

AM 702/25

NEW FOREST NATIONAL PARK AUTHORITY

AUTHORITY MEETING – 23 JANUARY 2025

NEW FOREST NATIONAL PARK LOCAL PLAN REVIEW – DIRECTION OF TRAVEL

Report by: David Illsley, Policy & Conservation Manager

Summary:

Following the decision at the March 2024 Authority meeting to commence a partial review of the adopted New Forest National Park Local Plan 2016 – 2036, an updated Local Development Scheme (LDS) establishing the timetable for the review was approved in July 2024. The first milestone in the review of the local planning policies for the New Forest National Park is a public consultation on the proposed strategic 'Direction of Travel', outlining the key matters considered to be in scope for the review. Following the members' session held in December 2024, Appendix 1 to this report sets out the 'New Forest National Park Local Plan Review – Direction of Travel' document which will form the basis for the initial public consultation. This report also summarises the next steps in the process and the supporting evidence base studies that will inform the later stages of the review.

Recommendation:

Members endorse the strategic 'New Forest National Park Local Plan Review – Direction of Travel' document in Appendix 1 for the purposes of public consultation.

1. Introduction

- 1.1 National policy recognises the town and country planning system as a key instrument in the achievement of the statutory National Park purposes and related socio-economic duty. National park authorities are legally the sole planning authorities for their respective areas under the Town & Country Planning Act 1990, with statutory responsibilities for plan-making, development management and minerals & waste planning. The first National Park-wide local plan (the New Forest National Park Core Strategy & Development Management Policies DPD) was adopted in December 2010 and the current New Forest National Park Local Plan was adopted in August 2019.
- 1.2 At the March 2024 Authority meeting members resolved that work should commence on a partial review of the adopted New Forest National Park Local Plan (report AM 675/24). The current Local Plan was adopted in August 2019 following extensive public consultation and independent examination and forms a key part of the statutory 'development plan' for the National Park. Throughout recent reforms to the planning system the new Government has continued to reaffirm the primacy of the development plan in decision-making and the benefits of having an up-to-date plan in place.
- 1.3 At the July 2024 Authority meeting members approved an updated Local Development Scheme setting out a publicly available timetable for the key stages in the plan review process. The first formal stage in the review process is a 'Regulation 18' consultation on the scope of the review, timetabled for the first quarter of the 2025 calendar year.

- 1.4 Government regulations and supporting guidance do not prescribe how the initial Regulation 18 consultation on the review of a local plan should be undertaken. The adopted New Forest National Park Local Development Scheme (July 2024) sets out a two-stage process at Regulation 18. This enables the Authority to seek views on the main planning policy areas identified for review – the stage we have now reached - before a (non-statutory) draft Local Plan is published towards the end of 2025 for further public consultation. This is the process undertaken for the adopted New Forest National Park Local Plan (2019), which it is considered worked well.

2. Scope of the New Forest National Park Local Plan Review

- 2.1 The Government's National Planning Policy Framework (NPPF) and the accompanying National Planning Practice Guidance (NPPG) resource confirm that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years; and should then be updated as necessary.
- 2.2 Officers used the toolkit prepared by the [Planning Advisory Service](#) to assist in undertaking a review of New Forest National Park Local Plan (2019) policies to assess whether they need updating (either in full or partially). The review concluded that a partial review of the Local Plan (2019) is required to ensure the National Park continues to be covered by up-to-date planning policies that are consistent with current national policy and guidance. This conclusion was endorsed by members in March 2024.
- 2.3 The NPPG resource on 'Plan-making' confirms that most plans are likely to require updating in whole or in part at least every 5 year; and that reviews should be proportionate to the issues in hand. It is important to emphasise that many key aspects of national planning policy, guidance and law relating to National Parks remain unaltered from the time our adopted Local Plan was examined and therefore the related local planning policies remain appropriate. For example:
- The two statutory National Park purposes – originally set out in the National Parks & Access to the Countryside Act 1949 – and the related socio-economic duty remain unaltered by recent changes in national policy and primary legislation. The two legal purposes are central to the planning policy approach in National Parks. Under Section 245 of the Environment Act 2023, the New Forest National Park Authority has a legal duty to seek to further the legal purposes in delivering our statutory planning functions. The preparation of the local planning policies for the National Park area is a key way through which the Authority can further the two purposes.
 - The main elements of national planning policy relating to National Parks set out in the updated NPPF (December 2024) remain unaltered from earlier versions. For example, National Parks continue to be listed in footnote 7 to the revised NPPF as areas of particular importance where development should be restricted; paragraph 189 confirms: (i) National Parks have the highest status of protection in relation to landscape and scenic beauty; and (ii) the scale and extent of development within National Parks should be limited; and paragraph 190 confirms major development should be refused in National Parks other than in exceptional circumstances.
 - The legal protections afforded to the internationally designated habitats of the National Park remain in place. These designations – including Special Areas of Conservation, Special Protection Areas and Ramsar sites – cover over 50% of the New Forest National Park area. The legal test placed on competent authorities to ensure development does not impact on the integrity of these designations remains.

3. 'Direction of Travel' consultation document and main areas in scope for review

- 3.1 The strategic 'Direction of Travel' consultation document in Appendix 1 is consciously not a draft revised Local Plan. At this stage in the review process it is considered important to set out and invite feedback on the key issues and areas which the Local Plan Review will focus, as well as the policy areas which have not changed since the Plan was adopted in 2019. Where local planning policies have continued to perform well and remain aligned with current national policy there will be no significant changes.
- 3.2 The proposed consultation document in Appendix 1 is structured around the chapters in the existing New Forest National Park Local Plan (2019). The appendix to the document summarises the review of the adopted local planning policies against the latest national policy and guidance using a simple traffic light system. The appendix will enable consultees to understand our assessment of the main planning policy areas that are 'in scope' for review, with the preceding chapters providing more detail.
- 3.3 The strategic 'Direction of Travel' document and supporting appendix confirm the following planning policy areas are in scope for review. These broad areas were discussed at the members' day session on the Local Plan Review in December 2024.
- The most appropriate way to incorporate the declaration of a nature and climate emergency, the introduction of mandatory Biodiversity Net Gain for certain developments and the emerging Local Nature Recovery Strategies for Hampshire & Wiltshire into the review of the natural environment policies in the Local Plan.
 - Linked to the climate emergency, the local planning policy approach to supporting appropriate renewable energy proposals that do not conflict with the statutory National Park purposes. The emphasis in national policy for National Parks on small-scale schemes that support local communities will be a key driver.
 - How the relative tranquillity of significant parts of the New Forest National Park – one of its defined 'special qualities' linked to the second statutory purpose – can be conserved and enhanced. This includes consideration of the scope the planning system has to manage the impacts of light pollution on the National Park.
 - The scope for new residential development within the National Park will be informed by the latest evidence on housing need (see section 4 of this report) and the monitoring of completions. Unlike local authorities, the National Park Authority does not receive a housing need figure under the Government's standard methodology. The review will consider the principle of further housing site allocations.
 - The detailed development management policies relating to extensions to dwellings, replacement dwellings and outbuildings are in scope for review. This will consider the experience of officers and members using the adopted policies over the last 5 years, as well as a review of relevant planning appeal decisions.
 - The local planning policy approach to business and employment development will be reviewed in light of the updated evidence base on local economic and employment needs in the New Forest National Park. The current criteria-based policy approach has delivered annual net gains in employment floorspace over the last 5 years.
- 3.4 The policy areas listed are not exhaustive and the consultation will invite feedback on whether the areas identified are correct, having regard to the national planning policy.

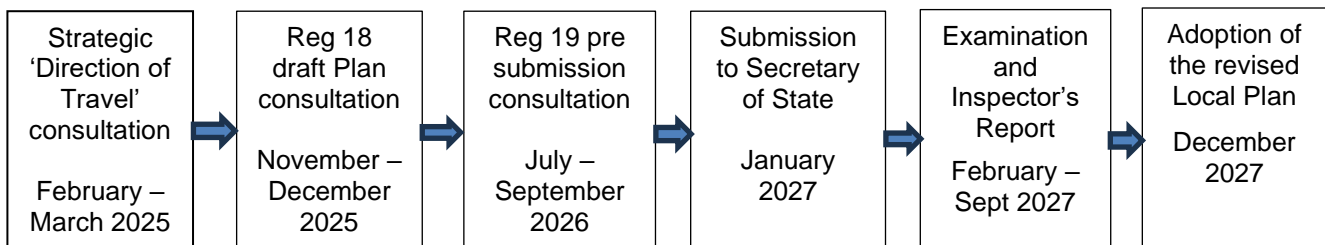
4. Evidence Base Studies

- 4.1 The partial review of the local planning policies for the New Forest National Park must be supported by evidence to justify the approach taken. The NPPG resource on ‘Plan-making’ emphasises the need for evidence to be proportionate and encourages the production of in-house and/or joint evidence base studies. This reflects the approach we have always taken in the preparation of our local planning policies.
- 4.2 The strategic ‘Direction of Travel’ document in Appendix 1 identifies the main evidence base studies that will inform the review. Many of these studies have been jointly commissioned with neighbouring planning authorities for efficiencies. The majority of the studies are well underway and due to conclude in Spring 2025. In addition, the review will be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), which includes the consideration of realistic policy alternatives and options.
- 4.3 The National Park Local Plan differs from the plans prepared by surrounding planning authorities in that it is not ‘development-led’. Instead, the two statutory National Park purposes form the golden thread running through the Plan – a fact recognised by the independent Inspectors who examined the current Local Plan in 2018/19. Therefore, in addition to the required evidence base studies that are applicable to planning authorities across the country – covering issues such as housing and employment needs, viability and flood risk – the New Forest National Park Local Plan review will be informed by evidence on the Partnership Plan themes around nature recovery, vibrant communities, and a thriving local economy within the context of a nationally protected landscape.

Local Plan theme	Main evidence base studies
The Natural Environment	Habitats Regulations Assessment (HRA) – legal assessment of the potential impacts of the revised Local Plan on the integrity of internationally designated sites in and around the New Forest Hampshire & Wiltshire Local Nature Recovery Strategies Updated Strategic Flood Risk Assessment (SFRA)
The Built Environment	Review of Conservation Area Character Appraisals and on-going work on the New Forest National Park Local List
Vibrant Communities	Updated assessment of housing needs (including gypsy & traveller needs) – the National Park is not covered by the Government’s standard method for calculating housing need and is required to generate its own ‘policy off’ figure to feed into the review A new ‘Call for Sites’ exercise will be undertaken Whole-Plan viability assessment undertaken at the appropriate stage
Rural Economy	Qualitative assessment of employment sites in the National Park Updated economic needs assessment (working jointly with New Forest District Council)
Transport & Access	Emerging Local Cycling and Walking Infrastructure Plans (LCWIPs) covering the National Park

5. Timetable and Next Steps

- 5.1 The New Forest National Park Local Development Scheme (LDS) was adopted in July 2024 and can be viewed at [Local Development Scheme - New Forest National Park Authority](#). We are undertaking a two-stage process at the initial Regulation 18 consultation stage. This first consultation document is seeking views on the main planning policy issues and the overarching proposed 'Direction of Travel' before a (non-statutory) draft Local Plan is published later in the year. The timetable for the key stages in the review process is summarised below.



- 5.2 As part of the consultation on the strategic 'Direction of Travel', a series of public drop-in sessions are planned across the National Park. A wide range of statutory and local consultees will be directly notified of the start of the consultation. We are also exploring various online consultation platforms that would enable us to reach a wider audience for the second part of the Regulation 18 consultation, currently timetabled for later in 2025.

6. Conclusions

- 6.1 National planning policy is clear that the development plan is at the heart of the planning system. The National Parks Circular (2010) confirms the planning responsibilities given to national park authorities are, "...a vital tool for managing the impact of development on landscape and biodiversity and a key part of conserving and enhancing cultural heritage, including the built heritage in Park settlements...." (paragraph 136). The New Forest National Park Local Plan therefore differs from the local plans being prepared for surrounding areas in that it is driven by the delivery of the statutory Park purposes.
- 6.2 The partial review of our adopted local planning policies is an opportunity to respond to the changes that have occurred since the current Local Plan was adopted in 2019. The Government's wider national policy agendas highlight the importance of National Parks to the delivery of nature recovery; tackling the climate crises; driving economic growth in rural areas; and supporting health & well-being. Where appropriate, the review of the local planning policies for the New Forest will reflect these wider Government agendas and set out how the planning system can contribute towards their delivery.
- 6.3 Members are asked to approve the strategic 'Direction of Travel' document in Appendix 1 to this report for public consultation. Members will be actively engaged in the Local Plan review and kept informed of further revisions to national planning policy that may influence the review. For example, the Levelling Up & Regeneration Act 2023 includes provisions for the introduction of national development management policies; and the abolition of Supplementary Planning Documents. Further details are awaited and the timetable for the review of the Local Plan should enable us to respond as required.

Recommendation:

Members endorse the strategic ‘New Forest National Park Local Plan Review – Direction of Travel’ document in Appendix 1 for the purposes of public consultation.

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Papers: **NFNPA 702/25** – cover paper
Appendix 1 – Strategic ‘Direction of Travel’ document (January 2025)

Equality Impact Assessment:

No impacts have been identified at this stage. The review of the New Forest National Park will include an assessment of the impacts of the proposed planning policies on different groups, typically set out in an Equalities Impacts Assessment.