

**NEW FOREST NATIONAL PARK AUTHORITY
PLANNING COMMITTEE – 17 MARCH 2026**

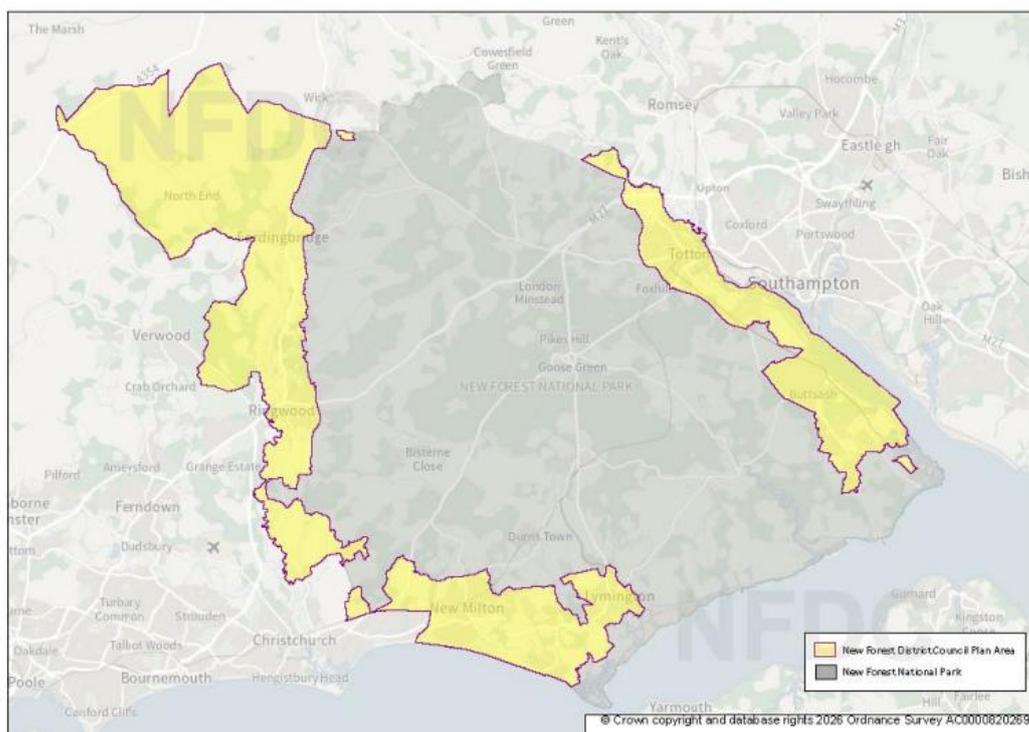
PC 510/26

NEW FOREST DISTRICT COUNCIL LOCAL PLAN REG 18 CONSULTATION - NEW FOREST NATIONAL PARK AUTHORITY CONSULTATION RESPONSE

Report by: David Illsley, Interim Head of Planning & Place

1. Introduction

- 1.1 On 6 February 2026 New Forest District Council launched a 6-week consultation on their 'Regulation 18 Spatial Options and Policy Directions' as part of their Local Plan review. Full details are available at [Local Plan review - New Forest District Council](#) and the consultation runs to 20 March 2026.
- 1.2 The National Park Authority is a statutory consultee on the District Council's Local Plan Review. The map below is from the District Council's consultation document and illustrates the close relationship between the respective District Council (yellow shading) and National Park Authority (grey shading) planning areas.



- 1.3 Paragraph 13 of the Council's consultation document states, "...we are preparing this draft Local Plan in close consultation and cooperation with the New Forest National Park Authority, which is producing a replacement Local Plan for the New Forest National Park area. Our timetables are similar and key parts of our evidence base are shared or jointly produced." This is correct and several of the key evidence base studies to inform the Council's Local Plan Review were jointly commissioned with the National Park Authority, illustrating that although we prepare separate 'development plans', the two authorities work closely together.

1.4 It is acknowledged that the Council face a series of challenges in reviewing the statutory development plan for the District within the timetable set out. These include, but are not limited to, Local Government Reorganisation in Hampshire; the creation of a new Mayoral Combined County Authority for Hampshire; and, perhaps most significantly, the delivery of the national growth agenda in a planning area with a rich array of natural and built environmental designations.

2. Summary of the main proposals and emerging ‘policy directions’

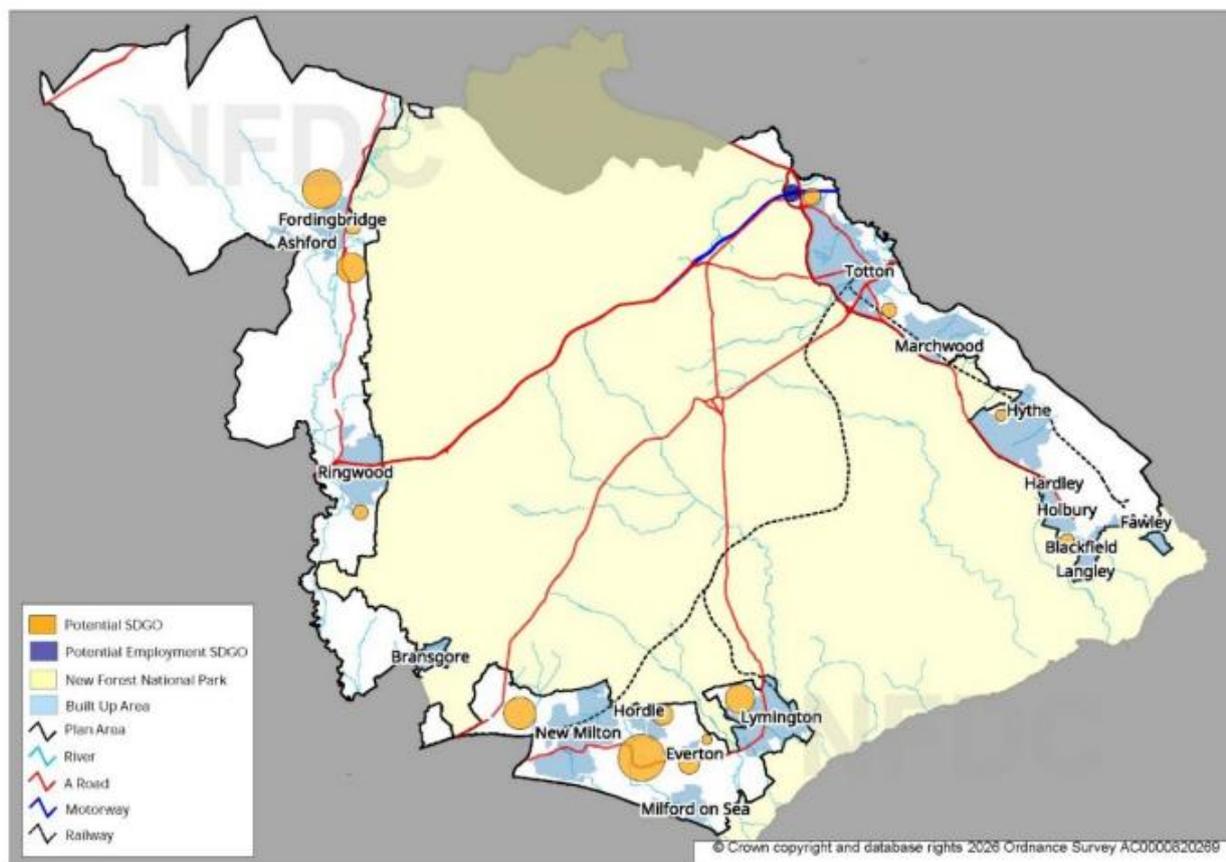
2.1 It is important to highlight that the District Council has not published a full draft Local Plan at what is still part of their Regulation 18 initial consultation. Instead the Council’s current consultation focuses on spatial options for the delivery of new development to meet identified needs; and ‘policy directions’ setting out their current thoughts on key planning policy areas to be included within their revised Local Plan (which will cover the period to 2043) and be the subject of further consultation in early Autumn 2026 prior to submission for examination.

2.2 The main focus of the District Council’s consultation document is on the spatial options for meeting identified development needs arising in the District. These needs are significant for a planning area of circa 140,000 people and careful consideration will need to be given to the extent to which these needs can be met given the environmental designations in and around the New Forest.

2.3 The approach set out to calculating housing need on page 36 of the Council’s consultation document is supported. In summary, the Government’s standard methodology for calculating need is based primarily on existing housing stock and affordability. It does not disaggregate needs arising in National Park areas from their constituent local authority areas and so this apportionment falls on local planning authorities to agree through their respective local plan reviews. In the case of the New Forest, circa 83% of the existing dwelling stock in New Forest District is located in the District outside the National Park and therefore the Government’s standard methodology figure of 1,511 net new dwellings per annum is apportioned between the National Park and District Council planning areas accordingly. The approach taken by New Forest District Council is consistent with the National Planning Practice Guidance wording and is supported. The consultation document also confirms the standard method housing need figure is a starting point for the plan-review process and is not the final housing requirement. This is important and a matter that it is recommended the National Park Authority’s proposed consultation response includes coverage of (see section 4).

2.4 Paragraph 102 of the consultation document states, “...based on the evidence so far, it is very likely that there is not enough land available in the Plan Area to meet the housing need calculated using the Government’s standard method. The shortfall is expected to be significant. This means the Local Plan will need to set a housing target that reflects what can realistically be delivered within the Plan Area during the plan period. We will continue working with neighbouring authorities to address any unmet need and will also assess the environmental and economic implications of different growth levels.” This illustrates the challenge facing New Forest District Council in their Local Plan review and it is agreed that meeting the ‘policy off’ housing need figure will not be possible in New Forest District.

- 2.5 The District Council has identified 15 potential development areas, referred to as Strategic Development Growth Options that may have potential for development of 100+ homes. In addition, several other potential development sites that may have potential for 10-99 homes have also been identified for consultation. At this stage, these are options for consideration and testing, not proposed site allocations. The Council is seeking views on these potential sites - illustrated on the plan below - to help shape the next steps in the Local Plan Review process.



- 2.6 In addition to the identified housing need for 1,254 dwellings per annum in the District, evidence on economic development needs (commissioned jointly with the National Park Authority and undertaken by the consultants Lichfields) shows a need for around 142,600 square metres (14.26 hectares) of new employment floorspace in the District over the period to 2043. The District Council's consultation document sets out spatial options for how this identified need could be met, including a series of potential site allocations.
- 2.7 The District Council's consultation document also sets out a series of 'Policy Directions' on a range of planning policy matters where feedback is sought. Several of these are pertinent to the work and remit of the National Park Authority, including protecting the internationally designated sites of the New Forest, Solent & Avon Valley; biodiversity, local nature recovery & environmental enhancement; green & blue infrastructure; back up grazing land; high quality design, landscape and place-making; climate change mitigation and adaptation; renewable energy & energy efficiency; and the rural economy. Where appropriate, it is recommended that the National Park Authority responds to the policy directions outlined by the Council and further detail is set out in section 4 of this report.

3. Consideration of impacts on the New Forest National Park

- 3.1 National planning policy (e.g. paragraphs 189 – 190 of the current National Planning Policy Framework, December 2024) and primary legislation (e.g. Section 245 of the Levelling Up & Regeneration Act 2023) require ‘relevant authorities’ to seek to further the statutory National Park purposes in delivering their functions. Further guidance on the delivery of this strengthened statutory duty is available at [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#) which confirms that neighbouring planning authorities to National Parks are ‘relevant authorities’ and are therefore covered by the duty. The guidance states, “...relevant authorities will need to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. This may include the preparation of Development Plans and associated assessments and documents...[and]... functions outside of a Protected Landscape which may have an effect on land in a Protected Landscape.” The guidance emphasises the duty is an active duty, not passive, which means, “...a relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes.”
- 3.2 In terms of national planning policy, paragraph 189 of the NPPF (December 2024) confirms that development within the setting of National Parks and National Landscapes, “...should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.” This is particularly relevant for the review of the New Forest District Local Plan given the relationship between their plan area and the National Park and the Cranborne Chase National Landscape.
- 3.3 Section 4 of this report sets out the recommended areas that the Authority’s formal consultation response is based on. In this it is recommended that the District Council prepares a report to form part of the evidence base for their Regulation 19 Plan setting out how they have considered impacts on the nationally designated landscapes, as envisaged by the Government’s guidance from December 2024.
- 3.4 It is clear the District Council recognises the legal requirement to consider impacts on nationally protected landscapes and a report that collates the measures they are taking to manage impacts would be beneficial. For example, paragraph 74 of the main consultation document states, “...in relation to the New Forest National Park, the proposed policy approach will consider the relevant information contained and relevant objectives / actions from the New Forest National Park Partnership Plan. This includes five theme-based agendas for action which have also been used to inform the council’s Green & Blue Infrastructure (GBI) Technical Study. The statutory purposes of the New Forest National Park, in conjunction with its local objectives, have informed the identification of the priority projects in the GBI study. The council therefore needs to provide a clear policy approach for the implementation of the key priority projects alongside emerging growth points and site allocations.” This is broadly welcomed and further details are awaited, demonstrating how the duty is being delivered. Similarly the ‘Possible Strategic Policy Approach: Protection of the New Forest National Park and Cranborne Chase National Landscape’ outlined on page 33 of the Council’s consultation document is considered reasonable and appropriate.

4. New Forest National Park Authority – recommended areas for response

- 4.1 As outlined in the introduction to this report, the National Park Authority is a statutory consultee on the review of the New Forest District (outside the National Park) Local Plan. In addition, there are legal and planning policy requirements for the District Council to carefully consider impacts on the National Park in delivering their planning functions (including plan-making/review).
- 4.2 The National Park Authority and District Council have a positive working relationship. This is reflected in a range of evidence base studies that have been jointly commissioned by the two planning authorities, including evidence on housing need, employment needs and the need for additional gypsy, traveller & travelling showpeople’s provision. It should also be recognised that although the National Park is covered by a separate local plan, the communities within the New Forest District Council planning area make a distinctive contribution to the cultural heritage of the National Park. This is highlighted by the reference to back-up grazing within the Council’s consultation, but could be supplemented by other policy areas that contribute to the strengthening of the cultural heritage.
- 4.3 The respective planning policy teams meet on a regular basis and the local plan review timetables for the District Council and National Park Authority are closely aligned. It is within this context of co-operation that the following areas are recommended to be included in the Authority’s consultation response.

Recommended consultation responses – New Forest National Park Authority

- **Demonstrating the S245 duty to seek to further National Park purposes:** The ‘Possible Strategic Policy Approach: Protection of the New Forest National Park and Cranborne Chase National Landscape’ outlined on page 33 of the Council’s consultation document is considered reasonable and appropriate. As a ‘responsible authority’, we encourage the District Council to prepare a report to accompany their Regulation 19 Local Plan in Autumn 2026 setting out how they have fulfilled their legal duty to seek to further the statutory National Park purposes through the local plan review. This should include the measures taken within proposed site allocations (including siting and design of the interface between built development and the adjacent nationally protected landscape); as well as how the Council’s Local Plan is helping the resilience of sites within the National Park to support the [national 30x30 targets](#).
- **Meeting identified housing needs:** The NPPG resource confirms, “...the standard method identifies a minimum annual housing need figure, and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure.” Local planning authorities should use the standard method as the starting point when preparing the housing requirement in their plan and the ‘policy on’ assessment can justify a lower housing requirement than the ‘policy off’ assessment of need. With over 50% of the New Forest District Council planning area covered by NPPF paragraph 11 footnote 7 designations (including National Landscape, Green Belt and internationally designated habitats), it is clear the full housing need cannot be met within the district

without fundamental conflicts with national planning policy. Meeting the identified housing need in full is not mandatory under national planning policy and we encourage the District Council to further assess whether the scale of development envisaged through their Local Plan Review is sustainable.

- **Strategic Development Growth Options (SDGO):** While noting that the options identified in the current consultation are not proposed allocations at this stage, several SDGOs raise significant concerns from the Authority's perspective. Paragraph 189 of the NPPF (2024) confirms that development within the setting of National Parks should be sensitively located and designed to avoid or minimise adverse impacts on the designated landscape. SDGO A (New strategic employment area at Ower); SDGO E (Land between Holbury & Blackfield); SDGO F (Land north of Lymington); and SDGO M (Land south east of Fordingbridge) are all located within the landscape setting of the adjacent National Park. Land at Ower (SDGO A) has previously had development rejected due to landscape impacts on an important gateway to the National Park. Land at Holbury (SDGO E) is subject to a current planning application that the Authority has formally objected to due to concerns about impacts on designated sites; and land north of Lymington (SDGO F) was previously deleted as potential allocation in the Council's adopted Local Plan (2020) partly due to impacts on the setting of the National Park. We encourage the District Council to further explore town centre regeneration (for example, the recent consultation proposals for Totton town centre) and the gentle-densification of settlements within the District alongside greenfield development.

The site allocations in the adopted New Forest District Local Plan (2020) have, in places, resulted in development pressures within the adjacent National Park for supporting infrastructure, including access roads, drainage infrastructure and greenspace provision. As a point of principle, the National Park Authority's position is that the development and supporting infrastructure planned within New Forest District should not physically encroach into the National Park.

- **Protecting internationally designated nature conservation sites:** Planned new development in New Forest District has potential impacts on the internationally protected habitats of the New Forest, Solent coast and River Avon, as well as neighbouring designations including the Dorset Heaths. Several strategic development options are located within close proximity (400m) to the New Forest's internationally designated sites and the Authority continues to raise significant concerns regarding impacts, including urban edge effects, that cannot be addressed through increased greenspace provision.

In terms of in-combination recreational impacts, paragraph 174 of the consultation document states, "...it is also important to highlight that these initial housing capacity estimates have been calculated based on the existing adopted strategy for the mitigation of recreational impacts on international conservation sites. However, this mitigation strategy approach is being reviewed as part of the Local Plan review in order to ensure that the strategy for the mitigation of recreational impacts is appropriate and effective." Given that NFDC are considering a scale of development far higher than the adopted Local Plan (2019), it is agreed that the approach to mitigation must be

reviewed and 'scaled up'. This is an opportunity to embed the New Forest Strategic Access Management & Monitoring (SAMM) work alongside in-district greenspace measures in an updated recreation mitigation scheme.

- **Biodiversity, Local Nature Recovery & Ecological Enhancement:** The District Council could use the Local Plan Review process to demonstrate how their local planning policies and decisions contribute to the conservation and enhancement of biodiversity, reflecting the strengthened "biodiversity duty" introduced by the Environment Act 2021. Paragraph 251 of the consultation document confirms that the Council's Local Plan will seek to demonstrate alignment with the aims of the Local Nature Recovery Strategy (LNRS) for Hampshire. There are good cross references to the LNRS within the draft document, setting out how future site allocations could deliver the priorities of the LNRS. This is welcomed and reflects the fact that the adopted Hampshire LNRS is a material planning consideration. There may also be elements of the Dorset and Wiltshire LNRSs that are relevant to the District Council's Local Plan review given the relationship of the Council's plan area to these areas.
- **Green & Blue Infrastructure:** The consultation document and supporting evidence demonstrate the consideration given to green and blue infrastructure as part of planned new development. The 'Policy Direction' outlines that the future green & blue infrastructure policy will provide a framework for developers, requiring the retention and enhancement of existing assets and the implementation of additional features. It is further proposed that the policy will require developers to provide a Green & Blue Infrastructure Statement setting out how the proposal contributes to the strategic network and supports delivery of BNG, the LNRS and climate resilience objectives. This is supported.
- **Back up grazing:** The references within the current consultation to the support for commoning and the recognition of the vital role that the commoning system plays in the New Forest's ecosystem and landscape character are welcomed. The Council's emerging policy direction is that any development which would result in the loss of land actively used for back-up grazing, or with potential for such use, will not be permitted. The policy would also likely require an inventory of such land be maintained, and kept up to date, to ensure sufficient land is available. This would require significant resource and time, but could be a combined approach between NFDC, the National Park Authority, and the Verderers. The Council state that these organisations could monitor factors that have a bearing on the commoning system and the requirement for back-up grazing land. This is an interesting proposal requiring significant combined resource and co-ordination, and one the Authority supports.
- **Placemaking:** There are other factors beyond back up grazing that contribute to the cultural heritage of the National Park and could be highlighted within the Council's Local Plan. Demonstrating the links between the communities of New Forest District (outside the National Park) and the National Park – such as skills, housing, work space for local producers and creative artists, buildings of interest associated with the heritage of the National Park – will be of mutual benefit to the placemaking ambitions of both plans.

- **Landscape:** The evidence being assembled to support the District Council's Local Plan Review includes a refreshed Landscape Character Assessment (an update to the 2000 version), Landscape Sensitivity Study, and Settlement Character Study. This focus on landscape character and sensitivity is welcomed. It is recommended that District Council engages with the National Park Authority on the Landscape Character Assessment update, as the equivalent document for the National Park area was produced in 2015 and it would be beneficial to ensure there is consistency between the assessments.
- **Fawley Waterside:** It is noted that the mixed-use development for which the former Fawley Power Station site is currently allocated through policy SS4 of the adopted New Forest District Local Plan (2020) is not considered achievable as the development would not be feasible or viable. This position is understood and is consistent with the approach we have taken in the New Forest National Park Local Plan Review. The District Council is currently working with the site promoter to ensure a feasible, viable and appropriate future for this important brownfield site. The National Park Authority is keen to continue to work with the District Council and site promoter on a positive policy approach for the site.
- **Transport:** The District Council's consultation document rightly recognises the need to take a holistic view of transport across the New Forest and surrounding area and highlights joint work on (i) the emerging New Forest Movement & Place Strategy; and (ii) the adopted Local Cycling & Walking Infrastructure Plans led by Hampshire County Council and supported by the National Park Authority and the District Council. Housing development will inevitably increase cross-National Park travel and understanding impacts of this is an important part of the evidence base for the submission draft Local Plan. The National Park Authority is therefore keen to liaise with the District Council (and other partners) over this joint evidence base to ensure there is clear policy direction to deliver the relevant movement and transport strategies.

5. Conclusions and next steps

- 5.1 As outlined above, the New Forest National Park Authority and New Forest District Council have a positive working relationship. Many of the key evidence base studies that inform the respective local plans reviews have been jointly commissioned and our timetables for the main milestones in the plan-review process are similar, with both planning authorities looking to consult on their Regulation 19 (Submission draft) Local Plans in early Autumn 2026, prior to submission for independent examination in December 2026.
- 5.2 The District Council have a series of national policy agendas and priorities to seek to address in their local plan review. The District Council's plan-area is heavily designated and it is the environment of the New Forest (including the wider Solent coast and Avon Valley) that make such a positive contribution to people's quality of life. The Council's Local Plan plays a key role in safeguarding these qualities.

5.3 The National Park Authority recognises the challenges faced by the District Council in balancing the national policy objectives. The proposed feedback on the Council's Regulation 18 'Spatial Options and Policy Direction' consultation recognises the positive work undertaken in many policy areas. The proposed response also recommends that the District Council collates into a single report evidencing how they are seeking to deliver the statutory National Park purposes through their Local Plan Review.

Recommendation:

Members of the Planning Committee:

- (i) Endorse the key principles set out in the box after paragraph 4.3 of this report to form the basis of the Authority's consultation response; and**
- (ii) Delegate authority to the Interim Head of Planning & Place – in consultation with the Chair and Deputy Chair of Planning Committee – to submit the final response by the deadline of 20 March 2026.**

Papers:

PC 510/26 – Cover report

Equality and Diversity Implications:

There are not considered to be any specific equality or diversity implications arising out of this report. Ultimately it is a decision for New Forest District Council how they revise their local planning policies and discharge their statutory responsibilities.

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