

 NEW FOREST NATIONAL PARK	New Forest National Park Submission Draft Local Plan Regulation 19 Representation Form	Ref: (For official use only)
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The Regulation 19 consultation will run for six weeks from **Monday 17 August until Wednesday 30 September 2026**. You can return this form to the Planning Policy Team at the New Forest National Park Authority, Lymington Town Hall, Avenue Road, Lymington, SO41 9ZG.

Alternatively, you can send it to us via policy@newforestnpa.gov.uk

Please return this form to us by **5pm on Wednesday 30 September 2026**.

DATA PROTECTION

This stage of the consultation requires us to identify (by first and last names only) individuals who comment on the draft Local Plan. The lawful basis for this personal data processing is [Regulation 6\(1\)\(c\) of the UK General Data Protection Regulation \(GDPR\)](#) i.e. the processing is necessary to comply with a legal obligation. Any other personal data that you provide, such as telephone numbers, email or home addresses will not be published and will be redacted from public facing documents. The consultation responses will be retained for up to 6 months after the Local Plan is adopted, after which time they will be destroyed.

More details on how we process personal information can be found at: www.newforestnpa.gov.uk/privacyandcookies. Should you require any further information about how your details will be used or stored and/or would like to access any information we hold about you, please email our Information & Data Protection Officer at: dpo@newforestnpa.gov.uk.

Please note that all information held by public authorities is subject to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 and may be disclosed upon request if it is appropriate to do so.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	David	
Last Name	Rigby	
Job Title (where relevant)	Clerk to the Parish Council	
Organisation (where relevant)	Copythorne Parish Council	
Address Line 1	C/O 9 The Cleaves	
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Post Code	SO40 8WL	
Telephone Number	02381 120150	
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Part B – Please use a separate sheet for each representation

Name or Organisation: Copythorne Parish Council

1. To which part of the Local Plan does this representation relate?
Please mark the appropriate box below.

Paragraph Eg 4.1	☐	Policy Eg SP2	☒ Various policies	Policies Map	☐
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2. Do you consider the Local Plan is:

2.1 Legally compliant

Yes

☐

No

☒

2.2 Sound

Yes

☐

No

☒

Please tick as appropriate

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See attached document, providing the Parish Council's responses to each of the 66 policies within the Reg 19 Consultation document.

We are supportive of many of the policies; neutral regarding a number of others; and are against the following policies:-

SP6; SP8; SP12; DP26; SP29; SP39: SP42; SP43; and SP50

(Continue on a separate sheet /expand box if necessary.

Please provide a summary of any attachments, such as supplementary evidence, submitted alongside your representation.)

4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached document, providing the Parish Council's responses to each of the 66 policies within the Reg 19 Consultation document.

We are supportive of many; neutral regarding a number of others; and are against the following policies:-

SP6; SP8; SP12; DP26; SP29; SP39; SP42; SP43; and SP50

(Continue on a separate sheet /expand box if necessary. Please provide a summary of any attachments, such as supplementary evidence, submitted alongside your representation)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note: While this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To be able to expand – in particular - on the against responses.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

COPYTHORNE PARISH COUNCIL RESPONSE TO NFNPA LOCAL PLAN REVIEW – REG 19 CONSULTATION – SEPTEMBER 2026

POLICY	POLICY TITLE	RESPONSE	COMMENTS
SP1	Supporting sustainable development	SUPPORT	Is the transport strategy robust enough to support these ambitions? SP1 a) we support the improved public transport links. SP1 f) great to see climate change resilience being addressed. Need to guard against national policies and directives that are in opposition to principles but over-ride them, giving purely a “top down” approach. Support and improve local transport links, five working days, Saturdays too, Copythorne Parish only has limited buses two days a week currently. Traffic pollution an issue. Improve cycling/walking routes. We note the inclusion of a new paragraph 4.12 on the Waste Hierarchy which aligns with principles we support. We also note the required renumbering of the original paragraph 4.12 to be 4.13
DP2	General development principles	SUPPORT	Points (g) and (h) of this policy use the word unacceptable, a word that is not clearly defined and is open to interpretation. Point (i) Active travel can only be enabled with well maintained and safe pavements & cycle lanes. These are very worthy aims, but difficult to balance against the new developments proposed later in the document. How will developments be measured objectively against subjective aims? We note and support the broadening of the third paragraph of this policy to include supportive references to biodiversity; ecosystems; and socio-economic wellbeing. It is pleasing to see the new point c) includes comments on climate change, flood resistance and resilience. Also, the addition of “Building for a Healthy Life” & “Healthy Streets” under point j), along with point n) regarding the inclusion of sustainable drainage are all very welcome.

SP3	Spatial Strategy	SUPPORT	The differentiation between the existing “Defined Villages” (now called “Larger Defined Villages”) and the proposed “Defined Villages” (to be known as Smaller Defined Villages”) covered under paragraphs 4.20-4.22 is noted. We still have concerns about the reality of the availability of public transport as mentioned in paragraph 4.18 (para 4.15 in the Reg 18, Part 2 Review) and remain unconvinced as to how the strategic approach to “sustain and enhance the local services and facilities in the villages” will play out in this regard. Copythorne does not meet this policy in terms of public transport, walking or cycling focus to neighbouring Totton, Lyndhurst or Romsey for delivering new housing to help address local needs while at the same time ensuring development does not compromise the delivery of the two statutory National Park purposes – national planning policy recognises that national park authorities have an important role to play in delivering housing for local people within the context of a nationally protected landscape for example health appointments. We expect provision of enhanced local services and facilities to be spelt out. We need to see hard evidence of how this will be done in practice and who will pay. Saying “<i>Seeks to sustain and enhance local services and facilities in Bartley/Cadnam</i>” is simply not good enough. For example, we need an improved bus service (it currently only runs a limited service on two consecutive days a week), it needs to be spelt out exactly where the proposed walking and cycle paths going to run to and from (they need to link up to Totton and Lyndhurst), we have no doctors or dentists, we have very limited public sports facilities (a couple of cricket grounds), exactly what is being proposed? Comments related to the re-drawing of the boundary of “Cadnam and Bartley” are included in our response to DP28.
SP4	Major development in the National Park	SUPPORT	Maximising transport opportunities is essential when looking at major developments. In the parish of Copythorne we have the tourist attraction Paultons Park and are a gateway to the New Forest. As the park grows, it becomes more important that traffic management and public transport is addressed. Although I support this policy, I am bothered by the effect any large major urban development would have on a rural Parish like Copythorne. Regarding paragraph 4.33, this policy has a major impact for parishes such as Copythorne which has a major tourist attraction. In SP4, what national considerations would override the statutory purposes of the National Park? How big would the negative impact on the local economy override the first statutory purpose? In spite of what they are saying, when the New Forest National Park actually undertakes major developments, we remain firmly convinced that the detrimental effects cannot be truly be mitigated against (SP4 paragraphs c, d, & e refer).

SP5	Land to north of Fawley Waterside	SUPPORT	Although we are in support of this proposal, we have concerns regarding traffic congestion. Those concerns are that as the A326 gets more and more congested, drivers will be encouraged to take a detour through the minor roads within the National Park. We are also concerned that this is just Stage One in eventually developing the whole of the Waterside into one vast Freeport. Consider cycle and footpaths linking more hamlets across the areas for the workforce. We note the enhanced commentary regarding the level of remediation required (paras 4.39 and 4.40) and are pleased to see that the need to undertake this work are now included within this policy. Although the level of remediation required should not be underestimated. We ask that the need for improved transport links is reinforced, specifically the proposed A326 improvements, the Hythe Ferry and Waterside Rail links.
SP6	Infrastructure provision and developer contributions	AGAINST	For a Local Plan in a National Park, the December 2024 NPPF does not treat infrastructure provision as separate from the environmental and landscape constraints of the designation. The key issue is whether the Plan makes adequate provision for the infrastructure needed to support its development strategy, while ensuring that infrastructure is appropriately located, designed and delivered having regard to the National Park's special qualities. Paragraph 189 of the December 2024 NPPF is particularly important. It requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to those matters. It also requires great weight to be given to the conservation and enhancement of wildlife and cultural heritage in National Parks, while the scale and extent of development should be limited. Consequently, infrastructure requirements cannot simply be justified by reference to the needs arising from proposed development. The location, scale, design and environmental consequences of the infrastructure itself also need to be considered. Looking at Paragraph 4.48 within the Reg 19 Consultation document, should some of this detail be added to SP5 to ensure it is fully robust? Looking at Paragraph 4.50, can more information be provided on how the process will work with regard to the authority and interaction with local residents to determine the extent of new/improved infrastructure needs. The paragraphs (4.52 and 4.53) are welcomed as they go someway to adding more details about “cross authority involvement” in relation to mitigate the impact of development and improve infrastructure. We continue to have serious concerns regarding the last sentence of the policy <i>‘In implementing this policy regard will be had to economic viability considerations at the ‘site specific level’</i> which seems to indicate that a developer could make an argument that infrastructure improvements could be too costly to be carried out? Is this the case? If so, then surely if

			infrastructure improvements can't be delivered then the development shouldn't proceed, in practice we suggest it will probably make things worse not better (i.e. more development in a location but the same level of infrastructure).
SP7	Safeguarding and improving water resources	SUPPORT	Great to see the Race to Zero (paragraph 5.11) and climate change emergency (5.12) initiatives in the Plan. Agree with reducing the max allowable daily usage per person to 100 L/day. Broadly support this policy, however point e) the 100 litre usage, how can this be achieved and enforced? Is this applicable to all new homes regardless of size? Will there be an increase in water quality testing and daily usage monitoring? The inclusion of a preference for "Nature based SuDs" (point c of this policy) is also supported. It is pleasing to see that alongside the continued inclusion of para 5.18 and 5.19 related to SuDS, the additional para 5.20 builds on that. The statement that <i>"Development which does not implement SuDS or appropriate means of drainage will not be supported by the Authority"</i> is good to see. It is pleasing to see the addition of <i>"Where possible, natural flood management techniques should be explored and incorporated into development proposals"</i> to point a) of this policy. Protection of groundwater Source Protection Zones (point f) is also welcomed.
SP8	Flood Risk	AGAINST	Under the December 2024 NPPF, flood risk is addressed principally in paragraphs 170–182. For a Local Plan examination, the key point is that flood risk should influence where development is planned in the first place, rather than being treated solely as a matter of mitigation at the planning application stage. The starting point should be to avoid flood risk. Paragraph 170 of the December 2024 NPPF requires inappropriate development in areas at risk of flooding to be avoided by directing development away from areas at the highest risk, taking account of both existing and future flood risk. Where development is necessary in an area at risk, it should be made safe for its lifetime without increasing flood risk elsewhere. For plan-making, this means that flood risk is a spatial planning consideration, not simply a technical issue to be resolved through conditions or site design. With regards to Strategic Flood Risk Assessment Paragraph 171 of the December 2024 NPPF requires strategic policies to be informed by a Strategic Flood Risk Assessment (SFRA) and to manage flood risk from all sources. The SFRA should also consider cumulative impacts in, or affecting, areas susceptible to flooding and take account of advice from the Environment Agency and other relevant flood risk management authorities. Although we recognise that the proposed NFNPA Local Plan is assessed against the December 2024 NPPF, the August 2026 NPPF wording broadens the circumstances in which a site-specific Flood Risk Assessment (FRA) may be required where a site is identified as being at flood risk. We think it is important to note what the August 2026 NPPF says.

			This makes it particularly important not to assess flood risk solely by looking at whether a property falls within Flood Zone 1, 2 or 3. Flood Zones primarily relate to river and sea flooding. Depending on the site, other sources may also be relevant, including surface-water flooding and future flood risk. A site in Flood Zone 1 should therefore not automatically be treated as a site where no further flood-risk assessment could be needed. That does not mean every development in Flood Zone 1 now requires an FRA. The requirement and level of assessment will depend on the actual site, development proposal and applicable planning requirements. Various parts of the Parish of Copythorne have a history of high flood risk in particular Bartley and Cadnam. Any more dwellings built in flood risk areas will increase the risks from surface water. It remains a marked concerns that our Reg 18, Part 2 comments about the omission of Bartley as a known surface water flooding area from para 5.25 (now 5.27) have not been taken on board. It is though good to see that this policy has been expanded to include a more detailed requirement for Flood Risk Assessments. The continued omission of Bartley as known areas at risk of flooding is seen as a serious error and needs to be rectified. As a consequence, we withdraw our previous support to SP8 and are now against.
SP9	Sustainable Construction	SUPPORT	Pleased to see support given to proposals for development that mitigate and adapt to the impacts of climate change. 5.33 What are the improved building standards to be applied to extensions and thermal upgrades? In Point b) of the policy we would like to see “consider” be rephrased more strongly to “should have”? Would an applicant have to provide evidence that they have considered “small-scale” renewable. Correct sustainable construction of all dwellings using high quality materials to cover all aspects of the build, drainage and sewer infrastructure. Whilst we note that flooding is referenced in point I of this policy it is disappointing that “<i>Surface Water flooding</i>” is not explicitly mentioned.
SP10	Renewable Energy	SUPPORT	It is good to see that the plan supports the installation of solar panels over car parks and car ports (an example of this is Paultons Park). We are against ground mounted solar panels in residential gardens.

SP11	Nature conservation sites of international importance	NEUTRAL	Paragraph 6.9 says that “a target of 80% of SSSIs within the New Forest National Park to be in favourable condition by 2042” How does the SSSI site bordering Barrow Hill Road rank in terms of returning to a favourable condition? The final bullet point states “Applications for new net dwellings and other forms of overnight accommodation will be required to demonstrate nutrient neutrality”. Why does it not apply to other existing buildings such as residential outbuildings, large extensions etc? Is this addressed elsewhere in the plan? Any overnight sites, caravans, wild camping should provide correct facilities to demonstrate nutrient neutrality. We remain very concerned about the last sentence of the policy, which seems to be designed to allow developers to develop the site regardless of impact. As written, if not properly managed the effect this policy could have on the long-term survivability of the National Park, is very worrying.
SP12	The natural environment, national; regional; and local	AGAINST	The December 2024 NPPF provides a particularly strong policy framework for the protection and enhancement of the natural environment in a National Park. The relevant provisions are principally in Chapter 15, “Conserving and enhancing the natural environment”, particularly paragraphs 187–191. Paragraph 189 of the December 2024 NPPF is fundamental. It requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these matters. It also states that conservation and enhancement of wildlife and cultural heritage should be given great weight in National Parks. The important point for soundness is that environmental protection should not be treated simply as a development management consideration at the application stage. Paragraph 188 requires the Plan itself to take a strategic approach to environmental assets, habitat networks and natural capital. We are pleased to see more in the first paragraph of SP12 relating to what is considered “<i>irreplaceable habitat</i>” although the second and third paragraphs are a complete contradiction. The inclusion of “<i>replacement of driveways and road side verges</i>” is welcomed. Addition of new paragraph (6.26) regarding protection for Great Crested Newts is good to see. It is very disappointing to see that the phrase “<i>will not be permitted</i>” has been replaced by “<i>will not ordinarily be supported</i>” in paragraph 2. We believe that this seriously weakens SP12. As a consequence, we withdraw our previous support and are now against.
SP13	Biodiversity Net Gain	SUPPORT	Biodiversity net gain being delivered in a hierarchical manner is good. How will the National Park ensure that the applicant monitors that a 10% biodiversity net gain is achieved?

			The new opening paragraph of SP13 is good to see, making it clear that mitigation or compensation is a last resort. The expansion of the penultimate paragraph to include a wider range of bio-diversity enhancement features is very good news and goes well beyond the previous wording which was limited to <i>“bird bricks”</i>.
SP14	Landscape Character	SUPPORT	<i>“Development proposals will be permitted if they conserve and enhance the character of the New Forest’s landscapes...”</i> We are not convinced that all new developments will actually enhance the character. We are against development within SSSI’s, we don’t believe any development can enhance the landscape. 6.37 - We agree with <i>“Landscape character cannot be solely determined by what is visible from a publicly accessible location, as this can change over time.”</i> We strongly agree with policy point c) that the character of largely open and undeveloped landscapes between and within settlements will not be eroded or have their setting harmed. The landscape character of any build should complement the area by it’s design.
SP15	Green & blue infrastructure	SUPPORT	We are very happy and agree that the Authority will work with other partners and adjoining authorities to develop green/blue infrastructure. It is good to see in paragraph 6.39 specific types of blue infrastructure. The inclusion within the policy (point g) of <i>“.. nature-based solutions to address climate change, strengthen bio-diversity, manage flood risk, and enhance air and water quality..”</i> is a pleasing addition.
DP16	Open Space	SUPPORT	Given all the other worthy policies and support for the environment and wellbeing detailed in the rest of the plan, how would the open space apply to the allocation for 55 dwellings off Winsor Road? In the Copythorne Parish Design Statement, it is stated that green open spaces are not generally open to the public. How would DP16 (Open Space) apply to the site allocation for 55 dwellings? As worded point a) seems a little strange, how on earth can open space be surplus to requirements in a national park? We welcome the addition of commentary related to <i>“..integrate open space with the wider green and blue infrastructure network”</i> in the opening paragraph of this policy, it makes good sense.
DP17	Recreational horse keeping	SUPPORT	In terms of detrimental impact on the landscape is horse riding and keeping given higher priority than, say connected walking/cycle routes between villages and settlements? If not, how would this be demonstrated? What permission would be being sought for this policy to be considered?

DP18	Field shelters and stables	SUPPORT	-----
DP19	Maneges	SUPPORT	-----
SP20	Coastal Development	SUPPORT	-----
SP21	Coastal Change Mgmt Area	SUPPORT	Reinforcing sea defences is a high priority
SP22	Tranquillity	SUPPORT	Whilst not covered by this policy, in relation to Pollution, it is acknowledged in paragraph 6.63 that pollutants can harm human health, there's no mention in 6.64 of mitigation with respect to reducing harm to human health. Eg vehicle emissions, wood burners etc. This policy focusing on other aspects of tranquillity is well worded and will help protect the “<i>...special quality of the New Forest National Park..</i>” (Para 6.65)
SP23	Dark Skies	SUPPORT	Reducing the impacts of light pollution on the ‘dark skies’ of the National Park and control of development to prevent artificial lighting from eroding rural darkness and tranquillity is very important, especially when a reasonably large development is built in the middle of a rural village. There is a high emphasis on Light pollution in this policy. The tranquillity map in the landscape policy documents appears to show least tranquil areas (after high population areas) flank roads is traffic pollution. Is there anything in the Plan to mitigate against this? However, it seems inconceivable that new developments will be able to adhere to this policy. We welcome the “<i>...avoidance-first approach to external lighting..</i>” in this policy.
SP24	The historic and built environment	SUPPORT	We are happy that adaptations that reduce carbon emissions will be supported where this would not harm the significance of the heritage asset or its setting. We agree with the reuse of historic buildings and brownfield sites and seeing carbon emission reduction being addressed in the plan. The “whole building approach” when adapting for climate change is very sensible.
DP25	Heritage assets	SUPPORT	We are thankful that Copythorne now has a Parish Design Statement which is recognised as a Supplementary Planning Guidance Document. Point (b) of the policy should be changed from resisted to not allowed. Point(d) should add reference to consulting Historic England.

			This policy gives a realistic way forward to conserve our historic assets. It aligns with national planning policy as outline in 7.13. 7.16 what is the update for the next conservation specific management plan? Does this involve Parish Councils? Many old buildings have been demolished in the past, fine example recently the demolition of the Fawley Power Station chimney in 2021.
DP26	Local Distinctness	AGAINST	Under the December 2024 NPPF, local distinctiveness is principally addressed through the Framework's policies on good design, character and heritage. We would expect the Planning Inspector to consider whether this policy:- 1. properly identify the characteristics that contribute to local distinctiveness, rather than relying on generalised assertions about character; 2. provides an appropriate and proportionate design framework for new development; 3. allows appropriate innovation and change rather than imposing unjustified requirements to replicate existing development; 4. has regard to the relationship between built character, landscape setting, settlement pattern and heritage; and 5. is supported by appropriate evidence, such as character assessments, design evidence or other locally specific studies. How is this policy applied when only part of a village is defined? How is this balanced against developments which do exactly what this policy is seeking to guard against? Relevant to new developments; extensions; and outbuildings. Support paragraph 7.26. In settlements bordering SSSIs this can be more difficult to manage. Having had time to reflect since responding to the Reg 18 Part 2 consultation, we believe the effect of - for example - the proposed building of circa. 55 new houses off Winsor Road (SP39 below refers) should not be underestimated. The present rural ribbon development in the village will be seriously undermined by the addition of an urban style housing estate! As a consequence, we withdraw our previous support and are now against.

DP27	Design Principles	SUPPORT	Paragraph 7.28, this talks about new development, does that include outbuildings and extensions? Good checklist in 7.29.
DP28	Residential character of defined villages	SUPPORT	We note that comments made regarding the boundaries of the “Cadnam-Bartley” Smaller Defined Village made at the Reg 18, Part 2 stage have resulted in a redrawing to include areas adjoining the previous boundaries. We still feel though that the eastern boundary should be further extended to include all of the properties on the northern side of Chinham Road at its eastern end. Not all of the Defined Village of Cadnam/Bartley is actually in the villages some is in Winsor and some is in Copythorne, although we note that any naming protocol has to be succinct. To preserve residential character, reference to be made to Supplementary Design Guides (i.e. Neighbourhood Plans and Village/Parish Design Statements where they exist). This will be important for the transition of parts of Cadnam-Bartley to “Small Defined village” status. 7.33 Good to see reference to the open spaces and gaps when characterising Defined Villages. 7.34 How would appropriate development density be applied to Cadnam-Bartley when significant parts in the Defined village are Ribbon development? Whilst noting the comments about “<i>..local character..</i>” and “<i>..local distinctiveness..</i>” etc. in paragraphs 7.32-7.34, our continued expectation is that the Copythorne Parish Design Statement will continue to be recognised when planning applications for properties within the Smaller Defined Village are considered.
SP29	New residential development in the National Park	AGAINST	Under section 11A(2) of the National Parks and Access to the Countryside Act 1949, as amended, relevant authorities must seek to further the purposes for which National Parks are designated when exercising functions affecting National Park land. The duty can also be relevant to development outside the National Park where it affects the National Park or its setting. The December 2024 NPPF recognises National Park designation as providing a strong reason for restricting the overall scale, type and distribution of development. This is relevant when determining the appropriate spatial strategy and housing requirement for a Local Plan. Consequently, an identified housing need does not automatically translate into an obligation to accommodate that need in full within the National Park. The development strategy needs to take account of the particular constraints arising from the designation.

			Paragraph 189 of the December 2024 NPPF is central. It provides that: • great weight should be given to conserving and enhancing landscape and scenic beauty; • National Parks have the highest status of protection in relation to landscape and scenic beauty; • conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks and the Broads; • the scale and extent of development should be limited; and • development within the setting of a National Park should be sensitively located and designed to avoid or minimise adverse impacts We made the following comments in response to the Reg 18 (part 2) Consultation:- Against this policy as worded. The National Park open and green spaces should be sacrosanct, there should be only new developments on proper brownfield sites, meaning SP33 and SP35 would fall into this category. The supporting housing need information indicates that there is expected to be a reduction of population within the park, but a shift in household make-up. So having identified a problem, rather than exploring imaginative solutions, the answer has been decided that building is the best solution. There seems to be a narrative (driven top down) that building has to happen in the park whatever, is there any evidence of local communities demanding new developments on green/open spaces in their community? We support point e) housing for commoners and agricultural and forestry workers. The output of the housing needs analysis has some very accurate numbers, but the inputs don't seem so much so. Who is determining local housing needs and how? Has the redevelopment of unoccupied properties in disrepair been considered? We would like to see a development of small bungalows for the elderly in our parish rather than housing aimed at younger generation. This would allow older residents to be able to downsize but stay in the Parish. There needs to be the number of homes added to (d) (development on rural exception sites). The reduction from the 4,940 new dwellings down to 950 is welcome to maintain the constraints within the National Park. Will neighbouring authorities be taking on this shortfall in housing need in their allocations? To continue to nibble building within the National Park. There will not be a park left. Whilst continuing to stand by the comments made to the Reg 18, Part 2 review we note that the following has been added to this policy:- <i>“Net new open market housing delivered within the National Park will be restricted to “principal residency in perpetuity.”</i> <i>“Affordable housing delivered within the National Park will have local connection criteria applied.”</i>
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SP30	Specialist housing for older people (Use Class C2)	SUPPORT	There should be specialist housing for the older generation. This needs to have numbers of specialist housing units for older people added otherwise it is completely open ended. We are concerned that over time the third paragraph of this policy as worded could lead to homes being occupied by younger people. Supported, as if done properly and well will help to address the shift in household make-up, alleviating the need for the volume of new developments
SP31	The size of new dwellings	SUPPORT	We note that all net new dwellings permitted in the National Park will have a maximum total internal habitable floor area of 100 square metres, whether inside or outside of a defined village. We also note the possibility of some affordable dwellings being larger than 100 square metres where supported by the relevant statutory housing authority against robust evidence.
SP32	Land at Whartons Lane, Ashurst (existing allocation)	NEUTRAL	Whilst this site is nearing completion, we remain disappointed the 50% affordable housing was a target not a requirement, although we recognise that setting a requirement is outside of the NFNPA's hands.
SP33	Land at Ashurst Hospital (existing allocation)	NEUTRAL	Our previous comment to the Reg 18 (Part 2) consultation regarding whether paragraph 8.30 (now paragraph 8.33) to include a possible covenant to prevent dog or cat ownership is enforceable remains. It is pleasing to see a new point within this policy regarding the need to “.. carry out adequate transport assessment and design..”.
SP34	Land at Knellers Lane, Ashurst	NEUTRAL	In addition to our previous response to the Reg 18, Part 2 review which read as follows:- Remove target for 50% affordable and make it a required 50% (again we recognise that this is outside of the NFNPA's hands). 8.32 (now 8.35) Good to see an emphasis on improved cycle/pedestrian links. Thus land should not be developed as it an open space/green site. it is good to see an additional point within this policy requiring “the submission of a drainage strategy for the whole site.”.
SP35	Land at the former	NEUTRAL	This development is well underway.

	Lyndhurst Park Hotel (existing allocation)		
SP36	Land at Calpe Avenue, Lyndhurst	NEUTRAL	There appears to be enough provision for C2 housing in Lyndhurst already. We note a reduction from 60 to 50 units and the additional requirement for a <i>“drainage strategy for the whole site.”</i>
SP37	Land south of Church Lane, Sway	NEUTRAL	Pleased to see a recognised need for proper sewage provision Good to see 8.47 off road pedestrian link supported in the plan. Should not be developed as an open space/green site
SP38	Land to west of Brighton Road, Sway	NEUTRAL	Yet more C2 provision Should not be developed as currently an open space/green site
SP39	Land to west of Winsor Road, Winsor	AGAINST (as currently presented, due to the number of concerns of both members and residents)	At the Reg 18 (Part 2) consultation stage the Parish Council said the following:- This at first glance seems to mirror the Whartons Lane (SP32) site? Hence where is the need? And, it's not in Bartley, it's in Winsor. The main concern from residents at the Parish Council arranged drop in were:- 1. Worried about inadequate sewage infrastructure 2. Worried about increased traffic along by the school. 3. Residents who have adult children living with them currently were not aware of the eligibility criteria to go on the NFDC housing register. Should not be developed as an open space/green site. Any need for housing could more than be accommodated by development already scheduled for Bartley and within a short distance in the Calmore/Totton area (that have more amenities and better transport links) Deep concern re traffic flow, already congested with moving traffic and parked vehicles from residents living in Winsor Road. Concerns about the drainage/sewer infrastructure. Dangerous crossing in/out of school by foot or vehicle.

			A mix of properties by height and size would be beneficial (including accessible designs to some properties to aid “downsizing”). Some of the other proposed “Site Allocation” policies have a site-specific reference to open spaces. We would like to see similar for this site as well and would want to work with any proposed developer on what that might look like (play area; orchard planting; pond (might help with drainage?); allotments; possible parking accessible for school drop off/collection) Given the justified concerns of residents relating to drainage (both foul and surface water) within the local area, we would want to see a requirement for these matters to be included in a site-specific requirement. Surface water drainage should be by the use of green (nature based) SuDs rather than grey SuDS where possible. As per Policy SP7 c) with Points 5.17 and 5.18 also of note. Whilst it is pleasing to see site-specific requirement b), it is strongly felt that this should be expanded to consider in detail the overall impact of circa 110 vehicles (avg. 2 per dwelling) on traffic issues in a wider area than just the ingress/egress point and proximity to Bartley Junior School. Concerns have been raised by residents that this development will make the village feel less rural. Turning to the Reg 19 document, we note that additional commentary regarding this site has been added since the Reg 18, Part 2 consultation. Paragraphs 8.55 and 8.56 are not disputed, although - for residents without the benefit of their own vehicle - transport links to anywhere outside of the very local area are limited to a short period bus service to/from Totton on two adjoining days per week, leaving no service at all for the other five days. Sport facilities are also limited (three cricket club pitches). Paragraph 8.57 would benefit from the inclusion of reference to the adopted Copythorne Parish Design Statement. In paragraph 8.58 it would be more correct to describe the site as being surrounded by existing residential development as it sits behind existing housing (to the north, east and south) along both Southampton Road and Winsor Road. As such the proposed development is in opposition to the recommendations in Section 7.7 of the adopted Copythorne Parish Design Statement. We note that the statement from Southern Water confirming capacity for connections to their existing infrastructure needs further capacity assessment. Since the Reg 18, Part 2 review a further 3 site-specific requirements have been added to the 8 already included in this policy, bring the total to 11. This is the longest list of any of the site allocations. In looking in detail at the policy we have the following comments:-
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			Opening para - It is disappointing that the 50% affordable housing requirement has been watered down to a target. Surely a minimum requirement should be quoted. Point a – We note the addition of the words “open market” in front of dwellings (SP 31 refers) Point b – It is good to see this new point which reflects concerns regarding both transport needs and road safety (in particular with regards to the school) has been expanded following our Reg 18, Part 2 comments. The Healthy Streets Audit is welcomed. Points c & d – Previously points b & c, unchanged. Point e – We are delighted to see this new point relating to drainage concerns has been included as previously requested by us at the earlier review stage and would ask that this point be expanded to include a comprehensive assessment and strategy for both drainage and sewerage for the whole site. Point f – Previously point d, unchanged. Point g – Again, we are pleased to see that this reflects comments made by us at the Reg 18, Part 2 stage. Point h, i, j & k – Previously points f, g, h & i, unchanged. We have major concerns about the effect circa 55 new homes will have on the local traffic. The proposed ingress and egress is onto an already extremely busy local through route and close to the very busy complex (and accident prone) local Bartley crossroads and is also directly opposite Bartley Junior school, which by its very nature is very busy at drop off and collection times. All of this needs to be considered when addressing point c) of this policy. We have real concerns about the effect 55 houses will have on the local sewage infrastructure. Although Southern Water are saying is OK, recent local sewage incidents would suggest otherwise! The possibility of flooding Bartley Junior School with raw sewage is not to be taken lightly. This needs to be included within point e) which currently only references “drainage” We would also request that rather than being allowed to use the soft option of using off-site credits, that Nutrient Neutrality provision is made an on-site requirement.
SP40	Land to the south of Hamptworth Road, Landford	NEUTRAL	At first glance the rest of the area is pre-dominantly ribbon development along existing roads, any departure from this requires careful consideration.

SP41	Land to the east of The Ridge, Redlynch	NEUTRAL	At first glance, this will need much more research before agreeing to any planning proposal. Site is currently an open space/green site
SP42	Affordable housing provision within the defined villages and on allocated sites	AGAINST (as currently presented – see comments)	Looking at the December 2024 NPPF, affordable housing is addressed principally through paragraphs 61–68, within Chapter 5, <i>Delivering a sufficient supply of homes</i>. For a Local Plan examination, the key consideration is whether the Plan has properly identified affordable housing need and translated that evidence into a justified, viable and deliverable policy requirement. Paragraph 63 of the December 2024 NPPF requires strategic policies to assess the size, type and tenure of housing needed by different groups, expressly including people requiring affordable housing, including Social Rent. That assessment should be reflected in planning policies. Paragraph 64 of the December 2024 NPPF is particularly important. Where a need for affordable housing is identified, policies should specify the type of affordable housing required, including the minimum proportion of Social Rent homes required. The expectation is that affordable housing will be provided on site. The existence of an affordable housing need does not, by itself, determine how much development should be accommodated within a National Park. The Plan also needs to take account of the requirement that the scale and extent of development should be limited in National Parks and that great weight should be given to conserving and enhancing landscape and scenic beauty. SP42 as written seems to allowing developers scope for providing less than 50% affordable. Also, not sure about the last but one sentence about the tenure mix of affordable housing. Against as worded currently. The evidence for affordable housing isn't clear, in the New Forest Housing Needs Assessment section 2, paragraph 2.30 it states that 'Despite the level of need being high, it is not considered that this points to any requirement for the local planning authorities to increase their respective Local Plan housing requirements due to affordable needs'. Further clarification regarding the apparent dichotomy is required please Also the 50% figure appears to be driven by limit of acceptance of financial impact of provision of affordable housing that a developer is willing to bear. Again are there other ways of addressing affordable accommodation needs rather than just building. Losing so much agricultural and grazing land already in rural areas. We believe that the use of development targets should be changed to a mandatory 50% affordable figure (although we recognise that this is outside of the NFNPA's hands).

SP43	Rural exception sites	AGAINST	Under the December 2024 NPPF, rural exception sites are specifically supported as a mechanism for delivering affordable housing in rural areas. The policy though is not a general mechanism for permitting housing in the countryside. The site must be intended to provide affordable housing to meet an identified local need. Planning Practice Guidance explains that rural exception sites should address the affordable housing needs of local communities and can provide different forms of affordable housing where supported by appropriate evidence, such as a local housing needs survey. The policy approach is therefore not simply "Affordable housing need exists, therefore a rural site should be developed." The amount of building that is taking place on the other side of the New Forest National Park boundaries needs to be taken into account when accessing the need. When we considered this policy as part of the Reg 18, Part 2 consultation we agreed to support this policy but felt that the element of the policy relating to the level of local services was not upheld when considering the New Inn Road development in Bartley as the availability of local transport is rather tenuous. We do feel that affordable housing built on rural exception sites should be for rent in perpetuity and that it should only be agreed to fulfil a local housing need for people with a local connection. Agree with 100% affordable housing. Should a limit on development size be detailed? Only building on brownfield sites though It is disappointing that <i>"basic level of services and facilities"</i> in point d of this policy is no longer defined as it was in the Reg 18, Part 2 review. The omission of the words <i>"including a school, pub and local shop and access to public transport"</i> after <i>"basic level of services and facilities"</i> from point (d) is unacceptable and should be reversed. This "definition" of basic level was included in the Reg 18 (Part 2) policy wording. We believe that this is a significant omission and we withdraw our previous position of "support" to "against".
DP44	New Forest Commoners' dwellings	SUPPORT	-----

DP45	New Forest Estate Workers Dwellings	SUPPORT	-----
DP46	New dwellings for agricultural and forest workers	SUPPORT	-----
DP47	Removal of agricultural occupancy conditions	SUPPORT	We note that bullet point 4 of paragraph 8.88 reflects our comment at the Reg 18, Part 2 review stage which was “Could dwellings considered in this policy not be used to support DP44?”
SP48	Self and custom House Building	SUPPORT	-----
SP49	Gypsies, travellers and travelling showpeople	SUPPORT	The “local connection” requirement should be looked at stringently for any occupancy.
SP50	Allocation of land at Ringwood Road, Netley Marsh for Travelling Showpeople’s use	AGAINST	Whilst this new policy was discussed (and agreed by a majority) at the NFNPA Full Authority meeting on July 23rd 2026 it was surprising that it was omitted from the index and the relevant pages (137-138) were omitted from Reg 19 document that had been circulated for the meeting. Clearly, the index and the page numbering show that a space had been left for the details to be inserted? Section 19(5) of the Planning and Compulsory Purchase Act 2004 requires a sustainability appraisal. Regulation 12 and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 require the assessment of the likely significant environmental effects of the Plan and reasonable alternatives, with reasons for selecting the alternatives considered. We do not feel that the NFNPA has complied with these requirements and therefore the legal compliance objection is that the required assessment of reasonable alternatives, together with the reasons for selecting the preferred approach, has not been adequately demonstrated. Travelling Showpeople have been a part of the local community in Netley Marsh for many years (Coles Yard has 12 pitches) and the ORS report makes the case for a further six pitches being required in the local area during the life cycle of the 2024-2043 Local Plan. We assume that is important for both family and logistical reasons that a second site be found near to the existing one?

			We are not sure though that the proposed site off Ringwood Road is suitable. The portion of the site which the Local Plan seeks to allocate is on a marked slope and reasonably adjacent to existing housing along Ringwood Road. Land further into the overall parcel of land is more even. A great deal of ground work would be needed to create east-west levels within the site. The likely tenants/ purchasers of the site would – by virtue of point b of the policy - need to have local connections to the National Park and so would therefore be readily identifiable. So, have they been asked as to whether they find the site suitable for their needs. If they don't feel it is suitable then surely the policy fails as there is unlikely to be other qualifying occupier? With regards to the opening paragraph of this policy, we can understand the residential and storage uses but seek more clarity on what - in relation to this policy – is the business use? We note all of the policy points and feel that they are all valid. Although we feel that the drainage strategy needs to include the land to the south of the proposed site allocation.
DP51	Replacement dwellings	SUPPORT	It is our understanding that this policy doesn't distinguish between dwellings in or outside of Defined Villages. The additional clarity provided by the new paragraphs 8.100 and 8.101 is welcomed.
DP52	Extensions to buildings	SUPPORT	The greater detail for this policy from that within the Reg 18, Part 2 review adds clarity on how this policy will work. The final paragraph relating not permitting rainwater drainage on residential extensions be discharged into a foul or combined sewer in order to minimise the risk of sewer flooding and protected water quality is welcomed. As is the mandatory requirement to submit a "Build Over Application to the waste water service provider for their approval.
DP53	Outbuildings	SUPPORT	Guidelines on how "subservient" is defined would be helpful. "Clearly subservient is too open ended.
SP54	Local community facilities	SUPPORT	The addition to the policy of a requirement for evidence of non-viability is strongly supported.
SP55	Maintaining and improving Business Floorspace	SUPPORT	9.17 - We agree with not encouraging general warehousing for the reasons mentioned. 9.19 - We support retaining existing employment sites. Good to see the issue of parking and traffic addressed directly. Supported if correct procedure followed
DP56	Redevelopment and extensions to existing	SUPPORT	This is supported but it needs to be mentioned that there is always the danger of "chicken houses" becoming workshops, becoming offices, becoming bungalows".

	employment buildings		We believe it is important to retain employment in communities. But depends on type of business
SP57	The land-based economy	SUPPORT	Paragraph a (ii) contradicts Policy SP42 which could release back up grazing land for Affordable Housing 9.22 - We support the direction of travel for the Farming in Protected Landscapes programme. We support the emphasis on land management linked to the National Parks main aims. Affordable housing for Commoners is an important aspect to achieve this. Depending on type of trade
DP58	New agricultural and forestry related development	SUPPORT	Especially support the consideration of the building or structure
DP59	Re-use of farm buildings	SUPPORT	Good to see that the National Park is looking after the commoners. Support the emphasis on commoners having priority for buildings If it helps the farmer.
DP60	Loss of local retail facilities	SUPPORT	-----
DP61	Retail development outside of the defined Village boundaries	SUPPORT	Good to see support for our local village shops and farm shops.
SP62	Sustainable tourism development	SUPPORT	This is broadly supported but wherever possible attention needs to be paid to linking up local transport services. How do “Airbnb” type properties fit into this policy?
DP63	Holiday parks and campsites	SUPPORT	We support the relocation of campsites within the National Park to less sensitive areas. Fully restoring the existing sites to an appropriate New Forest landscape is essential. Paragraphs 9.50 and 9.51, we support both the Article 4 Directions for pop up and temporary campsites, if a reasonable size

SP64	Telecomms and Digital infrastructure	SUPPORT	To reduce impact, can masts be painted green or be camouflaged with greenery? This Policy needs to be strengthened for 5G telecom masts which by their very nature are particularly intrusive and will cause visual harm if not carefully sited and disguised to be as unobtrusive as possible. We support the provision of IT infrastructure and the conditions imposed to minimise visual, tranquillity and character impacts. The condition to remove the equipment once redundant is important. Paragraph 9.58 – We agree the Solent Freeport Fawley Waterside tax site is the obvious site to meet this need. IT infrastructure is always important. We note that much of this type of infrastructure falls under national planning laws and policies.
DP65	Transport Infrastructure	NEUTRAL	Should this policy also include horse riding? Horse riding is a very important mode of transport - for some - in the National Park This policy is far too “woolly”, and needs to spell out minimum acceptable levels of transport that must be provided for new developments. It is though good to see “iv. private car” removed from point 1b of this policy Paragraph 10.3 we support the New Forest Tour. Paragraph 10.9 - What kind of traffic management initiatives would be considered? Not sure how this is going to work in rural settlements like Copythorne. Minimal lighting, narrow lanes, lack of footpaths and/or cycle lanes affects the safety of active travel. Heavy traffic to Lyndhurst and Romsey. There are no public transport links for health appointments or linking to railway stations. There is a limited (two weekdays only) bus service suitable for food shopping or visiting family in Totton.
SP66	Sustainable transport and access	SUPPORT	We support this policy but currently feel that Copythorne Parish is being overlooked. We have virtually no public transport, no cycle routes and roads and pavements are in poor state of repair. From what we have heard at the recent NFNPA Community Transport Summit, at the moment the National Park is removing rather than enhancing cycling and walking infrastructure! This is a great wish list but in reality, when some of these have been proposed they conflict greatly with the National Park’s strategic objectives. Can the Design statement help overcome this? 10.25 - I am led to believe the LCWIP has removed the link from Copythorne to Lyndhurst. Does that conflict with this policy? 10.26 - The “utility network” appears to have very low priority in the last presentation made regarding the LCWIP. Especially more joined up no-vehicle routes. We need a link between Copythorne and Lyndhurst.