

## **New Forest National Park Local Plan 2016 – 2036**

### **Examination Statement – New Forest National Park Authority**

---

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

##### ***Issue – Whether the Authority has complied with the duty to co-operate in the preparation of the Local Plan?***

##### ***General***

#### **2.1 *What strategic, cross-border matters have arisen through the preparation of the Local Plan?***

1. In response to the Localism Act 2011 (CD34) and the requirement for planning authorities to engage constructively and on an on-going basis on strategic matters, the Authority has prepared a Duty to Co-operate Statement (CD19). This sets out the work done in response to the requirements of the duty.
2. Section 5 of CD19 summarises the co-operation on cross-boundary matters that has gone into the preparation of the Submission draft Local Plan since the review commenced in 2015. As well as the four stages of formal consultation, liaison has taken place through the Authority's Local Plan Working Groups in 2016; regular officer and member liaison meetings; and the duty to co-operate discussions initiated with neighbouring authorities in the three Housing Market Areas of Southampton, Bournemouth / Poole and Salisbury by the National Park Authority and New Forest District Council in summer 2017.
3. From the liaison that has taken place since the Local Plan review commenced in summer 2015, three main strategic issues that require cross-boundary co-operation have been identified. These relate to: (i) the provision of housing to meet identified needs; (ii) habitat mitigation measures to ensure that the planned level of development in the area does not affect the integrity of the protected habitats of the New Forest (including the coastline); and (iii) the former Fawley Power Station site, which is a strategically important development site requiring cross boundary working and co-operation between the National Park Authority and New Forest District Council.

##### ***Overall housing provision***

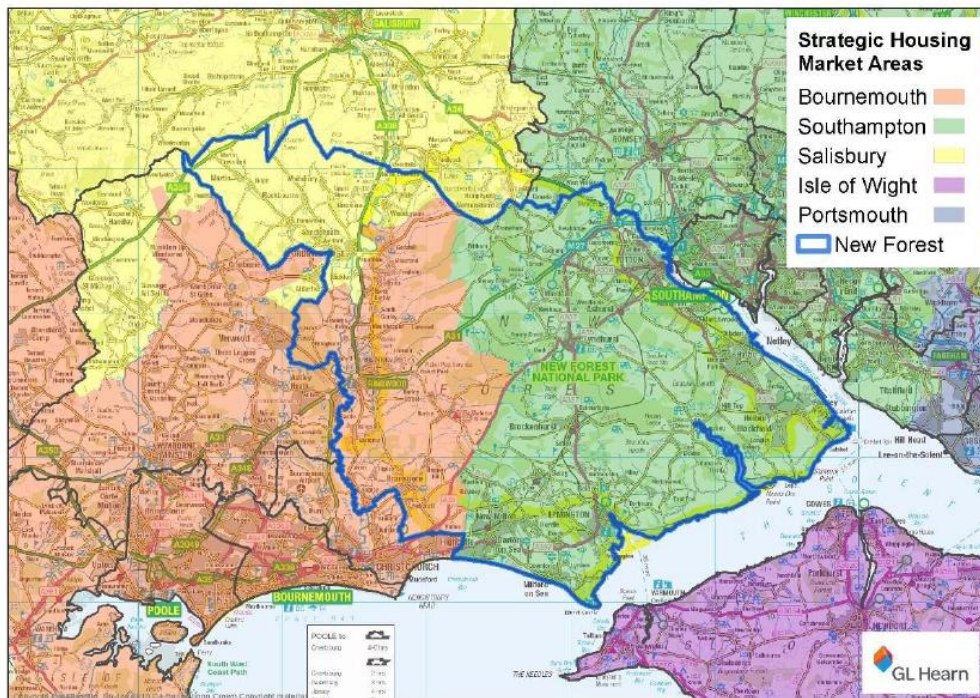
#### **2.2 *Who has the Authority engaged with in terms of overall housing provision and what form has this taken?***

1. The Authority has engaged with the other LPAs within the three Housing Market Areas (HMAs) that cover parts of the National Park (i.e. the Southampton, Bournemouth and Salisbury HMAs). This engagement is set out in detail in the Authority's Duty to Co-operate Statement (CD19) and has taken the form of:
  - The joint commissioning of evidence base studies to assess the local housing need with New Forest District Council in 2014 and 2017.

- Formal consultation with all neighbouring planning authorities at each of the four formal consultations undertaken by the Authority between 2015 – 2018.
  - An initial ‘Duty to Co-operate Workshop’ was held by the Authority in spring 2016 with neighbouring planning authorities. The workshop was attended by Hampshire County Council, New Forest District Council, Test Valley Borough Council, Christchurch & East Dorset Councils, Wiltshire Council and Southampton City Council
  - Regular officer level liaison meetings with New Forest District Council and on a broadly quarterly basis with Christchurch & East Dorset Councils.
  - The duty to co-operate discussions initiated with neighbouring authorities in the three HMAs of Southampton, Bournemouth / Poole and Salisbury by the Authority and New Forest District Council in summer 2017. Officer level meetings were held with Eastleigh Borough Council, Southampton City Council, Fareham Borough Council, Winchester City Council, Wiltshire Council, Test Valley Borough Council, Christchurch & East Dorset Council, Bournemouth Borough Council and Poole Borough Council.
  - A further workshop was held in September 2017. During the workshop the Authority and New Forest District Council presented their Local Plan housing positions to neighbouring authorities. The meeting was attended by officers representing Bournemouth Borough Council, Eastleigh Borough Council, Southampton City Council, Test Valley Borough Council, Wiltshire Council, and Winchester City Council.
  - Prior to the publication of Regulation 19 Submission draft Local Plan in January 2018, the Authority formally wrote to neighbouring authorities (and the Partnership for Urban South Hampshire) setting out the projected shortfall in housing provision against the objectively assessed housing need for the National Park; and asked whether neighbouring authorities could assist in meeting the predicted housing shortfall.
2. The table contained in Section 6 of the Duty to Co-operate Statement (CD19) draws together the engagement undertaken under the sub-heading strategic priority title as outlined above.
  3. The Statements of Common Ground (CD20 to CD23) signed by the Authority with Hampshire County Council, Test Valley Borough Council, New Forest District Council and Wiltshire Council also summarise the engagement undertaken between the Authority and these specific bodies.

### **2.3 What are the inter-relationships with other Authorities in terms of migration, commuting and housing markets?**

1. The New Forest National Park is covered by three Housing Market Areas (HMAs) – as illustrated on the map below. The majority of the National Park (illustrated by the yellow line) is located within Southampton HMA (green), with smaller areas to the west of the National Park within the Bournemouth HMA (peach) and to the north within the Salisbury Housing Market Area (yellow). There is no separate New Forest HMA.



2. Inter-relationships with other authorities were considered in the New Forest Strategic Housing Market Area Assessment (SHMAA) (GL Hearn, 2014) (CD164), which indicated a relationship between the New Forest (District and National Park) with all adjoining authorities. The New Forest is predominantly covered by the Southampton Travel to Work Area (TTWA) which extends from the New Forest in the west to Romsey, Winchester and Eastleigh. There are also localised relationships with the Bournemouth TTWA (affecting the south west of the New Forest area) and with the Salisbury TTWA which affects a localised area in the north of the Forest. The strongest commuting and migration relationships are with Southampton and the study concluded that the New Forest area is most closely related to and influenced by the Southampton housing market.
  
3. The SHMAA research indicated significant daily net out-commuting from New Forest to Southampton; with the next highest net out-commuting flows being from the New Forest to Test Valley. These patterns highlight the significant influence which the South Hampshire area generally, and Southampton specifically, exerts on the labour force of the New Forest. Given the rural nature of the New Forest and the proximity of major population centres, the communities in the National Park will continue to look to neighbouring urban areas for higher order services.

**2.4 How have these been taken into account in preparing the Local Plan and specifically in terms of the Objectively Assessed Need for housing (OAN)?**

1. The National Park Authority and New Forest District Council have liaised with neighbouring authorities in identifying housing need. In assessing housing need, the authorities have used a consistent set of consultants – GL Hearn and

Justin Gardner Consulting – to neighbouring authorities in both Eastern Dorset and South Hampshire. It has sought to ensure a commonality of approach and read across between evidence, whilst recognising the complex geography of the area (both District and National Park) which to some degree cuts across housing market geographies; that key demographic data such as population and household projections are not published below local authority level; and the need for a cohesive evidence base to support the development of plans.

2. The National Park is not an appropriate location to meet the wider housing needs of the three HMAs that overlap the National Park area. National Park designation in 2005 recognised the need to provide statutory protection for the New Forest and the recent revisions to the NPPF (2018) highlight that the scale and extent of development within National Parks should be limited (paragraph 172). The Authority's duty under Section 62 of the Environment Act 1995 is to foster the economic and social well-being of local communities within the National Park. The Government's National Parks Vision and Circular (CD35) – cross-referenced within the NPPF – also recognises that National Parks are not suitable locations for unrestricted housing. The expectation is that new housing in National Parks will be focused on meeting local affordable housing needs, rather than catering for external demands in the wider HMAs. This policy approach is reflected in the draft policies for affordable housing delivery in the National Park on site allocations and rural exception sites; and the proposed local occupancy condition on C2 development (Policy CP20).

**2.5 *The New Forest falls within three Housing Market Areas (HMAs) (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 HMA? Is this an appropriate approach?***

1. The New Forest National Park includes land within three HMAs and there is no separately defined New Forest Housing Market Area. The Authority acknowledges the intention in national guidance that Housing Market Area Assessments are prepared for the Housing Market Area, with local planning authorities working across administrative boundaries where appropriate.
2. However, when work commenced on the review of the Authority's Local Plan, plan-making timescales were not aligned. A Strategic Housing Market Area Assessment (SHMAA) covering South Hampshire had already been prepared. This covered the Waterside area of New Forest District but did not extend into the National Park (none of which lies within the Partnership for Urban South Hampshire area). Similarly, none of the HMAs undertaken in Dorset or Wiltshire extended into the National Park. Instead they were cut to the planning administrative boundaries and typically reflected the different stages of Local Plan production. Consequently, the National Park (and most of New Forest District) was not covered by any SHMAA work and there was a void.
3. Furthermore key data which is needed to calculate objectively-assessed housing need - such as demographic information and projections and affordability data - is not consistently available below local authority level or cut

to National Park boundaries. There was a need for consistent evidence to inform the Authority's Local Plan review and that of New Forest District. It would have been impractical for evidence to have been prepared as part of separate studies covering the three HMAs and then brought together, as studies were under preparation at different points and deal with different time periods.

4. The Authority therefore jointly commissioned work on identifying the objectively assessed housing need within the National Park (and surrounding areas of New Forest District) to fill the void. This work (CD105) provides an update to the original New Forest SHMAA work (GL Hearn, 2014, CD164). The analysis and conclusions of this work were specifically developed for the District and National Park areas, to be read in conjunction with the SHMAAs prepared for surrounding areas of South Hampshire, South Wiltshire and South East Dorset.
5. The Authority considers this to be an appropriate and necessary approach. The alternative would have been to wait for a future review of the Strategic Housing Market Area Assessments to be commissioned by neighbouring authorities and then to push for the assessments to cover the respective parts of the National Park. The Partnership for Urban South Hampshire SHMA was reviewed in 2016, but this work was again commissioned by planning authorities in urban south Hampshire and did not extend to cover the whole of the Southampton HMA (including the land within the National Park). Furthermore this would not have overcome issues regarding use of different data sources and time periods, and would not have provided a consistent evidence base for the development of plans by New Forest District and the National Park Authority.

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

1. The issue of the unmet housing need arising within the National Park has been discussed with neighbouring local planning authorities at the workshop in Spring 2016 and the duty to co-operate meetings held in Summer 2017 with neighbouring planning authorities within the HMAs. In addition, prior to the publication of the Submission draft Local Plan in January 2018, the Authority formally wrote to the nine authorities (and the Partnership for Urban South Hampshire) setting out the projected shortfall in housing provision against the objectively assessed housing need for the National Park contained within the Justin Gardner Consulting Report (CD105). Neighbouring authorities and the Partnership for Urban South Hampshire were asked if they could assist in meeting this predicted housing shortfall. The housing shortfall in the National Park was quantified at circa 23 dwellings per annum, or 460 dwellings over the 2016 – 2036 Plan-period.
2. Paragraphs 5.7 – 5.27 of the Authority's Duty to Co-operate Statement (CD19) summarise the responses received from neighbouring planning authorities and the efforts being made elsewhere within the Housing Market Areas to accommodate the housing needs identified. This includes:

- The review of the Green Belt being undertaken by planning authorities in South East Dorset and New Forest District Council to identify sustainable location for development through Green Belt releases.
  - The Submission draft New Forest District Local Plan proposes an increase in the level of planned housing development from the current development plan target of circa 200 dwellings per annum, to a target of circa 500 dwellings per annum in response to identified housing need. The District Council and National Park Authority have also worked together to develop complementary planning policy to guide the comprehensive redevelopment of the former Fawley Power Station site for 1,500 homes on a site that straddles the National Park and District Council boundary.
  - A number of planning authorities (Fareham Borough Council, New Forest District Council, Bournemouth Borough Council) are themselves facing significant increases in identified housing need in line with the Government's standardised methodology for calculating housing need.
  - Southampton and Eastleigh Councils are positively planning for growth to meet the housing targets set out in the PUSH Spatial Position Statement 2011 – 2034 (CD172). Southampton City Council is planning to deliver nearly 20,000 new dwellings by 2034 through high density growth in the city centre and the regeneration of housing estates. However, even with this the city is unable to fully meet its own housing need and therefore does not have the capacity to meet unmet needs from surrounding areas. The Eastleigh pre-submission draft Local Plan (December 2017) aims to deliver a housing figure that slightly exceeds the Borough's objectively assessed housing need and is therefore already helping to meet needs arising from the wider housing market area.
  - Winchester City Council expects to be able to make a substantial contribution to other authorities' housing needs where they are within the Partnership for Urban South Hampshire area (the National Park is not).
  - The response from PUSH highlights that a number of planning authorities in south Hampshire are unable to fully meet their own housing needs so cannot meet further unmet needs from any surrounding areas at present.
  - Wiltshire Council highlighted that Wiltshire itself has a range of environmental constraints and infrastructure capacity issues that will need to be taken into consideration in planning for additional growth. At this early stage in the Council's Local Plan review process there is the possibility for unmet need to be addressed across Wiltshire's defined Housing Market Areas before full consideration can be given to requests to address 'unmet housing needs' arising from outside the county.
3. In conclusion, the Authority recognises the significant challenges faced by planning authorities within the three HMAs in accommodating the unmet need arising from the National Park. The emerging development plans for neighbouring authorities include ambitious plans for town centre development,

Green Belt release and strategic greenfield allocations. In addition, neighbouring local authorities including Christchurch Borough Council are unable to meet their own identified housing needs, let alone plan for additional unmet needs arising in neighbouring areas. The Authority is not aware of opportunities to accommodate the relatively modest unmet need arising from within the National Park elsewhere that have not been explored by the respective local planning authorities.

**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?**

1. Against the best available evidence of the OAN housing figure for the National Park (CD105), the housing shortfall in the National Park has been quantified at 23 dwellings per annum, or 460 dwellings over the 2016 – 2036 Plan-period.
2. Under the requirements of the Duty to Co-operate and national planning policy, prior to the publication of Submission draft Local Plan 2016 – 2036 the Authority formally wrote to the nine authorities (and the Partnership for Urban South Hampshire) setting out the projected shortfall in housing provision against the objectively assessed housing need for the National Park. Neighbouring authorities and the Partnership for Urban South Hampshire were asked if they could assist in meeting this predicted housing shortfall.
3. The implication of this unmet need within the National Park is that the need should be accommodated in areas outside the nationally protected landscape of the New Forest if possible. The Authority has made representations on neighbouring authorities draft Local Plans highlighting this need and it will potentially be a matter at future examination for neighbouring Local Plans. There is also scope for future reviews of the SHMAs for surrounding urban areas to factor in the unmet need arising from the National Park.

**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?**

1. The position of other planning authorities in the respective HMAs covering the National Park in terms of the planned level of housing in the Authority's Submission draft Local Plan is summarised below. More detail is contained within paragraph 5.8 – 5.27 of the Duty to Co-operate Statement (CD19) which sets out the responses received following the duty to co-operate meetings and correspondence in 2017; as well as the representations received by the Authority on the Regulation 19 Submission draft Local Plan in early 2018.
  - Bournemouth Borough Council highlight the constructive dialogue between the two planning authorities in respect of emerging Local Plan housing requirements. The Borough Council have raised no objections to the level of housing proposed within the Authority's Submission draft Local Plan.
  - Christchurch & East Dorset Councils welcome the Authority's attempts to meet the National Park's housing needs within the Park boundary.

- New Forest District Council commend the Authority in seeking to address housing needs arising within the National Park area by the allocation of land for new housing development. The District Council also highlight the collaboration that has taken place on the former Fawley Power Station site, acknowledging the importance of enabling development within the National Park to ensure the comprehensive redevelopment of the site.
  - Fareham Borough Council considers that any response on the approach to addressing housing needs would be best addressed by the Partnership for Urban South Hampshire (PUSH).
  - Test Valley Borough Council welcome the work which the Authority has undertaken jointly with New Forest District Council in revisiting the Objectively Assessed Housing need figure arising in the combined New Forest area. The Borough Council also welcome the Authority's proposed actions to bring forward residential development within the National Park.
  - Southampton and Eastleigh Councils recognise the importance of protecting the National Park as a key asset that contributes to the quality of life for the wider sub-region. The Councils also recognise the strong protection afforded to National Parks through the NPPF and the efforts made by the Authority to make provision for new housing within this policy context. The Councils confirmed their view that the Authority is fully meeting its Duty to Co-operate obligations with Southampton and Eastleigh in preparing its Local Plan.
  - Winchester City Council does not accept that any part of its District is in the same housing market area as the National Park and therefore does not propose to plan for any unmet National Park housing needs.
  - PUSH recognise the protection afforded to the National Park by the NPPF and the efforts made by the Authority to make provision for new housing provision in this context. PUSH and its constituent authorities recognise the importance of protecting the National Park as an important asset to the area which contributes to the quality of life for residents in the sub-region.
2. The Authority has also signed Statements of Common Ground with New Forest District Council, Test Valley Borough Council, Wiltshire Council and Hampshire County Council. In these, New Forest District Council confirm their support for the approach taken by the Authority in seeking to accommodate new residential development within the National Park (including through proposed housing allocations) where it can be achieved in accordance with the principles of sustainable development. Test Valley Borough Council supports the principle of the Authority's Local Plan proposing allocations for residential development within the National Park to contribute towards meeting local housing needs. Wiltshire Council welcomes the positive approach taken in planning for housing within the National Park to contribute towards meeting identified need, including the allocation of sites. Wiltshire Council agrees that new housing provision within the National Park should be focused towards affordable housing.



**2.9 *In overall terms, has the Authority engaged constructively, actively and on an on-going basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?***

1. As set out in the Duty to Co-operate Statement (CD19) and the Consultation Statement (CD12), the Authority's engagement on strategic, cross-boundary planning matters (including housing provision and habitat mitigation) has been constructive and on-going since 2015. As well as the four stages of consultation undertaken (which included all neighbouring planning authorities under the requirements of the relevant planning regulations), the Authority has used a range of methods to engage neighbouring authorities including workshops, presentations, written correspondence and meetings.
2. The engagement has also included the joint commissioning of evidence work with New Forest District Council and the preparation of complementary planning policies to guide the comprehensive redevelopment of the former Fawley Power Station site. In terms of outcomes, this site straddling the National Park and District Council boundaries is proposed to accommodate 1,500 new homes and represents by far the largest proposed housing allocation in both the National Park Authority's and District Council's Submission draft Local Plans. When assessed against the Objectively Assessed Housing Need figure of 11,680 additional dwellings for the combined National Park and District areas identified in CD105, provision is made within the two respective draft Local Plans for 11,300 additional dwellings. This represents 97% of the identified housing need.
3. The Authority has actively engaged neighbouring authorities throughout the Local Plan review process and this is reflected in the responses received to the statutory consultation periods on the Local Plan; the responses to the duty to co-operate letters sent by the Authority in late 2017; and the signed Statements of Common Ground. It is acknowledged that there is a modest unmet housing need arising from the National Park that, to date, has not been accommodated in other parts of the respective HMAs. However, none of the planning authorities surrounding the National Park have stated that the Authority has not fulfilled the requirements of the Duty to Co-operate; and none has raised objections to the proposed approach to new housing provision within the National Park contained in the Submission draft Local Plan.

***Habitat Protection and Mitigation***

**2.10 *Who has the Authority engaged with in terms of habitat protection and mitigation for the protected habitats of the New Forest?***

1. In addition to a continuous dialogue with Natural England and formal consultation with Natural England, the Environment Agency and a range of nature conservation bodies, there are two main ways in which the Authority has engaged. Firstly, to ensure that the Authority's Habitat Mitigation Scheme would be suitable and effective for the development planned for in the Local Plan, the Authority's Habitat Mitigation Scheme Steering Group worked constructively to develop a revised version of the Scheme to accompany the

publication of the Local Plan. This revised scheme can be found as CD58. In addition to the Authority (with input from Land Use Consultants' work on the HRA), the participants of the Steering Group were:

- Natural England
  - RSPB
  - Hampshire and Isle of Wight Wildlife Trust
  - New Forest District Council
2. The Authority has also worked with Natural England, RSPB, Hampshire and Isle of Wight Wildlife Trust and 14 other local authorities<sup>1</sup> throughout the Solent to establish the joint approach to habitat mitigation for the coast contained in the Solent Recreation Mitigation Partnership's Mitigation Strategy (CD59).
3. The Local Plan also includes a commitment in Paragraph 5.45 that ... "the Authority will also work with Natural England and other local authorities, as well as a range of relevant stakeholders, to develop a strategic approach to prevent adverse effects on internationally designated nature conservation sites in the New Forest." Following a successful bid for Government funding to deliver this work, the Authority is working with five other planning authorities and Natural England to develop a strategic cross-boundary approach to habitat mitigation. The Authority is engaging with the following organisations in this exercise:
- Natural England,
  - Test Valley Borough Council
  - Wiltshire Council
  - Eastleigh Borough Council
  - New Forest District Council
  - Southampton City Council
  - Forestry Commission
4. Finally it should be noted that the Authority works very closely with New Forest District Council on this issue. The New Forest District Council's Mitigation Strategy for European Sites Supplementary Planning Document requires the operation of a ranger service to provide mitigation (by helping to manage visitors to the European sites within the National Park) for development within the District. This ranger service is hosted and overseen by the Authority.

### **2.11 Which cross-boundary issues have been identified and how have these been addressed?**

1. It has been recognised by many of the local authorities surrounding the National Park that proposed development in their planning areas could have impacts on the European designated sites in the heart of the New Forest.

---

<sup>1</sup> The Partnership comprises the fifteen Solent local authorities, Natural England, RSPB, HIOWWT, and Chichester Harbour Conservancy. The authorities are: Chichester District Council, East Hampshire District Council, Eastleigh Borough Council, Fareham Borough Council, Gosport Borough Council, Hampshire County Council, Havant Borough Council, Isle of Wight Council, New Forest District Council, New Forest National Park Authority, Portsmouth City Council, Southampton City Council, South Downs National Park Authority, Test Valley Borough Council, Winchester City Council.

2. To date, each planning authority has considered the potential impacts on the New Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) independently and has decided how these should be mitigated, if necessary.
3. To address this issue a number of authorities have committed to seek a consistent strategic approach to mitigating the impacts on these sites. The Authority has included a commitment in the Local Plan Paragraph 5.45 that ... “the Authority will also work with Natural England and other local authorities, as well as a range of relevant stakeholders, to develop a strategic approach to prevent adverse effects on internationally designated nature conservation sites in the New Forest.”
4. This work is already underway and the participating local authorities have commissioned a consultant to gather appropriate evidence to understand the nature and extent of potential effects on these European sites, and to inform the identification of appropriate mitigation in relation to future development.
5. In addition, local authorities throughout the Solent recognised that evidence showed that recreational disturbance associated with new residential development could adversely impact the designated European sites along the Solent, and, to comply with the Habitats Regulations, mitigation would be required. Consequently, the Solent Recreation Mitigation Partnership was established and it produced a joint approach to habitat mitigation for the coast contained in the Solent Recreation Mitigation Partnership’s Mitigation Strategy (CD59). This provides measures to allow developers to comply with the Habitats Regulations by delivering mitigation for the recreational impacts of new housing development that is close to the designated European sites along the Solent coast, including those in the New Forest National Park.

**2.12 *In overall terms has the Authority engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?***

- 1 The Authority has engaged constructively, with the aim of all co-operation being the protection of the designated habitats and birds of the European sites, and thus, compliance with the Habitats Regulations.
- 2 The outcomes of the co-operation, that has been described in the answers to questions 2.10 and 2.11, has been that:
  - Appropriate measures have been identified and included in the Authority’s Habitat Mitigation Scheme to provide mitigation for the recreational impacts from new development contained in the Local Plan. This addresses the conclusion of the HRA of the Local Plan that, prior to mitigation, the HRA cannot rule out the recreational impacts of any new residential and visitor accommodation throughout the National Park having a likely significant in combination effect (with impacts from outside the National Park) on the New Forest SPA and SAC sites. Policy SP5 outlines that a contribution to the Authority’s Habitat Mitigation Scheme can ensure (in most cases) that

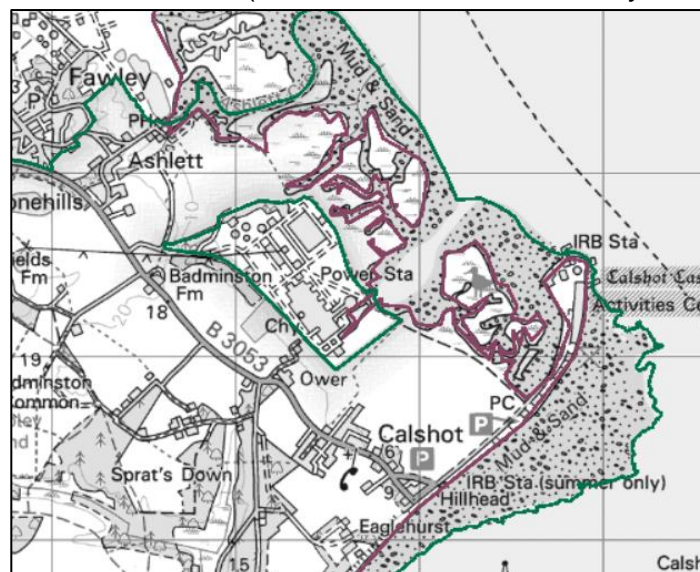
appropriate measures are secured to mitigate these recreational impacts on the New Forest SPA and SAC.

- Under the Habitats Regulations, the likely significant impacts on the designated European sites along the New Forest coast also need to be considered for all development close to these sites. The Authority has adopted the Solent Recreation Mitigation Partnership's Mitigation Strategy (CD59) and allows a contribution to this (in most cases) to be used by developers to provide mitigation of the recreational impacts of new development to satisfy the requirements of the Habitats Regulations.
- Following a successful bid for Government funding, detailed visitor research has been commissioned by six local planning authorities around the New Forest (including the NPA) to provide a better understanding of the extent and nature of the potential impacts on the European sites from new development planned in areas surrounding the National Park. This will assist in exploring the possibility of greater co-operation in mitigating the impacts from new development surrounding the New Forest SPA and SAC.
- An outcome of co-operation has been that a ranger service is hosted and overseen by the Authority to ensure that the New Forest District Council meets its requirements in its Mitigation Strategy for European Sites Supplementary Planning Document, which provides protection for the European sites within the National Park. This addresses the issue of providing appropriate mitigation for access management, which forms part of the New Forest District's overall mitigation strategy for potential impacts on the European sites.

### ***Fawley Power Station***

#### ***2.13 What are the particular issues that have required co-operation?***

1. The site of the brownfield former Fawley Power Station is effectively an island in the National Park - as illustrated by the extract below from the Government's Magic Map online resource (the National Park boundary is the thin green line).



2. Consequently, the main issue that has required co-operation has been the drafting of consistent and complementary planning policies to guide the comprehensive redevelopment of the site in both the Authority's and New Forest District Council Submission draft Local Plans. Policy SP25 in the Authority's Local Plan is supported by policy Strategic Site 4 in the District Council's Submission draft Local Plan (June 2018) and officers from both authorities have worked together on the drafting of policies. There are also signed Statements of Common Ground relating to Policy SP25 and (i) flood risk; and (ii) landscape and nature conservation between the Authority, New Forest District Council, Fawley Waterside Ltd, Natural England and the Environment Agency.
3. Policy SP25 has been informed by the joint commissioning of evidence base work. In 2017 the Authority and New Forest District Council jointly commissioned consultants to undertake a *Fawley Waterside Viability Appraisal* (CD117). This assessed a range of potential development scenarios from a viability perspective to test whether a small amount of development was required within the National Park to deliver the wider redevelopment of the brownfield site. Both the Authority and District Council have also worked with the consultants WSP on the site specific flood risk assessments undertaken to support the proposed Local Plan allocations. The flood risk work (focusing primarily of the sequential test) has been endorsed by the Environment Agency, as set out in the agreed Statement of Common Ground.
4. The Authority has also liaised with Hampshire County Council in their capacity as the highways and education authority for the Fawley site. The Authority's Submission draft Local Plan makes provision for a school to serve the site should this prove necessary and Hampshire County Council supports this position. Hampshire County Council also requested additional wording be added to criteria (c) of draft Policy SP25 to include reference to an 'integrated transport strategy' for the entire Fawley Power Station site. The Authority concurs with this representation and it is reflected in a proposed modification to the wording of policy SP25.

**2.14 *Who has the Authority engaged with? When did this engagement begin, has it been active and on-going and what form has it taken?***

1. As outlined above the response to question 2.13, the main issues that have required co-operation with neighbouring planning authorities in relation to the proposals for the former Fawley Power Station site have been: (i) in ensuring a consistent approach to the redevelopment of the site by the two respective local planning authorities (the Authority and New Forest District Council); and (ii) the infrastructure requirements to serve the development – including highways and education – which has involved liaison with Hampshire County Council.
2. The Authority has been discussing the future of the site with New Forest District Council and the site owner since 2015/16. The District Council made representations on the Authority's non-statutory draft Local Plan in autumn 2016 stating that the Authority should investigate opportunities on land in the vicinity of Fawley Power Station that could be brought forward on a cross-boundary basis. Subsequently the Authority and District Council jointly commissioned a viability assessment of various options for the development of the site (CD117).

This assessed the economic viability of development being limited to outside the National Park only, as well as variations on the size and proportion of affordable housing provided. CD117 informed the drafting of policies contained within both the Authority and District Council's Submission draft Local Plans (both 2018). The Authority has also considered the proposals for the site against the major development tests set out in paragraph 116 of the NPPF (2012).

3. The Authority consulted on the potential allocation of land within the National Park and adjacent to the brownfield Power Station site in Summer 2017 as part of the 6-week public consultation on potential alternative housing sites. This consultation was sent to all statutory consultees (including neighbouring planning authorities, Natural England, Historic England and the Environment Agency). In response to this consultation, New Forest District Council supported the potential allocation of the site and commended the joint work undertaken between the two authorities. The District Council's response to the Authority's Submission draft Local Plan (Regulations 19), "*...welcomes the inclusion of this policy [Policy 25] in the National Park's Local Plan and strongly supports the policy. The two planning authorities have worked closely together to address the future of the former Fawley Power Station site, and the opportunities for the beneficial use of this very significant brownfield site. The inclusion of policy SP25 is essential for the delivery of this major development in terms of supporting the viability of the overall scheme.*"
4. The Authority has engaged with Hampshire County Council regarding the redevelopment of the site over the same time period. As well as regular officer level liaison meetings that include the Authority, the site owner, New Forest District Council and Hampshire County Council, the County Council have been formally consulted on the potential allocation of land at Fawley Power Station on two occasions. The Council's representations on the Authority's Submission draft Local Plan recognise that National Park land will be required as part of the wider redevelopment of the site. The County Council submitted proposed amendments to criterion (c) of Policy 25 and these are reflected in the schedule of proposed main modifications prepared by the Authority (MAIN-07).
5. As well as engagement with planning authorities, the Authority has engaged with other bodies including Natural England and the Environment Agency on matters including landscape impact and flooding. As outlined above, this formal Local Plan engagement started when the Authority undertook a 6-week public consultation on potential alternative housing sites in summer 2017 to specifically seek feedback on the principle of land within the Park being allocated to support the comprehensive redevelopment of the adjacent brownfield Power Station site. Statutory consultees were also consulted on the Authority's Submission draft Local Plan in early 2018. Statements of Common Ground have been signed by the Authority, Natural England and the Environment Agency relating to Policy SP25 and (i) flood risk; and (ii) landscape and nature conservation.
6. In conclusion, the Authority has engaged with a range of bodies over the potential allocation of land adjacent to Fawley Power Station. The Authority has also liaised closely with the site owner as part of the Local Plan-preparation process. This has included agreeing the methodology of evidence base studies. New Forest District Council and Hampshire County Council have been formally

consulted on the principle of allocating the site twice since summer 2017; and a joint viability assessment (CD117) was also commissioned by the Authority and New Forest District Council. Officers from the two authorities meet regularly to discuss the site and other consultees (including Natural England, Historic England and the Environment Agency) have been consulted through the Plan-making process, as well as taking part in meetings over the last two years.

**2.15 *In overall terms has the Authority engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?***

1. The Authority has engaged constructively with a range of bodies over the last two years to support the comprehensive redevelopment of the Fawley Power Station site in a manner that respects its setting within the New Forest National Park. The Authority has engaged with the Environment Agency and Natural England on flooding, landscape and nature conservation matters for example (as evidenced by the signed Statements of Common Ground), as well as Hampshire County Council on highways and education. This engagement includes the Authority's consultation on potential alternative housing sites undertaken in summer 2017 which specifically sought the views of neighbouring authorities and other consultees on the principle of allocating land within the National Park to support the redevelopment.
2. The outcome of the engagement with planning authorities including New Forest District Council and Hampshire County Council; and statutory consultees including Natural England, the Environment Agency and Historic England, is the development of a Local Plan policy (SP25) that complements the policy contained within the District Council's Submission draft Local Plan. This policy has been informed by jointly commissioned evidence on economic viability which has formed part of the evidence base for the policy criteria relating to the size of dwellings and the proportion of affordable housing sought.
3. The engagement undertaken with other statutory consultees (including Natural England and the Environment Agency) has informed the policy criteria relating to protected species; and the preparation of the sequential test flood risk assessment for the site. The Authority has also submitted proposed modifications to Policy 25 that address the points raised in representations from Hampshire County Council, Natural England and the Environment Agency. Natural England and the Environment Agency have signed Statements of Common Ground on flood risk and landscape & nature conservation.

***Other Strategic Matters***

**2.16 *What are the other strategic matters and particular issues, for example Dibden Bay or other site allocations?***

1. The Authority's Duty to Co-operate Statement (CD19) identifies the main strategic matters that have been agreed by the National Park Authority with neighbouring planning authorities. As outlined above, these relate to:
  - Co-operation on joint evidence studies on matters including flood risk, viability and gypsy & traveller need to provide a consistent evidence base for Local Plan production.

- A co-ordinated approach to housing provision across Housing Market Areas, co-operating to meet identified housing needs.
  - A co-ordinated approach to mitigation measures to ensure development does not impact the integrity of internationally designated habitats.
  - Cross boundary co-operation regarding potential strategic development sites that could impact on more than one Plan-area.
2. CD19 sets out the engagement undertaken by the Authority with neighbouring authorities on each of these, and how they have informed the Submission draft Local Plan. Matters relating to the overall housing provision (questions 2.2 – 2.9); habitat protection and mitigation (questions 2.10 – 2.12); and the former Fawley Power Station site (questions 2.13 – 2.15) area addressed above.
  3. The other strategic matters identified in CD19 include the joint commissioning of studies to provide a consistent evidence base; and potential strategic development sites that could impact on more than one Plan-area. Page 19 of CD19 provides examples of the joint commissioning of evidence that has informed the Submission draft Local Plan.
  4. In terms of potential strategic development sites, it should be noted that such sites will typically be located outside of the National Park due to the level of protection afforded to the landscape of the National Park through primary legislation and national policy, allied to the major development test contained within paragraph 116 of the NPPF (2012). Consequently, the Authority's Submission draft Local Plan cannot provide detailed planning policy coverage for proposals outside the National Park.
  5. Where there are potential strategic development sites located close to the National Park boundary, the Authority has engaged with the appropriate planning authority. For the Dibden Bay site, the Authority has included wording within its Submission draft Local Plan (paragraph 4.11 – 4.14) on the factors to be considered should the site come forward for development. This wording is considered consistent with both national policy and the wording in the New Forest District Council Submission draft Local Plan. Representations received from Associated British Ports confirm they, *"...welcome and support the inclusion in the emerging plan of a section which deals specifically with its strategic land reserve for the Port of Southampton...an indication in the emerging plan of the factors the NFNPA consider need to be taken into account in such circumstances, is also welcomed."*
  6. For other strategic site matters, the Authority has engaged in the Plan-making process and consultation undertaken by neighbouring authorities. This has included submitting representations on the New Forest District Council Local Plan Part 1; the consultations undertaken by Christchurch & East Dorset Councils in summer 2018; and the consultation undertaken by Wiltshire Council as part of their Housing Site Allocations Plan in 2017. The aim of this engagement is to ensure that neighbouring planning authorities reflect their legal 'duty of regard' to the National Park purposes in developing their plans for areas surrounding the National Park.



**2.17 Who has the Authority engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?**

1. As set out in the Authority's Duty to Co-operate Statement (CD19) and the Consultation Statement (CD12), the Authority has engaged constructively and on an on-going basis with neighbouring planning authorities on strategic matters throughout the Local Plan review process. As well as the four separate public consultations undertaken since 2015 on the Local Plan review (where all neighbouring authorities and statutory consultees were directly notified as set out in the Annexes to the Consultation Statement), the Authority has used a range of other methods to engage relevant bodies since 2015.
2. This has included the topic-based workshops held in Spring 2016 which engaged neighbouring planning authorities and statutory consultees such as Historic England; the public drop-in events held in Autumn 2016 and Summer 2017 as part of the Local Plan consultation and on potential alternative housing sites; and the face-to-face meetings held with neighbouring planning authorities in the three Housing Market Areas that include parts of the National Park in Summer 2017. The Authority has also met regularly with Natural England as part of the Habitats Regulations Assessment process and to review the existing Habitat Mitigation Scheme in parallel with the Local Plan review.
3. The Authority has also worked closely with New Forest District Council on the preparation of complementary policies and wording on the potential strategic development sites at the former Fawley Power Station site and Dibden Bay. This has included the joint commissioning of relevant evidence base studies (e.g. the Fawley Waterside Viability Appraisal Report, CD117). In addition, nearly 40% of the membership of the National Park Authority is made up of New Forest District Council-appointed councillors and this has also been helped to ensure a consistent approach to strategic planning matters with the Council.
4. Other consultees have also been engaged throughout the Local Plan review process and their representations have informed the Submission draft Local Plan and its supporting documents. For example, a number of the policy criteria listed in the proposed site allocation policies are based on the representations from consultees (e.g. the criterion relating to connections to the sewerage network in policies SP23(i), SP24(h) and SP26(f) are based on Southern Water's representations). The engagement with Natural England prompted an additional period of public consultation on potential alternative housing sites in summer 2017. The Authority has also engaged with Hampshire County Council to consider school capacity in the New Forest resulting from proposals in the respective National Park and District Council's Submission draft Local Plans. The County Council have confirmed that there is capacity in local schools to accommodate the scale of development proposed within the National Park, subject to education contributions being made where necessary.

**2.18 In overall terms has the Authority engaged constructively? What has been the outcome of the co-operation and how has this addressed the issue?**

1. The consultation and engagement undertaken by the National Park Authority since the Local Plan review process commenced in 2015 significantly exceeds

the requirements in the relevant planning regulations and the commitments made in the Authority's adopted Statement of Community Involvement (CD11).

2. As set out in the Consultation Statement (CD12) and the Duty to Co-operate Statement (CD19) a wide range of methods have been used to engage relevant bodies, including four separate periods of public consultation where a wide range of statutory and other consultees were invited to submit representations to inform the preparation of the Local Plan.
3. The consultation undertaken has identified a number of strategic issues and these are listed in the Authority's response to 2.16. In terms of addressing the main strategic issues identified:
  - The Authority has worked constructively with neighbouring authorities on the joint commissioning of evidence base studies. This includes working with New Forest District Council on the Strategic Housing Market Assessment; the Strategic Flood Risk Assessment and the Business Needs & Commercial Market Study for the combined National Park and District areas. This ensures a consistent approach is taken to these cross-boundary issues.
  - The Authority has worked closely with New Forest District Council and other neighbouring planning authorities on the issue of housing need in the New Forest area. As well as the joint commissioning of evidence studies, the two authorities have undertaken extensive consultation with neighbouring authorities on the issue of unmet need. None of the planning authorities neighbouring the National Park have formally objected to the approach to housing taken in the Authority's Submission draft Local Plan.
  - The strategic issue of habitat mitigation measures has been progressed well over recent years. The Authority works with Natural England and 14 other local authorities to deliver the Solent Recreation Mitigation Project. In January 2018, the Authority, New Forest District Council, Test Valley Borough Council, Wiltshire Council, Southampton City Council, Eastleigh Borough Council and Natural England were successful in a joint bid to the 'Joint Working Fund' element of the CLG's Planning Delivery Fund. The funding received will help provide a robust evidence for future joint work on a strategic mitigation approach for development around the New Forest. This takes forward an action in the National Park Partnership Plan 2015 – 2020.
  - The Authority has worked closely with neighbouring planning authorities to (i) ensure complementary policy coverage for strategic sites that straddle the National Park boundary (e.g. the former Fawley Power Station site and Dibden Bay): and (ii) has made representations on the emerging development plans of neighbouring authorities to ensure that their 'duty of regard' towards the statutory National Park purposes is embedded.