

NEW FOREST ACCESS FORUM

Meeting: Monday 5 December 2016

Agenda Item 7: Draft response to NFNPA Local Plan Review consultation



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DRAFT

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Date 28 November 2016

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Reference NFNP Local Plan (11/16)

Dear Sir/Madam,

New Forest National Park Local Plan Review 2016

This letter constitutes formal advice from the New Forest Access Forum in response to the consultation draft Local Plan for the New Forest National Park.

The New Forest Access Forum is the statutory Local Access Forum for the New Forest National Park plus the New Forest District Council area, as provided for under the Countryside and Rights of Way Act 2000. Its membership is comprised of individuals with a wide range of interests and expertise, including land owners/managers, conservationists, representatives of user groups and those with disabilities. The role of the Forum is to provide balanced advice that reflects the combined view of individual members.

The New Forest National Park Authority is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Forum in carrying out its functions.

The Forum welcomes the opportunity to comment at this stage of the Local Plan Review and is in general supportive of the Plan. We are in particular pleased to see references to both the Hampshire Countryside Access Plan 2015-25 and the Wiltshire Access Improvement Plan 2015-2025 within Chapter 9: Transport and Access, and look forward to the release of the Recreational Management Strategy that is referred to within the draft.

Mounting pressures: with 1.05 million additional visitor days per annum anticipated as a result of developments within 50km of the Forest (representing an increase of 8%), the National Park is facing a step-change in the challenges facing the protected landscape and habitats within its remit. The Forum notes that a number of older policies have been retained that pre-date the surge in pressure that new development will bring. It is not clear whether these will be sufficient to

address and mitigate both existing and future pressures, and the Forum suggests that the NPA should consider a new and more radical set of policies than those set out in the current draft plan.

Working with other partners and adjoining authorities: The Forum strongly supports the statement in policy 8 of the draft Plan that ‘The Authority will work with other partners and adjoining authorities...to ensure the impacts of development within and outside the Park’s boundary do not affect the landscape character of the Park or the internationally important nature conservation designations’. This is a critical consideration given the scales of development that are proposed in the wider area beyond the New Forest.

In addition we have the following specific comments:

Chapter 5: Protecting and Enhancing the Natural Environment

Green Infrastructure and Open Space

- We suggest that policy 8(b) should be amended to read ‘provide opportunities for local communities to access open space and provide for healthy recreation that is accessible from existing and new dwellings on foot/without use of the car’.
- The Forum strongly supports Policy 9.

Chapter 8: A Sustainable Local Economy

Policy 46: Holiday Parks and Camp Sites

The Forum disagrees with paragraph 8.27 on page 81 of the plan, as it believes that there is a need for more affordable provision for families with relatively low incomes and others looking for low-cost sites. Permanent, dedicated campsites without toilet facilities potentially disenfranchise the lower-income visitor, and it is the Forum’s view that policy should favour the provision of appropriately-placed ‘affordable’ (e.g. pop-up) campsites. Appropriately sited and managed, these could provide the following benefits:

- Provision for lower-income visitors
- Planning control over placement (e.g. away from sensitive habitats), structure and facilities
- Modest additional income for Commoners.

We recommend that consideration be given (in discussion with the Forestry Commission and Verderers) to the provision of toilet facilities on those campsites which currently do not have any.

In addition, opportunities should be identified through the management of these sites to influence visitor perceptions, understanding and behaviours. It is the Forum’s view that Policy 46 should seek to manage pressures, rather than put up barriers against increasing demand.

Chapter 9: Transport and Access

Policy 54: Access

- This policy identifies the need for more sustainable forms of transport for enjoyment, health and well-being, but should more explicitly address the need for utility walking and cycling routes to local services and amenities. We suggest that the first paragraph of this policy should be amended to include ‘...**for access to services and amenities and** for enjoyment, health and well-being, ...’.
- We suggest that provision is also needed within this policy for influencing behaviours towards greater use of sustainable transport opportunities, for example providing adequate cycle parking in the locations required and supporting measures that encourage greater use of public transport.
- The Forum strongly supports point (f), and welcomes the reference to both disused railways and roads.

Local Public Transport

- Existing services should be retained and enhanced – the Forum hopes that the NPA will pursue all available opportunities to achieve this.
- Transport planning must include the needs of new residents in the area to commute to their places of work, including to locations outside the area.
- Given the success of the 2 existing bus routes linking major destinations, the Forum suggests that the NPA should now look at further (e.g. minibus) services to smaller settlements.

Car Parking

- The majority of day visitors to the New Forest come in their cars, owing to the limited alternative transport options for getting to and exploring within the New Forest.
- It is many years since the disposition and capacity of the existing car parks was decided. The Forum suggests that it is time that these were reviewed as to their suitability, location and capacity, in the light of current and anticipated demand.
- Would there be benefit in looking at provision at other National Parks, for example in Germany where in some parks visitors are bussed-in from parking areas outside the park?

Coastal Access

The draft plan acknowledges the England Coast Path (paragraph 9.22), but provides no policy on coastal access. The NPA may feel that this is covered under the National Planning Policy Framework (which encourages planning authorities to improve public access to and enjoyment of the coast) and the [Coastal Access Scheme](#) guidance, which encourages planners to ensure that planning proposals take account of coastal access objectives and make provision for them where appropriate. The Forum feels however that there should be specific reference to the England Coast Path within Policy 54, and that in addition the Local Plan should include a policy requiring provision for public access to the seaward side of any development or redevelopment, to facilitate the implementation of the Coast Path. *The Authority should also consider how potential requests to change the use of land within the coastal margin will impact upon coastal access land and public access to this. As the Access Authority for the New Forest National Park, the NPA will have an ongoing responsibility to ensure that the public has reasonable access to the coastal margin once it has been established. The presence of the Coast Path and coastal access land will need to be a material consideration relating to any planning application along the coast of the National Park.*

Yours faithfully,

Ruth Croker

Ruth Croker
Chair, New Forest Access Forum