



Development Standards Supplementary Planning Document (SPD) Adoption Statement of Consultation – September 2012

Introduction

The New Forest National Park Authority has prepared a Development Standards Supplementary Planning Document (SPD) to provide further detail on the requirements placed on new development in the National Park. As well as covering the standards for open space provision, sustainable construction and car parking, the document also provides additional guidance on the Authority's affordable housing requirements and the consideration of development proposals close to the protected habitats in the National Park.

This Consultation Statement is a record of the consultation undertaken during the preparation of the SPD, prior to its adoption, and has been prepared in accordance with Regulation 17 (1) (b) and 18 (4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004. The National Park Authority's Statement of Community Involvement also identifies how the National Park Authority will involve the community in the production of SPDs, and the Development Standards document has been produced in accordance with this.

Purpose of the document

During the preparation of the Authority's Core Strategy, the Government advised that it would not be appropriate for detailed development standards (such as those relating to car parking) to be included within a Development Plan Document. Consequently the adopted Core Strategy (December 2010) commits the Authority to preparing a 'Development Standards Supplementary Planning Document', setting out in more detail the required standards (paragraph 5.9).

The SPD provides more detailed guidance on several aspects and policies in the Core Strategy. Policy DP1 for example, refers to new development meeting the required standards for car parking; open space; and sustainable construction. The SPD also provides supplementary guidance on the application of the Authority's affordable housing policy (Policy CP11) and policy CP1 which relates to habitat protection and mitigating the impacts of development.

Planning policy framework

The Government's National Planning Policy Framework (NPPF) states that Supplementary Planning Documents (SPDs) should be used to provide further detail to the policies in the Development Plan where they can help applicants make successful applications. Once approved, SPDs can be a material consideration in determining planning applications. As well as generally conforming with national planning policy contained within the NPPF, development in the New Forest National Park should comply with policies contained within the Authority's adopted Core

Strategy DPD (December 2010). The key policies within the Core Strategy which are amplified by the Development Standards SPD are Policy CP1: Nature Conservation Sites of International Importance; Policy DP1 General Development Principles; Policy DP3: Open Space; and Policy CP11 (Affordable Housing).

Details of consultation on preparing the draft SPD

The draft Development Standards SPD was published for a six week public consultation in June 2012. The SPD does not create new planning policy, but instead supplements and provides further guidance on the implementation of policies within the Authority's Core Strategy. The adoption of the Core Strategy in December 2010 marked the culmination of more than three years of consultation, including two statutory periods of public consultation and the Examination in Public held in autumn 2010. Consequently, the detailed planning policies relating to matters such as affordable housing, habitat protection and sustainable construction which the draft SPD supplements have already been through extensive consultation. The Core Strategy policies are also supported by a detailed evidence base, including an Affordable Housing Economic Viability Assessment and a Habitats Regulations Assessment which have been endorsed at the Core Strategy Examination sessions.

During the production of the Core Strategy, the Authority received a number of consultation responses that supported the production of the Development Standards SPD. For example, a number of respondents supported the broad approach to habitat protection in policy CP1, and commented that a clear approach to the implementation of strategic avoidance / mitigation measures would be required. The consultation draft Development Standards SPD included a specific chapter on this issue and the preparation of the draft SPD was informed by:

- Meetings with the Forestry Commission and the National Trust, as two of the major land managers in the Park, in March 2012. The proposed habitats mitigation package has also been informally discussed with Hampshire County Council as owners of the one country park within the National Park (Lepe).
- Following these meetings, the Authority met with Natural England in April 2012 to discuss the proposed habitat mitigation package. As indicated within the SPD, the package will continue to be developed through liaison with Natural England.

The broad scope of the draft document was also outlined at the Authority's annual Planning Agents meeting, which took place in mid March 2012. Finally, the draft chapter on housing has also been shared with New Forest District Council – the housing authority for over 90% of the National Park.

Strategic Environmental Assessment, Habitats Regulations Assessment.

Under the requirements of European legislation – namely the Strategic Environmental Assessment Directive 2001/42/EC and the Habitats Directive 92/43/EEC – there is a requirement to perform a 'screening' exercise to determine whether these assessments are needed. These 'screening' exercises have been done and the screening report for a Strategic Environmental Assessment (SEA) found there were no significant environmental effects, and therefore a SEA is not needed. The screening exercise for a Habitats Regulations Assessment did not identify any aspect of the draft Development Standards SPD which is likely to have a

significant effect on European sites and therefore a further detailed appropriate assessment was not required.

Sustainability Appraisal

A Sustainability Appraisal for the draft SPD was not prepared as the Town and Country Planning Regulations 2009 removed the requirement for a Sustainability Appraisal for an SPD and it is considered that it would not have significant effects that are not covered in the Sustainability Appraisal prepared for the Core Strategy.

Public Consultation on the draft Development Standards SPD (June 2012)

The draft Development Standards Supplementary Planning Document was considered by Authority members at a meeting of the Planning Development Control Committee on 15 May 2012 and was endorsed for the purposes of undertaking a period of public consultation.

Public consultation on the draft SPD was carried out under the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) for a six week period between 1 June and 13 July 2012. Copies of the document and accompanying documents were available for inspection at the Authority's offices at South Efford House in Lymington, as well on the Authority's website.

Public notices were placed in three local newspapers, namely the Forest Journal on 31 May 2012, and the Lymington Times and the Romsey Advertiser, both on 1 June 2012. Additionally the Authority issued a press release on 1 June 2012 setting out details of the forthcoming public consultation, which generated articles in a number of local newspapers.

Immediately prior to the start of the public consultation copies of the SPD and accompanying documents were sent to the relevant specific consultation bodies, as set out in the relevant Regulations. These comprised organisations such as English Heritage, Natural England and the Environment Agency. Local Authorities and parish councils in and adjoining the National Park were also sent copies of the SPD and accompanying documents. The SPD and accompanying documents were also sent to relevant general consultation bodies comprising a range of local groups, as well as a range of local planning agents, architects and developers. A fuller list of those bodies consulted is set out in Annex 1.

Responses were received during the public consultation period from a total of 20 individuals, consultees and local organisations. The issues spanned all of the topics set out in the draft Standards SPD and a summary of the main issues raised and the Authority's response can be viewed in Annex 2 of this Consultation Statement.

Adoption

Following consideration of all of the consultation responses received, the draft document was updated in a number of places. The final version of the Development Standards SPD was formally adopted by members of the National Park Authority at the full Authority meeting in Lymington on 27 September 2012 and becomes a material planning consideration.

Annex 1: Public Consultation – list of bodies consulted

Statutory and Specific Consultation Bodies

English Heritage South East	NHS Hampshire
English Heritage South West	Wiltshire primary Care Trust
Environment Agency	Southern Gas Networks
Natural England	Sembcorp Bournemouth Water Ltd
SEEDA	National Grid
The Coal Authority	Scottish and Southern Energy
Department for Transport	Wessex Water
South West RDA	The Home Communities Agency
BT Group	Hampshire Police Authority
Mobile Operators' Association	Wiltshire Police Authority

Local Authorities

Hampshire County Council	Test Valley Borough Council
Wiltshire County Council	Southampton City Council
Dorset County Council	Christchurch Borough Council
New Forest District Council	East Dorset District Council

All Town and Parish Councils within the New Forest National Park (37 in total),

General Consultation Bodies

A wide range of bodies were consulted (98 in total) including environmental groups (for example RSPB, Wildlife Trust, CPRE), forest groups (for example Verderers of the New Forest, New Forest Consultative Panel), interest groups (for example Gypsy Council, Hampshire Council for Voluntary Youth Services, Hampshire Deaf Association).

35 local Planning Agents/Architects

Annex 2: Main issues raised during the statutory public consultation and the Authority's response

Issues raised	Authority Response / Proposed Amendment
Chapter 1/General Comments	
<ul style="list-style-type: none"> ▪ Support for this constructive and practical document which will help clarify the standards, restrictions and financial constraints that developers need to consider. 	Support welcomed.
<ul style="list-style-type: none"> ▪ A certain percentage of the Community Infrastructure Levy should be ring fenced to go to the parish or town council to be spent as they see fit. 	The Authority will be consulting on a draft Charging Schedule for the Community Infrastructure Levy in due course. Currently Section 106 contributions are ring fenced and the open space funds are available for Parish Councils to draw down from. Any future Levy for the National Park will obviously generate funds proportionate to the low level of development that takes place.
<ul style="list-style-type: none"> ▪ The Authority should consider applying the contributions to extensions as well as new dwellings, given the large number of planning applications for extensions to dwellings and the resultant increase in population and strain on services. 	It is not appropriate and within the scope of the test for developer contributions to apply this to extensions.
<ul style="list-style-type: none"> ▪ There are too many acronyms in the document. 	Comments noted - however, it should be recognised that this is a relatively technical planning policy document providing details on development requirements and standards. The full wording has been used in the first instance in the document followed by recognised planning policy acronyms.
<ul style="list-style-type: none"> ▪ It needs to be made clear that for a new development all contributions may be applied. 	Section 1 of the SPD confirms that not all standards will be relevant to types of development and advice should be sought from the NPA if applicants are in any doubt.
<ul style="list-style-type: none"> ▪ The Authority should produce transparent and accountable reports. 	It is proposed that the contributions gathered by the Authority will be reported in the Annual Monitoring Reports prepared in December each year. In the interim period before a CIL charge is introduced for the National Park, agree that additional wording should be added to the Introduction stating that the Authority will report on Section 106 contributions through the Annual Monitoring Reports to provide transparency.
<ul style="list-style-type: none"> ▪ Small developments may become unviable given the level of contributions required. 	The SPD confirms that applicants can submit justification if they consider the Authority's development standards are not economically viable. However, the requirements for affordable housing, sustainable construction, open space, and habitat mitigation are all

	set out in the adopted Core Strategy which was endorsed and found 'sound' by the Government's Planning Inspectorate 18 months ago. The affordable housing requirements for example were informed by an economic viability assessment (that factored in the sustainable construction requirements) and this study concluded that the Authority's policy requirements were economically viable.
Chapter 2 – Parking	
<ul style="list-style-type: none"> Reduced on-site parking provision should be considered if acceptable on-street parking is available. 	This is covered by paragraph 2.2.2 which states that reduced parking provision may be acceptable if "there is clearly demonstrated alternative capacity" which could in some circumstances include nearby car parks or on-street parking as appropriate. No change proposed.
<ul style="list-style-type: none"> The commercial parking standards conflict with the BREEAM requirements. 	Transport represents a small percentage of overall available credits for BREEAM standards and there is no mandatory minimum rating. No change proposed.
<ul style="list-style-type: none"> Where garage space is available for the storage of cycles a reduction in individual cycle stands and communal cycle stands should be considered. 	Agree - need to clarify ambiguity in paragraph 2.4.1 and Annex 1. Change paragraph 2.4.1 to read " <i>Residential development that also provides sufficient garage space for storing cycles will not be required to provide additional cycle parking. Each individual garage counts as one car plus one cycle space." with corresponding text in Annex 1.</i>
<ul style="list-style-type: none"> The cycle provision required is excessive. 	These standards reflect the established Hampshire County Council standards that many local authorities in Hampshire currently use. The NPA considers that these are appropriate to the National Park. No change proposed.
<ul style="list-style-type: none"> The parking standards are insufficient for a rural area with poor public transport. 	
<ul style="list-style-type: none"> It should be made clear that transport contributions will only be sought on a case by case basis and where the tests of the CIL Regulations (2010) are met i.e. necessary, directly related to the development and fairly and reasonably related in scale and kind to the development. 	Agree - for clarity and transparency the schedule of transport improvements will be set out in Annex 2 to the SPD. However, this will only represent a snapshot at a particular time and will be regularly updated separate to the SPD. Therefore developers will need to check with the NPA on the most up-to-date schedule.
<ul style="list-style-type: none"> The Authority should consider either developing its own guidance or using HCC's guidance to provide advice for developers on when a Transport Assessment is required. 	Agree - need to provide clarity on circumstances where a Transport Assessment will be required. Add new text to reflect the provisions of the National Planning Policy Framework and the HCC Standards.
<ul style="list-style-type: none"> The Annex refers to a limited range of use classes 	The standards in Annex 1 are those most relevant to the nature of planning applications

unlike the HCC guidance 'Hampshire Parking Strategy and Standards 2002 which refers to a much wider range of use classes.	received in the National Park. However, for clarity add in additional text to state that for other development not referred to in Annex 1 then regard should be had to the standards set out in the Hampshire document as a starting point for discussion with the NPA.
Chapter 3 – Affordable Housing	
<ul style="list-style-type: none"> ▪ If a viability assessment has not been submitted at pre-application stage, will registration of an application be delayed to enable the independent appraisal? 	Para. 3.5.5 confirms that "ideally" viability assessments should be submitted and independently assessed prior to the submission of an application. However, if an assessment was instead submitted with an application the Authority would still arrange to have it independently assessed while the application is being considered, rather than delay the registration of the application. No change proposed.
<ul style="list-style-type: none"> ▪ Should prioritise spending affordable housing contributions as close as possible to the developments that provided the contributions. 	Agree - add additional wording to paragraph 3.4.5 stating that priority will be giving to spending affordable housing contributions as close as possible to the developments that provided the contributions (in lieu of on-site provision). This will not always be possible but should be the preferred approach where appropriate.
<ul style="list-style-type: none"> ▪ Affordable housing contributions should be available to fund affordable housing on other developers' schemes. 	Contributions are not gathered to enable other developers to meet the requirements of the statutory 'development plan'. The affordable housing policy requirements should be factored in to site acquisition costs. No change proposed.
<ul style="list-style-type: none"> ▪ Commoners' dwelling should be exempt from paying affordable housing contributions; consideration should also be given to using affordable housing contributions to deliver commoners' dwellings. 	Dwellings permitted under the Commoners' Dwellings Scheme are effectively treated as an 'exception' to policy to meet the affordable housing needs of the commoning community in the National Park. On this basis the Authority does not seek affordable housing contributions and additional wording should be added to paragraph 3.3.1 to clarify this.
<ul style="list-style-type: none"> ▪ Remove the exemption for care homes from paying affordable housing contributions. 	Care homes are classified as Use Class C2 Residential Institutions (which also includes nursing homes) and are therefore considered separately to new dwellings (Use Class C3). Local planning authorities generally do not seek affordable housing contributions (whether on-site or through financial contributions) from C2 developments. No change proposed.
<ul style="list-style-type: none"> ▪ The new SPD charges should not act retrospectively on re-negotiations. 	Any developer wishing to re-negotiate an existing consent will need to do so in the context of current policy. The option of implementing a previously consented scheme remains, but re-negotiations must be based on the Authority's up to date policy statements. No change proposed.
<ul style="list-style-type: none"> ▪ Section 3 does not reflect the NPPF statements that planning authorities should consider allowing some 	Para. 214 of the NPPF states that decision makers may continue to give full weight to relevant adopted local plan policies "even if there is a limited degree of conflict" with the

<p>open market housing on rural exceptions sites to facilitate provision of affordable housing. Suggest 30% open market housing and 70% affordable housing.</p>	<p>NPPF until the end of March 2013. Supplementary Planning Documents cannot change adopted policy (which must go through public consultation and independent examination) and it is considered that the suggested changes to the wording in paragraph 3.2.1 effectively amount to a new policy. Para. 54 of the NPPF does not require local planning authorities to allow open market housing on rural exceptions sites, instead stating that they "should consider" allowing "some" market housing to facilitate the provision of significant additional affordable housing to meet local needs. This national planning policy will be considered from April 2013 onwards but the Standards SPD is not an appropriate place to change the Authority's adopted planning policies. No change proposed.</p>
<ul style="list-style-type: none"> ▪ Object to proposal that a new financial appraisal will be required if a development has not be completed within 12 months. Planning permission should be given for a minimum time limit of 3 years and there should be no requirement to update financial viability. Alternatively, a reasonable approach would be to request an updated financial viability assessment if development hasn't commenced within a specified time period. 	<p>Other local planning authorities have planning conditions setting out a shorter period for commencement where a reduced affordable housing contribution/provision has been agreed in light of site specific viability evidence. It is acknowledged that some other conditions (e.g. biodiversity reports) can take some time to discharge and therefore it is proposed that paragraph 3.5.6 is amended to state that: "<i>If an approved development has not been completed commenced within the specified period, an updated financial viability assessment will be required. Consequently the Authority is likely to place a condition on developments requiring the submission of an updated economic viability assessment if development does not commence within 18 months of consent being granted. require the commencement of development within a twelve month timeframe, rather than the usual three year time limited planning permission.</i>"</p>
<ul style="list-style-type: none"> ▪ Instead of rounding down a fraction of a dwellings and the balance being financial, this should be changed to round up. 	<p>The practice of rounding down the affordable housing requirement has been established in the New Forest for many years, dating back to the New Forest District Council local plans that predated the creation of the National Park in 2005.</p>
<ul style="list-style-type: none"> ▪ Housing completions are at a historically low level. The need to comply with Code for Sustainable Homes, financial contributions for habitat mitigation and the forthcoming CIL within the National Park will collectively undermine the potential for the creation of new low cost and affordable housing. 	<p>Annual monitoring indicates that over the last 5 years (2006-11) an average of 25 dwellings per annum have been completed within the National Park (compared to an annualised requirement of 11). There is a large stock of dwellings benefitting from permission within the Park that have yet to be implemented and evidence suggests that the requirements of the development plan have not led to a reduction in completions.</p>
<ul style="list-style-type: none"> ▪ The background notes provided by the District Valuation Service (DVS) for the Authority should be appended to the SPD to allow for transparency and to allow the Authority to further understand where a deviation may occur if a viability study was submitted 	<p>The information provided for the Authority by DVS informed the SPD and there is no need for all of the detailed to be repeated in the Document. However, it is agreed that there is merit in setting out some of the main assumptions behind the figures (e.g. the assumed developers profit; the costs of meeting the Code for Sustainable Homes requirement) and this has been done in the final version of the SPD.</p>

post the adoption of the SPD.	
<ul style="list-style-type: none"> Do not consider that the build costs to be reflective of today's build costs for the National Park. The basic build cost is 20% too low in all cases. The amount considered for the Code for Sustainable Homes Level 4 is not correct – it adds around 10%. 	<p>The Authority commissioned the District Valuation Service to provide the updated figures. As the commercial arm of the Government's Valuation Office Agency the Authority is confident in the methodology used by DVS. The costs of meeting the Code for Sustainable Homes requirements have been recently analysed by the DCLG who concluded that meeting Code 4 added on average between 6% - 8% on base build costs. This is accurately reflected in the DVS calculations which factored in an 8% increase in build costs to meet the Code 4 requirements. No change proposed.</p>
Chapter 4 – Sustainable Construction	
<ul style="list-style-type: none"> Concerns regarding the implementation and processes of the national Code for Sustainable Homes scheme and the BREEAM standards, including flexibility; list of suppliers to be used; pre-assessment report. 	<p>The SPD reflects the guidance set out in the Department for Communities and Local Government's (DCLG) Technical Guidance on the Code for Sustainable Homes and the relevant BREEAM standards guidance. No change proposed.</p>
<ul style="list-style-type: none"> Putting in energy efficient measures is costly for single dwellings. The Code needs to be able to differentiate between size/location of development schemes. 	<p>The SPD reflects the guidance set out in DCLG's Technical Guidance on the Code for Sustainable Homes. No change proposed.</p>
<ul style="list-style-type: none"> The Authority is adopting standards which are in advance of nationally Adopted Building Regulation Standards. Where is the evidence to show that this is necessary? 	<p>The standards are established in Policy DP1 in an adopted Core Strategy that has been subject to an examination by an independent planning inspector, and this SPD cannot change that established policy. The SPD reflects the advice set out in the DCLG Technical guidance document on the Code for Sustainable Homes and the BREEAM guidance and DCLG have also set out the benefits and likely costs of the implementation of the Code. No change proposed.</p>
<ul style="list-style-type: none"> There is a need to consider local circumstances which may influence how dwellings are constructed. 	<p>The NPPF already sets out provisions that planning decisions should "<i>ensure that: the site is suitable for its new use taking account of ground conditions</i>" (NPPF, paragraph 121). It is not proposed to repeat it in the SPD. No change proposed.</p>
<ul style="list-style-type: none"> The SPD should state what standard it intends to seek for new commercial and industrial buildings and justify the standard sought. 	<p>Policy DP1 of the adopted Core Strategy established that a BREEAM level of 'Very Good' is required for commercial development, as reiterated in paragraph 4.1.5 of the SPD. However, for clarity it will be reiterated in paragraph 4.3.1 of the SPD.</p>

Chapter 5 – Open Space	
<ul style="list-style-type: none"> Needs to be made clear that open space contribution is only sought for new dwellings other than replacement dwellings and not for extensions to dwellings. 	<p>Agree – amend wording to improve clarity. Add the following text to paragraph 5.2.4 <i>"An additional bedroom equates to one additional person. For the purpose of Policy DP3 of the adopted Core Strategy, the Authority will only seek to secure the provision of open space on proposals resulting in a net increase in dwelling units and the requirements of the policy and this guidance will not apply to proposals for replacement dwellings or extensions to existing dwellings. The cost of providing open space..."</i></p>
<ul style="list-style-type: none"> Open space contributions should be allocated to the parish in line with the Localism Act. 	<p>Open space contributions are already ring fenced through the Section 106 agreement that accompanies the granting of planning permission. Open Space contributions are made available to the relevant parish or town council. No change proposed.</p>
<ul style="list-style-type: none"> Disappointed to note that no funds are required for maintenance. 	<p>A maintenance contribution is also required by the National Park Authority as outlined in paragraph 5.2.4. No change proposed.</p>
<ul style="list-style-type: none"> Welcome the commitment to the provision of informal, natural green space within the list of proposed schemes in the document. 	<p>Comments noted and support welcomed.</p>
Chapter 6 – Habitat Mitigation	
<ul style="list-style-type: none"> Commoners Dwellings Scheme developments are by their nature close or in the SSSI/SAC. As commoning is recognised as vital to the management of the habitats, it would therefore be illogical for habitat mitigation measures to be applied to CDS developments which should be exempt. 	<p>The Conservation of Habitats and Species Regulations do not make exceptions for certain types of housing or occupiers. However the SPD allows applicants to offer bespoke measures to mitigate any likely significant effects where they are in a position to do so. No change proposed.</p>
<ul style="list-style-type: none"> It is proposed that the contribution requirement be deleted as the evidence supporting the £1250 financial contribution per new residential unit is not based on any robust, transparent evidence of harm and benefit. 	<p>The Habitats Regulations Assessment of the Core Strategy provides evidence of the likely significant effects of development on the European designated sites in the New Forest, and Policy CP1 was informed by this. The Habitats Regulations Assessment, the potential impacts of development, and Policy CP1 were considered as part of the Examination of the Core Strategy by the Planning Inspector, who concluded that the approach taken was sound. The Conservation of Habitats and Species Regulations 2010 confirms that a developer must provide sufficient evidence about the potential effects of a proposed development on the European designated site (in combination with other developments, and including any proposed mitigation measures) to allow the NPA to determine if there will be any likely significant effects on the European site, and, if so, to make an appropriate assessment to decide if it can ascertain that the proposal will not adversely affect the</p>

	<p>integrity of the site. As a way of assisting the applicant, the NPA has identified a package of mitigation measures that would allow the applicant to make a contribution to ensure the delivery of mitigation measures for their proposal - this is further emphasised in paragraph 6.3.1. Paragraph 6.3.1 outlines, however, that applicants are not precluded from offering bespoke measures where they are in a position to do so. Further detail and clarification of the financial contribution to the measures has been added in Annex 5, including how each measure provides mitigation.</p>
<ul style="list-style-type: none"> ▪ The number of new dwellings in the National Park represents a small number of park users and the small sum collected will not fund any significant mitigation. 	<p>The proposed mitigation scheme relates to Policy CP1 of the Core Strategy, which specifically deals with development within the National Park which may affect the European designated nature conservation sites. Plans for increased development outside the National Park that could lead to greater numbers of visitors are also subject to the Conservation of Habitats and Species Regulations, but are the responsibility of other planning authorities. The measures funded by this scheme aim to mitigate likely significant effects on European designated sites. No change proposed.</p>
<ul style="list-style-type: none"> ▪ It is suggested that the contributions do not pass the CIL tests. 	<p>The CIL tests require the obligation to be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These tests are satisfied with the contribution being necessary due to the requirements of the Habitats Regulations and Core Strategy Policy CP1; being directly related to development in proximity to the designated conservation sites; and the level of contribution being related to the scale of development. No change proposed.</p>
<ul style="list-style-type: none"> ▪ Whilst habitat protection and mitigating the impacts of development is welcomed and the development of Core Strategy policy CP1 is supported, the list of mitigation measures in Annex 5 needs underpinning detail as to how the Authority envisages the measures providing avoidance/mitigation. It is important that it is clear how the measures can be monitored to illustrate that they meet their aim. The results of such monitoring need to allow for further measures to be implemented. 	<p>Support for the habitat protection and mitigation of the impacts of development is welcomed. Much greater detail of the mitigation measures has been added to the document in a table in Annex 5, including how the measures provide mitigation, and how the measures will be monitored. The SPD already allows for new innovative mitigation approaches to be brought forward in the plan period, but this will be expanded to include measures that can rectify deficiencies in those undertaken.</p>
<ul style="list-style-type: none"> ▪ With regard to land beyond 400m of the SPA, recommend that applicants are also advised to seek the advice of the Authority in deciding whether their 	<p>Agreed. The third bullet point in 6.3.6 has been amended to clarify that it will need to be determined whether proposals will lead to any likely significant effects, and if so, an appropriate assessment will be required. Applicants will be advised to seek</p>

proposals are likely to have a significant effect.	advice from the NPA on these requirements before making an application.
<ul style="list-style-type: none"> ▪ Ensure that the document uses the same terminology as the Habitats Regulations in paragraph 6.3.6. 	Agreed. Wording to be amended in 6.3.6
<ul style="list-style-type: none"> ▪ Most of the pressure in the NP comes from extensions rather than the small number of new dwellings. The Authority should consider introducing a contribution on extensions. 	As extensions to dwellings do not necessarily involve an increase in habitants it is not appropriate to apply the scheme to this type of development. The approach is similar to the scheme for the Dorset Heathlands which also does not apply to extensions. The scale of extensions is limited by Core Strategy Policy DP11. No change proposed