

## Home Builders Federation

### Matter 2

## NEW FOREST DISTRICT LOCAL PLAN EXAMINATION

### Matter 2: Duty to Co-operate

#### Issue - Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan

##### Overall housing provision

##### 2.1 Who has the Council engaged with in terms of overall housing provision and what form has this taken?

We are pleased to note that the Council has now published a statement as to how it has worked with its neighbouring authorities and other statutory parties under their duty to co-operate. There are aspects indicate a positive approach to joint working such as the engagement with the Partnership for Urban South Hampshire. This has led to a shared evidence base and broadly positive approach to delivering new development. Similarly, the joint working with the National Park has led to shared studies and joint working. However, outside of these examples it would appear that the majority of the co-operation with neighbouring local authorities to the west and north has been through correspondence and joint planning meetings. Whilst this is helpful, we are concerned that there are very few outcomes from this engagement. Planning Practice Guidance states in paragraph 9-011-20140306 that the Duty to Co-operate is: *“unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone”*. The same paragraph also states that the duty requires *“sustained joint working with concrete actions and outcomes”*.

It is questionable whether the lack of an objection to NFDC local plan can be considered an effective outcome. For example, there are shared concerns with the Dorset authorities regarding housing supply and the capacity to meet unmet needs. Yet no consideration appears to have been given to a shared review of the Green Belt across these two Borough's and how amendments to this designation could deliver significant improvements in supply with minimal harm to its purpose. In fact, we would have expected a wider joint assessment of Green Belt across this part of Hampshire and Dorset. It is therefore questionable as to whether the form of engagement adopted by the Council is consistent with PPG.



2.2 What are the inter-relationships with other authorities in terms of migration, commuting and housing markets?

For Council to comment on.

2.3 How have these been taken into account in preparing the Local Plan and specifically in terms of the Objectively Assessed Need for housing (OAN) and housing provision?

For Council to comment on.

2.4 What is the basis for undertaking an assessment of OAN for the New Forest District and National Park areas, rather than the wider HMAs. Is this an appropriate approach?

Given that the prepared by the Council shows that NFDC is on the boundary between three Housing Market Areas (HMA) it is not inappropriate for a separate Strategic Housing Market Assessment (SHMA) to be prepared to provide a clear picture of the OAN for the Borough. However, where this is the case it is important that the Council has a clear understanding of the needs arising in its neighbouring authorities and works with those neighbours to ensure housing needs are met in full across each HMA. The Council appear to have recognised this in paragraph 5.6 of the Duty to Co-operate Statement which reiterates the statement in the SHMA that the Borough was not a singular HMA. However, the Council do not seem to have engaged particularly effectively with other areas in seeking to consider wider strategic issues effecting housing delivery and the constraints to supply.

2.5 How has the issue of unmet housing need from the National Park been addressed through co-operation?

It would appear from the Council's Duty to Co-operate Statement that nothing has been done to address the unmet needs arising from National Park. We are aware, as the Council state in paragraph 5.22 of the Duty to Cooperate Statement, the NPPF recognises that authorities may not always be able to meet need in full, but it does not suggest that these should then be ignored. Paragraph 179 states that "*Joint working should enable local planning authorities to work together to meet the development requirements which cannot wholly be met in their areas.*" It is not sufficient for NFDC and the National Park Authority to agree needs cannot be met due to existing designations it should have prepared a plan identifying where these will be met.

2.6 Has the Council made every effort to engage with adjoining Authorities in terms of their potential to meet housing need on non-Green Belt land within their areas, thus avoiding/reducing the need for Green Belt land for housing in the District?

From the Council's evidence it would appear that the Council have engaged with neighbouring authorities with regard to their capacity to meet the needs arising with NFDC and the National Park. This would suggest that in order to meet needs it is necessary for NFDC to amend Green belt boundaries. However, what has not taken place is a joint review of the Green Belt to understand whether the strategic imperative of the Green Belt in NFDC is still required since the creation of the New Forest National Park.

2.7 Does the overall provision being planned in the Local Plan have any implications for other authorities? If so, what are they and how have these been addressed?

Our primary concern is that if NFDC and the National Park are not meeting identified needs this puts additional pressure on its neighbouring authorities. This will mean that affordability in the wider HMAs are unlikely to be addressed unless additional housing is provided in those areas.

2.8 What is the position of other authorities in terms of the planned level of housing in the District? What representations were submitted?

For Council to comment on.

2.9 In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

Whilst the Council have engaged with their neighbours it is debatable whether this has looked to maximise the effectiveness of the Local Plan in relation to meeting housing needs. The fact that there are unmet needs within the National Park is one indication that the co-operation has not been effective. The only outcome is that both authorities have agreed that housing needs cannot be met and that 460 homes that are needed will not be delivered. It is not clear as to whether any further actions resulted from this position or whether the expectation is that these needs will remain unmet. Given the pressing needs for new homes and the constraints created by the national park we would suggest that this be considered sufficiently exceptional to allow for additional amendments to the Green Belt.

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