



New Forest National Park Authority Local Plan Review February 2025

Comments Form

Consultation on Scope of the New Forest National Park Local Plan Review

(Reg 18 Part 1)

This comments form relates to the review of the emerging Local Plan for the New Forest National Park following the adoption of the previous document in 2019. The consultation period will be open for 6 weeks from **Tuesday 4 February 2025 until Tuesday 18 March 2025**. Before completing this form please take the opportunity to read the 'Direction of Travel' document (702/25) available here: [New Forest National Park Authority Meeting 23/01/25 - New Forest National Park Authority](#) and returning it to the Policy Team by email via policy@newforestnpa.gov.uk.

Or by post to:

Policy Team
Lymington Town Hall
Avenue Road
Lymington
SO41 9ZG

Comments need to be received by 5pm Tuesday 18 March 2025

To keep up to date on this consultation and others relating to the local plan review please visit our consultations page here: [Consultations - New Forest National Park Authority](#).

Your Details

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*If you are completing this form as an agent, please make this clear and ensure contact information is correct.

DATA PROTECTION

We will process personal data in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Your response(s) will be used to inform subsequent reports to inform the Local Plan Review process and anonymised comments may be shared online, on our website, or within material documents as part of this process. However, your personal data will not be published and will be redacted from public facing documents, this includes personal email addresses home addresses and personal phone numbers.

More details on how we hold personal information can be found at: <http://www.newforestnpa.gov.uk/privacyandcookies>. Should you require any further information about how your details will be used or stored and/or would like to access any information we hold about you, please email our Information & Data Protection Officer at: dpo@newforestnpa.gov.uk.

Please note that all information held by public authorities is subject to the Freedom of information Act 2000 and the Environmental Information Regulations 2004 and may be disclosed upon request.

Feedback

Would you like us to keep your contact details so we can inform you about the next stages in the progress of preparing the Local Plan?

Yes ☒

No ☐

Please write your comments in the sections provided below

*Before providing us with your comments, please ensure you have read and consulted the ['Direction of Travel'](#) Document.

1. Introduction	
n/a	Please comment below:

2. Strategic policies & development principles	
Q1	Do you consider the current Local Plan Vision is still broadly appropriate? Please comment below:
The vision statement would be improved by starting with a statement of strategic context of the New Forest National Park (NFNP) eg 'a unique protected landscape set in the centre of an urban sub-region, with growth ambitions, stretching from Portsmouth to Poole. The challenge for the local plan is to find a balance between the growth external to the NFNP and the pressure this puts on the unique and sensitive environment of the New Forest'. This pressure arises from the recreational use of the NP and these pressures are seriously understated in the vision. The sub-region surrounding the NFNP has a population of around 1.5 million residents and 15m residents within a 90 minute drive time. Around 13.5m visitor days were estimated in 2018 and that figure will only have increased since the pandemic. With continuing population growth in the sub-region the pressures will only grow. The vision states 'recreation and visitor pressures have been successfully managed' . This statement needs to be revised and reviewed to reflect the real situation. The governance of the New Forest is very complex, and with the prospect of further structural change in local government it is essential that the plan prioritises the need to work with all the surrounding local authorities as well as other partner organisations. The NFNPA cannot deliver on it's statutory responsibilities without the support and collaboration of all organisations in the sub-region (both to the east and west of the NP).	

Q2	Do the existing Strategic Objectives still represent the main considerations for development in the National Park? Please comment below:
	Stronger emphasis should be placed on the pressures on NFNP from population growth and increasing recreation.
Q3	Is the Spatial Strategy the most sustainable way to deliver new development over the next 20 years? Please comment below:
	Yes. However there needs to be greater emphasis on the need for affordable housing for local people. Without a strong policy approach to affordable, more importantly, social housing for rent, the NFNP will continue it's inexorable change to a place where only the rich and old can afford to live. The NFNPA could take a more robust stand on this issue. An example of this is the way in which Welsh authorities are using their evidence base around second homes and short term lets to support a changed, more robust policy approach.

3. The natural environment	
Q4	Do you consider the current Local Plan policies on the natural environment still broadly align with national policy? Please comment below:
	There has been, and continues to be, significant change in the approach of government to environmental policy. The document sets out some of these changes. What is missing is a more holistic approach to the various mitigation regimes in place, and likely to emerge over the coming months, eg Biodiversity Net Gain (BNG), nutrient neutrality and net zero. A holistic approach would also set out the opportunities both within and outside the NFNP.
Q5	Are there any additional key issues that we may have missed? Please comment below:
	The current plan underestimates the scale and potential benefits of a coordinated and energetic approach to the receipt and use of recreation mitigation payments. The formula for calculating the value of the mitigation payments for recreational pressure arising from development within the zone of influence (ZoI) needs to be reviewed and brought into line with comparable mitigation schemes elsewhere in southern England. It is essential to include within the

evidence base the current and possible future position for payments across all contributing local authorities. NFA recent research demonstrates that there is variable, and in some cases absent, reporting by the councils that lie within the Zol.	
Q6	Do you have views on the planning policy approach to climate change and are there areas we should look to go further on? Please comment below:
There needs to be more reference to what declaring a climate emergency means in planning terms. What can the planning system do to support any actions arising from this declaration? The document should be stronger on this issue.	
Q7	How can we use local planning policies to protect the relative tranquillity of large areas of the New Forest National Park? Please comment below:
The NFA has recently challenged the extent to which the tranquil areas of the NFNP can be protected through the planning process. This arose in the context of proposed cycle routes across designated tranquil areas and, on questioning, the absence of an up to date evidence base or any recognition of uses such as increased cycling that can impact and reduce the tranquillity. This policy area needs much more work on it to provide a safeguarding for these areas that are under pressure from recreation.	

4. Protecting and enhancing the historic and built environment

Q8	Do you consider the current Local Plan policies on the historic and built environment still broadly align with national policy? Please comment below:
Q9	Are there any additional key issues that we may have missed? Please comment below:

5. Vibrant Communities (including housing)

Q10 Pending the conclusions of the current evidence base work on local housing needs, what do you consider to be the best approach to meeting needs in a way that is compatible with the statutory National Park purposes? Options include site allocations, revisions to the Defined Village boundaries and other alternatives that will be tested through the Sustainability Appraisal/SEA process. Please comment below:

It is likely that any suggestion that there could be revisions to defined village boundaries will affect the willingness of landowners to release adjacent land as exception sites for affordable housing. Imaginative proposals for new dwellings within the defined villages should be encouraged.

Q11 Should the revised Local Plan identify specific settlements where rural exception sites would be supported in principle? Please comment below:

Rural exception sites should be specifically included in the call for sites. There should be no identification of specific settlements. The wording of the current policy, that exception sites should be 'adjacent' needs to be reviewed. These sites are the only clear means to provide guaranteed affordable housing for rent for local households and should be encouraged.

Q12 Do you agree with our intentions to retain policies focusing on commoners' dwellings and Estate workers' dwellings? Please comment below:

See earlier comments – Q3.

Exception sites to be encouraged to come forward with a category of the call for sites to include exception sites.

Q13 What is the best policy approach to protecting the character of the National Park from incremental change from proposals for replacement dwellings, extensions to dwellings and outbuildings? Please comment below:

The existing policy restrictions on size of extensions should in theory limit the size of extensions. There is a link between change of use of outbuildings and short term lets. A better understanding of short term let properties and second homes in the NP as part of the evidence base would assist enforcement and provide a potential deterrent to unauthorised use of outbuildings for residential use and the sequence of Certificates of Lawful Use and then full planning permission. The cycle of this known process should be disrupted.	
Q14	Are there any additional key issues that we have missed? Please comment below:

6. Local economy	
Q15	Do you consider the current Local Plan policies on the local economy still broadly align with national policy? Please comment below:
Q16	Are there any additional key issues that we may have missed? Please comment below:
Policy SP48: the land based economy should be strengthened to emphasise the importance of commoning. A critical aspect of this is the availability of back-up grazing land. The commoning system of the New Forest underpins the area's ecosystem. The grazing and browsing of de-pastured livestock maintain the wide variety of heath, bog and woodland that characterise the landscape and the mosaic of habitats covered by national and international designations for nature conservation. The area's beauty and relative accessibility also bring millions of day visitors and holiday makers to the area each year, adding considerably to the area's economy. The visible aspect of this system are the small groups of ponies, donkeys and cattle that are so familiar to residents and visitors, while the management of these animals, both on and off the Forest, is almost completely invisible to anyone who isn't aware of the reality of the New Forest. SP48 (iii) acknowledges the need for backup grazing land and for its protection. With increasing pressure for housing, both within and adjacent to the NP back up grazing land is reducing in quality	

and quantity. A recent survey by NFA (2025 currently draft) concludes that the demand for back up grazing land continues and without this land the practice of commoning will be under threat and consequently there would be changes to the ecosystem of the New Forest.

Q17 Do you have views on the planning policy approach to the range of uses within the defined shopping areas of the National Park? Please comment below:

Q18 Do you support our proposed approach to campsite development and continued use of Article 4 Directions? Please comment below:

NFA supports the proposed approach to campsite development.

Q19 What should be the local planning policy approach to the impacts of national permitted development rights on the local economy (e.g., office to residential)? Please comment below:

7. Sustainable transport and access

Q20 Do you consider the current Local Plan transport policies still broadly align with local and national policy? Please comment below:

Q21 Are there any additional key issues that we may have missed? Please comment below:

The plan review is silent on rail infrastructure. A main railway line crosses the NP, stopping at Ashurst, Beaulieu Road, Brockenhurst and Sway and a branch line goes to Lymington from Brockenhurst. These stops provide opportunities to encourage greater access to the NP from trains as a contribution to reducing car journeys for visitors to the New Forest.

Q22 Do you have views on whether the current transport policies adequately respond to the climate emergency? Please comment below:

Q23 Do you support the current cycle and car parking standards, or consider that they should be reviewed to support sustainable transport? Please comment below: