

## NEW FOREST NATIONAL PARK: PROPOSED BOUNDARY Local Authority Consultation

### 1. Background

- 1.1 The Countryside Agency held a public consultation on a draft New Forest National Park boundary in October 2000. This Council considered the draft boundary in detail and submitted a full response to the Agency, with comments about each of the proposed boundary sections. (P & R Cmttee 21<sup>st</sup> February 2001- Report A)
- 1.2 The Countryside Agency are now carrying out the statutory consultation with local authorities on a proposed boundary, which has been altered in the light of comments made during the public consultation. Town and Parish Councils have been included in the local authority consultation.
- 1.3 Copies of the full consultation report have been supplied to all Members. Members have also received copies of summary leaflets, which have been distributed to all households in the New Forest. The New Forest Committee, although not a consultee, considered the consultation document at their meeting on 7<sup>th</sup> August 2001 (Report F). The Committee have sent their views to all of the local authorities. Members have been supplied with copies of the report as further background information. Various other comments have been received from organisations and individuals. These have been taken into account in preparing this report. They are listed in Appendix 1 and copies are available in the Members room. This Cabinet Report does not reproduce the information set out in the Countryside Agency's consultation document, nor the detailed comments contained in P & R Report A of 21<sup>st</sup> February 2001. *Members are asked to bring both documents with them to the meeting.*

### 4. Criteria for Defining a National Park Boundary

- 2.1 The boundary for National Park designation should include land that qualifies under one or both of the two National Park purposes for *Natural Beauty* and for *Opportunities Offered for Recreation*. In their draft consultation document the Agency highlighted the following key headings:
  - Outstanding historic landscape
  - Landscape with a unique character
  - Landscape with an aesthetic appeal
  - Ecological considerations
  - Historical considerations
  - Commoning considerations
  - Opportunities for open-air recreation
- 2.2 The Countryside Agency has recently reviewed and agreed a revised approach to drawing the detailed boundary of a National Park. *Members' attention is drawn to the approach and criteria set out in Appendix A of the Countryside Agency's draft boundary consultation document.*

### 3. Proposed Boundary – Comments on Revised Boundary Sections

- 3.1 In their consultation document the Countryside Agency have described the boundary using the same Sections as for the draft consultation. There are 17 Sections shown on Maps 1 to 20.
- 3.2 There are no changes proposed to the draft boundary by Countryside Agency to the following Sections. The draft boundary for each of these Sections was supported by NFDC.

**Section 1: North of Totton - Map 1**

**Section 2: Totton Bypass - Map 1**

**Section 4: Marchwood - Map 2**

**Section 5: Dibden Bay - Map 3**

**Section 7: Langley to Fawley - Map 6**

**Section 10: Solent Coast - Maps 7 to 9**

**Suggested Response:**

- Support the proposed boundary.
- No change to previous comments.

- 3.3 The Countryside Agency have either proposed changes, or have not agreed with NFDC recommended changes, to the draft boundary, for the following Sections.

**Section 3: Eling - Map 2**

- 3.4 The proposed boundary has been revised to include Eling Great Marsh.
- 3.5 Land north-west of Marchwood, that NFDC asked to be included, between, Tavell's Lane, Bury Road, the built-up area of Pooksgreen and the A326 is still excluded. The Agency considers that even after restoration the land is unlikely to meet the natural criterion because of visual intrusion. This is disappointing and it is considered that this is the first of three locations where the Agency is trying to assess natural beauty at a single snapshot in time and at too fine a scale. None of the peripheral blocks of land in the vicinity of the proposed boundary are very large. Each of them should be seen as an entity (unless there are very strong local features that dictate otherwise). Wherever possible a more robust and long-term approach should be taken both to the assessment of natural beauty and to the creation of a clearly defined boundary to the national park whose logic will remain apparent well into the future. In responding to the draft boundary NFDC commented:

"North-west of Marchwood the boundary follows the existing NFHA, excluding land within the Strategic Gap that is currently being worked for gravel. These mineral workings are due to be completed before 2010, with the land being restored and re-instated to farmland. In its re-instated form this area will have considerable potential as back-up grazing close to areas of relatively affordable housing. It could also offer opportunities for access and quiet recreation in an area where such potential between extensive urban areas and the Open Forest is scarce. Given the relatively short period that gravel extraction will continue before restoration the proposed designated area should be extended at the outset to include land between Tavell's lane, Bury Rd, the built-up area of Pooksgreen and the A326."

**Suggested Response:**

- Welcome and support the proposed boundary change to include Eling Great Marsh.
- Object to the continued exclusion of land north-west of Marchwood between, Tavell's Lane, Bury Road, the built-up area of Pooksgreen and the A326 for the reasons above.

## **Section 6: Hythe to Langley - Maps 4 & 5**

- 3.6 The proposed boundary has been revised to include the coastal marshes between Hythe and the refinery marine terminal, and the countryside of the Frost Lane valley linking the Open Forest and coast. The revised boundary for the land within the Strategic Gap at Frost Lane follows that recommended by NFDC, apart from the exclusion of land (regenerating heathland in an area of former gravel extraction) that is identified as a preferred area for waste disposal in the Minerals and Waste Local Plan. Following permission being granted for the Marchwood incinerator it is suggested that the Countryside Agency monitor the possible changing status of this land during the boundary designation process. If it could be included it would be a valuable addition to this area.

### **Suggested Response:**

- Welcome and support the proposed boundary change.

## **Sections 8 & 9: Ashlett Creek & Calshot - Map 6**

- 3.7 The proposed boundary has been revised to include the foreshore from Fawley oil refinery to Calshot Point. Fawley Power Station remains an excluded "island". In principal this change meets the recommendation by NFDC and is to be supported.

### **Suggested Response:**

- Welcome and support the proposed boundary change.

## **River Test and Southampton Water**

- 3.8 In response to the draft consultation NFDC suggested to the Countryside Agency that the boundary of the designated area should follow the administrative boundary along the River Test:
- "The functions of local planning authorities - including national parks - extend across rivers and estuaries and to Mean Low Water (MLW) on the coast. The designated area should therefore extend consistently to administrative boundaries where rivers form the proposed boundary (i.e. At the River Blackwater and the River Test in Southampton Water to the Esso marine terminal); and to MLW on the coast (i.e. From Ashlett to Hurst Spit)"
- 3.9 The Agency has said that a boundary to the mid-point of the River Test would be difficult to administer, and no change is proposed. The boundary proposed by NFDC is precisely the one currently administered by the local planning authority without difficulty. It would be illogical and contrary to established practice for administrative boundaries not to use an existing defined river boundary.
- 3.10 It has been suggested that with the inclusion of coastal marshes and foreshore at Hythe and Ashlett / Calshot, it would be logical to join these areas by including in the designation the area between Mean High Water and Mean Low Water in front of the Esso terminal. This land is also part of the SSSI, SPA, SAC and Ramsar designations. This would leave the Esso site treated as an "island" in the same way as Fawley Power Station.

### **Suggested Response:**

- Repeat the view of the District Council that the logical National Park boundary that is consistent with that currently operated by the local planning authority should be adopted along the River Test.
- The boundary should be extended to include the area subject to nature conservation designations in front of the Esso terminal so as to complete the

area of coastal marsh and foreshore proposed to be included in the national park.

### **Section 11: Lymington River to Everton - Maps 9 to 11**

- 3.11 The proposed boundary has been revised in the vicinity of Keyhaven to follow New Lane and Lymore Lane, but to exclude Efford Horticultural Research Station. This change, while not identical to that proposed in the previous report to the Advisory Cabinet on the draft boundary consultation, is a considerable improvement in an area where it is difficult to find a very strongly defined boundary.
- 3.12 In response to the draft boundary consultation Members resolved to recommend to the Countryside Agency that the settlement of Milford-on-Sea and adjacent countryside should be included within the designated area. The principal reasons for this were:

"Historically Milford was part of the Royal Forest long before many other parts now proposed for inclusion. Milford and Keyhaven have been one community for many years dating back to the 1665 Hearth Tax, which shows them together.

In terms of natural beauty Milford (without Keyhaven) has considerable qualities of landscape and character. There are parts of 2 Sites of Special Scientific Interest (SSSIs), and 10 Sites of Importance for Nature Conservation (SINCs) that include ancient semi-natural woodland sites. These natural areas are all publicly accessible and their quality is on a par with any similar areas in the New Forest. Ponies graze Studland Common. Sturt Pond at the landward end of the spit supports geese and moorhen. The finest views of the Isle of Wight and the Needles are from the cliff top at Milford. The historical quality of the village is recognised through 2 Conservation Areas with manor houses and a Norman church as well as other listed buildings.

So far as recreational criteria are concerned, Milford has much to offer as a part of the proposed national park, extending the range of facilities and taking some visitor pressures away from the Forest core. In addition to quiet recreation - walking, cycling, fishing and birdwatching - there are opportunities to relax and enjoy a traditional beach scene. There are good footpath links back to Lymington. The village makes a significant contribution to visitor accommodation with 4 caravan and camping sites in addition to hotels and B&B facilities."

- 3.13 The Countryside Agency have considered the representations made about Milford-on-Sea in some detail. Their responses are set out on pages 25 to 29 of the consultation document. These include comments about the village itself. The document also considers the issue of back-up grazing as a part of the "natural beauty" criterion, and concludes, "the existence of back-up grazing [here] is not sufficient to elevate this area to a quality that would satisfy the criteria". Overall the Agency decision is still to exclude Milford-on-Sea from the proposed boundary. Members, therefore, need to decide whether to accept this decision, or to object to the proposed boundary in favour of inclusion of Milford-on-Sea as suggested in response to the previous consultation on a draft boundary.

#### **Suggested Response:**

- Support the proposed boundary change as being clearer than the boundary in the draft consultation document.

### **Section 12: Everton to Highcliffe – Maps 10A, 11 and 12**

- 3.14 The Countryside Agency does not propose any changes to the draft boundary for this Section. NFDC's response to the draft boundary consultation

recommended that the boundary between Everton and Hordle should be revised:

“Parts of the boundary in this Section following NFHA boundaries are complicated threading across the countryside along field edges. The transitions in character and quality of landscape are not sufficiently clearly marked to warrant such detailed variations. It would be much better for the boundary to follow roads or the defined edges of built up areas wherever possible so as to give a clearly discernible, simpler and more robust long-term boundary.

From Everton to the B3055 a robust boundary should be taken replacing the existing NFHA boundary by one following the caravan park / built up area boundary at Everton and then along Everton Road and the defined built up area of Hordle. The boundary would rejoin the NFHA boundary north of Hordle, beside the defined built up area of Ashley and along the Danes Stream to the B3055.

This more clearly defined boundary would remove some of the current boundary anomalies such as at Ice House plantation. It is slightly wider than the NFHA and would bring Efford House and Arnewood House into the designated area. Efford House is a grade II\* listed building with some residual designed landscape in its grounds. A fictionalised version of Arnewood House provides the setting for the opening of Captain F Marryat’s novel “The Children of the New Forest, much of whose action takes place between here and Lymington.”

- 3.15 In the consultation document the Countryside Agency recognises, “There is some merit in extending the boundary southwards to the edges of Everton and Hordle in terms of landscape quality, commoning and a better defined boundary”. Nonetheless the Agency justify not revising the boundary on the grounds that:
- The NFHA boundary has stood the test of time
  - There is a subtle but clear change in landscape character....from farmland landscape types to coastal plain estates
  - Increasing urban fringe influences
- 3.16 The first of these reasons has nothing to do with national park designation criteria. In fact the NFHA boundary in this area has never been tested or scrutinised through the local plan process. Officers of NFDC who originally walked this part of the NFHA line prior to its adoption were, even then, not happy with its unclear definition. However, because of the constraints of the process at that time, adjustments to the draft NFHA boundary suggested by consultants were confined merely to rationalising it to the nearest extant boundary where there was no discernible feature on the line of the draft version.
- 3.17 It is considered that this is the second location where the Agency is trying to assess natural beauty at too fine a scale, and this area should be treated as an entity up to the Everton Road or built up area boundaries. It is difficult to square exclusion of this land on grounds of a subtle shift to a small parliamentary enclosures landscape, with the Agency’s proposal for the inclusion in the designation of much of the land around Burton, described in the consultation document as comprising “small parliamentary fields”. This area is typical of much of the fringes of the New Forest. Everton and Hordle (which are not proposed by NFDC for inclusion) have seen significant recent development, but its scale and consequent urban fringe influence on the nearby Forest fringe is no greater than, for example, at Brockenhurst, Sway or Bransgore.
- 3.18 The whole of this area also has strong New Forest associations in an area where there is a need for back-up grazing. It is suggested that the Countryside Agency should consider recent further research carried out on behalf of the New Forest Committee.

**Suggested Response:**

- Object to the proposed boundary for the reasons above. The boundary north of the A337 should follow the caravan park / Everton built up area boundary, Everton Road and the built up area of Hordle.

**Section 13: Avon Valley below & including Ringwood – Maps 13 to 15**

3.19 The proposed boundary has been revised to include Town Common, St Catherine's Hill and Leybrook Common; and to include the whole of Ringwood. In response to the draft consultation, each of these areas was recommended by NFDC for inclusion and these changes are very welcome. There are also some minor changes to the proposed boundary at Burton.

3.20 The Countryside Agency has not revised the proposed boundary between Town Common and Leybrook Common as recommended by NFDC. Instead of utilising the A338 as the boundary, as was suggested, the Agency proposes to retain the boundary as shown in the draft consultation. This follows field edges at the foot of the escarpment. The excluded area, which is a relatively narrow strip of land, comprises Week Common, which is a SSSI and part of the Dorset heathlands SPA/Ramsar site, and conifer plantation overlying heathland. In their report the New Forest Committee have commented:

"The Agency seems concerned about extending the boundary to include some coniferous woodland stating that it does not meet the natural beauty criterion. In fact the mosaic of conifer plantation over heath, or with heath and other habitats, is particularly characteristic of the New Forest, and appreciated by the public. Coniferous woodland also makes an important contribution to the socio-economic management of the area. English Nature comment that these largely first rotation plantations have high potential nature conservation value, particularly if sympathetically managed. In any case sympathetic management of this land will be important to maintain the integrity of the River Avon and its associated habitats. [This area] has high potential value for recreational use in the future"

These comments are agreed with. This area is an integral part of the Avon Valley landscape and the A338 would be a much clearer and robust long-term boundary.

**Suggested Response:**

- Welcome and support the proposed boundary changes to include Ringwood; and Town Common, St Catherine's Hill and Leybrook Common.
- Object to the continued exclusion of land east of the A338 between Town Common and Leybrook Common for the reasons above.

**Section 14: Avon Valley: Ringwood to Fordingbridge - Maps 15 & 16**

3.21 The Countryside Agency do not propose to make any changes to the boundary in this Section despite recommendations made in response to the draft consultation by NFDC, The New Forest Committee and others. This is very disappointing.

3.22 The following comments were made by NFDC on the draft boundary:

"The boundary includes all of the river terraces and valley sides to the east of the river, but follows a complicated field edge route working along the edge of the ESA and/or floodplain.

The reasons for revising this boundary to a more robust line to the west so as to incorporate both sides of the river valley are as logical and strongly justified as for the Section to the south.

As well as not being a satisfactory landscape boundary for the Avon valley overall, the boundary excludes various important local areas and significant buildings that are

landmarks in the valley. For example, the valley edge through Turmer, Harbridge Farm and Harbridge Green is a characteristic Forest edge landscape of a comparably high quality to that found on the western slopes along the Gorley Road. Harbridge church is in the centre of the valley and has an approach from the east via Ibsley bridge. Somerley House (grade II\* listed building) also enjoys both a commanding location to the west of the river and has one of its principal accesses from the east via Ellingham and New Bridge. Both of these visually important historic buildings within the Avon valley would be excluded by the proposed boundary.

The proposed boundary also fragments opportunities for outdoor recreation by excluding a significant length of the Avon Valley Path.

A boundary following the ridge line above the valley would include some important viewpoints across the Avon Valley and the New Forest, for example near to Bowerwood House."

- 3.23 In addition to excluding areas that in themselves merit inclusion, the proposed boundary is unnecessarily over-complicated (and thus not a good long-term boundary), pays no regard to farming practices in the area and is hard to comprehend on the ground by, for example, anyone walking along the footpath network in the Avon Valley.
- 3.24 As the New Forest Committee have commented, It is difficult to understand the Agency's comments about dominance and unacceptability of coniferous woodland within the landscape, or lack of landscape quality. Most of the area is typical Avon Valley mixed grass and arable farms. Coniferous plantations do not extend beyond Lower Turmer. The valley side includes Somerley House with coniferous plantation beyond it on the quite pronounced slopes. Further north the valley opens out into farmland and semi-natural woodland that has the New Forest characteristics of an area subject to grazing prior to the relatively recent fencing and gridding of the Perambulation. As was previously stated, in parts the excluded landscape has much of the character and quality of the eastern Avon Valley fringes at North and South Gorley, which is highly regarded for its "New Forest character".
- 3.25 In considering the draft boundary at Fordingbridge it was recognised that, on the edge of the designated area, it was a difficult judgement as to whether in terms of the designation criteria the town should be included or not within the boundary. On balance Members decided to recommend that Fordingbridge should be included. The Countryside Agency has re-considered the town (page 35 of consultation document), but does not consider that there is a sufficiently compelling case for the inclusion of Fordingbridge.

**Suggested Response:**

- Object to the proposed boundary between Ringwood and Fordingbridge for the reasons above. The boundary should follow the B3081, the Alderholt Road / Harbridge Drove from Baker's Hanging, Lomer Lane and Bowerwood Road (B3087) to re-join the proposed boundary

**Section 15: Fordingbridge to Searchfield Farm - Map 17**

- 3.26 The proposed boundary has been revised to include land in the vicinity of Burgate House, further land at Breamore village and a further part of the built up area at Redlynch. In response to the draft consultation NFDC recommended inclusion of the land at Burgate House, the whole of the Breamore Conservation

Area and the relic water meadows at South Charford Farm and North Charford Manor House.

- 3.27 While the inclusion of a greater area of Breamore Village is to be welcomed, parts of the Conservation Area are still excluded and the boundary as now proposed is not logical and cannot all be located on the ground. The Agency appears to be reluctant to change the adjacent boundary of the AONB. It is accepted that this is an additional administrative task, but in an overall process that will take several years, involve a public inquiry and include de-notification of the South Hampshire Coast AONB, this should not be an obstacle preventing setting the proper boundary for a New Forest National Park at the outset. The existing AONB boundary and co-terminus proposed National Park boundary does not follow topographical features. It cuts across fields and cannot be identified on the ground. While it might notionally be thought to demarcate the edge of the chalk landscape it has no practical reality and contravenes the principles for defining recognisable boundaries. It also means that the parts of the village at Upper Street and Breamore House and church are severed from the remainder of the village.
- 3.28 Because the Countryside Agency have not included the additional land at South Charford Farm and North Charford Manor House, as recommended by NFDC a further part of the Breamore Conservation Area is excluded from the boundary. The Conservation Area was designated to include the whole of Breamore Village and its Common together with the directly associated water-meadows and pasture. The whole of the Conservation Area should be incorporated in the proposed National Park.

**Suggested Response:**

- Welcome the Countryside Agency's recognition that "the case for inclusion of Breamore is clear ... and that a wider area merits designation", but object to the boundary as proposed for the reasons above. The whole of the Breamore Conservation Area should be included within the proposed boundary. In the vicinity of South Charford Farm and North Charford Manor House, the boundary should either follow the A338 as previously recommended by NFDC, or should follow the Conservation Area boundary.

**Section 16: Searchfield Farm to Plaitford Green - Maps 18 & 19**

**Section 17: Plaitford Green to A3090 - Map 20**

- 3.29 The Countryside Agency has not proposed any alterations to the draft boundary for these Sections. In response to the draft consultation NFDC recommended that the boundary should be altered north of Searchfield Farm to follow a public bridleway that runs from Moot Lane, just north of the small brickworks, to North Charford. It is an old green lane bordered by oaks and holly.
- 3.30 The New Forest Committee suggested changes to the draft boundary, and has again proposed the inclusion of additional areas. In responding to the draft consultation, NFDC requested the Agency to assess the countryside proposed for inclusion by the New Forest Committee; and to consider its qualification for whole or part inclusion.

**Suggested Response:**

- Not object to the proposed boundary but repeat the view of the District Council that the bridleway as described above would be a better long-term boundary



- Draw the Countryside Agency's attention to the recommendations of the New Forest Committee for inclusion of additional land, and request that they be considered together with responses from the local authorities.

#### **4. De-notification of the South Hampshire Coast AONB**

4.1 The proposed de-notification of the South Hampshire Coast AONB is a necessary and logical part of the process of incorporating the whole area into a national park designation.

##### **Suggested Response:**

- Support de-notification of the South Hampshire Coast AONB in conjunction with designating a New Forest National Park.

#### **5. Financial Implications**

7.1 None arising directly from this report.

#### **6. Crime and Disorder Implications**

6.1 None arising directly from this report.

#### **7. Environmental Implications**

7.1 As set out in the report

#### **8. Recommendation**

That the Countryside Agency be informed that the District Council's comments on the consultation document are as set out in each of the suggested responses in this Report.

##### **Further Information:**

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##### **Background Papers:**

A New Forest National Park : proposed boundary  
Local Authority Consultation –  
Countryside Agency consultation document June 2001  
New Forest Committee Report F –  
August 2001  
Comments received as in Appendix 1

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**Comments received on Consultation Document  
(copies available in the Members room)**

New Forest Commoners' Defence Association  
Environment Agency  
Milford-on-Sea Parish Council  
Ringwood Society  
New Forest Association of Local Councils  
Clarks Solicitors (Acting for Moortown Farms Limited)  
Countryside Agency - financial information  
New Forest Association  
Council for the Protection of Rural England  
The Wildlife Trust  
Calshot Oyster Fishermen Ltd  
Further submission by Commoners' Defence Association  
Further correspondence on behalf of Moortown Farms Limited ( Counsel's opinions)