

Policy and Plans Team,
New Forest District Council

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Ref: New Forest District Council Local Plan

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By email only

Dear New Forest District Council,

RE: Consultation on the New Forest Local Plan (Regulation 18)

Thank you for the opportunity to comment on the Issues and Scope consultation for the New Forest Local Plan.

Dorset Council appreciate the further detail provided over the previous consultation in 2025. The policy directions proposed give an idea of what the emerging Local Plan will contain but do not give detailed policy positions. As such, the responses below highlight some areas where there are potential implications for Dorset Council which can be addressed through our regular Duty to Cooperate meetings and reflected in detailed policies, when they are produced.

The context for forming the Local Plan strategy and policies will be national policy and guidance and both councils will need to balance the competing demands of meeting the development needs of the area against potential negative impacts. Regard will need to be had to the new National Planning Policy Framework (NPPF) expected later this year as this will alter this context.

Meeting housing needs is an essential part of the Local Plan. Over the Plan period, housing is delivered via existing consented development sites and allocations in the adopted Local Plan that are yet to be implemented. With both of these sources of housing, and given the proposed Plan period, there is likely to be a reasonable prospect that development will take place on the identified sites. Estimates of supply should therefore be built into the expected housing delivery unless there is clear evidence that the site will not be developed for example because it has been developed for an alternative use. Additional sites will need to be considered through the Local Plan to meet any shortfall in provision against the housing target.

Within the consultation document, Dorset Council note the statement that *'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'*. It is essential that all opportunities for meeting the housing needs of the area are explored in detail prior to concluding that the housing needs cannot be met and requesting that neighbouring areas assist.

The consultation document outlines a number of scenarios that have been developed to meet housing needs. This approach is clear and shows the incremental consideration of options that would enable additional growth to be delivered. Like many councils around the country, both Dorset Council and New Forest District Council are seeing a step-change in housing targets as calculated through the Government's standard method. In response, an approach to housing delivery that is different to the adopted Local Plan approach is needed, meaning that all realistic sources of supply need to be included in the Local Plan.

Dorset Council concur with the statement that *‘a “brownfield-only” spatial option is not a reasonable or justifiable option for the Local Plan review to pursue. This is because there is a limited supply of available brownfield sites in the Plan Area and would result in a considerable housing shortfall against housing need.’* The position is similar for Dorset Council where there is a limited supply of brownfield land however where brownfield land is appropriate for redevelopment, it should be identified in the supply.

Dorset Council consider that large scale, self-contained allocations in sustainable locations that do not result in over reliance on car travel should be considered, including the potential for new settlements. Some of these opportunities may well have cross-boundary implications and therefore require a coordinated approach between councils to ensure they are capable of achieving the desired outcomes. These larger scale strategic opportunities will take time to evaluate and are unlikely to deliver homes in the short to medium term. They should be considered as opportunities for meeting the longer-term growth needs of the area.

Where the housing needs of the area are not met without a review of Green Belt opportunities, there will be a need to consider Green Belt sites. The lack of available housing land supply constitutes the exceptional circumstances for Green Belt release. Regard will also need to be had to emerging National Policy.

The proposed spatial development strategy is broadly supported but it could usefully be supplemented by including a reference to reducing the need to travel and the distance travelled to meet everyday needs and the aim of reducing reliance on car-based travel. Within the context of the spatial development strategy, settlements where growth is considered appropriate could be identified and a flexible approach applied at these locations especially when housing delivery falls behind the housing target. Not listing settlements where growth is not considered appropriate would by default restrict development in these locations.

To establish a robust, deliverable housing target for the Local Plan that meets as much of the housing need calculated using the Standard Method as possible, all sites and opportunities will need to be carefully considered. The approach to site consideration will require a coordinated assessment aligned with neighbouring authorities including consideration of sites that could cross boundaries such as those around Totton with NFNPA and around Fordingbridge with Dorset.

Dorset Council welcome the efforts of New Forest District to meet the need for Traveller pitches including the consideration of alternative measures to traditional site allocations. The approach of requiring larger scale growth areas to also provide Traveller pitches is very much supported and reflects the approach that Dorset Council are taking.

There are multiple habitats and protected species issues that affect both Dorset and New Forest district and we have a history of working towards solutions on these issues. The consultation material specifically mentions the links between the Avon Valley hibernation bat roosts and the links with the Dorset maternity and hibernation roosts. It will be important that the approach to addressing any impacts on these roosts is coordinated across the boundary. This will apply equally to other species and habitats, allowing for the movement of species.

It is assumed that the assessed employment land need relates to the past rates of delivery of employment space. This will in turn relate to economic growth and to demographic change within the area. However, if there is an increase in housing supply derived from the Government's Standard

Method, the projected employment land need may require adjusting. It may be that there is surplus employment space that could be released for alternative uses or that there is an increased need for employment space.

Meeting the significantly increased housing targets and other growth needs will be a challenge for both Dorset and for New Forest and discussions about how these needs can best be met will need to continue during the production of our local plans.

We welcome the continued opportunities to work together to consider cross boundary issues as our local plans progress towards examination.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Garrity', written in a cursive style.

Michael Garrity
Corporate Director - Planning