



New Forest District Council Local Plan

Ref:

(For official use only)

Recreational Impacts Mitigation Strategy for European Sites (Review 1)

Supplementary Planning Documents Representation Form

New Forest District Council has prepared a draft Supplementary Planning Document (SPD) on the above topic to provide further details on certain policies contained within the New Forest district (outside of the National Park) Local Plan 2016-2036 Part 1 Planning Strategy – Pre-Submission Draft

These documents are available for public consultation from 7 July 2018 to 30 September 2018. All comments made should be restricted to the content of the draft SPD.

Do not use this form to make representations on the Pre-submission draft Local Plan.

Further copies of the form can be obtained from the Planning Policy Team, downloaded from the Council's website or you can photocopy this form.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

First Name

Last Name

Job Title

Organisation

(where relevant)

(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

(where an email address is given, this will be used as the primary means of contact)

Signature:

Bruce Tindall


Date:

29/9/2018

Would you like to hear from us in the future?

I would like to be added to the database to receive updates on the Local Plan

Please do not contact me again

 <p>New Forest DISTRICT COUNCIL</p> <p>Recreational Impacts Mitigation Strategy for European Sites (Review 1)</p>		<p>Ref:</p> <p>(For official use only)</p>
<p>Sharing your personal details</p> <p>Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment.</p>		
<p>PART B: Your Comments</p> <p>Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help the Authority to understand the issues you raise. Please return completed forms to spd2018@nfdc.gov.uk by midnight on the 30 September 2018.</p>		
Chapter / Para / Project	Comment	
	<p>Introduction</p> <p>Whereas we welcome the initiative of NFDC to provide guidance for mitigating recreation impacts on European sites within the New Forest, we are concerned that the guidance is confused and focusses on the provision of alternative recreational greenspace as the key method of mitigating impacts to both the Solent and New Forest European sites. It is our view that the proposals for the provision of areas of alternative recreation greenspace are flawed and cannot be relied upon. In fact, the area of proposed alternative recreation green space required in the New Forest is probably four times that which is proposed– an area of 32 hectares per 1000 head of population, not the 8 hectares relied upon in this guidance. Our detailed comments are given below.</p> <p>Offsetting impacts of recreation on the Southampton Water and Solent Coast European sites</p> <p>Paragraph 2.35 of the SPD refers to the range of mitigation measures proposed for offsetting impacts to the Southampton Water and Solent Coast European Sites (SEMS). Whereas we agree that many of these will help manage these impacts we do not accept that the provision of alternative greenspace will act to mitigate recreation impacts on the coast.</p> <p>The use of SANG (Suitable Alternative Natural Greenspace) as mitigation to</p>	

recreational disturbance of the Solent European sites was considered by Footprint Ecology¹. This report concluded that SANG are not an appropriate way of mitigating recreation impacts on the coast. This is due to the value most visitors place on the coastal scenery they are visiting and the proximity of the coast to their homes. The report states;

“It would therefore seem that SANGs would have a role only where they are close to people’s homes and are attractive. Large developments may be the best way to deliver such mitigation, ensuring that the location of the SANG can be linked to the development.”

Small and fragmented areas of recreation mitigation land, such as that proposed within Local Plan policy SS6, will not therefore function to mitigate impacts on the coast.

Recreation Mitigation requirements for new development

Section 4.8 of the SPD states that “Alternative natural recreational green spaces will form a key element of the mitigation strategy and provision for 8ha per 1,000 of population of new residential development is a requirement for sites over 50 dwellings.” The 8 ha per 1,000 head of population was adopted following the South East Plan Examination in Public, held in 2007. It is specifically targeted at mitigating impacts on three species of heathland breeding birds for which both the Thames Basin Heaths and New Forest have been classified as Special Protection Areas (SPA). However, the 8 ha per 1,000 head of population SANG rate was based on an arithmetical calculation that reflects the density of visitors to the Thames Basin Heaths. This quantum of alternative natural greenspace has no application to the New Forest. It has not been assessed using any empirical methodology but is based upon an out-dated and in-appropriate calculation for the Thames Basin Heaths. The New Forest has a very different ecology and visitor use to the Thames Basin Heaths and we do not believe that this rate of alternative natural recreational green space has any relevance to the New Forest.

In fact, applying the data for visitor density and comparable SPA habitat (16,100 ha) in the New Forest to the arithmetical calculation used in the Thames Basin Heaths gives a total of 32.62 ha of alternative recreation greenspace space per 1000 head or **four times the 8 ha per 1000 head being proposed in the SPD.**

It is our view that the provision of 8 ha of alternative recreation green space per 1000 head of is inadequate to mitigate impacts of recreation on the diversity of habitats, birds and other European protected species that are present within the New Forest European sites. We therefore contend that the mitigation measures proposed in the New Forest Local Plan that are based upon this calculation are unsound and cannot be relied upon to provide the certainty required to reach a conclusion that the Plan will have no adverse effect on the New Forest European and Ramsar Sites.

Appendix 4 of the SPD provides further guidance on the provision of alternative natural greenspace. The confusion running through this SPD between mitigation of recreation impacts to the New Forest and those to the Southampton Water and Solent Coast is carried through to this Appendix.

The Mitigation for Recreation Impacts SPD suggests that there should be a minimum size for alternative natural recreational green space of 1 ha (para 5.1). Evidence from a variety of visitor surveys undertaken in the New Forest clearly demonstrates that **this will be totally inadequate to attract someone away from the New Forest**, where they are likely to undertake a walk of over 4 km. It is our view that the minimum area of alternative natural greenspace must be significantly increased. Natural England’s

¹ Liley, D. & Tyldesley, D. (2013). Solent Disturbance and Mitigation Project: Phase III. Towards an Avoidance and Mitigation Strategy. Unpublished report. Footprint Ecology/David Tyldesley & Associates
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guidance on the provision of SANG suggests these should provide for a walk of at least 2.5km (the average for other heathland sites). In the New Forest there is a requirement for walks of even longer.

Other features that attract people to the New Forest are its scenery, peace and quiet, good walking, ease of accessibility and wildlife value. These features also need to be incorporated into new alternative natural green spaces. By contrast, the landscape design illustrated in Appendix 4 of the SPD provides for the creation of **nondescript sub-urban green space lacking any features of the New Forest** and indeed, encourages activities that damage and destroy features of New Forest such as the removal of deadwood.

The layout of the alternative greenspaces illustrated in Appendix 4 proposes a series of connected circular patches of open space. These further reinforce the character of a gang-mown green desert devoid of naturalness or nature. With the addition of the sub-urban clutter of benches, surfaced paths, signs and interpretation boards the envisaged areas of land proposed in Appendix 4 will be totally ineffective in providing an attractive alternative to the New Forest European sites. Their design betrays a lack of understanding of either the character of the New Forest landscape, its wildlife value or any analysis of the reasons why local residents of the New Forest visit the internationally important protected landscapes in the National Park.

An alternative approach

To provide a real alternative to the New Forest European sites, much larger areas or networks of recreational green spaces are required. As an example, the popular Dibden Inclosure within the New Forest is about 90 ha in size and provides a range of walks of at least 4km in length. It is close to the urban centres of Dibden and Hythe and attracts large numbers of dog walkers from these centres of population. To provide a real alternative to the New Forest European sites, it will be necessary to provide similar sized strategically located areas of alternative natural recreation space that will offer a real alternative to both existing users of the New Forest and new residents of housing development. These should be areas that can be developed into semi-natural habitats of high nature conservation value where public access and wildlife conservation are joint objectives of management.

In conjunction with the provision of new strategically located large areas of natural greenspace it will also be important to improve visitor management in the New Forest European sites. As most visitors arrive in the New Forest by car, car parks need to be the focus of improved visitor management. This may include the introduction of car parking charges, seasonal closure of car parks in sensitive locations and reduction in car parking sizes. Guidance for dog walkers in New Forest has been produced by both the National Park Authority and the New Forest Verderers. This encourages owners to put dogs on leads in sensitive locations and at sensitive times of year. However, there is a need to achieve a greater public profile of this guidance and greater resources to enforce its implementation.

Conclusion

It is our conclusion that the ineffectiveness of the proposed provision of alternative recreation green space will mean that new residents of development proposed within Local Plan Policy SS6 will continue to use the New Forest for recreation. In addition, the development of this currently well used and accessible area of countryside will in fact reduce its value for recreation so displacing existing recreational use from this area of the Greenbelt to the more ecologically sensitive coast and New Forest.

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