes and through home working.
3. The Authority considers Policy SP42 and its accompanying text represent an effective framework for decision-making purposes as it provides clarity about the location, scale, and type of building that will be considered for new employment development.
4. Given that the same approach to business development was taken in Policy CP14 of the Core Strategy, and this approach was consistent with very low levels of unemployment for an extended period, the Authority believes that Policy SP42 will continue to be effective in delivering the Authority's duty to seek to foster the economic well-being of local communities.

Existing employment sites and buildings (Policies SP43, DP44 and DP45)

12.7 *Is the approach set out in Policies SP43, DP44 and DP45 effective, justified and consistent with national policy? Do the criteria provide clear and effective guidance in terms of the retention, development, redevelopment of existing employment sites and extensions to non-residential buildings and uses?*

1. The Business Needs and Commercial Property Market Assessment (2017) (CD123) outlines that it is reasonable, in the context of the National Park's wider environmental and social objectives, that future employment land and floorspace is delivered through a continuation of the windfall development approach influenced and shaped through the Local Plan's criteria-based planning policies. It is expected that the long term trend of new employment land development will continue and be able to satisfy future employment land needs. This approach, however, assumes that there will not be a significant loss of existing employment sites, and, consequently a policy to retain employment sites (Policy SP43) is important.

2. The Assessment also highlights that the supply of employment sites is constrained by the limited availability of employment land and sites in the National Park. As there are limited alternative sites, it is important to retain existing sites for employment use to ensure a prosperous local economy and employment opportunities for local residents in the future. Retaining employment sites also aims to avoid creating unsustainable settlements with little or no employment and increasing out-commuting to jobs beyond the National Park.
3. The quality of sites is also a key issue affecting their future use and whether they should be retained for continued employment use. The Authority assessed the employment site quality of existing larger sites throughout the National Park (see Topic Paper: Economy and Employment, CD128), which is in line with Paragraph 161 of the NPPF. The conclusion was that all these sites remain fit for purpose and none were recommended for release to serve other purposes. In its response to the consultation of the Submission Local Plan, New Forest District Council supported Policy SP43 to retain and make the best use of existing employment sites.
4. These policies are consistent with national policy. The Local Plan approach of using windfall employment development and not allocating new employment sites requires employment to be supported through criteria based policies (See also the response to Question 12.6). Policy SP43, DP44, and DP45 contribute to the overall strategy of supporting the local economy by retaining and aiding employment opportunities and are consistent with Paragraph 21 and 28 of the NPPF. Limiting the extension in Policy DP45 in order to achieve a minimal impact on the overall physical appearance and prominence of the building (or site) in the landscape strikes a balance between national policy support for the economy and protection of the landscape in Paragraph 115 of the NPPF.
5. As existing employment sites are not allocations and have all been assessed as fit for purpose, and windfall developments are expected to deliver the requirements for employment land, Policy SP43 is consistent with Paragraph 22 of the NPPF. Policy SP43 is also consistent with Paragraph 17 of the NPPF by encouraging the promotion of mixed use developments. The SA of the Local Plan (CD10) confirms that the four defined villages are more sustainable locations than other settlement approaches and, therefore, the flexibility to bring forward mixed development in Policy SP43 is focused on these defined villages. By managing patterns of growth to use public transport, walking and cycling and focus development in locations which are sustainable, Policy SP43 is also consistent with Paragraph 17 of the NPPF.
6. Encouraging mixed use developments in the four defined villages fortifies the spatial strategy for development in the National Park and the wider health of the four defined villages and is consistent with Paragraph 21 and 69 of the NPPF. Isolated employment sites do not represent an opportunity to build a community that supports a full range of facilities and services and provide access to key requirements such as schools, doctors, shops, transport, and leisure facilities and, therefore, would not be consistent with Paragraph 37 of the NPPF. The

approach to mixed use sites is also consistent with the overall spatial strategy for delivering housing, which remains focused on the four defined villages, and is limited to exception sites and commoners, agricultural and estate workers housing outside the defined villages.

7. The Authority considers these Policies and their accompanying text represent an effective framework for decision-making purposes as they set out what is required from applicants as well as providing sufficient criteria to assess the impact of development proposals.
8. For instance, the accompanying text to Policy DP44 provides effective guidance that the redevelopment of existing employment sites for general storage and warehousing purposes will not be encouraged. This is justified as both the Business Needs Survey (CD121) and the M3 LEP Commercial Property Market Study (CD160) did not identify this type of business space requirement in the National Park, with the latter outlining that *“Most of the demand in the district as a whole is for small scale manufacturing space, with little demand for logistics and distribution due to poor connectivity.”* Poor transport links are cited in the Business Needs Survey as one of the impediments to business in the New Forest, and large commercial vehicles may be unsuitable for some of the small New Forest roads. They may also be detrimental to tranquillity (one of the National Park’s special qualities). Typically it would be expected that this type of business use results in additional traffic.
9. Moreover, this type of development does not generate significant employment opportunities relative to the space required. Warehousing typically uses more floorspace per employee compared with other business uses⁴. Given the very limited land availability for employment, it is essential that the Authority maximizes its use in generating local employment. Furthermore, B8 uses are not consistent with the M3 LEP and LEADER Economic Strategies that focus on increased productivity through business support and increased skills to grow the New Forest economy ie the objective is to use the same land/premises to produce more output.

Sustainable Tourism (SP46 and DP47)

12.8 Do policies SP46 and DP47 provide a justifiable and effective approach for the support of sustainable tourism? Is the approach consistent with national policy?

1. The Authority believes that it has struck an appropriate balance between the need to protect the landscape, habitats and natural beauty of the National Park as required by its first purpose and Paragraph 115 and 119 of the NPPF, and the requirement to deliver sustainable tourism development in line with the NPPF. This balance remains the same as the policy approach taken in the Core Strategy. The Inspector's Report for the Examination of the Core Strategy (CD168) specifically noted that: *“The evidence base reveals that the New Forest National Park has more visitors per square kilometre than any other British*

⁴ The Homes and Communities Agency Employment Density Guide outlines that B8 use of land/space requires more floorspace per employee compared to other B Class uses.

national park and that the number of visits is likely to increase over the plan period...In allowing for some limited tourist-related development, policies CP16 and DP18 strike an appropriate balance between the national park purposes. The DPD gives adequate recognition to the important role of tourism in the local economy and is consistent with best practice guidance...and national policy...." and that *"The DPD would not harm the current or future efficient operation of the local tourist industry."* Core Strategy Policy CP16 has been superseded by the similar Local Plan Policy CP46, and Core Strategy Policy DP18 has been superseded by the similar Local Plan Policy DP47.

2. The Authority sees no reason for this conclusion to change. The key arguments for operating similar policies to Core Strategy Policy CP16 and DP18 remain valid today. The New Forest National Park is the smallest of all English National Parks and remains under pressure from the recreational visits created from development within the National Park and the significant levels of development planned surrounding it. It is worth recalling the very reasons why the National Park was established. The Explanatory Memorandum to the New Forest National Park (Establishment) Order in 2005 (CD55) stated that *"over the years the Forest has come under increasing development pressure from being sandwiched between two major conurbations of Southampton and Bournemouth. In addition there has been pressure from heavy and growing recreational use. These national, regional and local pressures are threatening its future and the very qualities that make it special."* The National Park status, and its highest level of protection, has not changed, nor has the protection required for the internationally designated nature conservation sites. The NPPF carries protection for both of these. The National Park's statutory purposes, that steer the Authority's planning policies in the Local Plan, also remain in place.
3. Paragraph 115 of the NPPF and the National Park purposes have both been important in steering the Authority to find the balance that is needed to achieve tourism development that can be sustainable in a National Park. In setting policies for tourism development, the Authority has considered that National Parks have the highest status of protection in relation to landscape and scenic beauty. The Authority also considers that Policy SP46 should support sustainable tourism by providing opportunities for enjoying the National Park's Special Qualities (second purpose) without compromising its first purpose. In seeking the appropriate balance between the National Park purposes in relation to tourism developments, the Authority has also considered the Sandford Principle⁵ which confirms that where there is a conflict, greater weight should be given to the first purpose over the second purpose.
4. To comply with the second purpose, tourism development policies need to focus on the understanding and enjoyment of the National Park's special qualities that include tranquillity, quiet recreation, learning and discovery, the New Forest's outstanding natural beauty, the diversity of plants and animals, the historic commoning system, and the unique historic cultural and archaeological heritage. Consequently, the aims of the second purpose have been directly

⁵ See Paragraph 18, English National Parks and the Broads: UK Government Vision and Circular 2010

included in Policy SP46 to encourage the type of tourism development in the National Park that is consistent with the special qualities.

5. Whilst the specific policy approach to supporting sustainable tourism development is needed to help ensure that landscape and scenic beauty are protected and adverse effects on the internationally designated nature conservation sites are avoided, it will be effective in delivering tourism development that is sustainable and appropriate within the New Forest National Park context. This is partially achieved by Policies SP46 and DP47 being consistent with the overall spatial approach to development set out in Chapter 4 of the Local Plan. Like other development in the Local Plan, tourism development is encouraged in the four defined villages. Outside these villages, tourism policies support new visitor facilities through the re-use or extension of existing buildings, and new visitor accommodation as part of farm diversification schemes. The four defined villages already provide restaurants, cafes, shops and other services used by visitors and together with their access by public transport make them more sustainable locations for tourism developments than elsewhere throughout the National Park. This spatial development approach was accepted by the Planning Inspector at the Examination of the Core Strategy (CD168). Consistent with this approach, the Authority operates a more restricted approach to camping and holiday parks that are located in the open countryside outside the defined villages using the criteria outlined in policy DP47.
6. In relation to Policy DP47, the Local Plan indicates that holiday parks and camp sites are well provided for in and around the New Forest National Park. It has over three times the number of camping and touring caravan bed spaces per square kilometre than the average of all other English National Parks. Moreover, according to Visit Britain data⁶, there are only six other local authorities and three unitary authorities out of a total of 326 in the country (including Cornwall and North Devon), that have more bedspaces in tourist campsites than found in New Forest District. In addition, there are a large number of short term 28 day 'pop-up' temporary campsites throughout the National Park each year. Given this high level of provision, and the fact that the National Park is the smallest of all the English National Parks and under severe visitor pressure, the Authority has taken a restrictive approach to development of existing camp sites and holiday parks.
7. The overall approach to sustainable tourism development in the National Park is consistent with national policy. This was confirmed in a recent Appeal Decision (Ref: APP/B9506/W/18/3196556, 16 July 2018, CD161) relating to Core Strategy Policies DP18 and CP16. The same approach to sustainable tourism development has been adopted in the new Local Plan Policies DP47 and SP46, so the Appeal Decision which supported this approach to tourism development is particularly relevant. The Appeal Decision outlines that in the revised NPPF "*Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty, wildlife and cultural*

⁶ See <https://www.visitbritain.org/accommodation-stock>

heritage. It goes on to advise that the scale and extent of development within these designated areas should be limited.” Whilst dismissing the Appeal against these Policies, it highlighted that the Inspector was “satisfied that the Core Strategy’s policies are consistent with the revised Framework’s approach to the protection of National Parks. I also consider they are consistent with the revised Framework’s approach to the rural economy....” The Inspector also emphasised the importance of the Authority’s purposes in concluding that the proposal to expand the holiday park “*would also conflict with the statutory purposes of the New Forest National Park which state that, where there is a conflict between the conservation aims of the first purpose and the recreation aims of the second, greater weight should be given to the first.*”

8. The overall approach to tourist development in the National Park is consistent with paragraph 28 of NPPF as it aims to support sustainable rural tourism which respect the character of the countryside. The Local Plan supports sustainable rural tourism by permitting visitor accommodation and facilities in the four defined villages through new buildings and the conversion or extension of existing buildings. Tourism development has also been included in the allocation Policy SP23. Outside the four defined villages visitor facilities will be supported through the re-use or extension of existing buildings, and visitor accommodation will be considered as part of a farm diversification schemes, to support existing land managers (who manage the landscape). It also supports the retention of existing serviced visitor accommodation as this typically requires high staff levels, the provision of food and drinks (which can be sourced locally), cleaning and laundry services, and has a multiplier effect on the local economy by also using maintenance and other services (eg. plumbers, electricians, etc) that can generate further employment in the local economy. The support for tourism development also allows for extensions of existing tourism developments, but with a restricted approach for holiday parks and camp sites.
9. It is recognised that this approach to tourism development in the National Park could be more restrictive and spatially orientated than elsewhere in other rural areas. The approach, however, reflects the balance that needs to be found between the National Park’s two purposes, and it is supported by the NPPF. A recent Appeal Decision (CD161) outlined that Policy CP14 (superseded by Local Plan Policy SP46) sets out a “*balanced approach to supporting the local economy*” and despite economic benefits arising from further holiday park expansion, these would not outweigh the harm created.
10. Paragraph 14 and footnote 9 in the NPPF clearly indicate that development should be restricted within a National Park. It also indicates that development should be restricted by land designated as Sites of Special Scientific Interest (over 32,000 hectares in the Park) and sites protected under the Birds and Habitats Directives. About 56% of the New Forest National Park is internationally designated as Special Protection Areas, Special Areas of Conservation and RAMSAR sites – the planning area of the National Park has probably the highest proportion of land covered by these international designations than any other planning authority in England. All this internationally

designated area, and any development that may affect it (the HRA concludes⁷ that this would be throughout the whole of the National Park), is subject to Paragraph 119 of the NPPF, and therefore the presumption in favour of sustainable development does not apply in this area. A restricted, but still supportive, policy approach, therefore, is considered to be consistent with the NPPF for tourism development in the National Park.

Land based economy (Policies SP48, DP49, DP50, DP51, DP52 and DP53)

12.9 Is the approach set out in policies SP48, DP49, DP50, DP51, DP52 and DP53 effective, justified and consistent with national policy?

1. Paragraph 115 footnote 25 references the English National Parks and the Broads: UK Government Vision and Circular 2010 (CD35) to highlight that it provides further guidance and information about National Park's statutory purposes, management and other matters. The Circular identifies two very important issues for the Local Plan. Firstly, that the Authority needs to pursue its statutory two purposes, and secondly, that National Park Management Plans are the over-arching strategic document for the Parks and set the vision and objectives which should set the context for the local development framework in the National Park. The statutory purposes and the objectives of the Management Plan (use of which is emphasised in the National Planning Practice Guidance (NPPG, CD26)) are particularly relevant to setting policies for the land based economy.
2. The land-based economy in the New Forest encompasses agriculture, forestry, commoning and other traditional rural businesses. Whilst providing only a small proportion of local jobs, farming, commoning, forestry and woodland management remain vital in maintaining the land use management practices that help conserve the landscape character and cultural identity of the National Park. Supporting the land based economy, therefore, is critical in delivering the Authority's first purpose.
3. The Partnership Plan for the New Forest National Park (CD29) contains a specific section on 'Encouraging sustainable land management', with an objective to encourage farming, commoning and woodland management that sustains the special qualities of the Forest. In this context, it should be noted that the special qualities include *an historic commoning system that maintains so much of what people know and love as 'the New Forest', forming the heart of a working landscape based on farming and forestry, and the iconic New Forest pony, together with donkeys, pigs and cattle roaming free.* Planning policies, therefore, need to reflect support for sustainable land management, and this is done through policies covering the land based economy.
4. Given the continuing need to support rural activities that help to conserve and enhance the landscape (the Authority's first purpose) and support sustainable

⁷ The HRA (CD15) confirms that: "it is assumed that, prior to mitigation, likely significant effects in combination cannot be ruled out for any residential or visitor accommodation development within the New Forest National Park. All of the 800 dwellings as well as the visitor accommodation provided for by the Local Plan are therefore assumed to contribute to recreation pressure on New Forest SAC and SPA."

land management (the Partnership Plan's objective), the Authority has not materially changed the policies relating to the land based economy in the Local Plan from those in the Core Strategy. There is a recognition that the owners and managers of land in the National Park are central to maintaining its landscape character and, therefore, the Authority is seeking to support those who, through their activities, help manage the landscape and maintain its cultural heritage.

5. The way the policies for the land based economy are framed to ensure protection and management for the landscape is consistent with national policy, particularly given that Paragraph 115 of the NPPF confirms that great weight should be given to conserving landscape and scenic beauty and this has the highest status of protection. Moreover, the support provided for commoning is consistent with Paragraph 115 of the NPPF that supports the conservation of cultural heritage.
6. Policies for the land based economy are also consistent with Paragraph 28 of the NPPF as Policy DP49 supports the conversion of existing buildings for all types of business, and Policies SP48 and DP50 allow for the development and diversification of agricultural and other land-based rural businesses.