

**Place, Operations & Sustainability**

Strategic Director: James Carpenter

**Matthew Pennycook MP, Minister of State**  
2 Marsham Street,  
London,  
SW1P 4DF

My Ref: Planning Reforms  
Your Ref:

31 December 2024

Sent by email to:

[PSMatthewPennycook@communities.gov.uk](mailto:PSMatthewPennycook@communities.gov.uk)

Dear Mr Pennycook

**RE: Implications of the National Planning Policy Framework on the New Forest area.**

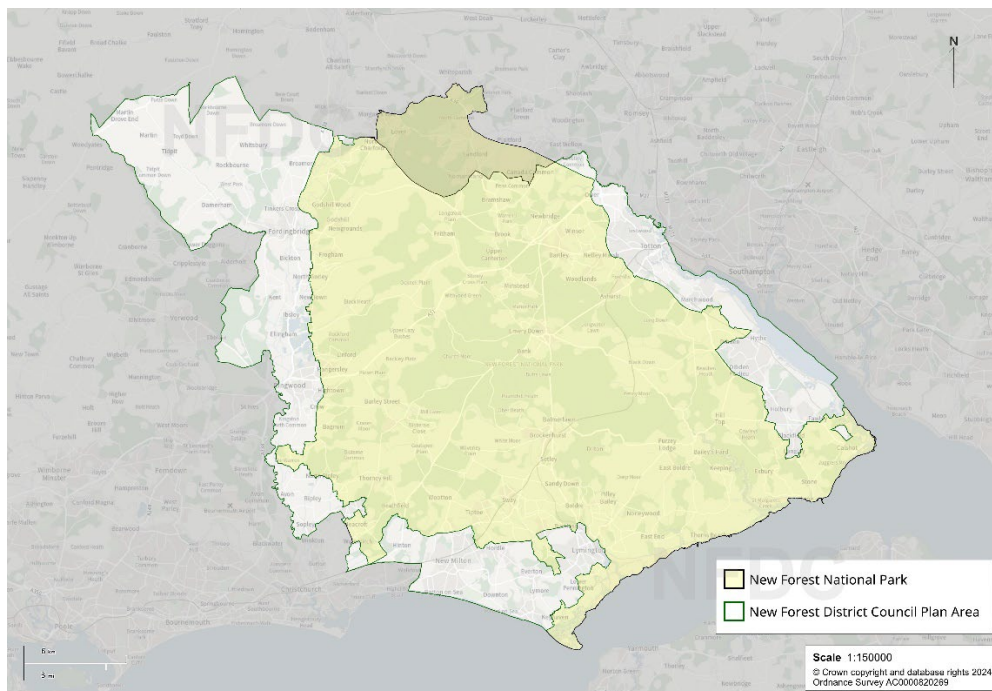
I am writing as the Cabinet Member for **Planning and Economy** on behalf of New Forest District Council regarding the recently revised National Planning Policy Framework (NPPF), which is aimed at significantly increasing housebuilding across the country. I am also mindful of the recently published White Paper on English Devolution.

I fully acknowledge and embrace the need for a significant increase in the delivery of housing growth across the country, and the benefits this is likely to have in the growth of the economy. However, I am also conscious that not all areas are equal in what they are able to deliver. The New Forest is an area with distinct environmental protections, together with its internationally important landscape and special habitats that all require careful stewardship, alongside ensuring every opportunity is taken to deliver new housing to meet needs.

This Council provided a response to the consultation which closed on 24 September 2024 which is available to view directly at: [Response to National Planning Policy Framework consultation - New Forest District Council](#)

Having reviewed the new NPPF and the accompanying response provided by the government to the issues raised in the consultation, I wanted to share our concerns with you on the implications this may have on the unique and highly protected areas that the New Forest in its totality represents, and the ability for the District Council, which is the Local Planning Authority **only** for that part of the New Forest District outside of the National Park, to expediently progress preparing a sound Local Plan. A map illustrating the relationship of the National Park to the District Council's Plan Area is provided below for your information.

Figure 1 - Relationship of New Forest District Plan Area to National Park



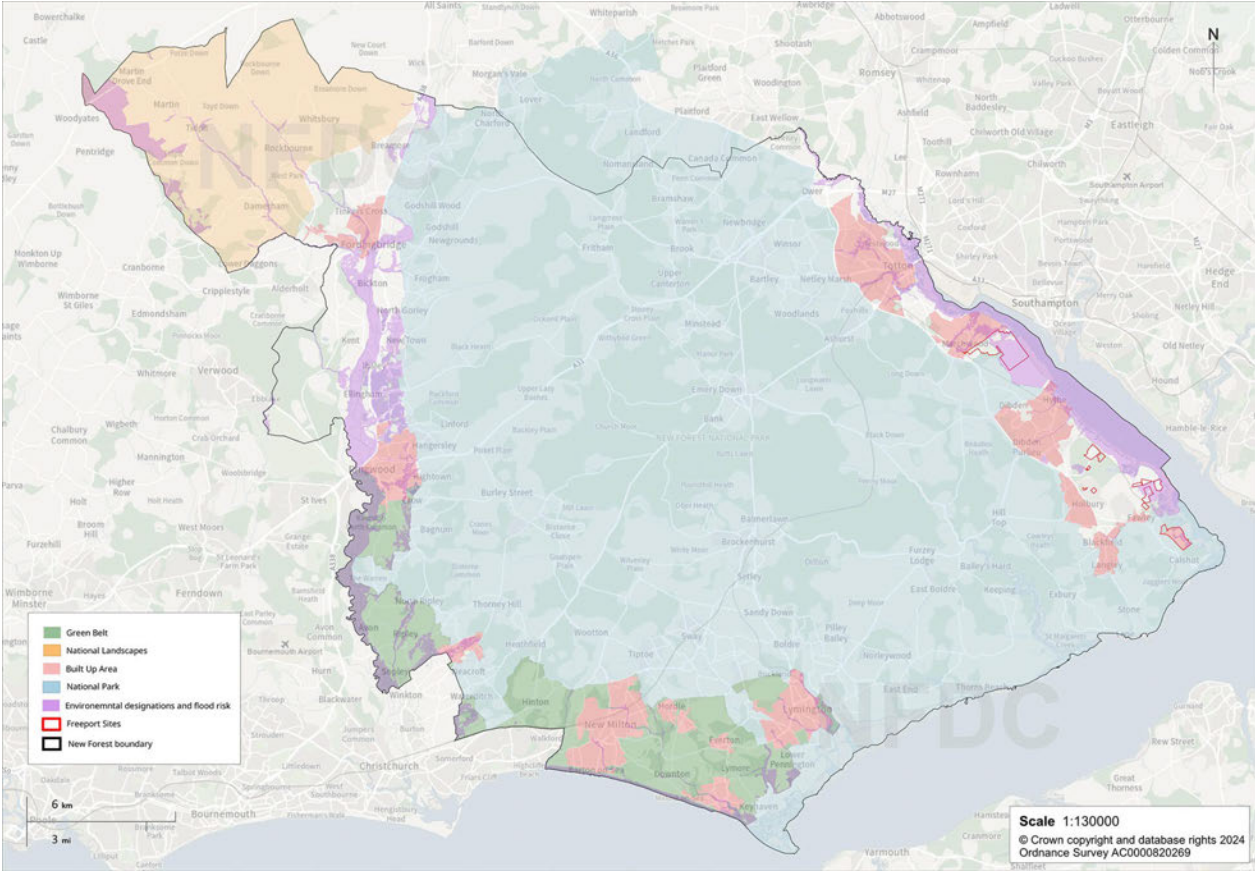
It is far from clear how the NPPF has taken into account the statutory duty for all public bodies to further the purposes of the New Forest National Park in considering the consequential short, medium and long term implications arising. I am sure our colleagues at the National Park will have their own views on that also.

Is your government's view that notwithstanding this duty, National Parks should now be making significant contributions to the delivery of housing needs arising in the districts that they are located. I would be grateful to receive your express view either way.

In responding to that point, you will no doubt be aware the Government published updated guidance on the application of the legal duty introduced through Section 245 of the Levelling Up & Regeneration Act 2023 on 16 December 2024 – see [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#). This government guidance confirms that 'relevant bodies' - including government departments and local planning authorities - will need to apply the duty when preparing Development Plan documents and making development management decisions.

It is now unclear how the District Council and other planning authorities neighbouring the New Forest National Park can expediently discharge their legal duty to further the National Park purposes in the face of such significant increases in housing need given to us through the government's standard methodology. As I'm sure you are aware, and as illustrated on the map below, the areas in New Forest District **outside** of the National Park are also significantly constrained by designations recognised in the NPPF, with other land outside of these areas already developed or subject to more localised constraints (e.g. buffers to an oil refinery & coastal erosion)

Figure 2 - Nationally set environmental, landscape & policy designations and built up areas in New Forest District Plan Area



This Council is already reviewing its Local Plan, well ahead of the required five-year period, to address challenges in delivering growth in its currently adopted plan. However, the revised NPPF risks undermining this plan-led approach by heavily favouring speculative housing delivery in the short term. This shift raises concerns about the delivery of required supporting infrastructure and the ability to achieve coordinated development and economic growth in a planned and comprehensive way.

In light of the above, there will be significant difficulty in meeting the revised housing target of 1,501 new homes per year in the New Forest, this is a figure that is over six times the recent average of 246 homes delivered annually. Despite having a Local Plan in place, the Council has never been close to this figure in previous local plans with housing requirements set following detailed assessments of capacity and fully tested at independent examination, taking account of the numerous and unique environmental designations and constraints of the area. The Council is also mindful of the recent requests from two neighbouring coastal authorities to accommodate their existing unmet housing needs, highlighting a broader challenge for the government in directing housing growth to areas with capacity to accommodate development in a sustainable way.

Given the above, I am deeply concerned that these new national planning policies present a very confusing message to unique areas with such limitations, and opportunities (particularly for economic development) as the New Forest. I, therefore, would welcome a meeting at the earliest opportunity with yourself and officers to discuss our concerns in more detail to inform how my Council should respond in future plan-making.

Finally, I also note that the government is requesting that local planning authorities publish a timetable for Local Plan preparation through to proposed submission for examination. The Council published its most recent work programme ([Local Development Scheme](#)) in October 2024. This covers the period up to the publication and consultation on a full draft Local Plan (Regulation 18) which is envisaged in Autumn 25. At this stage, and given the increasing uncertainties as summarised above, I am not yet in a position to confirm plan-making timescales beyond the dates published.

Thank you for your attention to this matter. I look forward to meeting with you shortly.

Yours sincerely

**Cllr Derek Tipp**

Portfolio Holder for Planning and Economy

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**CC:** Caroline Nokes MP

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