# New Forest National Park Local Plan 2016 – 2036 (adopted August 2019): Five Year Review March 2024

### PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

## Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the <u>National Planning Policy Framework</u> (NPPF) (paragraph 33 in particular) and the associated <u>National Planning</u> <u>Practice Guidance</u> on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

## How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the <u>Planning and Compulsory Purchase Act 2004 (as amended)</u>; <u>The Town and Country Planning (Local Planning) (England)</u> <u>Regulations 2012 (as amended)</u> and the most up to date <u>NPPF, PPG</u>, Written Ministerial Statements and the <u>National Model Design Code</u>. To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the <u>NPPF</u>. Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent. To use the matrix, consider each of the statements listed in the "requirements to consider" column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any 'made' neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position, any local design guides or codes and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

## How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
Α	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements. PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the 'content' requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).	DISAGREE	<ul> <li>Reason (with reference to plan policies, sections and relevant evidence):</li> <li>The adopted Local Plan was assessed against the 2012 National Planning Policy Framework (NPPF) and found sound at the public Examination in 2018/19. The NPPF has gone through several iterations since the Plan was adopted, together with a number of Written Ministerial Statements published relevant to plan-making.</li> <li>Given the overarching statutory purposes for National Parks remain unaltered, and national policy for National Parks set out in paragraphs 182 – 183 of the December 2023 version of the NPPF being consistent with previous iterations, the Authority considers the Local Plan to be in general conformity with the NPPF (December 2023). However, there would be benefits to reviewing and updating some of the policies in line with the new and revised elements of national policy and guidance issued since the Local Plan was adopted in August 2019.</li> <li>A more detailed review of the Local Plan policy content will be undertaken using the PAS Part 2 toolkit assessment.</li> </ul>
A2.	<ul> <li>There has not been a significant change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</li> <li>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). Consider whether your local housing need figure has gone down significantly (with the measure of significantly comparison with the housing need figure has gone down significantly (with the measure of significantly (with the measure of significantly for a comparison with the housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). </li> </ul>	AGREE	Reason (with reference to plan policies, sections and relevant evidence sources): Policy SP19 of the adopted Local Plan sets out a planned delivery of 800 dwellings in the National Park between 2016 and 2036. This was based on an assessment of housing needs arising from communities within the National Park, recognising the Government's position that National Parks are not suitable locations for unrestricted housing, with the expectation that new housing will be focused on meeting local affordable housing requirements. The extant National Parks Circular confirms that the Government does not provide general housing targets for National Parks.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.		The National Park Authority is not subject to the Government's Housing Delivery Test and is not given a housing need figure under the national standard 'OAN' methodology (which applies to local authority areas). The NPPG guidance on 'housing and economic needs assessment' confirms that in National Park areas authorities may continue to identify a housing need figure using a method determined locally. It is recommended that an updated assessment of local housing needs arising within the New Forest National Park is undertaken to inform a review of the local planning policies.
	You have a 5-year supply of housing land         PROMPT:         Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing	AGREE	Reason (with reference to plan policies, sections and relevant evidence sources):The Authority's five-year housing land supply is set out in the annual monitoring reports which can be viewed on the Authority's website.
A3.	Delivery Test measurement rule book	-	The latest monitoring report confirms that, as of 31 March 2023, the New Forest National Park Authority has a housing land supply of 6.9 years. As noted above, the NPPG resource on 'Housing supply and delivery' confirms that national park authorities are not subject to the Government's 'Housing Delivery Test' (paragraph 37).
A4.	You are meeting housing delivery targets PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon in doing as you pood to make a	AGREE	The Authority's housing trajectory indicates that the housing site allocations in the New Forest National Park Local Plan (2019) are predicted to come forward slightly later into the Plan period than originally envisaged. Consequently the dwellings completed in the first few years of the Local Plan period comprise solely windfall sites. The rate of windfall development between 2016 – 2023 is in line with the estimate set out in the Local Plan (paragraphs 7.10 and 7.44). Delivery of the adopted Local Plan's housing site allocations is on track
	that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.		<ul> <li>and planning applications have either been approved or have NPA Planning Committee resolutions to grant on all of the sites subject to the completion of the accompanying legal agreements:</li> <li>Full planning permission has been granted for 62 dwellings on land at Whartons Lane, Ashurst (policy SP22)</li> </ul>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<ul> <li>There is an NPA Planning Committee resolution to grant outline planning consent for a care home development of up to 70-beds on land at Ashurst Hospital (policy SP23)</li> <li>Full planning permission has been granted for 79 dwellings on the site of the former Lyndhurst Park Hotel, with the first dwellings due to be completed in 2024/25 (policy SP24)</li> <li>Full planning permission has been granted for 46 dwellings on land at Church Lane, Sway (policy SP24)</li> <li>There is an NPA Planning Committee resolution to grant planning permission for 120 dwellings at land to the south of the former Fawley Power Station (policy SP25).</li> </ul>
A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period. PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.	AGREE	The Authority's <u>Monitoring Reports</u> set out the delivery of the Local Plan's policies as regards provision of affordable housing and employment floorspace, both of which have been proportionate to the scale of development planned for the New Forest National Park. The adopted Local Plan housing site allocations make provision for a significant level of affordable housing for local people – with over 120 net new affordable dwellings due to be delivered on the site allocations. As outlined above, all of the adopted Local Plan site allocations either have full planning permission or Planning Committee resolutions to grant subject to the completion of the legal agreements.
			These legal agreements secure on-site affordable housing and set out the criteria for eligibility to occupy the dwellings.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A6.	Matters to consider         There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.         PROMPT:         A key employer has shut down or relocated out of the area.         Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.         Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.         Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.         You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.         Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.		Extent to which the local plan meets this requirement         Reason (with reference to plan policies, sections and relevant evidence sources):         The evidence base that informed the adopted Local Plan supported the Authority's position not to allocate employment land, but instead to rely on windfall development guided by criteria-based policies to ensure new employment development is of an appropriate nature. The Inspectors concluded there was no evidence to suggest the rate of employment development would slow down in the future or that the approach would stifle economic growth. Monitoring since the adoption of the Local Plan in 2019 indicates that employment land has continued to come forward in the National Park area through windfall development. However, the national permitted development rights allowing conversion from offices to residential uses remains a concern. An updated evidence base on employment land provision in the National Park would be beneficial.         The National Park's four defined villages continue to support a mix of uses, with vacancy rates in the village centres largely unchanged since the adoption of the Local Plan in 2019.         The Solent Freeport includes several tax and customs site adjacent to the National Park boundary (including one site at Fawley Waterside that is partly within the National Park's location between the urban areas of Bournemouth and Southampton (and the strong economic reliance on these areas) meant the Authority's position of not factoring in job growth forecasts into the housing requirement for the National Park was justified given the statutory framework for National Parks. The Government has stated that the Freeport designation does not undermine the protections afforded to National Parks.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	There have been no significant changes affecting viability of planned development.	AGREE	Reason (with reference to plan policies, sections and relevant evidence sources):
A7.	<ul> <li>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</li> <li>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</li> <li>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</li> </ul>		The Authority has not implemented the Community Infrastructure Levy (CIL) and so this indicator is not available. There is evidence that development generally remains viable within the National Park area. For example, the affordable housing targets set out in the adopted Local Plan (2019) have been secured through the subsequent planning applications on the site allocations. In addition, windfall development has also been delivered at a rate slightly higher than the estimate set out in the Local Plan, indicating that development that accords with local policy requirements (including the limit on the size of net new dwellings) is deliverable. However, there is also evidence from developers within the National Park that build costs have increased and of impacts associated with higher national interest rates, both of which have changed since the viability evidence that informed the adopted local plan was prepared. Together with updated evidence on the level of local housing needs in the National Park, the viability assessment of local planning policies will also need to be refreshed in a partial review of the Local Plan. The NPPG resource on 'Viability' confirms that local planning policies should informed by a proportionate assessment of viability.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A8.	Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk. PROMPT: Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.	AGREE	<ul> <li>Reason (with reference to plan policies, sections and relevant evidence sources):</li> <li>As set out in A4, delivery of the adopted Local Plan housing allocations is on track and planning applications have either been approved or have NPA Planning Committee resolutions to grant on all of the sites (subject to the completion of the necessary legal agreements):</li> <li>Full planning permission has been granted for 62 dwellings on land at Whartons Lane, Ashurst (policy SP22)</li> <li>There is an NPA Planning Committee resolution to grant outline planning consent for a care home development of up to 70-bed on land at Ashurst Hospital (policy SP23)</li> <li>Full planning permission has been granted for 79 dwellings on the site of the former Lyndhurst Park Hotel, with the first dwellings due to be completed in 2024/25 (policy SP24)</li> <li>Full planning permission has been granted for 46 dwellings on land at Church Lane, Sway (policy SP24)</li> <li>There is an NPA Planning Committee resolution to grant planning permission for 120 dwellings at land to the south of the former Fawley Power Station (policy SP25). The Authority continues to engage with the developers of this site regarding its deliverability.</li> <li>Windfall delivery between 2016 – 2023 is slightly higher than the estimate of 20 net new dwellings per annum set out in the adopted Local Plan (policy SP19, paragraph 7.10 and paragraph 7.44).</li> </ul>
	There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.	DISAGREE	Reason (with reference to plan policies, sections and relevant evidence sources): Since the adoption of the Local Plan in 2019 the National Park
A9.	PROMPT:You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).Identify if there have been any changes in Flood Risk Zones,		Authority has declared a climate and nature emergency. Consequently, climate change is now significantly higher up the agenda, which also reflects changes in national planning policy (e.g. the revised NPPF, December 2023). The Authority commissioned a study 'A greenhouse gas emissions assessment and target scenario for the New Forest National Park', published in November 2022. This provides a robust

Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
<ul> <li>including as a result of assessing the effects of climate change.</li> <li>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</li> <li>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</li> <li>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</li> <li>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</li> </ul>		<ul> <li>evidence base for climate action, mitigation and land use management considerations. It is recommended that a partial review of the National Park Local Plan explores how local planning policies can contribute to addressing the impacts of climate change on the New Forest.</li> <li>Linked to this, the National Park Authority is working with neighbouring authorities in the Partnership for South Hampshire on an updated Strategic Flood Risk Assessment (SFRA) that will cover the whole of the National Park area. This will be an important part of the evidence base for the partial review of the Local Plan.</li> <li>The Lyndhurst Air Quality Management Area was revoked by New Forest District Council in August 2023.</li> <li>Since the Local Plan was adopted in 2019, the 'zone of influence' relating to recreational pressures arising from new development on the New Forest National Park and reaffirms the Authority approach that mitigation measures are required from all relevant developments across the National Park. This is an important issue under the Habitats Regulations and new development also needs to consider:</li> <li>Water Quality: The requirement for 'nutrient neutrality' in the Solent and Hampshire Avon catchments</li> <li>Recreational impacts on the New Forest Special Area of Conservation: The need to continue monitor the impact of emissions on the SAC to assess impacts on site integrity.</li> </ul>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re- evaluated.	AGREE	Reason (with reference to plan policies, sections and relevant evidence sources):
	<b>PROMPT:</b> Consider if there have been any new sites that have become		No significant new sites have become available since the adoption of the Local Plan in 2019 that are considered to impact on the spatial strategy set out in policy SP4 of the adopted Local Plan.
A10.	available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.		Depending on the outcome of the updated assessment of housing need within the National Park, a review of land availability is likely to be undertaken to ascertain the availability of land for housing and identify any new opportunities. At this stage there do not appear to be any significant new sites that are now available for development that were not at the time the adopted Local Plan was prepared.
	Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.		

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<ul> <li>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</li> <li>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development. Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land. Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</li></ul>	AGREE	Reason (with reference to plan policies, sections and relevant evidence sources):         As set out in the Infrastructure Delivery Plan that formed part of the evidence base for the adopted National Park Local Plan, the scale of development set out in the Plan (40 dwellings per annum, a limited number of housing site allocations, no new employment site allocations) does not in itself require significant new infrastructure projects. This was confirmed by statutory consultees through the planmaking process. Given this, there are not considered to be any infrastructure issues affecting the Plan's spatial strategy.         There are several significant infrastructure projects planned that could affect the New Forest National Park, but these are not critical to the delivery of the Authority's own Local Plan (being driven instead by proposals outside the National Park area).

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	All policies in the plan are achievable and effective including for the purpose of decision-making.		Reason (with reference to plan policies, sections and relevant evidence sources):
A12.	<ul> <li>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</li> <li>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</li> </ul>		The Authority's Annual Monitoring Reports identifies that the policies are broadly performing effectively and remain largely achievable. However, there are several that will need to be updated to better reflect recent changes in the NPPF and legislation, including the changes to permitted development rights and the use classes order. This will be considered in more detail in the PAS Part 2 toolkit template looking at the compliance of the adopted Local Plan policies with the latest version of the NPPF.
	Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.	-	Feedback from the Authority's Planning Committee members and Development Management staff will inform the review of the planning policies and ensure they remain effective and fit for purpose. The Government's intention to introduced National Development Management Policies (NDMPs) will also be relevant to the partial review of the Local Plan. At this stage clarity is still sought on the scope and coverage of the NDMPs, but it may be that the revised Local Plan contains a more limited suite of local planning policies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<ul> <li>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</li> <li>PROMPT:</li> <li>In making this assessment you may wish to:</li> <li>Review emerging and adopted neighbouring authority development plans and their planning context.</li> <li>Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.</li> <li>Review any relevant neighbourhood plans</li> <li>Consider whether any of the matters highlighted in statements A1-A12 for their plan may impact on your plan - discuss this with the relevant authorities.</li> <li>Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs.</li> </ul>	AGREE	<ul> <li>Reason (with reference to plan policies, sections and relevant evidence sources):</li> <li>The National Park Authority undertakes regular liaison with adjoining planning authorities under the duty to cooperate, as well as through formal arrangements such as the Partnership for South Hampshire. The Authority is a statutory consultee on neighbouring authority local plans and is engaged in the work being undertaken by New Forest District Council, Test Valley Borough Council, Wiltshire Council, BCP Council and Dorset Council on their respective draft local plans.</li> <li>At the appropriate point the Authority will agree Statements of Common Ground with neighbouring authorities on strategic crossboundary matters. These are likely to cover matters including addressing the impacts of planned development on the New Forest's designated sites (principally recreational impacts); addressing that National Parks are unlikely to be appropriate locations to meet the unmet needs from surrounding areas); and transport matters.</li> <li>The National Park Authority continues to monitor the changing planning context relevant to local plans, including:</li> <li>The recently published Hampshire Local Transport Plan 4</li> <li>The emerging Hampshire and Wiltshire Local Nature Recovery Strategies</li> <li>The mandatory requirement for development to deliver Biodiversity Net Gain (BNG)</li> </ul>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<ul> <li>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</li> <li>PROMPT: <ul> <li>In making this assessment you may wish to:</li> </ul> </li> <li>Review any manifesto commitments and review the corporate and business plan.</li> <li>Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</li> <li>Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on.</li> </ul>	AGREE	Reason (with reference to plan policies, sections and relevant evidence sources): It is not envisaged that there will be any local political changes that would require a change to the approach set out in the adopted Local Plan. National Park Authorities are apolitical organisations and the framework for their statutory planning functions is established through primary legislation and guidance (e.g. the Protected Landscapes Outcomes Framework published by Defra is early 2024). However, a climate and nature emergency has been declared by the Authority since the Local Plan was adopted and this should be reflected in the updated Local Plan. The Authority is mindful of the likely forthcoming General Election, and the prospect of further changes to the planning system which may necessitate a change to the Local Plan approach. This will be monitored and considered in due course. A particular focus will be on further changes to national Permitted Development Rights which have undermined several local planning policies in recent years. National Parks have a degree of protection from changes in national planning policy given that the statutory purposes are enshrined in primary legislation through the National Parks & Access to the Countryside Act 1949.

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	NO	If no go to question A16.If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	YES	If yes, based on the above provide a summary of the key reasons why an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	Decision: Partial update to the policies in the adopted New Forest National Park Local Plan (2019)         Although the key elements of national policy for National Parks remain unaltered from the time the current Local Plan was adopted, there have been some revisions to national policy and legislation pertinent to the Authority's planning work. These include:         Compliance with national policy and legislation: The NPPF (2023) states the preparation and maintenance of up-to-date local plans is a priority in meeting identified development needs in a sustainable way. Although the National Park Local Plan (2019) is considered to be in general conformity with national policy, it will be 5 years old in August 2024. The Levelling Up & Regeneration Act 2023 also signposts the abolition of Supplementary Planning Documents (SPDs) and a review of the Local Plan would enable relevant sections of our existing SPDs to be incorporated into the revised local plan.         Climate Change: A focused review of our local planning policies on sustainable construction and energy efficiency will enable us to respond to the requirements of updated national policy; and use our planning powers to contribute to the delivery of the net zero with nature programme.		

	<ul> <li>Nature Recovery: Since the adoption of the Local Plan in 2019 the National Park Authority has declared a nature and climate emergency. The preparation of the Local Nature Recovery Strategies for Wiltshire and Hampshire has commenced and these strategies will have weight in the local plan-making process. The mandatory requirement for Biodiversity Net Gain (BNG) in new development came into effect in Spring 2024 and the review of the Local Plan for the National Park provides the opportunity to set out the Authority's target for BNG in new development.</li> <li>Housing Need: The National Park Authority is not covered by the Government's Housing Delivery Test. The Authority also does not receive a housing need requirement from the Government generated through the standard methodology relating to the objectively assessed housing need. Instead the National Planning Practice Guidance (NPPG) resource on 'housing and economic needs assessment' acknowledges that in National Parks an alternative approach to the Government's standard method for assessing housing need will be required. The NPPG confirms that national park authorities, 'may continue to identify a housing need figure using a method determined locally.' The Authority will therefore need to commission evidence on the current local housing need arising from communities within the National Park to inform the approach we take to the Local Plan review.</li> <li>National Development Management Policies: The Levelling Up &amp; Regeneration Act 2023 enables national development management policies (NDMPs) to be drawn up by the Secretary of State. The rationale is that NDMPs will make local plans quicker to produce because nationally important issues will be covered by NDMPs and local plans will therefore be shorter, focused on locally important issues. The adopted New Forest National Park Local Plan.</li> </ul>				
	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area		
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	UNSURE	The National Park Authority does not receive a housing need requirement from the Government generated through the standard methodology and is therefore required to identify a (policy off) housing need figure using a method determined locally. At this stage it is not known what need the evidence base update will identify.		
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	NO	The spatial distribution of growth set out in the Local Plan is considered fit for purpose. There are limited options for an alternative spatial strategy given the landscape and nature conservation designations in the New Forest National Park.		
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	YES	The update envisaged is likely to affect one or more strategic policies, which could have consequential impacts on the rest of the plan.		

	You have answered yes to one or more questions above.	YES	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.		
	You have said no to <u>all</u> questions (B1 to B3) above	NO	If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.		
	Decision: Partial Update of the New Forest National Park Local Plan Policies (2019)				
	Reasons for scope of review:				
	As outlined above in section A17, there are several areas where a focused review of the local planning policies would be beneficial. However, many key aspects of national planning policy, guidance and law relating to National Parks remain unaltered from the time the Local Plan was adopted, e.g.				
Β4	<ul> <li>The two statutory National Park purposes – originally set out in the National Parks &amp; Access to the Countryside Act 1949 – and the related socio- economic duty remain unaltered by recent changes in national policy and primary legislation. The two legal purposes are central to the planning policy approach in National Parks.</li> </ul>				
	<ul> <li>Although there have been several updates to the NPPF since the current Local Plan was adopted in 2019, key elements relating to National Parks remain unaltered. For example, National Parks are still listed in footnote 7 to the NPPF as areas of particular importance where development should be restricted; paragraph 182 confirms National Parks have the highest status of protection in relation to landscape and scenic beauty; and that the scale and extent of development within National Parks should be limited; and paragraph 183 confirms major development should be refused in National Parks other than in exceptional circumstances. The adopted Local Plan is in general conformity with these key national planning policies.</li> </ul>				
	<ul> <li>The legal protections afforded to the internationally designated habitats of the National Park remain in place. These designations – including Special Areas of Conservation, Special Protection Areas and Ramsar sites – cover over 50% of the National Park. The legal test placed on competent authorities to ensure development does not impact on the integrity of these sites remains. This is a key driver behind our local planning policies.</li> </ul>				

Date of assessment:

March 2024