

Planning & Economy

Portfolio Holder: Cllr Derek Tipp

Rt Hon Angela Rayner MP
Deputy Prime Minister and Secretary of State
for Housing, Communities & Local Government
2 Marsham Street
London
SW1P 4DF

My Ref: DT/NPPF Consult

Your Ref:

Date: 24 September 2024

Dear Ms Rayner

Response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system

Thank you for the opportunity to respond to the consultation on the proposed reforms to the National Planning Policy Framework and other changes to the planning system. Please find attached the response from New Forest District Council.

New Forest District Council fully acknowledges and embraces the need for a significant increase in the delivery of housing growth across the country, and the benefits this will have in growth of the wider national economy. This Council has a strong track record in producing Local Plans and is proactive in terms of seeking to appropriately increase future housing land supply in the Plan Area in a manner that achieves sustainable development. The current (adopted July 2020) Local Plan 2016-2036 Part 1: Planning Strategy made provision for at least 10,420 dwellings over the Plan period 2016-2036. This was more than a 2.5-fold increase on the previous Core Strategy housing target of 3,920 dwellings over the period 2006-2026.

However, as the Council sets out in its response, not all areas are equal in what they are able to deliver. New Forest District contains the New Forest National Park (68% of the District's area), together with a significant number of constraints the National Planning Policy Framework (NPPF) lists in 'footnote 7', in particular international nature conservation designations, (57% of the remaining area outside of the National Park). In addition to these 'footnote 7' constraints, the District (outside of the National Park) already has a number of other constraints. Not least of these is an oil refinery of national importance, notable port related uses, coastal erosion and a number of towns and villages which accommodate over 80% of the District's total population.

In this context, I have concerns that the proposed changes to the NPPF (and standard method for identifying housing needs) will place even greater pressure on heavily constrained areas such as New Forest District where its ability to deliver a step change in housing growth is very far from certain. Indeed, such a change will place increasing pressure on the unique natural environment of the New Forest and risk conflict with the new duty on statutory bodies to 'seek to further the purposes' of National Parks as set out in the The Levelling Up and Regeneration Act.

The Council is also under pressure to deliver the Solent Freeport (the District accommodates the majority of the sites) with consequential regional, national and international implications arising. The ability for this Council to effectively manage these considerations in delivering sustainable development for the New Forest is, in my view, significantly compromised by the changes to the NPPF.

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Appletree Court, Beaulieu Road, LYNDHURST, SO43 7PA

Taking the above into account, the proposed move to a simple stock-based approach as the baseline for calculating housing need, as part of a national strategy to significantly increase the delivery of new housing to meet national needs, is considered a flawed approach. It does not provide a 'need' figure that is well-related to the specific current needs of an area and fails to recognise that local authority boundaries do not necessarily align with equal opportunities to accommodate additional growth.

On 30 July 2024, the Chancellor of the Exchequer made a statement to parliament outlining the need for a review of spending on all transport infrastructure projects and that the A303 Stonehenge Tunnel, A27 Arundel Bypass and Restoring Our Railway programme will not be going ahead.

New Forest District, and particularly the eastern extent known as the Waterside, already has significant committed and planned growth to meet existing housing needs and help to deliver the Solent Freeport. A key component of delivery is the need for significant infrastructure investment in this area, including the widely supported upgrading of the A326 and supporting improved public transport in the area.

Since the initial 30 July 2024 announcement, I am very concerned that this Council has received no further communication or commitment from the Government for funding for the A326 improvements. As I am sure you can appreciate this leads to further uncertainty for our communities and investors in the area. It also potentially places increased risks to the longer-term delivery of the Solent Freeport due to the significant role that the proposed improvements to the A326 are expected to have in enabling the full potential for the Freeport to be delivered.

We need a commitment from Government that supports and provides infrastructure funding in situations such as this where the infrastructure is required in order to support significant housing and employment development and where it clearly enables growth in the economy.

Finally, in enabling the stepped change in growth being sought, it is essential that the Government ensures the statutory consultees are sufficiently resourced for whom the planning system will rely upon for expert advice and direction on the key issues in our District around the natural environment, flood risk and transport.

We hope you give this and our detailed responses due consideration when considering proposals to implement the economic growth you propose.

Your sincerely



Cllr Derek Tipp
Portfolio Holder – Planning & Economy

Email: derek.tipp@nfdc.gov.uk

Copy by email to: Planning Policy Consultation Team , Planning Directorate – Planning Policy Division, Ministry of Housing, Communities and Local Government