

NEW FOREST NATIONAL PARK PLAN CONSULTATION DRAFT

1. PURPOSE OF THIS REPORT

- 1.1 The New Forest National Park Authority has published a consultation draft National Park Plan. This sets out the proposed long-term vision and objectives for the National Park, together with policies and proposed priority actions over the next 5 years or so. It aims to fulfil the purposes of the National Park Management Plan and the Local Development Framework Core Strategy and Development Control policies, all in the one document.
- 1.2 This report sets out a recommended response to the consultation on the draft National Park Plan. It takes account of views expressed by Members at the informal meeting on 13th October. The aim of this response is to provide a basis for further joint working with the National Park Authority. The most successful outcome would be a position where both the District Council and the National Park Authority are able to endorse and support each other's Plans when they are tested through Public Examination. It is hoped that the final National Park Plan, when it is submitted to the Government, will be a Plan that New Forest District Council and the New Forest Local Strategic Partnership can support. As will be evident from this report, there is more work to be done in achieving this.
- 1.3 The National Park Authority has supplied all NFDC Members with a copy of the draft Plan.

2. BACKGROUND

- 2.1 The National Park Authority has a duty to prepare a National Park Management Plan and also, as a local planning authority, is required to produce a Local Development Framework (LDF). Initially, the National Park Authority and New Forest District Council agreed to prepare a joint LDF Core Strategy for the combined areas, which made a lot of sense in the light of the geography and relationships between the National Park and the rest of the District. Initial evidence-gathering work and consultation was done on this basis. In July 2007, the National Park Authority decided not to proceed with a joint LDF Core Strategy, but rather to combine the National Park's Core Strategy with the National Park Management Plan.
- 2.2 Consequently, NFDC has progressed its separate Core Strategy through the "Preferred Options" consultation stage to a submission document (Council 23rd October 2008). The National Park Authority's consultation document is the "Preferred Options" stage of their LDF Core Strategy (including Development Control policies) together with being a draft National Park Management Plan.
- 2.3 Under planning legislation, the National Park Core Strategy must have regard to any Sustainable Community Strategy for its area. In the case of the New Forest National Park, the main relevant Community Strategies are those for New Forest District (for which NFDC is the lead authority) and Hampshire, with those for Salisbury, Test Valley and Wiltshire also being relevant.

- 2.4 New Forest District Council, in the early 1990s, had pressed for National Park status for the New Forest but with a tailor-made constitution reflecting the unique circumstances of the New Forest, rather than setting up a separate standard National Park Authority under the 1949 National Parks and Access to the Countryside Act. A tailor-made arrangement was advocated by NFDC because of the existing statutory protections for the New Forest; the range of existing bodies concerned with the New Forest; the location of the New Forest – mostly within New Forest District Council area; the fact that the New Forest includes a substantial population; and the interactions between the New Forest and the surrounding areas in New Forest District. In 1995 the Government granted the New Forest Heritage Area (as originally created by NFDC) National Park status for planning purposes. NFDC welcomed this and appropriate “National Park” policies were included in the New Forest District Local Plan (and subsequently its First Alteration) to reflect this. The Government then decided to establish a standard National Park Authority under the 1949 Act, rather than applying a tailor-made approach. NFDC (Cabinet on 18th March 2002) had expressed its disappointment “that the Countryside Agency have not been persuaded that the unique circumstances of the New Forest warrant recommending to the Secretary of State that there should be special legislation. This would secure proper representative membership of a statutory co-ordinating body, while also retaining local accountability through existing local authorities for their statutory functions.” Given the establishment of a standard 1949 Act National Park Authority (against NFDC’s wishes), it is essential that the National Park Authority works very closely with NFDC, other local authorities in the National Park, and other local organisations to ensure that the special circumstances of the New Forest, as summarised above, are properly and fully taken into account in drawing up and implementing plans for the National Park.

3. COMMENTS ON THE DRAFT NATIONAL PARK PLAN

- 3.1 This section of the report comments on the draft National Park Plan, first in terms of general comments and then on specific issues. **Key points are emphasised in bold.** Appendices 1 and 2 set out some more detailed comments on the economy/tourism and on transport. The page references are to the parts of the draft National Park Plan that deal with the respective issue – although these references are not comprehensive as some issues are dealt with at many different places.
- 3.2 **New Forest District covers more than 75% of the National Park. NFDC Councillors have been elected to represent the local population, and in many cases represent wards which are wholly or partly within the National Park. This report reflects NFDC’s responsibilities relating to social, economic and environmental well-being over the whole area of New Forest District, which includes most of the National Park. It is essential that the final NPA Plan takes these points on board if the Plan is to deal properly with local issues and the needs of local communities. The comments made in this report also reflect NFDC’s position as an adjoining local planning authority.**
- 3.3 The National Park Plan must have regard to relevant legislative requirements, as set out below (paragraphs 3.4 to 3.8). Reconciling the competing requirements is not an easy task, especially given the circumstances and location of the New Forest National Park. The New Forest National Park has to take full and realistic account of the fact that some 34,000 people live within the National Park, that there are many

existing businesses within the National Park, and that the National Park is located between two major conurbations [South Hampshire and South East Dorset], both of which are proposed for substantial growth under Government policy. This is a very different position from the more remote and less-populated situation of most other National Parks.

NATIONAL PARK PURPOSES AND STATUTORY DUTY

- 3.4 The National Park Plan must reflect National Park purposes to:
1. conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and
 2. promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.
- 3.5 In those cases where conflict exists between the two purposes and reconciliation proves impossible, the first purpose should take precedence (the Sandford Principle). This is reflected to some extent in the “overarching Strategic Policy” of the National Park Plan (page 33) – although this Policy should refer to the aim to seek reconciliation of any conflict between the 2 purposes.
- 3.6 Section 62 of the Environment Act 1995 states that a National Park Authority, in pursuing National Park purposes specified, “shall seek to foster the economic and social wellbeing of local communities within the National Park, but without incurring significant expenditure in doing so, and shall for that purpose co-operate with the local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park” (this is commonly referred to as the “statutory duty” of National Park Authorities).
- 3.7 A recent High Court decision in the Pembrokeshire Coast National Park [usually referred to as the “Bluestone” case] established that the impact on the local economy is a relevant factor in National Park planning decisions.
- 3.8 The National Park Plan, as a LDF Core Strategy, must have regard to national planning policies and guidance, must be in general conformity with the regional planning strategy (the South East Plan) and must deal with the spatial aspects of the Sustainable Community Strategy.

THE OVERALL APPROACH OF THE DRAFT NATIONAL PARK PLAN, INCLUDING THE PRIORITY OBJECTIVES

- 3.9 **The Plan as a whole must properly reflect both of the National Park purposes and the statutory duty (as set out in paras. 3.4 and 3.6 above), and must give proper spatial expression to the application of the New Forest District Sustainable Community Strategy to the National Park area. As set out in more detail below, New Forest DC does not consider that the draft Plan has reached the correct balance in this respect. There is no argument regarding the need to conserve and enhance the special qualities of the New Forest National Park. This has always been a central concern of New Forest DC, as reflected in the District Council’s Local Plan (2005), which covered most of the area that is now in the National Park. However, the National Park Plan must properly deal with the needs of the 34,000 people who live in the National Park and the related economic, social and community needs.**

- 3.10 The “Priority Objectives” (pages 39 to 51, and 128 to 132) are:
- Priority Objective P1: Plan for the likely impacts of climate change on the special qualities of the area and reduce the overall environmental footprint of the National Park.
 - Priority Objective P2: Conserve the wealth of individual features that contribute to local distinctiveness and resist the gradual loss of landscape character.
 - Priority Objective P3: Maintain, extend and enhance the tranquility of the National Park.
- 3.11 Priority Objective 1, relating to climate change, is likely to figure in any recently produced plan. The other two Priority Objectives focus on conservation and tranquility. This focus feeds through into the development of policies, actions, targets and indicators. The draft Plan states (page 3) that “Policies under all the objectives will be actively pursued, but partner organisations will be encouraged, in particular, to focus resources over the next 6 years on the three Priority Objectives for this Plan.”
- 3.12 **New Forest DC considers that the Priority Objectives are too focused on National Park purposes [and in particular on the first purpose of conservation] and give inadequate weight to the duty to foster the economic and social well-being of local communities.** The priorities identified in the draft New Forest Plan need to reflect the priorities identified in the New Forest District Sustainable Community Strategy (which include, for example, “Increase the supply of affordable housing”), as well as reflecting National Park purposes,. The Local Strategic Partnership has expressed concerns about this, and has asked the National Park Authority to do further work on establishing links between the Sustainable Community Strategy and the National Park Plan.
- 3.13 **New Forest DC is not convinced that proper account has been taken, in putting together the draft Plan, of the views put forward by the District Council representatives and by other participants from the local communities, in the earlier consultations and workshops held by the National Park Authority.**
- 3.14 The above general comments are elaborated on in the more detailed comments below.

INTRODUCTION AND VISION FOR THE NEW FOREST NATIONAL PARK (PAGES 1-7)

- 3.15 The Introduction recognises (page 3) that: "It is a plan for the National Park as a place and a community, and not for the National Park Authority or any particular organisation. As such it is essential that the Vision is shared by a wide cross-section of interest groups and statutory bodies. The success of the final Plan will depend on the commitment and action of all those who manage, use or live in the National Park, as well as the nearby authorities and regional decision-makers".
- 3.16 **The above statement is to be generally welcomed, but the wording should be revised to recognise that NFDC (and the other local authorities that cover the National Park area) are not "nearby" local authorities but actually are the responsible local authorities for the National Park. As has already been mentioned, it is a statutory duty that the National Park Authority co-operates with the local authorities and public bodies whose functions include the**

promotion of economic or social development within the area of the National Park. The Plan should include a clear, short description of the respective responsibilities of the National Park Authority and the District Council (and the other relevant local authorities) within the National Park area.

- 3.17 The Vision is set out on pages 6 and 7 of the draft National Park Plan. As with most visions, this has some aspirational aspects to it, but in general **this vision can be supported as something to work towards**. In this respect it is important that, as well as reflecting the conservation aims, the Vision also properly reflects the National Parks second purpose (e.g. “Where everyone is welcomed and encouraged to appreciate the special qualities of the New Forest”); and the National Park statutory duty (e.g. “.....communities are increasingly self-sufficient, with improved access for all to local housing, employment, sustainable transport and a range of services,..”). The vision also (rightly) includes “A place for which people work together towards a common goal”. **The vision should better reflect recognition of the needs of the local economy, which contributes in its own right to the social and economic health of the area, and cannot all be expected to contribute directly to the National Park’s identified special qualities [which relate to conservation, enjoyment and understanding (see page 18 of the draft National Park Plan)] – recognising that economic development must not harm the special qualities.**
- 3.18 The issues raised in the comments below are based on broad support for the Vision for the National Park. The comments focus on whether the Plan is properly dealing with both of the National Park purposes and the statutory duty to foster the economic and social well-being of local communities. There is absolutely no issue regarding the need for plans within and around the Forest to protect the special qualities of the New Forest. This has been a longstanding priority of NFDC and is reflected in the Council’s currently adopted Local Plan and emerging Core Strategy.

PORTRAIT OF THE NEW FOREST NATIONAL PARK (pages 9 to 19)

- 3.19 This section usefully describes the main attributes and special qualities of the National Park and its surroundings. It reflects the inter-relationships with nearby areas: for example the role the National Park plays in providing for informal recreation for local people (“60% of all visits are local day visits made by people living within the National Park or in nearby towns...”).
- 3.20 **The Plan rightly recognises (page 13) that the numbers of people living in New Forest District, including most of the National Park, are projected to fall.** This is significant in considering appropriate responses to any impacts on the National Park arising from local recreational pressures (as opposed to the pressures from the substantial growth further away in the South East Dorset and South Hampshire conurbations, which need a different approach).

RELATIONSHIP WITH SURROUNDING AREAS AND CROSS-BOUNDARY ISSUES (pages 17, 32 to 33, 57 to 59, 86, 89-91).

- 3.21 The relationship with the National Park has been a key factor in drawing up NFDC’s Core Strategy, which includes many references to the National Park. Similarly, the relationship with surrounding areas, including in particular the rest of New Forest District has to be a key consideration for the New Forest National Park Plan. This is recognised on page 89 of the draft National Park Plan, which states: “The National Park covers a relatively small geographical area and therefore the importance of cross-boundary partnership work is critical to its functioning.” The same section, on

working with others across the boundary and in the wider region, states that the approach will be to: “Create a shared understanding of the positive role of the National Park can play in the sub-region, working with all relevant authorities and other protected landscapes to achieve policies and actions which complement National Park purposes.”

- 3.22 The New Forest National Park is in heavily developed south-central England unlike the other National Parks which are generally in more remote and tranquil areas. The references to cross-boundary issues (and to joint working) in the draft National Park Plan focus on what the NPA wishes other authorities to do to achieve the Plan’s aims. **The National Park Plan should better reflect the need for two-way joint working, recognising the complexities of dealing with difficult issues in this particular location where substantial towns and villages lie very close to (and within) the National Park; and must deal realistically with the issues arising from the fact that the National Park lies between the large conurbations of South East Dorset and South Hampshire, both of which are going to experience substantial growth as a consequence of national and regional policy. In finalising the Plan, the sections on cross- boundary issues need to be developed to show how the National Park proposes positively and realistically to respond to the consequences of the plans in the wider area; and how the plan will contribute towards resolving issues in the wider area, reflecting the need for constructive working with local authorities and other partners to achieve the best overall results for the National Park and the wider area.**
- 3.23 As an example, the draft National Park plan (e.g. page 30) refers to the aim of “minimising the impact of recreational pressure from surrounding areas”. The Plan could be written in a more positive way to reflect the second National Park purpose to “promote opportunities for the understanding and enjoyment of the special qualities of the area by the public”. As discussed in the next sub-section of this report, not all of the National Park is of equal sensitivity. **Clearly it is important to avoid harm to the sensitive areas but this does not mean that there cannot be a managed approach towards providing for recreational needs, and wider economic and tourism needs, in less sensitive parts of the National Park. This aspect needs to be developed in finalising the Plan, and one of the ways to do this is through zoning.**
- ZONING WITHIN THE NATIONAL PARK (pages 27 to 29)**
- 3.24 The draft plan proposes that areas within the National Park be classified into 3 zones, depending on their sensitivity. This approach has much to commend it. Areas of international nature conservation importance (included in Zone 1) clearly need greater protection than areas that lie within the National Park boundary but which are less sensitive. A proper zoning approach, backed up by the right policies, can help take pressures off the more sensitive areas including those designated as of national/international nature conservation value. **In the draft Plan, this classification into zones does not yet appear to be fully carried through into other policies (e.g. providing opportunities for recreational provision), although it is developed more in the draft Recreational Management Plan. This needs to be developed in finalising the National Park Plan.**
- 3.25 In particular, **the NPA should give serious consideration to identifying a fourth zone, characterised by more robust areas that are able to incorporate the stimulation of visitor revenues and jobs.** It could include towns and villages, large visitor attractions and other appropriate locations. It could provide an opportunity to create park and ride facilities, which could encourage spending on-site and support sustainable forms of transport into zones 2 and 3.

IMPROVING THE EXISTING NETWORK OF PATHS (page 31)

- 3.26 The draft Plan refers to the need to link current paths with new ones to improve access to and within the National Park. **This is to be supported and is an obvious matter for continued joint working.**

HOUSING REQUIREMENTS (page 32)

- 3.27 The draft National Park Plan refers to the housing requirement 2006-2026 for New Forest District in the submitted South East Plan of 4,140 dwellings, stating that there is no specific National Park requirement but that based on past building rates it is estimated that on average 10 dwellings a year might be built within the National Park (i.e. 200 dwellings over the whole Plan period). Events have moved on, and the Government's Proposed Change to the South East Plan have separated out a National Park requirement of 220 dwellings 2006-2026, leaving a requirement for New Forest District outside the National Park of 3,920 dwellings. NFDC Cabinet resolved on 1st October 2008 to support this housing requirement.
- 3.28 It is understood that the NPA is likely to object to the separate housing requirement for the National Park, on the basis that it would then need to maintain a rolling supply of land for housing development as required by Planning Policy Statement 3. **NFDC officers support the view that it is inappropriate to have a PPS3 housing requirement for the National Park** (and other National Parks do not have this requirement). The "220 dwellings 2006-2026" figure would more appropriately be treated as an estimate of the number of additional dwellings likely to be provided through the policies, which are directed towards affordable housing as discussed in the next point. It should neither be regarded as a PPS3 target nor as an annual limit if there are otherwise acceptable proposals that would bring forward affordable housing (as considered in paragraphs 3.29 to 3.33 below). **There is no case for adding the National Park's "220 dwellings" estimate into the housing requirement for New Forest District outside the National Park.**

AFFORDABLE HOUSING (pages 32, 77-79, 107, 142)

- 3.29 The provision of affordable housing is a key issue throughout New Forest District including the National Park. (as the Plan recognises on page 77). As an indication, in September 2008 there were over 550 applicants on the Council's Homesearch Register with a housing need in parishes wholly or partly in the National Park. NFDC is the responsible housing authority across the whole District and aims to work closely with the NPA to ensure that adequate provision for affordable housing is made. The NPA and NFDC jointly commissioned work on the economic viability of affordable housing as part of the evidence-base needed to support policies in the respective Core Strategies.
- 3.30 The draft National Park Plan deals with affordable housing in several places. Policy DC4 (page 107) states that within the four defined service villages (Ashurst, Brockenhurst, Lyndhurst and Sway), at least 50% of any housing development (of whatever scale) shall be for social rented housing with the balance being for intermediate housing. However, an element of market housing for not more than 25% of dwellings on the site, in place of intermediate housing, may be considered if it can be shown that the market housing is essential in order to ensure the viability of the affordable housing. Outside the four defined service villages, only small scale rural exceptions for affordable housing (at least 75% social rented and the rest intermediate housing) would be allowed.
- 3.31 The draft National Park Plan sets no overall or annual target for the provision of affordable housing.

- 3.32 While supporting the view that the National Park is not the right area to provide for general housing market demands, **NFDC officers are concerned that the proposed approach may not produce sufficient affordable housing. “Affordable housing” does not appear in the “Priority Objectives” (pages 39 to 51) or in the “Actions for the Priority Objectives” (page 93). There is no reference to affordable housing in the “Actions for Living and Working in the National Park” (page 96) – except for a reference to schemes for the provision and affordability of private rented accommodation for commoners and others involved in the local rural economy. The proposed “Indicators and targets” (pages 97 to 100) again make no mention of the need for affordable housing. These are serious omissions. The proposed affordable policy also needs to be properly related to the economic viability evidence.**
- 3.33 **The Plan must provide a more positive and committed approach towards working with NFDC and other partners to ensure that affordable housing will continue to be provided in the National Park, to help meet the needs of the communities who live in the National Park (more than 34,000 people). This should be through the continued provision of affordable housing in the main villages (based on 50% affordable/50 % market housing, reflecting the economic viability work carried out for the rest of the District); and a continuation of the affordable housing rural exceptions policy.** Within the four main villages, this approach would still enable the development of single market dwellings, subject to an appropriate contribution towards affordable housing provision.
- THE LOCAL ECONOMY AND TOURISM (Pages 15, 23, 80-83, 96, 100, 113, 120)**
- 3.34 The draft Plan rightly comments (page 15) that the economy within the National Park is diverse and highly integrated with the economy of the surrounding Districts and the wider region. Tourism is the single most important contributor. **The sustainable development of employment and tourism must be reflected in the relevant policies.**
- 3.35 The economy is referred to in the section on “Pressures, trends and opportunities”. This section perhaps treats economic growth too much as a “threat” rather than as an “opportunity”. **The Plan needs to say more about the opportunities for the National Park to contribute towards the local economy.** As the Plan recognises, “Tourism is the single most important contributor to the rural economy of the Park and New Forest District, with about 600 businesses generating £395 million in 2004 and employing more than 9,000 people” (page 15). The value of tourism should be updated to £440.8 million in 2006 (The Volume and Value of Tourism 2006 – Tourism South East).
- 3.36 **The section on “Living and Working in the National Park” (page 77 and subsequent pages) does not deal adequately with the needs of those local businesses which are not perceived to contribute to National Park purposes.** This may be in many cases an inappropriate distinction as there are forms of economic development which will fulfil the duty required of the NPA without compromising the Purposes, and as such will be of benefit to the overall sustainability of the area. Policy LP1.1 proposes to provide for small-scale employment development to meet National Park needs within the four defined Service Villages of Ashurst, Brockenhurst, Lyndhurst and Sway. The phrase “to meet National Park needs” is not clear and could be interpreted strictly as referring to the two defined

National Park purposes of conservation and enjoyment/understanding. It would be unrealistic and unreasonable to expect all businesses within the National Park to contribute directly towards these purposes – while of course there must not be harm to the special qualities of the National Park.

- 3.37 The sustainable management of the National Park requires a diverse, well-balanced, forward thinking, vibrant, healthy and sustainable local economy to support it. There is a need to stimulate the opportunity for high-value jobs in the Park. The economic strategy for New Forest District focuses on growing and developing from within, and small rural schemes for higher skills provide an important employment pathway for local people. NFDC's Economic Strategy and Core Strategy summarise these issues and solutions very effectively and should be mirrored in this chapter.
- 3.38 **New Forest DC considers very strongly that the statement (currently in the text at the end of page 82) should be given policy status, and should set the overall approach towards economic development:- i.e. that “A wide variety of employment opportunities for local people will also be encouraged where these do not have an adverse impact on the Special Qualities of the National Park, including home-based businesses, high value small businesses and those with a low carbon/environmental footprint.”**
- 3.39 For the reasons that the New Forest has been designated a National Park, there will continue to be some attraction of people from wider afield to use facilities based in communities within the Park. **There is therefore a need for a more refined policy base relating to visitor and tourism facilities, taking account of the catchment and wider community use of the particular facilities, as well as the scale and form of developments.**
- 3.40 **The “Actions for Living and Working in the National Park” (page 96) need to be developed to properly reflect the needs of the local economy and tourism.** At the moment, the only references are to advice services, local produce businesses and sustainability accreditation schemes.
- 3.41 **The headline indicators and targets for “Living and Working in the National Park” similarly need to be developed to reflect a wider range of economic and tourism matters.** The only target currently included is to aid the establishment of 20 new businesses which contribute directly to National Park purposes by 2015.
- 3.42 Policy LP2.4 (page 83) refers to a continued emphasis on a partnership approach to tourism involving the visitor, industry, community and environment. **This policy should be broadened out to include reference to involving NFDC and should refer to employment and economic development as well as tourism.**
- 3.43 Other detailed comments on Economy and Tourism are set out in Appendix 1.
- THE FOUR DEFINED SERVICE VILLAGES (PAGES 78-79, 123)**
- 3.44 Policy LP1.1 (page 78) proposes to “provide for small-scale development to meet National Park needs, including employment, retail and main community needs within the four defined service villages of Ashurst, Brockenhurst, Lyndhurst and Sway.” This is a development of the existing Local Plan policy that specifies these four villages as “defined New Forest villages”, within the boundaries of which different policies apply as compared with the rest of the National Park. The draft Plan comments that “Communities within the Park will continue to look to nearby towns to provide wider shopping, housing and leisure needs”.

- 3.45 **New Forest DC is not convinced that the policies in the draft National Park Plan will properly provide for the appropriate local needs of local communities within the National Park (amounting to over 34,000 people) to be met locally, thus reducing the need to travel to larger centres. In finalising the National Park Plan, it is important to ensure that the policies which will be applied do allow for appropriate needs to be met locally. The phrase “National Park needs” is not very clear in this respect, and could result in an unduly strict application of policy.**
- 3.46 **The Plan should include a short section on each of the main villages (as with Chapter 9 of the Core Strategy for New Forest District outside the National Park).**
- 3.47 With regard to retail and associated development, in 2005 (working with the emerging NPA) NFDC jointly commissioned expert consultants’ advice on a town centres strategy for the whole of New Forest District [New Forest District Town Centres Strategy, July 2006). This report identifies a need for up to an additional 1700 sq. metres of comparison retail floorspace (in total) in Brockenhurst and Lyndhurst up to 2018. This was only a broad guideline and the appropriate figures would depend on a detailed analysis of development opportunities. The emerging Core Strategy for the District outside the National Park takes on board the consultants’ advice. However, the draft National Park Plan does not appear to address this advice.

COAST (page 42)

- 3.48 The Plan should refer to the Shoreline Management Plans, as in the following extract from NFDC’s Core Strategy:
“The policy for management of New Forest District Council’s coastline is set out by two Shoreline Management Plans, which take a strategic approach to management of the shoreline. The frontage between Hurst Spit and Chewton Bunny is covered in the Hurst Spit to Durlston Head Shoreline Management Plan. The North Solent Shoreline Management Plan covers the coastal frontage between Selsey Bill and Hurst Spit. Shoreline Management Plans aim to determine and recommend sustainable coastal defence policy options to reduce flood and erosion risks to people, the developed and natural environments, and to identify habitat mitigation and compensation measures, including potential habitat creation sites. Compensation habitat will be delivered through the Environment Agency’s Regional Habitat creation Programme.”

TRANSPORT (various places throughout the draft Plan as referenced below).

- 3.49 There are 4 main issues relating to transport. Other detailed comments are set out in Appendix 2.

Strategic routes

- 3.50 Policy CP2.4 (page 59) is to “Resist further development of the road network or major new service infrastructure”. The Plan should recognise that the NPA is not a transport authority and will need to work with the County Councils, Highways Agency and other parties (including NFDC) to achieve the best solution to transport issues. **The NPA may seek to influence regional and sub-regional proposals, but the National Park Plan should take realistic account of the development that the Government is proposing in adjacent areas of SE Dorset and southern Hampshire, and work with the relevant local authorities in providing to best meet the transport needs of the wider area.**

- 3.51 Action LA8 (page 96) is to “Review the effectiveness of freight route strategies and weight restrictions and take action as necessary to further limit impacts of heavy commercial vehicles”. **This action is to be supported, but the NPA should recognise the strategic role of the A31 and that there are not alternatives to the A337 and A35 being designated as local lorry routes. The importance of the Trunk Roads and Principal Roads to the economic viability of the adjacent area both at Regional and Sub-Regional level should be acknowledged. Of particular importance is the need for good links between the Lymington/New Milton coastal towns area via the A337 (through Lyndhurst) to the Strategic Road Network and Southampton. The A337 and A35 should be acknowledged as the only lorry routes serving this area (recognising the lorry restriction on Lyndhurst High Street).**

Lyndhurst

- 3.52 Objective L3 (pages 84 and 45) states the aim to reduce the impacts of traffic on the special qualities of the National Park and provide a range of real and sustainable transport alternatives within the Park. This is to be supported. Lyndhurst’s traffic problem was identified as a key issue by many stakeholders. It is suggested that this issue is referred to here, and elsewhere as appropriate, in the strategy. **Reference should be made to Hampshire County Council’s conclusions (see Appendix 3 to this report) relating to:**
- **Review of Lyndhurst By-Pass options**
 - **Progress with non-By-Pass measures**

- 3.53 Under Policy LP3.4 (pages 87 and 146), it is suggested that reference be made to Lyndhurst’s Air Quality and Congestion problems. **Reference should be made to the Statutory Air Quality Management Area declared for Lyndhurst and the options to improve the air quality as set out in the related Action Plan.**

Road pricing

- 3.54 Policy PP3.2 (page 50) and Policy LP3.3 (page 86) state that road pricing may be introduced. HCC have raised doubts regarding the likelihood of road pricing being introduced in Hampshire at least in the short term, although the Local Transport Plan does include the proposal: *To investigate measures such as road closures and road pricing to manage the use of the New Forest’s highway network and reduce the undesirable effects of traffic on wildlife, outdoor recreation, the unique New Forest environment and the understanding and enjoyment of its special qualities.*
- 3.55 If road pricing were introduced on the main routes, some traffic would be likely to switch to other less suitable traffic routes to the detriment of the wider community. It would need to be demonstrated that any proposals have been considered on an area wide basis and are consistent with the Traffic Management Act 2004 (which was introduced in 2004 to tackle congestion and disruption on the roads and places a duty on local traffic authorities to ensure the expeditious movement of traffic on their road network and those networks of surrounding authorities). The NPA do not appear to have identified any viable alternatives for either car-borne visitors or residents (in marked contrast, for example, to the comprehensive public transport in London where road pricing has been introduced). **NFDC would oppose HCC and the Highways Agency introducing any road user pricing proposals that would increase congestion in the area on roads not subject to road user pricing. Any road pricing proposals and selective road closures should only be progressed following extensive community involvement including road users and adjacent authorities**

Alternatives to the car

- 3.56 Objective L3 includes to “provide a range of real and sustainable transport alternatives within the Park” and the associated text states the approach to “develop an integrated public and non-car transport system for visitors and local people.”
While these aims are to be supported, the Plan must be realistic about car-use for journeys where there is no realistic alternative, given the rural nature of the area.

RECREATION and COUNTRYSIDE SITES OUTSIDE THE NATIONAL PARK (page 75)

- 3.57 Policy UP 3.3 and the related text refer to working with nearby authorities and land managers to identify and establish countryside sites outside the National Park, close to population centres. **This section should refer to the Green Infrastructure strategy that is being developed by the PUSH (Partnership for Urban South Hampshire) authorities, which aims to deal with this matter.** The draft National Park Plan includes reference to Totton and the Waterside as suitable for country parks or similar sites. The NFDC does not contain any such proposal. While smaller scale provision may be possible in the Totton/Waterside area, any new substantial country park east of the National Park will need to be closer to the major development areas within the PUSH area if it is successfully to deflect pressures from the sensitive parts of the New Forest. Reference should also be made to provision west of the National Park (in Dorset). NFDC and the NPA jointly commissioned consultants’ advice on Open Space, Sport and Recreation to meet the requirements of Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation. Based on this advice, the NFDC Core Strategy recognises the need for appropriate levels of local open space and states that NFDC will work with PUSH, the NPA and other local authorities to develop green infrastructure strategies; and with land owners and local communities to preserve and enhance green infrastructure and green links between open spaces. The National Park Plan also needs to be better related to the requirements of PPG17.

PARISH PLANS (pages 78, 80, 91, 96)

- 3.58 **The references to the role of parish councils in representing the interests of their local communities, and the increasing number of parishes producing parish plans (page 91) are to be supported. However, to achieve the aims of local communities the National Park Authority must properly involve Parish Councils within the National Park in its work and decisions.**

RECREATIONAL HORSE KEEPING (pages 117 to 119)

- 3.59 This is one of the most controversial public issues in the draft New Forest Plan consultation. The draft Plan proposes that (Policy DC12, page 117):
“Recreational horse keeping will only permitted where it can be demonstrated that there will be:
- no adverse impact on the landscape or any nature conservation interests;
 - no increased riding pressures on the open Forest; and
 - no loss of run back grazing land”.
- 3.60 Grazing of horses for agricultural purposes does not need planning permission. The draft Plan states that it will be assumed that there is recreational horse keeping when, a there is a density of less than one hectare of grazing per horse. The draft Plan also stipulates a list of additional criteria that will be used to determine planning applications for recreational horse keeping (page 117). The new proposed guidelines are significantly more restrictive than those that the NPA inherited from the District

Council, which defined the recreational keeping of horses on the basis of less than 0.3 hectares per horse. This will have an impact on those residents of New Forest District who are concerned with recreational horse keeping businesses or who enjoy recreational horse riding. This is an important part of the local economy, and there is no evidence that the number of recreational horses being kept has been increasing.

- 3.61 **Before finalising the Plan, NFDC asks the NPA to reconsider this proposed policy and the associated evidence-base, including a full assessment of the impacts on local people and businesses. New Forest DC is not so far persuaded that there is any evidence to justify a change from the policies that the National Park inherited from New Forest DC [as set out in the New Forest District Local Plan First Alteration, 2005].**

4. ENVIRONMENTAL IMPLICATIONS /CRIME AND DISORDER IMPLICATIONS/EQUALITY AND DIVERSITY IMPLICATIONS

- 4.1 These are all integral to the report and referred to where appropriate.

5. FINANCIAL IMPLICATIONS

- 5.1 None .

6. RECOMMENDATIONS (to Cabinet)

- 6.1 **That New Forest District Council:**

- (i) Welcomes the opportunity to comment on the draft National Park Plan;*
- (ii) Emphasises the need for the National Park Plan properly to deal with the needs of the 34,000 people who live in the National Park and the related economic, social and community needs, as well as reflecting National Park purposes;*
- (iii) Urges the National Park Authority, in finalising the National Park Plan, to take on board the comments made in Section 3 of this report; and*
- (iv) Aims to continue to work with the National Park Authority to secure the outcomes set out in recommendations (ii) and (iii), with the intention of achieving an outcome where both NFDC and the NPA will have compatible plans that can be mutually supported.*

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Background Papers:

Appendix 1: Other Detailed comments on Economy and Tourism

Page 19: Special Qualities – add reference to a high quality world renowned tourism industry, diverse and locally owned with a strong link with landowners and small holdings. Also, the draft Plan refers to recreation centres at Lymington, Ringwood and Totton – but should also include those at Applemore (Dibden), Gang Warily (Fawley) and New Milton which also help meet the leisure needs of National Park residents. Facilities such as Sandy Balls and Shorefield also have a community value.

Page 66: Policy UP1.1 – This section should recognise that for 20 years NFDC and NFTA have replicated a consistent set of key messages in all published destination material, website and Visitor Information services and will continue to work with all partners to develop this idea with individual businesses through the established Visitor Stewardship scheme.

Page 68: Policy UP2 – Text needs to refer to the NFDC/NPA Tourism Strategy (in draft).

Page 70: Policy UP2.4 – See comments above re zoning, (paragraphs 3.23-3.24): all settlements and large visitor businesses should provide these services. There is no apparent justification or evidence to identify just these 4 villages as being the only appropriate location for visitor services.

Page 71: Policy UP2.6 – Needs a clear reference to Tourism Strategy currently in draft, development of existing Visitor Stewardship scheme and associated means of communication to visitors.

Page 74: Policy UP3.2 – While this policy is at a general level, there is substantial room for interpretation as to what “the most sensitive” means in terms of location. A definition would assist. Too broad an interpretation may stand in the way of practical benefits by limiting options for working within and between current sites.

Page 75: Policy UP3.4 – This should distinguish between attractions and different forms of accommodation as their characteristics and impacts can be very different. There may also be locations near Rail Stations/Confluences of public transport for example, where sustainable capacity could be beneficially grown. Again there is the question of what constitutes and is interpreted as “major”.

Page 78: Policy LP1.1 – Fine for villages but should also apply in more rural locations, it is therefore inadequate as an all embracing for the Park. This also relates to the comment on Policy UP2.4 above and the idea of a Zone 4 to support economic development.

Page 79: Policy LP1.2 – A job or economic activity is an essential local community facility/service – needs to be more clearly expressed in relation to employment as LP2 and the following are. An alternative approach would be to make Objective L1 and related policies exclusively about community facilities and Objective L2 and related policies exclusively about employment.

Page 81: Text - It should be noted that there is no evidence to suggest that “ The (local) tourism industry has expanded considerably over the last 20 years.....” All evidence suggests no identifiable increase in either visitor numbers or scale of activity/facilities; only the net economic value has grown. Not one single new Visitor Attraction or Hotel have been built in that time, indeed camping pitches have actually been reduced at Forestry Commission sites.

Appendix 2: Other Detailed comments on Transport

Page 6: Transport - Reference could be made here to road safety in terms of human and stock animal accidents (Policy LP3.5 (p146) does refer to animal accidents).

Page 35: Objective C3– Reference should be made to minimising the number of stock animal casualties and to the emerging Animal Accident Reduction Strategy.

Pages 49 and 51 -Objective P3 and Policy PP3.3 – Reference should be to Hampshire County Council’s Lighting Private Finance Initiative, and to the need for the NPA to work closely with HCC and NFDC in relation to this. The Plan’s proposal that unnecessary street lighting in and around the National Park should be reduced (page 51) or even “no lights at night” (page 93) needs to take into account considerations regarding road and personal safety and crime reduction.

Page 62 - Whilst Policy LP3.5 (page146) does refer to animal accidents it is suggest that reference is made to the issue of stock animal accidents in Policy CP3.1 as well.

Page 84 - Objective L3: The statement referring to a higher level of traffic accidents within the National Park than the average for Hampshire needs to be qualified, as more human recorded injury accidents take place in built up areas (most of these are outside the NPA) and along the main traffic routes than in the more rural parts of the National Park. The last sentence of the paragraph (on page 84) ending “...in recent years” would be better revised to say: “*The number of human recorded injury accidents within the Nation Park is a concern, and accidents involving.....*”. The reference to “animal accidents” could be clarified (to avoid inclusion of domestic pets etc) – perhaps stock animal (and deer) accidents.

Page 96 - Action LA8: Recent Hampshire County Council survey data relating to effectiveness of HGV restrictions indicates a good level of compliance. Some of the lorries that appear to be over 7.5t are in fact less than 7.5t. Also, regard needs to be given to agreed diversion routes implemented by the Police and Highway Authorities when parts of the motorway and strategic road network have to be closed.

Page 100 - Headline indicators: Additional indicators should be included:

- the number of recorded stock animal, deer and human road casualties;
- air quality levels in Lyndhurst Air Quality Management Area

Page 113 - Policy DC8: Reference should be made to workplace travel plans, including freight implications where appropriate.

Appendix 3: Hampshire County Council Cabinet 31 March 2008

Cabinet resolved the following in respect of traffic management solutions for Lyndhurst:

A Hampshire County Council should exercise whatever influence it can, either in its own right, or in partnership with other County Councils, to ensure that manufacturers of satellite navigation systems include road restriction information.

B Given current information from Lyndhurst traffic surveys that a large percentage of vehicles are local as opposed to through traffic, the review group would wish to see exploratory work on the potential for smarter travel choices in Lyndhurst reducing the need to travel by private car.

C As a short term measure, Hampshire County Council should seek the cooperation of the Highways Agency to make the signage on the M27 and at Cadnam directed at Heavy Goods Vehicles more explicit regarding restrictions on accessing Lyndhurst, except for lorries making local deliveries.

D Hampshire County Council should use its influence, together with partners, to support a review of the level of penalty fine for HGV's contravening the lorry restrictions to enhance its effect, and to ensure greater efforts are made by the police to enforce the restrictions.

E Hampshire County Council should put in place a communication plan which would make it clear to people what information they can expect to receive at different stages of the work to resolve Lyndhurst's traffic problems, and how they can contribute to and inform this process.

F Outcomes from the planned Hampshire County Council led local engagement, and the further consideration of options identified in the 2007 Study Report should be communicated to the Environment and Transportation Select Committee in summer 2008 as part of the scrutiny monitoring work of the committee.

G The review group recommends further trialling of the use of variable message signs on the M27 to direct drivers away from congestion hot spots in the New Forest such as Lyndhurst and routeing tourists to park and ride pick up points for the New Forest open top tourist bus.

H Hampshire County Council should prioritise New Forest wide approaches to traffic management with a view to known hot-spots such as Lyndhurst benefiting from such measures.

I In the light of viability and deliverability issues examined, the review group could not support the prioritisation of either a Lyndhurst focused bypass or a New Forest wide bypass at the present time. Concerns are those connected with the costs over benefits, as well as those relating to environmental impacts, given the stringent tests associated with an Appropriate Assessment under the Habitat Regulations, the potential adverse effects identified and the range of alternative measures that would be likely to have lesser environmental effect than a bypass, and have yet to be tested.

J The Cabinet does not support the further exploration of the two package options namely 7a and 7b (*bypass options*), but does support the lower cost option of demand management measures, such as junction improvements, one way system revisions etc. in the village, as identified by Hampshire County Council/Mott Gifford. [Note: it is understood that the County Council is reviewing these options and that one-way system revisions are unlikely to be proceeded with).