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19 September 2024

Dear Sir or Madam

**Proposed reforms to the National Planning Policy Framework and other changes to the planning system**





Set out below is the consultation response from the New Forest National Park Authority to the proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. Our response has been endorsed by the members of the New Forest National Park Authority.

This response focuses on the elements of the proposed reforms most relevant to the New Forest National Park and the work of the Authority. In addition to our own response, we have input into the joint consultation response from National Parks England on behalf of the English National Parks and the Broads and we endorsed the points raised in that separate response.

National Parks are specifically referenced in two main sections of the current NPPF (December 2023) – namely how the presumption in favour of sustainable development is applied to plan-making and decision-taking (paragraph 11 and footnote 7); and the wording on the protection afforded to National Parks, including the major development ‘tests’ (paragraphs 182 – 183 and footnote 63). The proposed amendments to the NPPF (July 2024) do not include any revisions to the National Park references in these key paragraphs and footnotes. They continue to be areas that national policy states should be protected, with great weight attached to conserving and enhancing their landscape, scenic beauty, wildlife and cultural heritage. This is supported.

**New Forest National Park Authority**

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CHAIRMAN GAVIN PARKER CHIEF EXECUTIVE ALISON BARNES

*Q1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?*

*Q2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in para. 61 and the glossary of the NPPF?*

*Q19: Do you have any additional comments on the proposed method for assessing housing needs?*

As proposed, the new standard method does not identify housing need figures for National Parks, only local authority areas. It is unclear from the consultation information how National Parks are to be treated in terms of identifying the 'policy off' housing need as an input into the plan-making process. Our preferred option is for the Government to provide further clarity to national park authorities through updates to the National Planning Practice Guidance (NPPG) resource. An alternative would be to generate National Park-specific figures based on the new standard methodology, although housing affordability figures are not available cut to National Park areas. This clarification through amendments to the NPPG would also be beneficial for our constituent local authorities in the New Forest (New Forest District Council, Wiltshire Council and test Valley Borough Council), who receive a standard method housing need figure for an area that they are not the planning authority for the whole of.

The consultation information published in July 2024 states that the housing need identified through the new standard method is a 'starting point' and is not the final housing requirement. However, this position is not translated through to the actual revised NPPF. Paragraph 61 in the current NPPF (December 2023) states, "...the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area..." and there would be merit in retaining similar wording in the final version of the revised Framework. As currently drafted, there is the potential for the distinction between (a) the housing need figure identified through the standard method – which is purely a mathematical calculation – and (b) the final housing requirement – which considers designations, constraints and other factors – to be blurred.

The Authority does not consider the housing need requirements generated by the proposed new standard method to be deliverable in the context of the New Forest area. While acknowledging that the proposed method is a 'policy off' starting point for plan-making, setting a requirement for New Forest District that is nearly three times higher than the current adopted development plan requirement (which already includes significant Green Belt releases) is simply undeliverable in an area with so many NPPF footnote 7 designations. In addition, in an area like the New Forest - which has the highest average house prices of any English National Park - there is no evidence that increased levels of housebuilding have any discernible impact on lowering house prices.

*Q25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful?*

*And*

*Q26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?*

Although there is no designated Green Belt land within the New Forest National Park, the local plans of our neighbouring planning authorities of New Forest District Council, Bournemouth Poole & Christchurch Council and Dorset Council all include designated Green Belt. In many places this existing Green Belt comes up to the New Forest National Park boundary and although not a specific purpose of the Green Belt, plays a role in protecting the setting of the National Park. This is consistent with national policy set out in paragraph 182 of the NPPF which confirms that development within the setting of National Parks should be sensitively located and designed. If planning authorities are to be undertaking future Green Belt reviews they should consider the contribution the designated Green Belt makes against a comprehensive range of policy objectives, including conserving and enhancing the setting of nationally designated landscapes (National Parks and National Landscapes), rather than purely against the narrower green belt purposes.

Linked to this point, Green Belt areas adjacent to the New Forest National Park can positively contribute to delivering the Government's '30 by 30' commitment to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030, reflected in the Environment Improvement Plan targets. Undeveloped Green Belt areas adjacent to several National Parks, including the New Forest, can play a key role in delivering bigger, better more joined up areas for nature. These wider Government objectives should therefore be factored into future Green Belt reviews, rather than them focusing purely on the five planning purposes of Green Belts set out in the NPPF.

*Q73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?*

The rationale for the proposed changes to paragraph 164 of the NPPF is understood. However, the proposed revisions to state that planning authorities should 'support planning applications for all forms of renewable and low carbon development' is considered to be an over-simplification. Such proposals need to be assessed against a range of material planning considerations and this is particularly the case within nationally protected landscapes such as National Parks. Although more detail can be provided in the NPPG resource on 'Renewable and low carbon energy', the changes to paragraph 164 of the Framework should include an acknowledgement of the range of planning considerations that should be weighed in the planning balance.

*Q93: Are there any application types for which fees are not currently charged but which should require a fee?*

The principle of increasing householder application fees to meet full cost recovery is supported. The majority of planning applications registered by the National Park Authority are householder applications and the current (nationally set) fee does not cover the resources required to determine the applications,

which engage important planning considerations within the nationally protected landscape of the New Forest. The proposed fee of £528 is unlikely to make any meaningful impact on viability.

The National Park Authority supports the principle of local flexibility on planning application fee setting. This would enable locally-specific factors – such as the need to consider impacts on designated nature conservation sites – to be reflected in the locally set application fees. These would be established following consultation with the development sector and other relevant stakeholders (including consultees).

It is noted that application fees could be introduced for other types of application where there are currently no fees. This is supported in principle, as other types of applications (such as those for Listed Building consent) require specialist knowledge on proposals that impact on the built heritage of the National Park; and others (such as applications for Lawful Development Certificates) can involve a significant level of resource to gather and assess the evidence. The introduction of fees for these types of applications would reflect the costs incurred in delivering these important functions.

In supporting the principle of introducing fees for other types of applications, such as Listed Buildings, our view is that fees should only be introduced where there is additional work required. For example, where a proposal requires Listed Building Consent and a planning application we do not consider it reasonable to introduce an additional fee for the Listed Building Consent application as well as the existing planning application fee. However, for proposals that only require Listed Building Consent we agree that a proportionate fee should be introduced.

*Q104: Do you agree with the proposed transitional arrangements?*

The proposed transitional arrangements appear reasonable. It is important that further changes to national planning policy do not delay the plan-making / plan-review processes being undertaken. Local planning authorities were responding to the revisions made to the NPPF in December 2023 and the system would benefit from a period of stability to enable plans to be brought forward. If plans are required to pause, restart or go back to an earlier stage, this will simply delay the whole process.

I hope these comments from the New Forest National Park Authority are helpful as the Government assesses the revisions to national planning policy. Should there be any points in this response that you would like further clarification on please get back to me.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Steve Avery', with a stylized, flowing script.

Steve Avery  
Executive Director (Strategy & Planning)