



NEW FOREST
NATIONAL PARK

Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

26 August 2020

Dear Sir or Madam

**Next Local Plan: Refined Issues and Options Consultation 2020
Planning for the future of Test Valley**

Thank you for consulting the New Forest National Park Authority as part of the preparation of the new Local Plan for Test Valley. Please find below the Authority's consultation response.

Mitigating the impacts of development on the New Forest's Natura 2000 sites

The Authority welcomes the acknowledgement in the consultation document (paragraph 7.34) of the joint work and evidence base relating to the recreational impacts arising from new development on the New Forest's Natura 2000 sites. This will be an important issue for development in southern Test Valley to address under the new Local Plan and related HRA process and we look forward to working with the Borough Council and other partners in the development of a strategic, cross boundary mitigation approach.

Emerging housing requirement and unmet need from neighbouring authorities

As noted within the consultation document (paragraph 5.5), housing completions in Test Valley Borough have exceeded the adopted Local Plan requirement and the requirement figure derived using Government's standard OAN methodology. The Council's Housing Implementation Strategy (December 2019) reports that the most recent Housing Delivery Test figures were published in February 2019, relating to the 2018 measurement. For Test Valley, the Housing Delivery Test 2018 measurement was reported to be 265% - indicating a strong performance for housing delivery in the Borough.

Paragraph 5.7 of the consultation document states, "*National guidance requires us to take account of any unmet housing need of neighbouring authorities. At present there is no evidence of any unmet housing need in*

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neighbouring local authority areas which would potentially need to be considered as to how it might be addressed."

The New Forest National Park Local Plan 2016 – 2036 was formally adopted by the Authority in August 2019 following a 14-month independent Examination. As you may be aware, National Parks (including the New Forest) are not covered by the Government's standardised methodology for calculating housing need and therefore we commissioned Justin Gardner Consulting to identify the 'policy off' OAN housing need figure for the National Park. This work identified a housing need for 63 net new dwellings per annum in the National Park over the Plan period 2016 – 2036, equating to a total of 1,260 additional dwellings. Due to the wide range of environmental designations covering the New Forest National Park, our adopted Local Plan makes provision for 800 additional dwellings over the Plan period to 2036. Consequently, there is an unmet housing need of 460 dwellings in the period up to 2036 arising from the New Forest National Park area.

Split housing requirements and housing in rural settlements

Question 1 of the consultation document invites comments on the proposed split housing requirement between southern and northern Test Valley. The National Park Authority recognises that this would be a continuation of the current approach in the adopted Local Plan. Southern Test Valley clearly relates closely to the South Hampshire urban area and there is a certain logic to retaining this split approach to the Borough's housing requirement. We have no particular preference and consider the Borough Council to be best placed to review the boundaries of the respective housing market areas.

Paragraph 5.16 indicates that the revised Local Plan may support a wider distribution of housing to a larger number of settlements in the Borough compared to the adopted Local Plan. This would include provision for housing sites across the rural areas to a number of villages, together with a wider range of smaller site allocations. There is a logic to this and it would recognise the role smaller settlements can play. In the National Park area, our newly adopted Local Plan (2019) includes housing site allocations in villages within the National Park, and so the rural settlements of the Borough may have a role to play in meeting identified local housing needs.

The 'duty of regard' towards the New Forest National Park

As you will be aware, Section 62(2) of the Environment Act 1995 places a legal 'duty of regard' on relevant authorities to ensure they consider the two National Park purposes in making decisions that could impact on the National Parks. This duty of regard applies to neighbouring planning authorities and recognises that development outside National Parks can still impact on them.

We therefore welcome the acknowledgement in paragraph 7.4 of the consultation document that the New Forest National Park – located to the south west of the Borough – will need to be taken into account in preparing the revised Local Plan. Linked to this, it is helpful to see the area of the New

Forest National Park illustrated on the map at the end of the consultation document. In the next published version of the draft revised Local Plan we would suggest highlighting that the area of Test Valley within the National Park is covered by a separate Local Plan and comes under the separate planning jurisdiction of the National Park Authority.

Please contact us at policy@newforestnpa.gov.uk if you have any queries regarding the National Park Authority's consultation response.

Yours faithfully

Policy Team
New Forest National Park Authority