



Planning and Transport Committee

19 March 2026

reply to:

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Sent as attachment to Email to [policyandplans@nfdc.gov.uk](mailto:policyandplans@nfdc.gov.uk)

Dear Team,

### **Response to Regulation 18 Local Plan 2025 -2043 consultation FINAL**

The New Forest Association (NFA) is one of the oldest conservation and environmental groups in the UK. Founded in 1867 with aims of protecting the Forest's unique quality and the protection of commoning in the Forest. Those aims remain relevant today.

This response uses the paragraph numbers in *Spatial Options and Policy Direction February 2026 - Cabinet Version*.

NFA has recognised that reversal of the habitat degradation of the New Forest National Park cannot be achieved solely by action within the Park and hence it seeks to influence the policies of the surrounding LPAs, of which NFDC is by far the most important - the Forest's guardian.

NFA has largely confined its response to matters associated with the protection of the habitat and traditions of the New Forest, with emphasis on the protected areas, (which for convenience will be termed the New Forest SPA in this response). Thus NFA's interest is in policies that safeguard the practice of commoning of pasture and policies that safeguard the Forest from ever increasing recreational pressure.

Consultation Questions (page 22).

The unique character, centred on the National Park's protected areas, is the very soul of the District and its protection and enhancement must be the Plan's priority. In this respect a planning horizon far beyond 2043 is appropriate.

[www.newforestassociation.org](http://www.newforestassociation.org)

[www.facebook.com/NewForestAssociation](https://www.facebook.com/NewForestAssociation)

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49. NFA welcomes the recognition that the mitigation of the recreational impacts of development on the New Forest international nature conservation sites is a strategic cross boundary matter.

50. The draft local plan rightly highlights that much of the plan area is significantly affected by major physical and environmental designations and constraints. We would suggest that the plan area affected by constraints the NPPF lists in footnote 7 is considerably more than 57% as new housing development outside these designations and constraints can still have adverse impacts on the same through increased recreational pressures, additional nutrient loads and visual intrusion (setting).

52. NFDC must ensure the ANRG space requirement, (currently 8ha/1000), is not used in place of the usual public open space standard, (typically 3.5ha/1000), to further enhance urban design. As currently provided NFA believes the “ANRGs” contribute only minimally to mitigation for recreation impacts on the New Forest SPA. Further comments are at paragraph 241.

62 and following. NFA welcomes the recognition of the interrelationship of the District and the National Park, the new requirement to further the purposes (para 70) and the need for robust mitigation (para 72). NFA notes the National Park Partnership Plan, the Green & Blue Infrastructure Technical Study, and the National Park’s ambition for a Green Halo, and recognises the Local Plan process is the vehicle where ideas become lines on the ground.

Consultation Questions (page 34). As stated above, the ceiling on the amount of new building is that which can be sustainably achieved without forever damaging the essence of the District (including the National Park).

84. The challenge of addressing future housing need is compounded by the disparate geography of the plan area with its three separate and very distinct areas surrounding the National Park. Not only does this hinder any strategic approach to new housing (as evidenced in the SDGOs – see below) but it risks real harm to the setting of the National Park as more and more housing is squeezed into ever diminishing areas of land available for development.

153. NFDC will be aware of the revised NPPF S5 proposal which if approved will effectively negate the decision made at 153. NFA trusts that NFDC will make representations to ensure that the proposal does not become a reality. (This response has been sent in advance) .

160. Strategic Development Growth Options. Reviewing the 15 SDGO leaves one in a state of shock. The descriptions appear to fairly describe each potential location and frequently state why each location, in full or in part, is unsuitable for development. A number of the SDGOs appear to be in direct conflict with Paragraph 189 of the NPPF. Some are sufficiently close to the SPA that urban edge effect is unavoidable. Natural England’s position on development within 400m is comprehensively developed in the letter to NFNPA dated 20 November 2018 which only allows very limited allocation within 400m in exceptional circumstances after appropriate assessment. It takes considerable time to determine whether it is reasonable to describe pasture within the SDGOs and other potential allocations as *loss of land actively used for back-up grazing, or with potential for such use*. NFA will work through the potential allocations and advise NFDC if it considers there are breaches of the policy described at 288 at a later date..

The NPPF requires that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of brownfield sites. NFA is not convinced that NFDC has fully explored all options for making the best use of brownfield land within the plan area. This needs to be set out in much more detail and fully justified before consideration can be given to the release of additional greenfield sites.

171. NFA takes the expression “in combination with other proposals” in its broadest sense. At the next consultation stage a section should exist which enables a discussion on whether it is indeed possible to ever fully mitigate the New Forest SPA from the effects of 11,000 extra dwellings on its doorstep. The possibility of full mitigation needs to be considered for all the 9550 dwellings suggested within the SDGOs whether completed by 2043 or not. It is not obvious that the mitigation hierarchy has been rigorously applied particularly in proposals within 400m of the boundary of the New Forest SPA.

199. NFA is not aware of the current house occupancy rate in NFDC outside of National Park. Within the Park the bedroom occupancy rate is so low that NFNPA adopted a policy of limiting new-build to 100 sqm.. Given its chronic lack of land, the NFDC might wish to consider a similar policy.

212. Statements such as *minimal proportion* and *absolutely required* may prove a variable feast over the duration of the plan. The Authority should consider including a specific maximum allowable percentage of market dwellings in its policy.

233. NFA understands *urban edge effect* refers to the particular problems arising from development within 400m of a protected site and would ask that it is only used in that way.

235 NFA does not accept that it is possible to adequately mitigate the recreational effects on the New Forest SPA with a provision of 8 hectares/1000 population increase across NFDC. The figure was calculated using an arithmetical formula suggested by the British Housebuilders Federation for the Thames Basin Heaths (TBH) SPA during the passage of the examination in public into the SE Plan in 2007. However, the constants applicable to the TBH are markedly different from those for the New Forest SPA heathlands. For instance the visits per person per year for the New Forest are an order bigger than those for TBH and earlier calculations results in a provision of 30 -40 hectares/1000 being applicable for the New Forest SPA. NFDC will be advised of the latest figure when NFA is satisfied all components reflect the most recent research. This fully sourced paper may be of use to NFDC in discussions with Natural England. The assessor's report is attached as appendix 2 to this response for information.

Whether the formula reflects the latest research is debatable. The more recent SAMM report<sup>1</sup>, which has been widely accepted, puts the boundary of the sphere of influence at 13.8km from the SPA and mitigation rates are graduated.

NFA believes the NFDC local plan cannot progress without agreement on mitigation provision. NFA, alone or with partners, will make its own representation to Natural England.

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<sup>1</sup> Liley,D., Caals. Z., Shelleswell, C. & Lake, S. (2023) New Forest Strategic, Access Management and Monitoring Strategy. Report by Footbridge Ecology

241. See remarks made at 235. A more detailed summary of NFA's position was given in NFDC's earlier *issues and scope* document and NFA welcomes NFDC's acceptance of many of the suggestions made. NFA is dissatisfied with the mitigation measures for recreation pressure on the New Forest SPA. They have never worked satisfactorily: see for instance *A Contribution to Understanding the Relationship of the Recreational Use of the New Forest with its Special Qualities*<sup>2</sup>. And the situation has the potential to deteriorate rapidly with the proposed housing numbers. NFA therefore welcomes NFDC's comments regarding an alternative approach, considering the revision being a necessity rather than an option. The 2020 report on the impact of recreation and potential mitigation<sup>3</sup> commissioned by surrounding PAs was a good start.

SANG are intended to provide avoidance measures for the potential impact of residential development on the SPA by preventing an increase in visitor pressure on the SPA. The effectiveness of SANG as mitigation will depend upon the location and design. These must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.<sup>4</sup> It is self-evident that the SANGs currently provided are not more attractive than the 28,000ha New Forest SPA. NFA welcomes the suggestion at 241 that a *wider approach with other authorities* might be more appropriate. NFA urges the creation of a Recreational Mitigation Partnership of the local planning authorities within the zone of influence of New Forest SPA working together to maximise their mitigation using pooled assets.

NFA welcomes the suggestion of additional country parks at 241, (while questioning the word additional). Such large areas offer a genuine alternative in terms of design including the opportunity for back-up grazing or even commoners holdings. Their location requires integration with the NFNPA recreational management strategy and the position of Forestry England car parks within and around the New Forest SPA. NFDC should consider whether BNG, Nature Recovery, and wildlife corridors would benefit from a joint approach. In this respect NFDC comments on the Green and Blue Infrastructure at 269 and 276 are relevant.

288. Commoning is essential to the maintenance of the protected areas of the New Forest and adequate back-up land is essential for the continuation of the practice. NFA commend NFDC in its intention to implement a policy that protects grazing land and the preferred policy approach *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 production and maintenance of a register of such land is problematic and possibly unnecessary. The policy in italics is sufficient to test every application at least in the interim. NFA have considered this problem over the years and would be happy to discuss with NFDC outside of this consultation. While not a national planning requirement, NFA consider that action that would endanger the practise of commoning would be contrary to the Conservation of Habitats and Species Regulations 2017.

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<sup>2</sup> Chatters, C., Wynn, R., (2020) *A Contribution to Understanding the Relationship of the Recreational Use of the New Forest with its Special Qualities*. REport for NFA available at <https://newforestassociation.org/wp-content/uploads/2020/10/2020-FoNF-Special-Qualities-report.pdf>

<sup>3</sup> Liley, D., Caals, Z., Shelleswell, C. & Lake, S. (2020) *Recreation use of the New Forest SCA/SPA/Ramsar: Impacts of recreation and potential mitigation approaches*. Report by Footbridge Ecology.

<sup>4</sup> Natural England updated SANG guidance August 2021

One of our experts in commoning and back-up grazing suggests some changes to your script. I have attached them for information as appendix 1 to this report.