

## **East Hampshire District Council's Response to New Forest District (outside the National Park) Local Plan Review Spatial Options and Policy Direction Regulation 18 Consultation**

### **Introduction and Duty to Cooperate**

East Hampshire District Council (EHDC) welcomes the opportunity to comment on the New Forest District Council Local Plan Review 2025-2043. We recognise the significant development constraints that continue to shape the District's capacity to meet its identified housing and employment needs.

### **Housing Need**

We understand the challenge that has been presented to New Forest District Council by the publication of the NPPF in December 2024, and the increase in housing number, as East Hampshire is in a similar position. As you have set out, New Forest's annual housing need has increased from 521 to 1,254 dwellings per year. In East Hampshire, we are having to respond to a 95% increase in housing number, to 1,124 per year.

Similar to that of East Hampshire, we recognise that 57% of the Plan Area falls within nationally protected or environmentally constrained land, such as land adjoining the New Forest National Park, Green Belt, international nature conservation designations and areas of Flood risk.

While we acknowledge New Forest District Council's view that the standard method figure is challenging to deliver due to land availability and constraints, we agree that it remains the starting point for plan-making. Any future housing requirement must be fully justified and evidenced to meet the tests of soundness as set out in paragraph 36 of the National Planning Policy Framework (NPPF). The consultation document acknowledges that even if every identified site were suitable and deliverable:

“there would still be a significant current projected shortfall of at least 8,910 dwellings.”

This demonstrates that the district cannot meet the Standard Method figure even under the most optimistic assumptions. The Local Plan should therefore work with neighbouring authorities under the Duty to Cooperate to address any unmet need.

Similarly, EHDC is preparing a new Local Plan, with Regulation 19 consultation scheduled for late summer 2026. We also acknowledge that the standard method is our starting point, and that we need to do everything we can to meet our housing need. In addition to our 95% increase in housing number, we are also facing

requests for assistance with large amounts of unmet housing needs from neighbouring authorities.

While Figure 2 illustrates the extent of designations that may constrain development, EHDC considers that these should not be treated as absolute barriers. Green Belt and National Landscape designations require careful and evidence based consideration, but they do not automatically preclude development where it can be justified. In circumstances of acute housing need and limited deliverable land, exceptional circumstances may warrant development in these areas. Higher density development should also be explored where appropriate, particularly in locations with good access to services and sustainable transport.

We note that the district's population is shrinking slightly and ageing rapidly, with 37% aged 60+ and a declining working age population. The evidence therefore points to a need for smaller homes, social rent, homes for younger adults, and accessible homes for older people. Meeting these needs does not require very high overall housing numbers. A more targeted approach — prioritising affordability, downsizing options and the right mix of homes — would better support balanced and sustainable communities. The priority should therefore be the type of homes delivered, not simply the total number.

Further re: types of homes, we acknowledge there is a need for Traveller accommodation. Akin to housing, every effort needs to be made to meet this need where possible, including exploring provision on large development sites.

## **Conclusion**

Thank you for the opportunity to comment on the Regulation 18 Consultation. There are many similarities between the challenges facing East Hampshire District Council and New Forest District Council in preparing a new Local Plan. Both authorities contain extensive National Park and both face significant increases in housing numbers under the Standard Method. We encourage New Forest District Council to not exclude development opportunities in constrained areas without careful assessment and evidence. There may be circumstances that warrant some form of development in these areas. We do however appreciate the challenges New Forest District Council is encountering in preparing its Local Plan and recognise the complexity of balancing housing need with substantial environmental constraints.

Please note that this response has been endorsed by Dawn Adey, Executive Director of Operations and Cllr Angela Glass, the portfolio Holder for Regulation and Enforcement.