

SENT BY EMAIL
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20/03/2026

Dear Sir/ Madam

NEW FOREST LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on 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.

Draft National Planning Policy Framework

3. HBF recognise the draft NPPF will have no weight until it is formally adopted. However, consideration will need to be given as to how the new NPPF, when it is published later this year, impacts on the soundness of policies in the local plan.
4. On the basis of paragraph 4 and 8 in Annex A of the draft NPPF this local plan, which the Council propose to submit under the current plan making process, will be examined under the NPPF24. However, it is also notable that in relation to decision making Annex A also states that from the date the new NPPF is published local plan policies that are "...any way inconsistent with national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework". Therefore, should this new iteration of the NPPF be adopted unchanged the Council will need to have regard to national policies for decision making given that any inconsistency would effectively render many of the development management policies proposed in this consultation that are not consistent with the new Framework redundant as soon as the local plan is adopted.
5. It is clear from the draft NPPF, and the decision to establish national policies for decision making, that the Government are seeking to limit the number of development management policies in local plans that seek to gold plate policies and go beyond national standards which place significant burdens on applicants as well as their own officers. As such, when the final version of the NPPF is published it is HBF's contention that any policies which are inconsistent with the new framework should be deleted in order to avoid unnecessary and length discussions on an application by application basis as to the weight that should be attached to the policies in the adopted local plan.

Duty to Co-operate.

6. The publication of the Housing and Planning Minister's Written Ministerial Statement on Reforming Local Plan Making published on the 27th of November states that the Government has decided not to save the Duty to Co-operate. The relevant statute has now been laid before parliament and once these regulations come into force local planning authorities will no longer be under a legal duty to co-operate.
7. While the legal duty to co-operate will therefore not apply to this local plan this does not remove the requirement in the NPPF that in order to be considered sound a local plan must be "based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground". The only difference arising from the removal of the duty is that a failure to co-operate effectively is a soundness matter. Given that the Council anticipates that there will be unmet needs arising from this plan, the Council will need to be able to show that it has been proactive in its efforts to ensure these needs are met elsewhere.

Draft vision and plan objectives

Q2: Do you think we have chosen the right priorities for the plan?

8. While the broad thrust of the priorities is reasonable, HBF would suggest that some of the objectives should be amended to reflect current a future planning policy. The first bullet point under 'People' references the delivery of affordable and accessible housing for all generations but does not take an active stance that the Council will seek to boost the supply of homes in order to achieve this objective. Making this an active statement as to the Council's intention to increase supply would align better with paragraph 61 of the NPPF.
9. HBF would also suggest an amendment is needed to the first bullet point under 'Climate and Nature'. This objective refers to policies promoting energy efficient buildings. As we will come to later on in this response the draft NPPF sets out that in PM13 that council's should not cover matters relating to construction or internal layout of building aside from space standards, water efficiency and accessibility. In order to align with this position HBF would recommend that this objective is amended to:

"Support meeting the national target of net zero carbon by 2050, by promoting sustainable patterns of development and the delivery of renewable energy generation, and low-carbon infrastructure."

Q4) Protected nature areas, Green Belt, flood risk, and National Landscapes all help shape decisions about development. How should decisions the Local Plan balance these factors when deciding where and how much new building should happen?

10. Decisions as to the balance between development and protected areas, Green Belt, national landscapes etc. should be based on national policy. In particular paragraph 11 of the NPPF will need to be taken into account and the need to meet needs in full unless the policies in the framework provide a strong reason for not doing so. The decision making with regard to each of the protected areas or policy designations will vary according to those policies. For example, there is far more scope for the Council to amend Green Belt boundaries or mitigate

flood risk in order to meet development needs than there is to place development in National Landscapes or other legally defined protected areas.

11. In particular the Council should not be confusing concepts that seek to preserve protected landscapes with the objectives of Green Belt and any decisions making relating to the amendment of green belt boundaries. As the Council recognise later on in the consultation document the fact that they cannot meet identified development needs in full is considered to be an exceptional circumstance that justifies reviewing and amending green belt boundaries. This should only prevent the Council from meeting needs in full where this would fundamentally undermine the purposes of the Green Belt across the plan area. This is a very different consideration to National Landscapes, for example where the Framework states that great weight should be given to conserving and enhancing their landscape.
12. However, that is not to say that development in the National Landscape should not be supported. There will be opportunities for development in those areas where these are sensitive to their location and designed to avoid or minimise adverse impacts. While NPPF states that the scale and extent of development should be limited it does not place a size threshold on sites that can be permitted. As such when considering development in the National Landscape HBF would suggest that bullet point 7 in the suggested policy is amended to “*are of an appropriate scale for the area and public interest can be clearly demonstrated, in accordance with national policy*”.

Housing need and requirement

13. HBF agree with the assessment of housing needs as calculated using the standard method. As set out in the NPPF this is the minimum number of homes the Council should be planning to deliver. However, the NPPF recognises that in some circumstances it may not be possible for an area to meet these needs in full. The Council consider this to be situation for the district, stating that if all suitable and available sites are delivered there would be a shortfall of 8,910 homes. If it is not possible to meet needs in full the Council will need to show that it has left no stone unturned in identifying sites for development and looked to maximise the number of homes that can be delivered on each site.
14. Where there are unmet needs, the Council must work proactively with neighbouring areas to secure the delivery of homes elsewhere to meet these needs. This may require the Council to challenge its neighbours through the plan making system where they do not consider their neighbours to have acted positively in seeking to increase supply in response to their requests for support on this strategic matter. While this is no longer a legal requirement following the removal of the duty to co-operate it remains a key test of soundness and one that can now be addressed by planning inspectors through the examination of the local plan.

Sustainable Spatial Strategy

6) Do you agree with the broad spatial options for distributing and accommodating development growth within the plan area?

15. The broad spatial options for delivering and distributing growth are considered to be reasonable and cover a range of options for delivering development. However, what is clear from the evidence set out in consultation document is that at present development from each of these options would still lead to a shortfall meeting housing needs. As such the Council will need ensure that it maximises development through each of these options to try and meet housing needs in full. One approach that does not appear to have been considered is whether there are opportunities to support development that would increase the services of a particular settlement so that it becomes a higher tier settlement within the spatial strategy. At present the approach taken by the Council is to support development that is commensurate to that settlement. This will inevitably limit development opportunities. However, if the Council decided to try and grow some settlements, where appropriate, to increase the number classified as towns or larger villages than this would deliver more scope for allocating sites alongside the delivery of improved services that are beneficial to existing communities and the long term sustainability of those settlements.

7) Do you agree with the approach taken to our spatial development strategy?

16. The Council state that the preferred approach to the spatial development strategy is still to be decided and as such it is not possible to either agree or disagree. As to the broad principles articulated the policy these are broadly reasonable. However, the fifth bullet point states that homes, jobs and services must be close together. This is overly restrictive as an approach. While there might be an objective that new homes are accessible to employment opportunities and services via sustainable modes of transport there is no need for them to be close. It is also unclear as to how the Council would define close.

8) It is likely that a combination of options will be needed to meet local housing needs. What combination do you think is the most appropriate and why?

17. The Council will need to maximise delivery using all the proposed options. In addition, they will need to consider whether smaller settlements could be grown to fulfil the functions of settlements further up the settlement hierarchy.

9) Do you agree with our proposed approach to the settlement hierarchy?

18. HBF note that the settlement hierarchy is being reviewed. It will be important that the Council has a clear understanding of the service available in each settlement and where necessary they should amend the tier in which a settlement exists should services have improved. The Council should also consider how cluster of smaller settlements may operate in tandem to provide a range of services and whether these could support higher levels of development. As we have previously stated the Council should also consider where services could be improved in smaller towns and villages in order to facilitate that settlement moving up the hierarchy, increasing its long term sustainability and its ability to support higher levels of development.

10) What are your views on the potential approach to defined built-up areas and development in the countryside?

19. The proposed approach with regard to development outside the defined built up area is too rigid and does not offer the flexibility to decision makers to support sustainable development opportunities on the edge of settlements that may not have been available at the point at which the plan was being prepared. This is particularly important in areas where needs are not being met in full as the Council must be looking to maximise the delivery of sustainable development where ever possible. The Council state in paragraph 156 that a more flexible approach is not considered to be reasonable as it would result in a higher risk of unacceptable harm. HBF would disagree. It is possible for policies to be written in a manner that provide flexibility to allow the decision maker to support development whilst also considering other policies in the plan and any significant harm arising from such development that outweighs its benefits. The use of hard settlement boundaries in decision making would prevent any such consideration.

Strategic Development Growth Options

11. Do you agree with the potential Strategic Development Growth Options (SDGOs) we are considering as options? Please explain your reason and note which of the SDGO area(s) you are commenting on specifically.

20. HBF does not comment on specific sites. However, in consider development opportunities the Council must ensure that its over arching aim is to meet development needs in full, and that this is achieved by allocating a wide range of sites, both in terms of location and size. In allocating a diversity of sites the Council will be supporting a mix of housing and support a diversity of provider that will allow for sustained delivery across the plan period.
21. The Council will also need to consider paragraph 73 the NPPF and the requirement that at least 10% of homes come forward on identified sites that are no larger than one hectare. In meeting this requirement these homes must be on identified sites – either as an allocation in the local plan or as a site in the Council’s Brownfield Register. This cannot include windfall development which is defined in the NPPF Glossary as “*Sites not specifically identified in the development plan*”.
22. In meeting this requirement of national policy the Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there were 20 years ago and that of a survey of SME house builders 93% said that planning was a major barrier to SME growth. Whilst this decline is due to a range of factors, more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.

Homes for all

13) What are your views on our approach to providing homes for all?

23. The proposed policy on housing mix needs is too prescriptive. When developing policies in mix it must be recognised that that assessment of needs provides a broad assessment of type of housing that is required across the district from all sites. It is not an assessment as to what every site needs to provide. On larger sites it is reasonable to use this assessment as the starting point for any consideration as to the mix of homes to be provided. However, on smaller sites the type of home that is to be provided should reflect the demands of the local market rather than the estimated district wide mix. This concern is also recognised by the Council in paragraph 201. Therefore, it is the HBF's position that the policy should not apply to small and medium sized that are less able to deliver a mix of homes as prescribed by the Council. These sites must be allowed respond to the demands of the market in that local area rather than a prescribed mix based on district wide aspirations. HBF would therefore suggest that as a minimum the policy only applies to developments of 50 homes or more.
24. HBF would also recommend that the first bullet point is amended to state: "*a mix of homes by size, type and tenure which ~~reflects~~ has had regard to the needs identified by best available local evidence*". This ensure the mix is not set outside of the plan and allows decision makers and applicants to agree a mix best suited for the area and that site. This amendment would also ensure the policy is consistent with the council's stated approach as set out in paragraph 200, which is not to set a prescriptive policy.

14) Do you agree that the Local Plan should provide a mix of homes, including affordable ones for younger people, and more options for older residents and people with additional needs, including those with disabilities

25. The HBF agrees that the local plan should provide a mix of homes as required by the NPPF. However, the ability of development to provide a mix of housing types and tenures will be dictated by viability. The Council are currently in the process of preparing a whole plan viability study and has not set out any specific requirements in relation to affordable housing for example. Without a policy it not possible to provide any comments on its soundness. However, in developing this policy the Council will need to have careful considerations as to the viability of development moving forward and ensure the costs in the viability study are accurate. The costs faced by new development are increasing rapidly. These include costs imposed by national policy such as the Future Homes Standard, changes to water efficiency standards, the Building Safety Levy and 10% Biodiversity Net Gain as well as the increasing costs of materials and labour will all add significantly to the cost of building new homes in future. In addition to this the cost of meeting the policies in this local plan will have a significant impact on the ability of development to deliver affordable housing. For example, the Council are proposing higher energy efficiency standards that will increase build costs by between 15 and 20% above current regulations. All these additional costs could impact on development ability to deliver affordable housing, and the Council will need to recognise this and decide clearly what its priorities are if the plan is to remain deliverable.

15) Should our affordable housing targets be the same throughout our plan area or vary by location or size of site?

26. The affordable housing targets in the local plan should reflect the viability of development in different locations. NPPF is clear in paragraph 58 that a decision maker should be able to assume that development that meets all

the policy costs is viable. PPG also establishes in paragraph 10-002 policy requirements, particularly for affordable housing, should be set at a level that does not result in the need for further viability assessment at the decision making stage. As such if there are certain areas or types of site where the evidence shows that a lower level of affordable housing is required to ensure that development remains deliverable then the policy should reflect this.

27. However, this does not only apply to areas or sites but also types of development. For example, the viability of the development of older persons housing (including extra care schemes) is particularly challenging. There are a number of reasons for this including: less efficient net to gross ratios than general purpose housing; the inclusion of extensive communal areas, providing care and other ancillary uses; different net to gross ratios, typically of 70% compared with 85% for low rise general purpose flatted blocks; specialist housing developments for older people tend to have longer sales periods, as purchasers prefer to view the flat they intend to buy which results in very little off-plan buying during construction; and sales and marketing budgets are typically higher as a result of the lengthier sales period. Therefore, where there is evidence that different type of development are also unviable, then this should also be reflected the Council's policy to avoid site by site viability assessments.

Protecting the Natural Environment

21) What are your views on the proposed approach to BNG? Should the Local Plan encourage developers to exceed the statutory 10% BNG requirement?

28. As the requirement to deliver 10% BNG is statutory with a significant amount of guidance supporting its application HBF does not consider it to be necessary to include a policy that simply reiterates this.
29. However, if a policy is to be included it council should refrain from stating how and where offsite gains should be delivered. If development cannot meet net gains on site national policy does not establish where this should be provided. The metric encourages provision as close as possible to the site through the spatial risk multiplier which increase the number of units to be provided the further, they are delivered from the site. As such it is more important for Council and its partners to identify sufficient land within the District to meet the need for offsite BNG credits rather than simply setting out in policy that they expect credits to be delivered near the development.
30. HBF does not consider it necessary to encourage development to deliver beyond 10%. The Government have established 10% as a minimum statutory requirement and as such it is unnecessary to require more and decision makers should not perceive a development providing 10% as in any way lesser in planning terms than one that delivers more than the statutory requirement.

22) Should we include a separate policy on rivers and watercourses to address the impacts of development on nutrient neutrality, pollution control and surface water runoff? Is there anything specific you would want to see included within this policy?

31. In considering such a policy the Council will have to ensure that it does not seek to address issues that are covered by other statutory regimes. Paragraph 201 of the NPPF is clear that focus of local planning policy should be on whether proposed development is acceptable in land use terms rather than the control of process or emissions. The NPPF goes on to state that planning decisions should assume that these regimes operate effectively.

26) How can we better manage visitor pressure on sensitive areas in and around the New Forest?

32. Councils are increasingly placing the responsibility of developers to offset visitor impacts on sensitive areas whilst simultaneously encouraging more people to visit national parks and the national landscape. If the Council and National Park were serious about preventing harm, then they should seek to prevent access to the most sensitive areas by closing off access and significantly reducing the number of parking spaces and then increasing the cost of parking in those sensitive areas.

The Green Belt

27) To meet future housing needs, the Council may need to review the current extent of the Green Belt. Are you satisfied that the Council has considered all reasonable options for meeting local housing need, before it considers releasing land from the Green Belt for development?

33. From the evidence presented by the Council it is clearly the case that it cannot meet housing needs without amending green belt boundaries and as such there are the exceptional circumstances required to do so.

28) Do you have any comments about how grey belt has been assessed in our Green Belt Study (Part 1)?

34. In general, the approach taken by the Council in assessing grey belt is consistent with NPPF. However, there are aspects of the assessment relating to purpose b that HBF do not consider to be consistent with national policy. In assessing purpose b, the Council state that the loss of visual separation between towns would result in the parcel being considered to be making a strong contribution to this purpose. However, purpose b does not refer to visual separation, it is simply seeking to prevent the merger of towns into one another. While the loss of visual separation may be considered to have some impact on this purpose it should be considered moderate not strong. The Council will need to ensure that its assessment of grey belt does not place significant weight on the visual separation when considering purpose b.

29) Do you have any comments on how we have applied the outputs of this assessment to the relevant housing options in the Plan Area?

35. HBF does not comment on site specific matters.

30) Do you think that applying national planning policies that protect important natural/semi-natural areas, like national parks, nature conservation sites, or places with special environmental or heritage value, could prevent or limit development in the District?

36. The application of policies that protect areas of land scape or environmental value in the NPPF may limit the amount of development that comes forward in the district. As such it will be essential that all opportunities for development in areas that are not protected by these designations are taken forward.

High Quality Design, Landscape and Placemaking

31) Do you agree with our approach to design and creating attractive places?

37. HBF recognises the importance of ensuring development is of a good quality and that it contributes rather than detracts from local distinctiveness. However, HBF has some concerns about the approach being taken. Firstly, HBF could not find any evidence supporting the need for space standards. This will need to be rectified if space standards are to be included. Secondly part f refers to design measures that enhance resource efficiency and energy performance as well as the use of greywater recycling. In referring to design and energy performance the council must ensure that this relates to the orientation and layout of buildings rather than the construction or internal layout of buildings. As set out earlier policy PM13 of the draft NPPF seeks to limit the degree to which local plans can setting technical standards and this must be taken in to account moving forward.
38. The Council should also not be requiring grey water recycling. Firstly, the use of site wide water re-use isn't currently legal. Was part of the review of Part G of the building regulations on water efficiency there was a call for evidence within the consultation paper to look at Water Re-use. This outlines that any change in the approach would require legislative change via S68 of the WIA 1991 and Regulation 4 of the Water Supply regulations (Water Quality) in order to introduce uncleaned, unchlorinated water into a domestic residence. While it is possible to have a private domestic water re-use pump within the actual home itself there are still some concerns as to the legal implications of using re-claimed water for domestic purposes. These concerns are reflected in the 'Water Ready' report¹ by the Future Homes Hub which notes in relation to water reuse systems that:

“... if they are not well designed and identified, they do increase the risk of cross contamination. There is therefore a need for a clearly defined standard approach to cover items such as layout options, differing pipework sizes or other mechanisms to readily identify these and prevent cross connections and materials; before any such systems can be mandated.”

39. HBF suggests that until there is clarity as to the legal position on such matters and that there are clear national standards and guidance for installation on going stewardship/ maintenance the Council should not be seeking to require greywater recycling systems within the home.

33) Should we allow higher-density housing in some areas?

40. The Council will need to consider where higher density development is appropriate taking into account of paragraph 129 of the NPPF.

¹ <https://www.futurehomes.org.uk/future-homes-hub-water-efficiency-report>

35) Should the Local Plan set minimum space standards for new homes? If yes, what should this be and should there be exceptions?

41. If the Council are to include spacer standard in the local plan, they will need to ensure that these are justified on the basis of need and viability as set out in paragraph 56-020 of PPG.

37) How important is it to include parks, trees, and water features in new developments?

42. While it is important to provide open spaces and trees within new developments, any requirements must be proportionate to the site and not compromise the capacity and viability of a development to deliver much need new homes.

Climate Change and Environmental Risks

38) Do you agree with our policy approaches for climate change? Is there anything else you would like to see considered here?

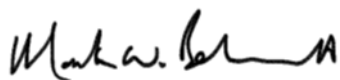
43. HBF does not agree with the approach to energy efficiency suggested by paragraph 424 of the consultation document. Such a policy is unnecessary as the Future Homes Standard will ensure that all new homes built in future will be zero carbon ready and produce direct new CO2 emissions. Once the grid decarbonises in line with national commitments then these homes will be zero carbon. As set out earlier it is also the case that such policies that seek to set technical standards with regard to the construction of new homes will also be inconsistent with policy PM13 in the draft NPPF.

Future Engagement

44. 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.

45. 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,



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