SENT BY EMAIL:

Email

 Date:04/04/2025

Dear Sir/ Madam

### NEW FOREST LOCAL PLAN: ISSUES AND SCOPE

1. Thank you for consulting with the Home Builders Federation (HBF) on the issue and scope of the New Forest Local Plan
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC’s, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.

**Housing**

*Q10. Do you have any comments on our housing need and how it can be met?*

1. HBF recognises that the number of homes the council is required to plan for using the latest standard method of 1,501 dwellings per annum will be challenging for New Forest District Council (NFDC). Given that very few homes are likely to be delivered in the national park to meet housing needs in NFDC it will fall to the Council to plan to meet these needs in full in those areas not covered by the national park.
2. In order to try and meet these needs in full, the Council will need to take a positive approach to planning for new homes by working proactively with the development industry to identify new development sites. HBF recognises that it may not be possible to meet needs in full within NFDC. If this is the case the Council will need to show that it has left no stone unturned in seeking to deliver the housing needs of the area. Given that there were exceptional circumstances to amend Green Belt boundaries in the last local plan, HBF consider it essential that further amendments to the Green Belt boundary are facilitated by this local plan. While the Council will need to ensure that it has followed the sequential approach outlined in paragraph 147 of the NPPF the scale of need for market and affordable housing, the cost of housing and constraints on land supply together provide an adequate justification to amend Green Belt boundaries.
3. A key part of local plan preparation continues to be the duty to co-operate and, if housing needs cannot be met in full, the Council will need to work with neighbouring areas to see if they can meet any of NFDC’s housing needs, particularly in light of recent comments in the Inspector’s initial comments on the BCP local plan review. The Council will need to undertake discussions with all neighbouring areas to try and identify a strategic approach to addressing any unmet needs arising in NFDC given the constraints it faces. Its approach to co-operation must not be to simply write to neighbouring authorities but to work with them to identify shared strategic solutions to meeting needs in full through this round of local plans. While changes to plan making and the structure of local government will see a different approach to plan making and the geographies they cover must not be used as an excuse for deferring such decisions. As the Council will be aware this would not only be a failure of the duty to co-operate but also an indication that, as set out in paragraph 36 of the NPPF, that the plan was not effective.

*Q11. Are there any specific sites not currently allocated in existing Local Plans or otherwise permitted for development that should be considered for their development potential?*

1. HBF does not promote sites and cannot comment.

*Q12. What role can town and parish councils have in addressing the development needs of the area, such as through preparing neighbourhood plans?*

1. It is the HBF’s experience that whilst neighborhood plans should proactively support development, they are more likely to act a hindrance than a catalyst. The Council should therefore not seek to rely on neighborhood plans when seeking to meet the development needs of the New Forest. The Council should be looking to allocate sites through this local plan.

*Q13. Should we consider a policy to restrict second home ownership within the area?*

1. HBF does not consider it appropriate to use the planning system to restrict the ownership of second homes. However, if the Council choose to do this, it will need to fully understand the consequences of any decision to restrict the ownership of new housing stock on the housing market in general. Preventing second home ownership of newly built homes in the area will place more pressure on the existing stock of housing to meet the demand for second homes, which could increase prices of existing homes.

*Q14. Are there any specific forms of affordable housing that we should aim to prioritise to provide for those most in need locally?*

1. The Council will need to ensure that the mix of homes the plan seeks to deliver is based on a robust assessment of needs and viability.

*Q15. How should we aim to meet the housing needs of our population and the current population trends?*

1. The Council should aim to secure a mix of sites, both in term of size and location, in order to provide sufficient choice for the market to meet the changing needs within NFDC.

*Q16. Do you have any comments on the range of densities that should be sought on new development sites?*

1. While densities need to be appropriate and reflect the character of the area the Council should look to maximise these where possible. However, there will be limits as to what can be viably achieved in terms of densities. In our experience very high densities in brownfield development in areas such as NFDC are unlikely to be viable. If higher densities are being proposed the Council will need to have robust evidence that these will come forward as expected and not lead to sites being left undeveloped or delivering much lower levels of housing.

**Infrastructure**

18. What are the key infrastructure priorities that need to be delivered and how can they best be delivered?

1. The key priorities will need to be identified by the Council working with the providers of those services. HBF note that the Council has specifically identified the issue of wastewater treatment and conveyance, and water supply as being of local concern. Firstly, the Council will need to consider whether any local concerns are shared by the Environment Agency and relevant water company operating in NFDC. It is only these stakeholders that can determine whether there is sufficient capacity in the wastewater and water supply network to meet the future needs of NFDC. What the Council cannot do is leave such matters to the development management process by requiring capacity of the network as whole in NFDC to be considered on a case-by-case basis. While local the capacity of the network within the vicinity of a development may be a consideration this must only be with regard to the need for localised improvements to support specific development rather than wider network capacity issues which must be addressed through plan making.

*19. What do you think are the key considerations for increased electricity generation from renewable sources in the* *New Forest (outside the national park), such as onshore wind or solar power?*

1. No comment.

*20. Do you have any suggestions for incorporating art and culture into our Local Plan?*

1. No comment.

**Health and wellbeing**

*21: Do you agree with the description of issues regarding health and wellbeing, and are there other issues to consider?*

1. No comment

*22: What options do you think should be followed for addressing health and wellbeing?*

1. To effectively consider health issues the Council will need to undertake a Health Impact Assessment (HIA) as part of the plan preparation. The HIA will enable the Council to properly examine the key health and well-being concerns of the area and then ensure these are reflected within the local plan and that development will support the delivery of improved health outcomes for the area as whole.

**Design and Place Making**

*23. Are we identifying the correct principles for creating a place people want to live and work, or are there any other principles that need to be considered?*

1. The key principles proposed by the Council in paragraph 86 are reasonable ones on which to ensure well-designed high-quality places and communities.

*24. Should we seek to set a policy for the size of houses and gardens that are different from those set nationally?*

1. No. The optional space standard is set out in Planning Practice Guidance. Where justification is provided to show that these are necessary then they can be applied, (subject to viability considerations) but it would not be consistent with national policy and guidance to apply an alternative standard to those set out in PPG.

**Climate change**

*Q25. How do you think we should work towards achieving net zero?*

1. Whilst the HBF would agree with the Councils that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that the Future Homes Standard (FHS) is expected to implemented in the near future. This national standard will mean that all homes will emit no carbon once the national grid decarbonises. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building standards are actually deliverable from the point at which they are introduced.
2. The concerns as to the deliverability of alternative ad hoc local standards are reflected in the Written Ministerial Statement from 2023, which remains relevant planning guidance. The WMS notes for example that “*Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes*” and that local standards can “*add further costs to building new homes by adding complexity and undermining economies of scale*”. After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:
* That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
* The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).
1. Therefore, whilst HBF considers the most effective approach to reducing carbon emission for new homes, whilst maintaining the delivery of those homes, is through building regulations, if the Council chooses to require a higher standards it must ensure that development not only remains viable but that the approach chosen will not impact on delivery. It must be able to show that there are the requisite skills in the labour market and supply chains in place for key products to ensure that delivery of new homes in the short and medium term is not affected. It will also be necessary to ensure that any standard, should the council choose to implement a higher standard, is based on building regulations and measured through SAP and not an alternative assessment procedure.

**Natural Environment**

*30. What should be our approach to ensuring that people do not harm the particularly environmentally sensitive parts of the New Forest? For example, additional rangers, considering providing a new country park or new more local areas of accessible green space.*

1. The HBF does not support anything that will require development to provide further costs to address the recreational impacts on sensitive areas of the New Forest. House builders are already contributing significant sums to address this issue, much of which is not caused by new housing given that many of those moving to new homes will already live in the area.

*31. What are the key mechanisms we should use to achieve benefits for the environment? How can this be measured?*

1. The legal requirement for development to deliver 10% net gain in biodiversity will ensure new development delivers benefits to the natural environment in NFDC. However, in order to maximise these HBF would suggest that the Local Nature Recovery Strategy is used to co-ordinate the delivery of offsite net gains to those locations that can provide greatest benefits. In particular it would help smaller sites which would on their own deliver small pockets of habitats into larger areas of new habitat that would have a wider range of environmental benefits. It may also be possible to use the same land to provide accessible green spaces for local people that can be sued to address the issue of recreation impacts. The stacking of credits in this manner the Council would be able to not only improve biodiversity increase accessible open space but also limit harms to more sensitive parts of the NFNP.
2. However, the LNRS should not be used to restrict development or to limit the requirements of the BNG and metric being met. As the LNRS emerges it will be important for this Local Plan to be kept under review and further public consultation on the interaction between the two documents and/or changes to Local Plan policy and/or its implementation, to reflect the LNRS may be needed. The Government recently published additional Guidance on how Local Nature Recovery Strategies should be integrated with/feed into Local Plan Making. We would encourage the Council to review the new guidance and fully consider its implications for this Plan.

*32. How should we introduce biodiversity net gain targets above the mandated 10%?*

1. The Council should not look to introduce a BNG target above the mandatory 10%. HBF do not agree that minimum biodiversity net gain (BNG) should be more than that required by the Environment Act 2021, and could not find any justification for requiring a 20% net gain in biodiversity
2. In considering the soundness of this policy it is necessary to take account of paragraph 74-006-20240214 of PPG which states that:

“*… plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented*”.

1. This indicates that the starting point is that local plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. As such there must be a very clear and robust justification that the area is significantly worse off with regard to biodiversity decline than a country as whole and that this decline is directly related to the new development rather than, for example, the result of changes in agricultural practices or industrial pollution. It is not sufficiently robust to highlight declines in species that whilst an important issue is not necessarily as a result of new homes being built.
2. In addition, there is still significant uncertainty as to the impact of BNG on the viability of development. While some sites will be able to deliver 10% BNG relatively simply on other sites it will be difficult to deliver on site and potentially require expensive off-site provision. The Council has not yet updated its viability evidence. Alongside other costs it will be necessary to ensure that the cost of delivering BNG is properly assessed. At present many viability assessments rely on DEFRA’s Impact assessment form 2019, which in turn relies on some costs from 2017. Not only is it dated but it is also very general in its assumptions and costs, lacking the necessary robustness to accurately reflect the actual cost of delivering BNG. The Council will therefore need to use up to date evidence as to the cost of delivering BNG both on and off-site. In particular the council will need to ensure that more detailed assessment is made as to what is required on allocated sites to ensure that expectations with regard to BNG and the delivery of new homes can be achieved.
3. Given that a 10% net gain will ensure that all new development makes an improvement to the environment and there are still significant uncertainties as to the cost of delivering even 10% BNG, HBF sees no justification as to why development should deliver more than is required by legislation.

*33. How can we make green spaces more accessible? Should we include minimum standards of access to green space* *(for example, by size and type)?*

1. While access to green spaces is important, any standard will need to be based on a robust evidence as to any deficiencies in the area and what is actually needed.

*34. How should we look to address the issue of backup grazing land? If so, what evidence is there to inform future* *considerations?*

1. No comment.

**Green Belt**

*35. How should our previous Green Belt study be updated and what factors should be considered?*

1. The key steps in undertaking a Green Belt assessment are set out in paragraph 64-003 of PPG and the Council’s current study has followed a broadly similar approach. However, the study is now nearly ten years old, and the Council will need to revisit the study to take account of national policy and in particular to identify parcels of grey belt within the Green Belt. It is noted that neighbours BCP and Dorset have jointly commissioned a Green Belt Study and a coordinated approach with this would seem sensible. In order to ensure the Green Belt study is robust the Council will need to:
* consider whether parcel boundaries should be amended to take account of changes in use and development that have occurred since 2016.
* consider whether the parcels are sufficiently fine grained to enable assessment as to the variable contribution land might make to the purpose of Green Belt, particularly in assessing whether land should be defined as grey belt.
* change the five-tier assessment scale to the three-tier scale set out in PPG.
* make an assessment of each parcel as to whether land could be defined as grey belt.
* reconsider the degree to which purposes D is relevant in NFDC. Whilst Ringwood and Lymington have historic cores, their relation to the surrounding area is limited and HBF considers little weight should be attached to purpose D.
* ensure that the separation of villages and towns is not a factor in the assessment of purpose B. The current Green Belt study recognises that with regard to purpose B the NPPF only refers to the merger of towns but then states that the perceived gap can be affected by smaller settlements. However, the latest guidance in PPG is clear that the merger relates to towns and not villages and as such the separation between towns and villages should not form part of the assessment of purpose D. HBF would also suggest that the study avoids considering the perceived gap between towns rather than the actual visual separation between towns as stated in PPG.

*36. Are there current Green Belt sites that you feel have the potential for more positive uses?*

1. No comment.

**Strategic Development Locations**

*37. Do you have any views on what the approach should be to existing site allocations that have not yet come forward or progress has stalled?*

1. The Council will need to discuss with the landowner why some sites have stalled or not come forward as expected following allocation and identify what changes might be required to policies to ensure those sites can be developed. Delays could be due to a range of reasons and any decision as to the future of an allocation must be based on a full understanding of the situation relating to that site. The Council will also need to be open to amending the policy requirement for a site to support its delivery where viability of development is being compromised by planning policy.
2. However, the reason why a site has not come forward as expected is often simply that the initial timelines for delivery are overly optimistic. Whilst all parties might be keen to ensure development comes forward quickly the Council must ensure that these timelines are realistic. Too often Councils look to optimistic delivery timescale as a way of reducing the number of sites required to meet development needs rather than allocating small and medium sized sites to come forward early in the plan period with the expectation that larger, more complex sites being delivered toward the end of the plan period and beyond. It might therefore by necessary, following discussion with the landowner to push back the delivery expectations on some sites.

*38. Are there further sites for any type of development that we should consider?*

1. HBF does not promote development sites.

**Future Engagement**

1. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider housebuilding industry.
2. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

**Mark Behrendt**

**Regional Planning Manager – SE and E**

Email: mark.behrendt@hbf.co.uk

Phone: 0786741554