

New Forest National Park Local Plan 2016 – 2036

Examination Statement – New Forest National Park Authority

Matter 7 – Housing Policies

Issue: Whether the Local Plan is justified, effective and consistent with national policy in relation to housing policies?

Specialist housing for older people (Use Class C2) – Policy SP20

7.1 Is the policy justified, effective and consistent with national policy?

1. Policy SP20 is a new policy in the draft development plan and does not feature in the adopted Core Strategy (2010). The policy has been included specifically in response to the requirements of paragraph 50 of the NPPF and the National Planning Practice Guidance which recognise the need to provide housing for older people as part of achieving a good mix of housing. The NPPF states that planning authorities should plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community.
2. Demographic projections for the New Forest (District and National Park) identify a growth in the over-65 population over the Plan-period. It is recognised that the housing needs of older people are met in a variety of ways, including adaptations to the existing dwelling stock; the provision of age-restricted open market housing (Use Class C3); and the provision of new specialist housing for older people (Use Class C2). The New Forest Strategic Housing Market Area Assessment (CD164) indicates that the growing older population in the New Forest will result in growth in households with specialist housing needs. Paragraph 8.31 of CD164 states that typically the greatest needs are for alterations to properties (such as to bathrooms, showers and toilets, provision of emergency alarms or help maintaining homes) and that many of these can be resolved in situ through adaptations to existing properties.
3. From a planning point of view, the Authority has a role in supporting the provision of additional specialist accommodation for older persons. Policy SP20 responds to this by offering policy support to proposals which address the identified local need or requirement for specialist housing for older people within the Defined Villages; as well as appropriate extensions to existing specialist housing for older people outside the defined villages. This approach balances the need to support the housing needs of older people with the protection of the landscape of the National Park and the promotion of sustainable development.

7.2 Is the approach of restricting occupancy to local people and their dependents justified?

1. The Authority has a duty under Section 62(2) of the Environment Act 1995 to foster the social and economic well-being of communities within the National Park (our emphasis). This duty recognises that the National Parks of England and Wales – including the New Forest - are areas with significant resident populations. The New Forest National Park itself is home to 35,000 people.

2. As well as the Authority's socio-economic duty, the Government's National Parks Circular (CD35) recognises that the demand for housing in National Parks has consistently driven up price and the consequence is that much of the stock is now beyond the reach of many local households. The Circular highlights the Government's recognition that National Parks, "...are not suitable locations for unrestricted housing..." (paragraph 78). Through their adopted local plans, many National Park Authorities include policies to ensure the needs of local communities are met, rather than new development in National Parks catering for external demands. Examples include:
 - Policy C8 in the Yorkshire Dales National Park Local Plan 2015 – 2030 (adopted 2016), which restricts the occupancy of new extra or residential care facilities to people who meet the local occupancy criteria. The Local Plan states it is essential that provision is targeted at meeting local need.
 - Policy HC-D4 in the Exmoor National Park Local Plan 2011 – 2031 (adopted 2017) supports proposals for accessible and adaptable homes for older people. The policy confirms that planning obligations will be used to ensure the occupancy of housing is confined in perpetuity to a local person to ensure the housing addresses the locally arising needs of the National Park's older residents and other vulnerable members of the community.
3. Draft Policy SP20 is consistent with the approach taken in other recently adopted National Park development plan policies. Paragraph 7.12 of the Submission draft Local Plan sets out the justification for restricting the occupancy to ensure C2 development addresses locally arising needs from the National Park's older residents. Given the limited availability of development sites within the National Park, it is important the finite land resource is utilised to meet local needs. Unlike other forms of housing development (C3 use), C2 use is not normally required to include provision for affordable housing for local people. Consequently, without a local restriction on the occupancy of C2 developments, there would be no guarantee that the development would meet local needs and assist in the delivery of the Authority's socio-economic duty and the aims of the National Parks Circular (2010).

The size of new dwellings – Policy SP21

7.3 Is the policy justified, effective and consistent with national policy?

1. The New Forest Strategic Housing Market Assessment (SHMAA, CD164) highlights the profile of the existing dwelling stock in the National Park. This demonstrates that the National Park area is currently characterised by a strong focus towards larger properties, with 75% of the circa 15,000 existing homes in the National Park having 3 or more bedrooms. The SHMAA states that given the ageing demographic in the National Park, allied to the high house prices and significant levels of under-occupation, the Authority may wish to promote a stronger focus on smaller units (typically 1 and 2 bedrooms) in the National Park through its Local Plan review.

2. Paragraph 50 of the NPPF states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing. The Submission draft Local Plan necessarily focuses on new development and it should be highlighted that this will make up a relatively small proportion of the National Park's housing stock by 2036. The Submission draft Local Plan proposals for 800 additional dwellings in the National Park by 2036 will increase the dwelling stock by around 5.5%. Consequently, the Authority considers it important that this 5.5% increase in the dwelling stock is focused on meeting identified local housing needs and diversifying the housing stock in the New Forest National Park as a whole.
3. The proposed approach of limiting the size of new dwellings to a maximum total internal habitable floor area has been adopted in the development plans for other English National Parks. For example policy HC-S2 in the adopted Exmoor National Park Local Plan 2011 – 2031 (2017) seeks to restrict the gross internal floor areas of local need affordable housing to up to 93 square metres.
4. The Authority's response to question 7.4 sets out in more detail the evidence and justification for the proposed restriction on the size of new dwellings in draft Policy SP21. The approach is considered:
 - *justified*, as it is supported by proportionate evidence on local housing need, the viability of development and the profile of the existing dwelling stock in the Park. It is also an approach supported by a number of consultees at the Regulation 19 stage including Copythorne Parish Council, Godshill Parish Council, Hale Parish Council, and the Hampshire Alliance for Rural Affordable Housing;
 - *effective*, as the viability evidence commissioned as part of the Local Plan review process indicates that development with a restriction on the floor areas is deliverable; and
 - *consistent with national policy*, which states that planning authorities should plan for a mix of housing. By focusing the future new development that takes place within the National Park on smaller dwellings, the mix of housing within the National Park as a whole will be diversified.

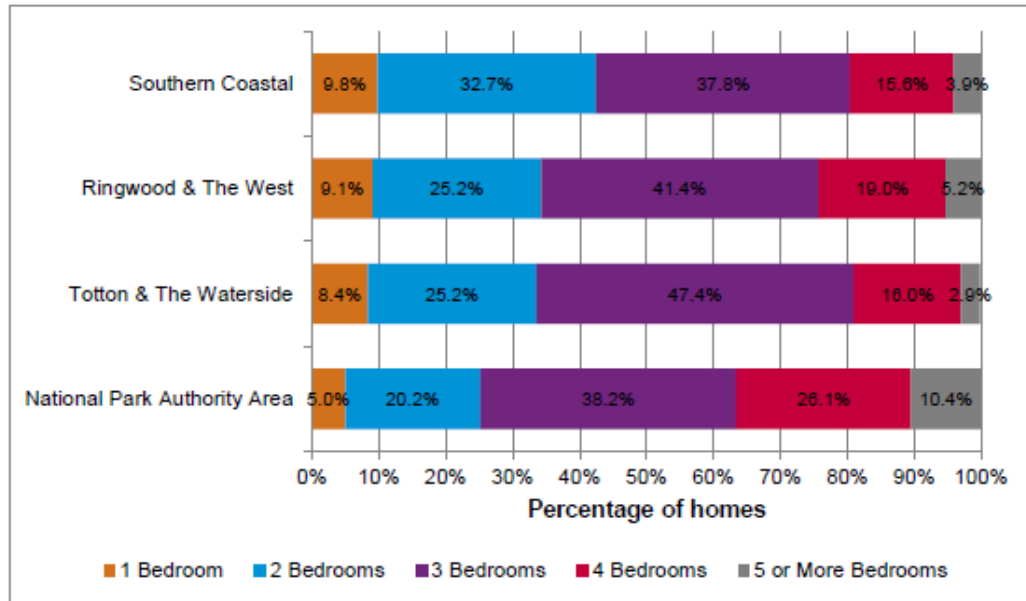
7.4 *Is the proposal to restrict the size of new dwellings to a maximal total internal habitable floor area of 100 square metres justified and supported by evidence?*

1. The proposed restriction in draft Policy SP21 on the size of new dwellings to a maximum total internal habitable floor area of 100 square metres is considered justified when reviewed against the evidence available. The policy has been informed by evidence on the mix of the existing dwelling stock in the National Park, the size of dwellings required to meet local needs, and the viability of development should such a policy restriction be adopted. Taking each of these factors in turn.

(i) *The existing dwelling mix in the National Park*

2. The current dwelling mix within the National Park is significantly skewed towards detached properties, which currently account for two thirds of the total stock (67%), with semi-detached properties accounting for another 19%. Correspondingly, the National Park has a very low proportion of smaller, denser property types (such as terraced or flats). As illustrated below, the National Park is characterised by a strong focus towards larger properties, with 36.5% of the existing dwellings in the National Park having 4 or more bedrooms.

Figure 12: Sub-Area House Size Profile



Source: Census 2011 QS411EW

3. 2011 Census data shows the issue of households who under occupy homes is acute in the National Park, where just under 85% of homes are under-occupied (paragraph 3.61, New Forest SHMAA, GL Hearn, 2014, CD164). The level of under occupation in the housing stock is a useful indicator of both housing need and possible mismatch between households and house sizes.

(ii) *The size of dwellings required to meet local needs*

4. The New Forest Strategic Housing Market Assessment (CD164) estimates that the overwhelming housing need identified across the New Forest (District and National Park) is for 1 – 3 bed properties, with 97.2% of the affordable need being for 1- 3 bed properties; and 86.8% of the open market need being for 1 – 3 bed properties (see Table 58 and Figure 48 of CD164).
5. Paragraph 7.41 of CD164 concludes that within the National Park, where the level of housing development might be restricted, consideration might be given to focusing delivering of market housing more towards smaller properties to assist local households to get on the housing ladder; and to support downsizing of older households (given the high levels of under occupation identified), releasing stock for other groups.

6. In relation to the demographic profile of the National Park, evidence illustrates the high levels of under occupation. Paragraph 3.62 of CD164 states that households may choose to downsize from a 4 bed to a 2 or 3 bed home where there is good quality accommodation available locally. Planning policies can help to ensure that there is appropriate housing available for households who might wish to downsize. Draft Policy SP21 supports this through the provision of new smaller dwellings within the National Park to meet identified needs.

(iii) *Viability evidence*

7. The Government's [Technical housing standards](#) for nationally prescribed space standard (2015) confirm that 100 square metres equates to a generous 3-bed dwelling, or a modest 4-bed dwelling as set out below.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

8. National Planning Practice Guidance states that local planning authorities should consider the impact of adopting these space standards as part of their Local Plan viability assessment. The Authority has followed this guidance as the Whole-Plan, Affordable Housing and CIL Viability Assessment (CD107 modelled the impact on viability of adopting a 100 square metres limit. CD107 highlights that, in theory, 100 square metres would allow for a modest 4 bed detached house but this is not common for a four-bed house which are typically at least 115 to 125 square metres). The dwelling sizes used in the viability modelling for all units comply with Nationally Prescribed Space Standards.
9. In response to comments from stakeholders, the viability modelling also included a series of sensitivity tests to assess the impact of allowing for dwellings above the 100 square metres limit proposed in the draft Local Plan. This highlighted that the introduction of larger houses (with associated increase in value but also of cost) strengthened viability across these case studies, but that the typologies tested were all viable with the 100 square metre limit in place.

10. In conclusion, the Authority considers the proposal in draft Policy SP21 to restrict the size of new dwellings to a maximum total internal habitable floor area of 100 square metres to be justified and supported by evidence. The policy will ensure that the new dwellings added to the housing stock in the National Park diversify the existing stock and are more closely aligned to the identified housing needs. The provision of smaller units will also assist those looking to downsize which would help address the significant under-occupation in the National Park. The proposed policy approach has been adopted in other National Park development plans and the viability testing indicates development is viable with the proposed restriction in Policy SP21 in place.

Housing outside the defined villages – Policies SP29, SP30, DP31, DP32, DP35

7.5 Are the policies justified, effective and consistent with national policy in relation to the approach to housing development outside the defined villages?

Policy SP29 - New Forest Commoners' Dwellings

1. The Authority took the decision early in the Local Plan review process to include a specific policy on Commoners' Dwellings. This reflects the importance of commoning to the landscape and rural economy of the New Forest and is consistent with the approach taken in a number of the development plans in place before the National Park was designated in 2005. A specific policy for New Forest Commoners' Dwellings also seeks to address concerns raised through more recent planning applications that are currently assessed under Policy CP11 (Affordable Housing) of the adopted Core Strategy (2010). Whilst commoners dwellings are a form of affordable housing (meeting a local need that cannot be met in other way), they are clearly different from other forms of social/affordable housing (for example, they are not managed by a Registered Provider, they are built and financed by the applicant and for practical reasons, the dwellings will not always be located close to appropriate local services).
2. Draft Policy DP29 has further been informed by the Review of the New Forest Commoners Dwelling Scheme (2011, CD170). One of the conclusions of the review was that there should be greater transparency about how an applicant meets the Scheme's eligibility criteria. To provide greater clarity, draft Policy SP29 and paragraph 7.52 of the supporting text outline the three stages in the Commoners Dwelling Scheme process.
3. Concerns have also been raised previously regarding the scale of holdings developed under the Scheme and policy SP29 therefore limits the size of commoners' dwellings in accordance with Policy SP21. The Authority is aware that this proposed restriction on the size of commoners' dwellings has raised concerns in representations received from the Commoners Defence Association for example. Draft Policy DP36 does allow dwellings to be extended in exceptional circumstances to meet the genuine family needs of an occupier who works in the immediate locality and this would include commoners.

4. The review of the Commoners Dwelling Scheme (CD170) also noted the variations in the scale of agricultural and ancillary buildings due to the differing levels of commoning activity undertaken by applicants. Control over the scale of holdings is provided through the development control system which requires the functional need for the building to be demonstrated and that its scale must be commensurate with that need, as set out in draft Policy DP50 in the draft Local Plan. The Authority has opted against prescribing the scale of the ancillary buildings provided and the preferred option is to continue to allow for differing scales of commoners holdings to be secured in order to reflect and provide for the varying levels of commoning activity that occurs in the Forest.
5. In conclusion, the Authority considers the principle of including a specific policy on New Forest commoners' dwellings to be justified. Policy SP29 and the supporting text provide clarity on how the policy will be effectively applied.

Policy SP30 - New Forest Estate Workers Dwellings

6. Draft Policy SP30 is a new policy (i.e. there is no equivalent in the currently adopted development plan for the National Park) has been included in recognition of the role played by the larger Estates in the New Forest in managing significant areas of the National Park and in the conservation of the landscape and cultural heritage of the New Forest, as well as the development of a sustainable rural economy.
7. National policy (e.g. paragraph 55, NPPF, 2012) recognises the need for rural workers to live at or near their place of work in the countryside. The NPPG also outlines the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. Given the increasingly broad range of work undertaken by Estate workers, many are ineligible for agricultural or forestry worker dwellings. Policy SP30 therefore aims to support the provision of a limited number of new dwellings for Estate workers.
8. Draft Policy SP30 encourages the production of Estate Plans to inform the consideration of development proposals within the larger Estates. This is an approach also adopted in the South Downs National Park Submission draft Local Plan (2017) to gain a comprehensive picture of the whole Estate to be shared and to place individual development proposals within their wider context.
9. The principle of including a local planning policy on Estate workers dwellings is considered: (i) justified given the nature of land management in the New Forest National Park; and (ii) consistent with national policy which recognises the need for specialist housing in rural areas. The criteria in draft Policy SP30 provide clarity on the application of the policy; and clarification is also provided regarding the scale of development that is appropriate.
10. The Authority is aware that representations have been made objecting to the inclusion of criterion (d) which states that support for new Estate workers dwellings is conditional on no other suitable dwellings on the Estate having been recently sold or let to non-Estate workers. The wording of this criterion is similar

to the approach taken to agricultural or forestry workers dwellings (e.g. criterion (c) of draft Policy DP30). This criterion is considered important to ensure new Estate worker dwellings are focused on the needs of the Estate, rather than enabling the sale of other housing stock.

Policy DP31 - Agricultural and Forestry Workers Dwellings

11. Paragraph 55 of the NPPF (2012) sets out the national policy presumption against isolated new homes in the countryside, unless there are special circumstances. The first bullet point of paragraph 55 (reiterated in paragraph 79 (a) of the NPPF, 2018) confirms that special circumstances can include the essential need for a rural worker to live permanently at or near their place of work in the countryside. The inclusion of a specific local planning policy setting out how this will be applied to support the rural economy of the National Park is therefore considered justified.
12. The policy criteria have been expanded from the equivalent policy in the existing development plan (policy DP13 in the Authority's adopted Core Strategy 2010). This reflects the fact that national planning policy in the annex to PPS7 no longer exists and therefore criterion (a) and (b) require the functional need for the dwelling to be demonstrated.
13. The Authority is also aware of representations received objecting to the inclusion of criterion (d) which seeks to limit the size of new agricultural and forestry worker dwellings to 100 square metres (in accordance with Policy DP21). In response the Authority would highlight that:
 - (i) against the Government's nationally prescribed space standards (2015), this equates to a 3 bed dwelling and so is not considered to be unduly restrictive;
 - (ii) draft Policy DP36 provides support for larger extensions to meet the genuine family needs of an occupier who works in the immediate locality (in respect of these exceptional circumstances, the total internal habitable floorspace of an extended dwelling must not exceed 120 square metres); and
 - (iii) larger dwellings for agricultural workers inevitably attract higher price premiums on any re-sale, thereby limiting their affordability/availability for future agricultural workers, which in turn leads to pressures to remove the associated occupancy condition¹.
14. In conclusion, in accordance with national policy the Submission draft Local Plan supports proposals for agricultural and forestry workers dwellings where a functional need is demonstrated. The restriction on the size of dwellings recognises the fact that dwellings should only be providing facilities required for the agricultural needs for the farm. The limit of 100 square metres in criterion (d) of draft Policy DP31 is similar to that contained within Policy HC-D9 of the recently adopted Exmoor National Park Local Plan 2011 – 2031 (July 2017).

¹ See Appeal Ref: APP/B9506/W/17/3190897 - *Fritillaries, Brockhill Nursery, Sway Road, Tiptoe, Lymington SO41 6FR*, 4 September 2018 where a 5-bed dwelling with an agricultural occupancy tie in the National Park was marketed for sale at £1.35 million. The appeal was dismissed.

Policy DP32 - Removal of Agricultural Occupancy Conditions

15. As outlined in paragraph 7.60 of the Submission draft Local Plan, there are over 100 existing dwellings in the National Park subject to agricultural occupancy conditions. The Authority receives applications each year for the removal of these conditions and therefore a specific planning policy is considered justified.
16. As part of the Local Plan review, the Authority identified the need to provide further clarification on the process for seeking the removal of agricultural occupancy conditions. The wording of paragraph 7.62 has therefore been expanded from the wording in the Authority's adopted Core Strategy (2010) to include: (i) the expectation that the property be placed with local and specialist estate agents and advertised locally for at least a 12-month period at a substantially discounted price that reflects the fact that it is subject to an agricultural occupancy condition²; and (ii) contacting the Commoners Defence Association to establish whether the property would meet the requirements of a New Forest commoner in housing need. Both of these additional requirements have been included based on the Authority's experiences of applying the existing policy for the last 8 years.
17. In terms of the tests of soundness outlined in paragraph 182 of the NPPF (2012), the Authority considers Policy DP32 and its supporting text to be justified, as it builds on the experiences of applying the existing development plan policy. The additional wording added to the supporting text aims to clarify the requirements of the policy, thereby improving its effectiveness. Finally, national policy confirms that isolated dwellings in the countryside are only supported in special circumstances and therefore the Authority considers it appropriate that the policy tests that must be met for the removal of occupancy ties set a high bar.

Policy DP35 - Replacement Dwellings

18. Successive development plans for the New Forest dating back to the 1990s have included planning policies on proposals for replacement dwellings. Draft Policy DP36 builds on Policy DP10 in the adopted Core Strategy (2010). In his Report into the Core Strategy in 2010, the Inspector stated, "...I recognise the value of including a policy on replacement dwellings, especially in such a sensitive landscape as the New Forest National Park. The minor changes proposed by the NPA would ensure that Policy DP10 was not unduly restrictive in preventing replacement dwellings in the defined villages." (paragraph 35).
19. The main aims behind draft Policy DP35 in the Submission draft Local Plan remain as valid now as they have over the preceding years. As highlighted in the Authority's response to question 7.4, the dwelling stock in the National Park is skewed towards larger properties and therefore it is considered justified to seek to restrict the size of replacement dwellings. In addition, draft Policy DP35 places tighter limits on the size of replacement dwellings outside the Defined Villages in recognition of the potentially greater landscape impact of

² See Appeal Ref: APP/B9506/W/17/3190897

development outside the larger villages. These aims accord with national planning policies protecting the landscape of National Parks; and planning for a mix of dwellings.

20. Policy DP35 states that the replacement dwelling should be of no greater floorspace than the existing dwelling, with the 'existing dwelling' defined in paragraph 7.79. This policy approach of seeking to restrict the size of replacement dwellings is consistent with the adopted Authority's Core Strategy (2010) and other adopted National Park development plans. For example:
 - Policy HC-D17 in the Exmoor National Park Local Plan 2011 – 2031 (adopted July 2017) states that replacement dwellings should be sited on or close to the footprint of the existing dwelling; be no larger in size than the original dwelling or 93 square metres; reflect the massing and scale of the original dwelling; and that Permitted Development Rights will be removed.
 - Policy C5 in the Yorkshire Dales National Park Local Plan 2015 – 2030 (adopted December 2016) states that replacement dwellings must be located on the same site as the original dwelling and must not be substantially larger than the dwelling to be replaced. The supporting text states the reason for the policy approach is to mitigate landscape impact and avoid a precedent that might undermine the aim of maintaining a range of house sizes and types across the National Park. Permitted development rights will also be removed at the time of permission
21. In conclusion, draft Policy DP35 builds on the existing adopted development plan policy on replacement dwellings which was endorsed as 'sound' in 2010. The policy is a core policy in guiding development in the National Park and is generally supported by local communities within the Park. The approach of restricting the floor area of replacement dwellings is consistent with that taken in other recently adopted National Park development plans and is in accordance with national policy on protecting the landscape of National Parks and planning for a mix of dwelling types.

Residential character and the design of housing – Policies DP34, DP36 and DP37

7.6 Are the policies justified, effective and consistent with national policy in relation to the approach to residential character and design?

Policy DP34 - Residential Character of the Defined Villages

1. Section 7 of the NPPF (2012) places a strong emphasis on planning positively for the achievement of high quality design for all development. The NPPF (2012) states that planning policies and decisions should ensure developments add to the overall quality of the area and establish a strong sense of place; optimise the potential of the site to accommodate development. Paragraph 59 states that, "...*design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.*"

2. The Submission draft Local Plan places a strong emphasis on local distinctiveness, supported by the National Park Design Guide SPD, various adopted Village Design Statements and the Authority's annual Building Design Awards. Draft Policy DP34 is a key part of this policy approach and aims to ensure new development conserves and enhances the character of the Defined Villages, balancing the delivery of development to meet local needs with respecting the character of the villages.
3. The NPPF also confirms that planning authorities can set their own density policies based on local circumstances. This was considered as part of the Local Plan review process and the Authority recognises the call in national policy to make efficient use of land by increasing development densities in high demand areas where sites are scarce. The Authority is also aware of concerns raised locally regarding the density of some recent applications and developments. Interestingly the perception that development is 'high density' can be caused by the size of the new dwellings, perhaps more so than the actual density of development. For example, the Authority has granted permission for relatively high density development, such as the village-centre scheme at 'The Boltons', Gosport Lane, Lyndhurst (application reference 09/94299) which equates to over 100 dwellings to the hectare and the scheme has received a New Forest National Park Building Design Award. Permission has also been refused for schemes of much lower density, such as the site at 'Beverley' in Sway (application reference 18/00089), where the Authority refused permission for a scheme where the development density was less than 30 dwellings per hectare, but the scale of the dwellings proposed (which totalled over 500m² for 4 units) perhaps led to perceptions of a much higher density development.
4. In conclusion, draft Policy DP34 forms an important element of the Authority's overall approach to conserving local distinctiveness in the National Park. This is in line with the NPPF and the emphasis on good design. Policy DP34 and its supporting text also highlight the range of character areas within the Defined Villages, with the core of the village often characterised by higher density development. The Authority has significant reservations regarding imposing density figures, given that in the right context higher density development in the National Park is entirely appropriate, but not so in others.

Policy DP36 - Extensions to Dwellings

5. The New Forest is the second most densely populated National Park and receives circa 900 planning applications per annum. Residential extensions make up a significant proportion of the applications received and therefore the inclusion of a more detailed policy to guide decisions on such proposals in a nationally protected landscape is justified.
6. Draft Policy DP36 builds on Policy DP11 in the adopted Core Strategy (2010) which seeks to avoid a long-term and cumulative erosion of the character and natural beauty of the National Park by successive extensions to the dwellings within it. The objective behind Policy DP11 is consistent with the principle set out in paragraph 115 of the NPPF (2012) that great weight should be given to conserving landscape and scenic beauty in National Parks. The Inspector's

Report into the Core Strategy (CD168) concluded that Policy DP11, “...strikes an appropriate balance between meeting changes in householder requirements whilst maintaining a stock of smaller sized dwellings for the benefit of the wider Park community. This is based on long-standing local policies, which have been supported on appeal, and is generally understood and accepted by residents. Limiting the 30% restriction to dwellings outside the defined villages is justified as extensions in these locations are likely to have a greater impact upon the unspoilt qualities of the New Forest.” (paragraph 35).

7. The Authority considers that the main factors the policy aims to address – namely supporting appropriate extensions while ensuring the cumulative impacts on the dwelling stock and the landscape of the National Park are not too great – remain valid, as do the general conclusions in the Inspector’s Report from 2010. While national Permitted Development Rights have been extended in recent years, the level of protection afforded to the landscape of National Parks in national policy remains unaltered.
8. Policy DP36 uses a base date of 1 July 1982 (or the date when the dwelling was originally built or legally established, if the residential use post-dates 1 July 1982) to calculate the floor area of the existing dwelling. This is consistent with the adopted Authority’s Core Strategy (2010) and is an approach adopted in other National Park development plans. Policy HC-D15 in the Exmoor National Park Local Plan 2011 – 2031 (adopted July 2017) for example, defines the original dwelling as dwelling as it existed on 1 April 1974 (the date when the National Park Authority assumed it’s planning responsibilities). The recently adopted Exmoor policy also limits residential extensions to 35% other than in exceptional circumstances.
9. In conclusion, draft Policy DP36 builds on the existing adopted development plan policy on extensions to dwellings which was endorsed as ‘sound’ in 2010. The policy is a core policy in guiding development in the National Park and protecting the locally distinctive character of the New Forest. It is generally supported by local communities within the Park.

Policy DP37 – Outbuildings

10. As set out in paragraph 7.80 of the Submission draft Local Plan, the Authority receives a significant number of applications for outbuildings and concerns have been raised regarding their impacts on the character of the New Forest. Policy DP37 builds on Policy DP12 in the Authority’s adopted Core Strategy (2010) and has been reviewed in response to experiences over the last 8 years and representations made in the early stages in the Local Plan review process.
11. Two additional criteria have been added to draft Policy DP37 in response to representations made by consultees and concerns raised by local communities. Criterion (a) requires new outbuildings to be proportionate and clearly subservient to the dwelling they are to serve in terms of their design, scale, size, height and massing. Criterion (e) states that proposals for new outbuildings should not reduce private amenity space – including parking provision - around the dwelling to an unacceptable level.

12. These two new criteria are considered justified in the context of development in a nationally protected landscape and are similar to the policy wording contained within recently adopted National Park development plans. For example Policy HC-D16 in the Exmoor National Park Local Plan 2011 – 2031 (adopted July 2017) requires outbuildings to be proportionate to the dwellings they are to serve; and that private amenity space around the dwelling should not be reduced to an unacceptable level.

13. The Authority also received representations earlier in the review process calling for firmer floorspace limits to be placed on new outbuildings and this option was considered. However, the Authority concluded it would not practical to set a floorspace limit on outbuildings given the range of dwelling types and residential plot sizes (and the respective residential curtilages) in the New Forest and therefore criterion (a) was the preferred approach to address the scale of outbuildings.