



Additional written statement from the New Forest National Park Authority

Issue 3 Neighbouring Authorities

Have neighbouring Local Planning Authorities been consulted on the revised housing and employment figures and, if so, what was their response?

- 1.1 In response to the first part of the question, '*Have neighbouring Local Planning Authorities been consulted on the revised housing and employment figures*', the National Park Authority ('the Authority') would comment as follows.
- 1.2 The Authority, as a neighbouring local planning authority who made representations on the Council's Submission draft Core Strategy and a statutory consultee as defined in the relevant Planning Regulations, was disappointed not to be automatically notified of the revised figures and the start of the six week public consultation. The Authority's Planning Policy Team was formally notified of the consultation exercise three and a half weeks after the commencement date; fortunately, there was sufficient time left to enable the Authority to submit a response by the deadline and it is not considered that the Authority's position was prejudiced by this delay in being notified.
- 1.3 In response to the second part of the question, '*If so what was their response?*' the Authority would comment on the revised housing figures as follows.
- 1.4 The Authority welcomes and supports the Council's proposed focused change (FOC/01) to reduce the number of new homes to be provided in South Wiltshire from 12,400 to 9,900, a reduction of 20%, to meet demand up to 2026.
- 1.5 Furthermore, the Authority particularly welcomes and supports the reduction in the number of proposed homes in the Southern Wiltshire Community Area from 740 to 555, a reduction of 25% (FOC/02). The Authority has repeatedly raised concerns since the Council's '*Our Place in the Future*' consultation of 2008 that this level of housing so close to a nationally protected landscape (and internationally designated habitats) is unacceptable given the possible impacts.
- 1.6 The Authority is of the opinion however, that the review into the implications of the Coalition Government's intended abolition of the South West Regional Spatial Strategy provided an opportunity for Wiltshire Council to reduce the number of homes in the South Wiltshire Community Area adjacent to the National Park further than the 25% reduction proposed. A greater reduction would more appropriately respond to the concerns raised by the Authority since 2008 and would also reflect (i) the proposed policy on the National Park in the South Wiltshire Core Strategy; (ii) Wiltshire Council's statutory duty to have regard to the National Park; and (iii) the Regional Spatial Strategy for the South West – as set out below.
 - The South Wiltshire Core Strategy aims to protect the New Forest National Park as set out in Core Policy 15. This draft policy states that development will only be permitted where it does not have a negative impact on: (i) the conservation and enhancement of the unique character and environment of the Park; (ii) the encouragement of understanding and enjoyment of the National Park's special qualities; and (iii) the social and economic well being of local communities in ways that sustain the National Park's special character.

- Wiltshire Council's statutory duty to have regard to the National Park purposes as set out in Section 62(2) of the Environment Act 1995 which requires relevant authorities, "...*in exercising or performing any functions in relation to, or so as to affect, land in a National Park, to have regard to the statutory national park purposes (i) to conserve and enhance the natural beauty, wildlife and cultural heritage; and (ii) to promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.*"

This statutory duty recognises that a wide range of bodies have a direct influence over the future of National Parks and that the fulfilment of their purposes rests not only with those bodies directly responsible for their management. The DEFRA guidance note '*Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads*' (2005) – attached for information at Annex 1 - further emphasises that National Parks have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (see paragraph 21, PPS7). Relevant authorities, including local authorities which are specifically listed on page 10 of the Guidance Note, are required to take account of the National Park purposes when coming to decisions that could affect land within these areas.

- The policy guidance set out in the South West Regional Spatial Strategy (Secretary of State's Proposed Changes) which recognises that the New Forest National Park extends into the part of the region and that development in the South West region adjoining the Park (e.g. South Wiltshire) should not prejudice the achievement of the Park's purposes as set out in Policy ENV3 which states;

"...Particular care will be taken to ensure that no development is permitted outside the National Park or Areas of Outstanding Natural Beauty which would damage their natural beauty, character and special qualities or otherwise prejudice the achievement of National Park or Area of Outstanding Natural Beauty purposes."

1.7 The Habitats Regulations Assessment (HRA) Appendix 13 paragraph 8 accompanying the Core Strategy proposed Submission Document (July 2009) acknowledged that 740 homes in the Southern Wiltshire Community Area would generate an increase in population of 1,746 people by 2026 and that this would be likely to result in an additional 60,000 local day visits within 8km and over 7,000 additional day visits from the remainder of the South Wiltshire Core Strategy area per year to the New Forest. Potential recreational pressures on the internationally protected habitats of the New Forest SPA, SAC and Ramsar sites resulting from future residential development in South Wiltshire is highlighted as an issue within the HRA. A further reduction in the level of housing proposed in the South Wiltshire Community Area would assist in reducing the potential increase in visits to the New Forest SPA/SPA/Ramsar sites, which lie within one kilometre of the Woodfalls / Morgan's Vale area, and within 3 kilometres of Downton at the nearest points.

1.8 In conclusion, the Authority welcomes and supports the Council's proposed reduction in the number of new dwellings in the plan area as a whole, and in particular for the Southern Wiltshire Community Area. Furthermore, the Authority considers that an opportunity has potentially been lost to further reduce the housing numbers proposed for the Southern Wiltshire Community Area in line with the Council's statutory duty to have regard to impacts on the National Park, whilst possibly balancing this with slightly increasing numbers around some of the larger settlements in the South Wiltshire area. A reduction of 25% as now proposed by the Council is welcomed, but is in reality only a reduction to the amount of new homes that the Authority first objected to in the '*Our Place in the Future*' consultation in September 2008.