

# **New Forest District Council – response to consultation on proposals for Local Government Reorganisation in Hampshire, Isle of Wight, Portsmouth and Southampton**

**Consultation on the Proposal from Basingstoke and Deane Borough Council, New Forest District Council and Test Valley Borough Council for 5 unitary councils (known as Option 1):**

**North: Basingstoke and Deane, Hart, Rushmoor.**

**Mid: East Hampshire, New Forest, Test Valley, Winchester.**

**South East: Fareham, Gosport, Havant, Portsmouth.**

**South West: Eastleigh, Southampton.**

**Isle of Wight: Isle of Wight to remain unchanged**

## **Executive Summary:**

New Forest District Council strongly supports Option 1 – a four-unitary model on the mainland that keeps the New Forest District whole within a new Mid Hampshire unitary (with Test Valley, Winchester and East Hampshire). This configuration reflects sensible populations, geographies and economic areas, balances devolution across the region, and aligns governance with statutory environmental duties, while succeeding in meeting all six Government criteria for Local Government Reorganisation (Annex A).

Option 1 strongly succeeds in delivering a balanced rural/market-town economic functional area for the New Forest, connecting Mid Hampshire with the Midlands' industrial base via the M3, A34 and A303, supported by fast rail access to London. Mid Hampshire generates £18.2bn GVA, includes nationally significant defence assets and a thriving visitor and land-based economy, and sits within the Government's indicative population range, enabling resilience and value for money and economic development opportunity.

**Question 1: To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?**

Strongly agree.

**Question 2: To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?**

Strongly agree.

**Question 3: To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?**

Strongly agree.

**Question 4: To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in receipt of Exceptional Financial Support?**

Strongly agree.

**Question 5: To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?**

Strongly agree.

**Question 6: To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?**

Strongly agree.

**Question 7: To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?**

Strongly agree.

**Question 8: To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?**

Strongly agree.

**Question 9: (free text) If you would like to, please use the free text box to explain the answers you have provided to questions 1–8 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on this proposal.**

**Question 1:**

The four proposed new mainland unitaries are based on sensible geographies anchored around the region's principal economies. For the New Forest, the appropriate functional anchor is Mid Hampshire - a balanced rural/market-town

area that includes two national parks - rather than a city based unitary. This keeps the existing New Forest boundary whole and aligns governance with the way people live and access their services. The configuration allows a swift and safe delivery of electoral arrangements for new unitary councils by using existing districts as building blocks, particularly through Mid Hampshire.

The economy of the area is distinct and a Mid Hampshire authority established on this footprint would be best placed to support the new Strategic Authority to develop the unique economic potential of the area – recognising the diversity of communities and place across what will become one of the biggest Strategic Authorities nationally. The Strategic Authority will, as a result, benefit from a balanced membership of five constituent councils which collectively represent the full range of different economic interests in the region which will secure more significant regional growth.

Establishing a single unitary authority to work with similar communities across Mid Hampshire and including the New Forest will enable an extension of already strong place-based working, supporting local communities to identify and deliver on their own aspirations and build their own resilience. This place-based approach will establish the conditions for transformative public service reform, that supports a preventative agenda to tackle demand, and control costs particularly in relation to adult and children’s social care. This approach reflects the preferences of residents and local partners, who value strong local identity, coherent and preventative delivery, and collaborative governance rooted in place.

### **Question 2:**

Option 1 strongly enables tailored, place-based outcomes: integrated planning and regeneration in market towns; landscape-led stewardship across national parks; and scaling of proven service innovations. These include examples such as Independence Matters (New Forest, supporting disabled and vulnerable individuals to improve their independence and safety at home), integrated homelessness and NHS mental health pathways, and the Andover Health Hub. These are designed around community needs and delivered through joint working models with the NHS, along with voluntary, community and social enterprise partners and local stakeholders. This is key to the prevention agenda, reducing pressure on demand led services including those for vulnerable adults and children.

### **Question 3:**

Mid Hampshire (599k population) succeeds in aligning with the Government’s guiding principle regarding population size. The overall model delivers scale where appropriate (procurement, back-office consolidation, ICT) while remaining close enough to communities to enable prevention-first, neighbourhood delivery in high-demand areas (adult social care, children’s social care, SEND,

homelessness). By building on existing council boundaries and avoiding the disruption and cost of lower tier disaggregation, Option 1 approach ensures continuity, organisational efficiency, and a smooth transition. Our financial modelling shows that creating four new mainland unitary authorities delivers significant budget improvements and provides a platform for long-term sustainability, with annual savings of £63.9 million and a payback period of three years, alongside recurring annual savings through transformation and service redesign, focusing on partnership collaboration and prevention.

#### **Question 4:**

Moving to four new mainland unitaries will significantly reduce duplication, enables integrated capital and revenue planning, and allows each authority to manage budgets end-to-end for their distinct geographies. It facilitates innovative place-based service design models. Option 1 avoids boundary-change disaggregation costs and loss of community buy-in, and provides balanced tax bases and GVA across the unitaries, improving resilience to financial shocks while supporting targeted growth, council tax harmonisation opportunities and long-term transformation. By creating a new Mid Hampshire unitary on the current footprint of Test Valley, Winchester, East Hampshire and the New Forest, it brings together four areas of local government with closely aligned operational models, shared priorities, and high-quality public service delivery across similar mixed rural-urban geographies. This commonality in approach, particularly around neighbourhood services, housing, and environmental management, offers a strong foundation for integrated, place-based governance to a resident base who identify with such an approach.

For Eastleigh and Southampton, Option 1 creates a single urban focussed unitary authority, enabling the authority to deliver significant development and economic growth within the city and M27 corridor, supporting the population to increase to take advantage of its existing infrastructure and help ensure a sounder financial footing going forward.

#### **Question 5:**

This model strongly prioritises neighbourhood delivery and prevention, aligning services with the lived realities of respective communities. In Mid Hampshire, these councils have already co-designed place-based models with key partners and the voluntary sector - e.g. domestic abuse strategies and accreditation, integrated hospital discharge and reablement, homelessness and mental health, and rural health access solutions. Scaling these approaches within a single unitary footprint improves quality, continuity and value for money.

By establishing the authority on a coherent and aligned demographic and economic geography, the new authority would be able to move on from outdated models of service delivery and deliver more place and asset-based approaches, with a focus on prevention and reducing demand, and crisis. In doing so, it

would enable the delivery of high quality and sustainable public services to all communities across the region, as well as tackling hidden deprivation through outreach-based public services, targeted investment, and inclusive community infrastructure.

The broader Option 1 model allows for coordinated transformation of complex services, including adult social care. Shared NHS providers, overlapping community networks, and a culture of place-based practice enable a safe, phased disaggregation of county functions. Together, these new authorities can redesign services around local geographies, ensuring smoother transitions for residents and stronger alignment with primary care, mental health, and voluntary sector partners. Support for children and families is also integrated. Across Mid Hampshire, shared community assets such as dual-use halls and children's centres support early years and family development. Joint work with schools, GPs, and VCSE partners enhances delivery of mental health and early help services.

### **Question 6:**

Engagement demonstrates strong, clear public and stakeholder support for Option 1. The New Forest district recorded the highest survey participation county-wide (3,141 responses), with 70% support for Option 1. The option was the most popular across the wider region with 47% overall support. Early town/parish engagement indicated 85% support for a Forest-Mid Hampshire option and 98% of New Forest businesses supported a rural mid-Hampshire footprint. Option 1 overwhelmingly reflects community identity and local needs across Hampshire and the Solent.

Across Mid Hampshire, individual councils led a series of engagement sessions to explore in more detail with residents what good local government looks like, how services should be delivered, and what principles should guide future reorganisation. Key themes from the engagement included:

- Strong local identity and pride in place, with residents emphasising the importance of nature, heritage, and community.
- A desire for efficient, seamless service delivery that feels reliable and offers value for money.
- A clear expectation that decision-making must be rooted in local knowledge, with transparency and accountability.
- Support for place-based services that reflect the unique needs of each community.
- Recognition of the benefits of a unitary structure, but only if it retains local agility and responsiveness.

Partner organisations and other stakeholders have also played a key role in informing and shaping the proposal, through a comprehensive programme of engagement. This has included sessions with higher and further education providers, police and crime commissioners, police, fire and rescue, health commissioners and service providers, coastal partners and national park authorities, businesses, local members of parliament, the voluntary and community sector, town and parish councils, trade unions and staff.

### **Question 7:**

A Combined/Strategic Authority with five constituent members (four new mainland unitaries plus the Isle of Wight) is well-balanced and avoids a democratic deficit. Mid Hampshire's inclusion with New Forest ensures strategic decisions on transport, skills and investment reflect the full Hampshire and Solent system and maximises the growth potential of thriving Hampshire towns and their hinterland.

Its geography connects high-potential growth corridors with exceptional natural capital assets, such as the New Forest and South Downs National Parks, Sites of Special Scientific Interest, and internationally renowned chalk rivers. These areas are not only environmental treasures but economic engines: supporting land-based enterprise, eco-tourism, and green innovation.

The scale and coherence of Mid Hampshire would enable it to act as a strategic delivery vehicle, harnessing this natural capital to drive inclusive, environmentally responsible growth. This includes:

- Sensitive delivery of housing and infrastructure in protected and constrained landscapes.
- Investment in sustainable transport and clean energy.
- Stewardship of ecosystems and biodiversity in ways that also support economic resilience.

Option 1 would ensure that this unique blend of landscape and economy is represented and governed in an integrated, place-sensitive way, aligning environmental responsibility with productivity and growth. Mid Hampshire's presence would help shape a more balanced regional offer, instead of concentrating growth, grounded in diverse strengths and shared ambition, better able to represent the diversity of communities and place across the region.

### **Question 8:**

The model is built on strong placed-based principles and enables co-designed neighbourhood governance and stronger local representation through town and parish partnerships, market-town networks and ward-level engagement. Mid Hampshire brings together national exemplars in neighbourhood-based

engagement, embedding communities in decision-making and service design and thereby strengthening local democracy, resilience, and ownership, creating a strong platform for future innovation. Central to this approach is the strength of having well-established parish and town councils across the entire geography. These local bodies play an essential role in shaping services, supporting vulnerable residents, and holding decision-makers to account. Option 1 would leverage this mature and trusted layer of local governance by bringing town and parish councils together with representatives from the new unitary authority within new Neighbourhood Area Committees – maintaining local representation while improving coordination.

Beyond parish and town councils, the councils within Mid Hampshire already operate highly localised governance structures, such as area planning committees, neighbourhood forums, and ward-led investment models, that empower local voices and ensure that frontline councillors are at the centre of all work with communities. Under a Mid Hampshire unitary, these mechanisms would not only be retained but elevated, embedding neighbourhood democracy in the new authority's governance model.

Government guidance stated, "There will need to be strong public services and financial sustainability related justification for any proposals that involve boundary changes". The strong justification has not been made, which adds further strength to the geography of Option 1. Option 1, avoiding boundary changes, sustains trusted local relationships with residents and stakeholders, and ensures decisions are rooted in place, improving accessibility, accountability and participation, which will ultimately lead to the success of local government reorganisation.

### **In summary:-**

Option 1 reflects sensible geographies and economic areas, with Mid Hampshire providing the right functional anchor for the New Forest - balancing rural/market-town identity with national connectivity and economic strength. The model's size enables efficiencies and capacity while remaining close to communities for prevention-led localised delivery. It puts local government on a firmer footing by avoiding boundary-change costs and loss of identity, balancing tax bases and GVA, and unlocking transformation and harmonisation opportunities. Engagement shows strong support for Option 1 and significant opposition to alternatives. The option is supported by both New Forest West and New Forest East MPs. The configuration aligns with statutory environmental duties and strengthens devolution by ensuring rural voices are represented alongside urban unitaries, evidenced by the New Forest National Park Authority formally assessing this option as the strongest to further the purposes of the New Forest National Park.

## **Assessment Against Government Criteria and LGBCE Statutory Tests**

Government criteria (Annex A) - outcome: Option 1 (Mid-Hampshire) succeeds

Strong and accountable local leadership: Succeeds - A balanced Mid-Hampshire footprint keeps leadership close to communities while large enough to lead all services effectively. The single unitary model strengthens democratic accountability (clear lines of sight from the Council and Cabinet to neighbourhoods) without the remoteness risks of larger, city-dominated footprints.

Improved local services (high-quality, sustainable public services): Succeeds - A coherent rural authority enables locally tailored delivery across adult and children's services, housing and homelessness, waste and streetscene, coastal protection, planning, economic development and people services, with neighbourhood working and co-design embedded. Coastal and environmental responsibilities (e.g., SMP-led shoreline policy; flood and coastal change in the NPPF) can be planned and delivered as one system across similar geographies.

Financial sustainability: Succeeds - The business case evidences recurring savings of £63.9m per annum area-wide with an approximate 3-year payback, achieved through simplifying structures, reducing duplication and modernising services at the right scale. A Mid-Hampshire council shares these system-wide efficiencies while avoiding boundary change fragmentation and risks.

Value for money and strategic fit: Succeeds - The Mid-Hampshire configuration aligns to its functional economic area, improving place-based planning, infrastructure prioritisation, and environmental stewardship. It positions the council to integrate cleanly with the proposed Strategic (Mayoral) Authority for devolution.

LGBCE statutory tests — outcome: Option 1 (Mid-Hampshire) succeeds

Reflecting community identity: Succeeds - Public engagement (one of the largest in the region, involving 13,000+ residents) demonstrates support for this option and rejection of the alternatives. Local engagement overwhelmingly supports this option.

Providing effective and convenient local government: Succeeds - A single Mid-Hampshire unitary delivers integrated, convenient services across a coherent geography - big enough to be resilient, close enough to be local - improving access, responsiveness and operational efficiency compared with over-large alternatives.

**Consultation on the Proposal from Eastleigh Borough Council, Fareham Borough Council, Hart District Council, Havant Borough Council, Portsmouth City Council, Rushmoor Borough Council and Southampton City Council for 5 unitary councils (known as Option 1A):**

**North: Basingstoke and Deane, Hart, Rushmoor.**

**Mid: East Hampshire, New Forest, Test Valley, Winchester, (less 11 parishes from all four areas).**

**South East: Fareham, Gosport, Havant, Portsmouth, (plus 3 parishes of East Hampshire and 1 parish of Winchester).**

**South West: Eastleigh, Southampton, (plus 4 parishes from New Forest and 3 parishes from Test Valley).**

**Isle of Wight: Isle of Wight to remain unchanged.**

**Question 1: To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?**

Strongly disagree.

**Question 2: To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?**

Strongly disagree.

**Question 3: To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?**

Strongly disagree.

**Question 4: To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in receipt of Exceptional Financial Support?**

Strongly disagree.

**Question 5: To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?**

Strongly disagree.

**Question 6: To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?**

Strongly disagree.

**Question 7: To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?**

Strongly disagree.

**Question 8: To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?**

Strongly disagree.

**Question 9: (free text) If you would like to, please use the free text box to explain the answers you have provided to questions 1–8 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on this proposal.**

**Question 1:**

The proposed councils in this option are not based on sensible geographies and economic areas. Boundary change would split the New Forest District - specifically the Waterside - from its coherent ecological and cultural geography and its economically integrated core. This area is significant and diverse, representing four New Forest district parishes, where 39% of the total population live. Over half of NFDC's national non-domestic rates (NNDR) take is generated in the four parishes (53.3% = £44.34m of £83.21m). NNDR per resident is 82% higher in the four parishes (£637 vs £351). Removing this concentration from Mid Hampshire carves out the district's growth-sensitive fiscal base, undermining the sensible economic footprint for unitary governance across Hampshire and the Solent.

The alternative Option 1, without a boundary change, creates the conditions to spread economic positivity across the entire region, connecting Mid Hampshire with the Midlands' industrial base via the M3, A34 and A303, supported by fast rail access to London. Option 1A's proposal indicates it is "designed to maximise concentration". This, by its definition, fails to harness the broader economic potential of all new unitary councils in Hampshire and the Solent, and is contrary to the government's guidance.

Regional, functional economies already operate across boundaries. You do not need to redraw the map to work together. Freeports are a live example: the Solent Freeport currently spans multiple authorities and already coordinates investment, business rates retention and delivery without boundary change. (Its approved Full Business Case anticipates c. £1.35bn private investment under

existing governance.) Much of the argument in favour of Option 1A draws on the benefits that will be delivered by devolution to the mayoral strategic authority, not by local government reorganisation, with Option 1A risking concentration and unbalanced constituent Members of the Strategic Authority. The new Mayoral strategic authority will be in place to oversee strategic development and growth, infrastructure, transport and skills and be the catalyst for economic growth across the combined region. This would be undermined by the boundary change option proposed here.

## **Question 2:**

The proposed councils would fail to deliver the described outcomes because fragmentation undermines public service delivery and the government LGR criteria.

A boundary change creates an imbalance of assets and geography, in order to deliver coherent and viable services. For example, in the new Forest Housing Revenue Account disaggregation for 2,236 HRA homes (40.6% of stock) plus hostel units (44.2%) in the Waterside introduces compliance and operational risk, whilst removing economic power to manage the retained stock. The fragmentation of waste, street scene and coastal protection loses economies of scale; electoral services face material risk ahead of 2027/28 elections; and social care, education and SEND coordination would be weakened. Temporary accommodation serving the New Forest is currently concentrated in the four parishes (64.2% of placements, 77 of 120 applicants), equating to 1.11 per 1,000 people vs 0.67 district-wide. Boundary change would disrupt homelessness prevention, housing pathways and continuity of placements.

This option disregards the unique cultural and historical ties which the people of the New Forest have to its land and boundaries. The recognised population of Commoners (who individually have rights to turn animals out to graze and browse the New Forest's woodlands and heathlands), use both forest land, and back up grazing in the boundary change area of the Waterside in a seamless tradition of working the land. Together the commoners and their animals have shaped the New Forest for generations. Splitting these lands across 2 councils risk disruption to livelihoods and unique ways of life, equally felt by a long history of Romany Gypsy populations who live across forest and proposed boundary change areas.

Ultimately, the cumulative impact of the loss of services and assets to what remains of the New Forest district would significantly impact service delivery in Mid Hampshire, and therefore effective, balanced local government service delivery across all councils.

### **Question 3:**

Disaggregating a unified operating geography reduces efficiency and capacity, particularly in statutory housing and environmental services. The boundary change impacting the New Forest district removes significant fiscal bases: 53.3% of NNDR (£44.34m), and 32.4% of the council tax base (23,753 Band-D equivalents). Fragmentation heightens Business Rates Retention volatility (levy/safety net, pooling) and undermines resilience to financial shocks. Asset/operations loss is material: 64.8% of significant NFDC assets are located within the Waterside - including 72% of commercial investments, 65% of leases, and 50% of depots - requiring duplication or renegotiation post-split.

The cumulative impact of the loss of services and assets to what remains of the New Forest district would significantly impact service delivery in the new Mid Hampshire council, and therefore effective, balanced local government service delivery across all councils.

### **Question 4:**

Boundary change creates financial risk for the Housing Revenue Account, and represents a significant increased risk to investor confidence for planned strategic investment linked to nationally significant assets in the proposed boundary change area of the Waterside (e.g., Fawley Refinery, Marchwood Military Port, Solent Freeport sites). National non-domestic rates and council tax fragmentation, combined with rising demand (homelessness/temporary accommodation, adult and children's social care, SEND), does not put local government on a firmer footing - it introduces instability across the area.

This instability also risks harming current strong and effective partnership working supporting growth. For example, the Waterside Steering Group with representatives from the Solent Freeport, Waterside tax site businesses including Associated British Ports and ExxonMobil, New Forest colleges, the National Park, councils and the voluntary sector.

### **Question 5:**

The proposed councils would fail to deliver high quality, sustainable public services. For example, boundary change causes significant service disruption to social housing tenants (tenancy management, repairs, allocations), waste and coastal protection (lost economies of scale), and SEND (fragmented commissioning and transport). The concentration of existing temporary accommodation placements in the Waterside (64.2% of all placements in the New Forest) and the complexity of HRA stock division (2,236 homes) would reduce service quality and continuity, whilst creating a loss of identity for several thousand people who live in these homes. It would also introduce an unnecessary additional local planning authority to an area with unique challenges

in delivering sustainable development into a unique, fragile and world-class environment.

District boundary changes would cut across established County Council locality models and multi-agency delivery footprints, replacing embedded and coherent geographies with fragmented arrangements that would fail to deliver high quality, sustainable public services to communities, both in the Waterside and those neighbouring it. This undermines neighbourhood-based services (for example, Hampshire Constabulary's New Forest neighbourhood policing areas) and introduces transition and safeguarding risks for vulnerable adults and children - contrary to the Government's criterion to avoid unnecessary fragmentation of services. Hampshire County Council social care teams are locality based, covering the New Forest. School pyramids would begin spanning multiple council areas, with feeder schools separated by artificial boundaries.

Option 1A would split communities across different ICBs and HWBs, disrupting aligned planning and making local partnerships harder to run effectively, even though the Health and Care Act 2022 expects these bodies to work together on coherent, place-based areas.

Option 1A undermines the Local Government Boundary Commission for England's statutory criteria of "effective and convenient local government." An Electoral Review of new unitary councils would be very unlikely to produce the proposed configuration against the backdrop of a significant fragmentation of service delivery and representation, noting the cohesive New Forest East parliamentary consistency would be significantly split between two new councils.

### **Question 6:**

Local views are very clear and consistent: residents, businesses, stakeholders and communities overwhelmingly oppose boundary change modifications. The diverse Waterside communities identify with the New Forest's rural character and historic and cultural ties to the National Park area. Engagement with Waterside communities, including those from minority groups such as commoners, who have ancient grazing rights and ways of life, and settled travelers, revealed the common use of the phrase "The New Forest is who we are". Engagement evidenced 80% opposition to the creation of Option 1A, from 3,141 survey responses from within the New Forest district. This was the highest number of responses from a single district in Hampshire, with every ward responding. The joint survey evaluation describes Option 1A as being "universally disliked" across Hampshire and the Solent, with 65% opposition across the region. The 80% opposition from the New Forest district rises to 86% when sampling the affected parishes of the proposed boundary changes.

The proposal disregards the evidence base gathered through extensive engagement and does not meet local needs. 98% of surveyed New Forest businesses support the alternative Option 1, with 92% opposing Option 1A.

Option 1A significantly undermines the Local Government Boundary Commission for England's statutory criteria of "community identity and interests." An Electoral Review of new unitary councils would be very unlikely to produce this configuration against the backdrop of overwhelming community opposition.

**Question 7:**

By fragmenting a coherent district, boundary change strongly undermines the functional geography needed to support strategic authorities and devolution arrangements, and the building blocks of new unitary councils. Strong strategic governance requires unitary councils that reflect real economic areas and environmental assets; splitting the Waterside from the New Forest weakens that alignment and the voice of Mid Hampshire's rural economy.

Regional, functional economies already operate across boundaries and there is strong partnership working in place regardless of council boundaries. Freeports are a live example: the Solent Freeport spans multiple authorities and already coordinates investment, business rates retention and delivery without boundary change. (Its approved Full Business Case anticipates c. £1.35bn private investment under existing governance and benefit across the wider area.) Much of the argument in favour of Option 1A draws on the potential benefits of devolution, including strategic economic growth plans, not local government reorganisation. The new Mayoral strategic authority will be in place to oversee strategic development and growth, infrastructure, transport and skills.

**Question 8:**

Boundary change increases remoteness of decision making for Waterside residents, erodes trust, and disconnects communities from local representation that understands Forest culture and rural priorities. It diminishes neighbourhood empowerment and community engagement and divides governance and accountability for newly created communities, such as that in north Totton. It also brings parished areas together with a non-parished urban city, leading to challenges in developing equitable and effective neighbourhood governance and partnership models for the new authority.

**In summary:**

Option 1A (boundary change) fails to reflect community identity, fragments a coherent operating geography, and undermines effective and convenient local government. Public service delivery suffers across local authority administered affordable housing stock (HRA disaggregation - 2,236 homes/40.6% of stock; 44.2% of hostel units). The fragmentation would also harm waste service provision, positive planning for economic and housing growth through the planning services, coastal protection, electoral services, social care, education and SEND. Financial sustainability is reduced through loss of NNDR and council

tax bases (53.3% NNDR; 32.4% council tax), heightened BRR volatility, and duplication of assets/operations (64.8% of significant assets in scope).

Engagement evidence shows overwhelming local opposition to splitting the district and supports keeping the Forest whole. The proposal is therefore contrary to the Government's criteria and the LGBCE statutory tests.

**Question 10: This proposal is accompanied by a request that the Secretary of State considers boundary changes. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?**

Strongly disagree.

**Question 11: Explanation of answer to Question 10**

There is no strong public services and financial sustainability justification for boundary change. Nor is there an economic justification. The specific proposal for boundary change modification as outlined in the Option 1A appendix does not present a credible business case, quantified savings, or an options appraisal that demonstrates financial sustainability, value for money or improved public services. Instead, boundary change would create new transition costs and introduce structural financial risk and service disruption across a well-functioning, unified operating geography.

There are also various legal difficulties with Option 1A, these include (1) lack of vires and (2) unlawful predetermination, which we wish to highlight here.

As to (1) and (2), in this local government reorganisation it is necessary for the Secretary of State, in order to act lawfully, to reject, and to be seen to reject, Option 1A, since otherwise the Secretary of State would be acting unlawfully.

The same applies to Local Government Boundary Commission for England (LGBCE) powers in relation to this local government reorganisation, i.e. its powers under sections 5 and 6 of the Local Government and Public Involvement in Health Act 2007 (the 2007 Act).

### **1. Lack of vires**

The local government reorganisation process under Part 1 of the 2007 Act concerns solely whether an entire council area should have one or two layers of government. For example, invitations under section 2 of the 2007 Act can only be for proposals of Types A, B or C, all of which concern whole district and whole county councils only and all of which exclude proposals relating to parts of district councils. The Secretary of State has no power in this process to change the boundary of any current district council, such as by cherry-picking individual parishes (as Option 1A seeks to do) into any different council area. Section 7 implementation and modification powers, and section 11 implementation powers, are likewise subject to this limitation i.e. can only relate to whether any

particular area shall have one or two layers of local government.

Therefore, the Secretary of State has no power to approve Option 1A in this local government review.

Indeed Option 1A is an impermissible and invalid proposal under the applicable part of the 2007 Act.

Boundary changes such as those suggested by Option 1A can only be considered in a wholly separate exercise, conducted lawfully, under the provisions enacted for that purpose i.e. sections 8-10 of the 2007 Act.

The councils proposing Option 1A say that they do so expressly as support for Option 1 subject to an undertaking by the Secretary of State to carry out a boundary review subsequently. The proposal for Option 1A submitted to the Secretary of State in September 2025 states, for example:

*"This submission is conditional upon this modification being approved by the Secretary of State using the modification powers under the 2007 Act".*

But the Secretary of State does not have vires to entertain let alone approve a conditional course such as this.

The proposal also states:

*"Option 1 meets the government criteria".*

The lawful solution is therefore to adopt Option 1.

The above applies likewise to LGBCE powers under Part 1 2007 Act in relation to this local government review, which as stated concerns (and to be lawful can only concern) whether any area should have one or two layers of local government.

## **2. Unlawful Predetermination of future boundary review**

Further, any Secretary of State support, whether in form (such as by indication) or substance (i.e. by action), in this local government reorganisation for any boundary changes, such as those aspects of Option 1A, would amount to unlawful predetermination by the Secretary of State in relation to his functions in any future boundary review process concerning any of the current district council boundaries, and/or the unitary authority within which the parishes targeted by Option 1A would sit. The same applies to LGBCE. If (contrary to the requirements of lawfulness explained above) the Secretary of State (and so far

as material, LGBCE) entertain Option 1A at all in the current process, they each should for this additional reason reject Option 1A in this review.

**In summary:**

Public services: Housing, planning, economic development, waste, coastal protection, electoral services, social care, education and SEND are delivered across a unified New Forest geography. A boundary change fragments service delivery, breaks economies of scale, and reduces resilience.

Housing is a critical example: disaggregating the HRA for 2,236 homes (40.6% of stock) plus hostel units (44.2%) introduces compliance and operational risk (ring-fence, apportionment of reserves/debt), jeopardising tenant services and planned investment and housing delivery to meet housing needs. Temporary accommodation pathways are at risk where placements are concentrated (64.2% in scope) and per-capita temporary accommodation demand is circa 66% higher than the district average (1.11 vs 0.67 per 1,000). The Waterside parishes of the New Forest are critical to help meet the affordable housing needs demand of the wider district areas, including the National Park.

The boundary change option would introduce an unnecessary additional local planning authority to an area with unique challenges in delivering sustainable development into a unique, fragile and precious environment. There is effective and long-standing partnership working in the New Forest which delivers high quality planning services, economic development support and environmental stewardship. A proposed fragmentation could significantly harm this.

Splitting the Waterside from the wider Forest geography would result in school pyramids spanning multiple council areas, with feeder schools separated by artificial boundaries. With no obligation on schools to take pupils from outside the admissions authority where oversubscription criteria apply, which risks pupils being diverted to distant schools, adding potential 36-mile round trips, increasing cost and absenteeism risk, and undermining high quality, sustainable public services for families.

Brockenhurst College delivers skills and training courses for adults, adult leisure and learning courses and two higher education programmes. It has over 3,000 16-19 year old students and around 5,000 adult learners. The College has its main campus in Brockenhurst and an additional campus in Marchwood (in the Waterside). Students travel to the college from the wider area including Bournemouth and the Isle of Wight. Splitting the College into two council areas would create additional complexities regarding some funding streams, and may risk the current strong relationships with major employers on the Waterside which, for example, provide valuable student placements.

Financial sustainability: The four parishes contain 53.3% of national non-domestic rate income approximately (£44.34m), national non-domestic rates

per-resident is approximately 82% higher (£637 vs £351), and 32.4% of the council tax base (23,753 Band-D equivalents). Splitting this fiscal base heightens business rates retention volatility (levy/safety net mechanics and pooling) and worsens resilience ahead of the planned business rates retention reset.

Approximately 65% of significant district council assets are concentrated in the Waterside. This includes 72% of commercial investments; 65% of leases; 50% of operational depots. The boundary change option would also lead to costs associated with multiplying IT/data separation, contract novation, estates and workforce transition costs before any claimed savings. The Waterside's Freeport sites (ExxonMobil Fawley Refinery, Solent Gateway & Fawley Waterside Solent Freeport sites) would fall under a separate authority to the wider New Forest, weakening strategic fit and value for money.

The Freeport already aligns strategy and investment across multiple authorities. Its governance, accountable body arrangements and pooled business rates are purposely designed to overcome "fragmentation" without redrawing council lines. The latest Freeport annual update shows delivery and seed-funded projects are moving under existing arrangements and a Mayoral strategic authority will be in place providing effective future governance.

Planning tools will already exist at the new strategic authority level to positively respond to the Government's growth agenda. Strategic infrastructure, transport and skills will sit with the strategic authority, which is designed to coordinate cross-boundary investment. The new Spatial Development Strategy for Hampshire and the Solent will identify and provide for development needs at a strategic level, being the appropriate level to reconcile sustainable development opportunities and challenges. That is an argument for good Devolution and combined-authority design, not for local government boundary change.

## **Assessment Against Government Criteria and LGBCE Statutory Tests**

Government criteria (Annex A) - outcome: Option 1A fails:

- Strong and accountable local leadership: Fails - increased remoteness of decision making and reduced local representation for Waterside communities.
- Improved local services (high quality, sustainable public services): Fails - service disruption in housing, planning, economic development, waste, coastal protection, electoral services, social care, education and SEND.
- Financial sustainability: Fails - loss of national non-domestic rates and council tax bases weakening Mid Hampshire, increased volatility (levy/safety net, pooling), duplication costs and asset disaggregation risks.

- Value for money and strategic fit: Fails - fragmentation undermines strategic assets and investment and weakens place-based planning and environmental stewardship.

LGBCE statutory tests - outcome: Option 1A fails:

- Reflecting community identity: Fails - engagement evidences that Waterside residents identify with the New Forest, not Southampton; splitting the district is contrary to this identity.
- Providing effective and convenient local government: Fails - boundary change reduces effectiveness and convenience by fragmenting integrated service delivery and governance.

### **Closing Statement:**

Option 1A (boundary change) is contrary to the Government's criteria, policy and legislation. It unnecessarily introduces fragmentation, service disruption and financial risk. It does not deliver public service delivery improvements or financial sustainability and fails to reflect community identity or provide effective and convenient local government. The Secretary of State has no power to approve Option 1A in this local government review, should reject Option 1A outright and, if any boundary changes are considered, commission a full independent review by the Local Government Boundary Commission for England, before entering into due process of decision making.

**Consultation on the Proposal from Winchester City Council for 5 unitary councils (known as Option 2):**

**North: Basingstoke and Deane, Hart, Rushmoor.**

**Mid: East Hampshire, Test Valley, Winchester.**

**South East: Fareham, Gosport, Havant, Portsmouth.**

**South West: Eastleigh, New Forest, Southampton.**

**Isle of Wight: Isle of Wight to remain unchanged.**

**Question 1: To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?**

Strongly disagree.

**Question 2: To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?**

Strongly disagree.

**Question 3: To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?**

Strongly disagree.

**Question 4: To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in receipt of Exceptional Financial Support?**

Strongly disagree.

**Question 5: To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?**

Strongly disagree.

**Question 6: To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?**

Strongly disagree.

**Question 7: To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?**

Strongly disagree.

**Question 8: To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?**

Strongly disagree.

**Question 9: (free text) If you would like to, please use the free text box to explain the answers you have provided to questions 1–8 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on this proposal.**

**Question 1:**

While the five-council framework is broadly coherent, placing the New Forest with Southampton/Eastleigh (South West), mixes a major city economy with a predominantly rural/coastal district whose communities and service needs align more closely with Mid-Hampshire. Option 1 better reflects sensible geographies and economic areas.

**Question 2:**

A South West authority centred on a large city brings significant risks of centralised commissioning and urban service models that do not align with Forest communities (e.g., rural housing, coastal protection, waste/streetscene across dispersed settlements). Outcome delivery is more credible where councils have similar geographies and are local enough to co-design tailored services, which are balanced and aligned. This option could lead to polarised challenges with urban authorities having limited experience of the nuances required for policy-making and delivering services within nationally protected landscapes. For example a bespoke 'behind the gates' food waste collection system has been introduced for open Forest properties where there are free roaming animals. Innovative and unique approaches have also been taken to bringing forward development sites across the New Forest to address local and national needs. This includes designing strategies to address potential recreational disturbance into the unique habitats of the New Forest, as well as ensuring that the role and needs of Commoners in the New Forest are addressed positively through new development.

There are different requirements to establish service delivery models in rural and urban geographies, resulting in higher costs to meet nuanced delivery requirements.

**Question 3:**

Placing the New Forest in a South West authority alongside Southampton and Eastleigh creates a council with high disparity (major city economy plus rural/coastal communities). That drives complex, city-led demand pressures (e.g., homelessness, social care, transport and regeneration) which often have significantly different drivers and solutions in cities than in more rural areas.

This mix dilutes efficiency and increases exposure to shocks, and increased costs, compared with Option 1 - a Mid-Hampshire configuration that groups sensible economic areas together at an appropriate scale.

**Question 4:**

Whilst the projected overall savings case (£63.9m recurring) for four mainland unitary councils is strong, placing the New Forest within a South West authority that includes Southampton - which had in-principle Exceptional Financial Support for 2025/26 - could significantly and negatively complicate the South West's financial footing and priorities versus a Mid-Hampshire alignment. Clarity of purpose is better created with the alternative Option 1 and in turn avoids the costs associated with creating multiple solutions for an incoherent geography.

**Question 5:**

Service sustainability depends on fit to place. A South West authority may prioritise city infrastructure and systems, while the Forest requires more rural tailoring, prevention-led services and neighbourhood working - better achieved in Mid-Hampshire.

**Question 6:**

Engagement indicates strong support for alternative new council configurations that reflect distinct geographies around key hubs and keep communities together. NFDC's engagement has consistently pointed to keeping the Forest whole within a Mid-Hampshire council, rather than identifying with a more city-led South West authority. This Option 2 proposal received 56% opposition across the region in the county wide survey, with 87% opposition from the New Forest district.

**Question 7:**

Five councils can provide a balanced voice into a future Mayoral Strategic Authority; however, balance is only achieved when footprints reflect coherent economic areas. A Mid-Hampshire Forest alignment improves strategic fit and voice, relative to a South West council focussed on a major city.

**Question 8:**

Neighbourhood empowerment is strongest when councils have clear identities and locality structures designed around them. A South West footprint centred on Southampton risks weaker neighbourhood voices for rural/coastal Forest communities than a Mid-Hampshire council, placing a fully parished, coherent district with an unparished city. There is also a risk that Option 2 would result in the New Forest area being viewed as a rural hinterland to the city of Southampton, rather than a culturally distinct area with a strong sense of identity.

**In summary:**

Option 2's South West placement of the New Forest fails sensible geographies, undermines rural service outcomes, and weakens resilience through the mis-alignment of rural and urban service delivery models. While the savings case is strong (as it is for Option 1), Southampton's EFS context suggests caution in council composition. Service quality and sustainability depend on rural/coastal tailoring, and local engagement strongly supports keeping the New Forest district within Mid-Hampshire. Devolution alignment and a balanced and representational voice are improved by coherent footprints. Neighbourhood empowerment for the New Forest area is likely to be diminished under a city-dominated South West model.

**Consultation on the Proposal from Hampshire County Council & East Hampshire District Council for 4 unitary councils:**

**Mid North: Basingstoke and Deane, East Hampshire, Hart, Rushmoor, Winchester.**

**West: Eastleigh, New Forest, Southampton, Test Valley.**

**South East: Fareham, Gosport, Havant, Portsmouth.**

**Isle of Wight: Isle of Wight to remain unchanged**

**Question 1: To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?**

Strongly disagree.

**Question 2: To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?**

Strongly disagree.

**Question 3: To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?**

Strongly disagree.

**Question 4: To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in receipt of Exceptional Financial Support?**

Strongly disagree.

**Question 5: To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?**

Strongly disagree.

**Question 6: To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?**

Strongly disagree.

**Question 7: To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?**

Strongly disagree.

**Question 8: To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?**

Strongly disagree.

**Question 9: (free text) If you would like to, please use the free text box to explain the answers you have provided to questions 1–8 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on this proposal.**

**Question 1:**

The "West" authority (707,000 population) fuses a major city economy with extensive rural/coastal geographies, diluting rural identity and weakening functional fit for the New Forest. An alternative four-hub model averaging 500,000 populations, and the inclusion of a Forest Mid Hampshire Council would better reflect sensible geographies and economically aligned areas.

**Question 2:**

The proposal emphasises speed and safety of reorganisation, but the scale and disparity proposed in the West configuration risks centralised, city-led commissioning over tailored rural services, undermining outcome delivery. Locality-centred models at an average of 500,000 enable prevention and co-design.

**Question 3:**

A population of 707,000 in the West far exceeds the government's indicative scale of 500,000, creating span-of-control risks and weaker local connection. With future population growth, including that needed to address the government's housing growth agenda, this new West council would be one of the largest in the country, risking the need for further reorganisation in the near future. Such large-scale councils risk the repetition of previous financial issues experienced by current County Councils, and would require a tier of local delivery mechanisms, resulting in additional cost. Balanced councils closer to the 500,000 population figure can be more economically resilient, flexible and efficient.

**Question 4:**

This proposal's savings case of £50m annually is weaker than the £63.9m annual saving evidenced by Option 1. With Southampton City Council having received in-principle Exceptional Financial Support for 2025/26, coherent footprints and stronger savings are required, as outlined in Option 1.

**Question 5:**

A city-dominated footprint risks prioritising urban systems over the requirement for secondary delivery models to accommodate rural identity and demands. Effective and integrated service delivery for adult and children services, housing and homelessness, public health, transport, waste/streetscene, and coastal protection, is better achieved with coherent footprints that recognise the need for rural/coastal community service delivery models which support effective and localised neighbourhood governance.

**Question 6:**

Engagement by a partnership of 12 councils reached more than 13,000 residents across Hampshire and the Isle of Wight, evidencing the highest net support (47% across the Hampshire and Solent region, and 70% from the New Forest district) for the alternative Option 1 being consulted on. This is compared to approximately 3,500 respondents to the consultation exercise carried out by Hampshire County Council / East Hampshire District Council proposal to gain views on this single option. NFDC's own extensive and additional engagement showed overwhelming support for the alternative Option 1 within this consultation and that local views from the New Forest district compellingly do not support this proposal.

**Question 7:**

Devolution is best enabled by councils aligned to coherent economic geographies (four anchors including a market towns anchor). A West footprint in this option reduces balance of voice and complicates integration with a future strategic authority. The scale of the three mainland councils proposed does not align with the fourth unitary, the Isle of Wight, thus accentuating the disparity of representation within the future strategic authority.

**Question 8:**

The scale of the authorities weaken neighbourhood voice and local accountability. With specific regard to the proposed 'West' authority, it also brings parished areas together with an unparished city, leading to challenges in developing equitable and effective neighbourhood governance for the new authority. Option 1 proposals, on the other-hand, embed strengthened neighbourhood working and co-design with communities.

In summary:

**Geography & identity:**

The West configuration blends a city economy with extensive rural/coastal geographies; it fails the test of “sensible geographies and economic areas” and does not reflect rural identity.

**Size & efficiency:**

Population sizes are wrong for their locality and geography; balanced councils closer to 500,000 are more efficient and resilient.

**Outcomes & service delivery:**

A city-led commissioning footprint centralises decisions and undermines prevention-led, locally tailored services (adults and children’s, housing and homelessness, waste/streetscene, coastal protection, transport, public health).

**Financial footing:**

Compared with the alternative Option 1 proposal of £63.9m recurring savings, this case is weaker; and alongside Southampton’s Exceptional Financial Support context, it fails to put local government on a firmer economic footing.

**Local views & needs:**

Engagement shows a preference for rural-with-rural arrangements and rejects this option; the West option is rejected by local views.

**Devolution & strategic fit:**

This option is misaligned to functional economic areas; reducing balance of voice into a Strategic Authority.

**Community engagement & empowerment:**

Scale distances decision-making and diminishes neighbourhood empowerment, identity and accountability.