

Director of Strategy & Planning  
The New Forest National Park Authority  
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Hampshire  
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Your Ref: ME/MPA/7/1

17<sup>th</sup> October 2008

Dear Sir

**New Forest National Park: draft Management Plan**

Thank you for your letter of the 15<sup>th</sup> August 2008 enclosing a copy of your draft plan for consultation.

We have now had an opportunity to consider the draft plan, and in response to your invitation to express our views, please accept this letter as our formal reply to the consultation.

Overall we feel that the document is well presented, very readable, reasonably easy to understand, and commendably brief. We are impressed by its scope, and the scale of the ambition that the plan sets out for the area for many years ahead. In addition we are pleased that the strategic policies that are set out in the plan are all underpinned, and subject to, two important principles, namely the Sandford Principle and the Precautionary Principle. Subject to various comments that we make in relation to both these Principles below, we hope that the strong emphasis that is given to these doctrines in the draft will remain in the final version of the plan.

**Special Qualities**

We firmly approve of the description of the New Forest's Special Qualities which are well thought out and clearly embrace both of the National Park's statutory purposes.

**Zones**

We believe that the idea of various types of zones for the National Park is a sound concept. However we do not accept that Inclosures are in some way not as special as the open areas of the Forest as described in Zone 2. We do not believe that any area as described in Zone 1 should be categorised as "robust" because all are an integral part of a fragile mosaic. Inclosures are just as important as any part of the open Forest, and they should be recognised and treated as such.

**Priority Objectives**

We are particularly pleased with the plan's Priority Objective P3, which aims to maintain, extend and enhance the tranquillity of the National Park. That objective in turn leads to the policy framework statements contained in UP3, which ties in very clearly with our own existing policies on managing the development of current, and likely future recreational demands made upon the New

Forest. We agree that detailed research is needed in order to determine the impact of recreation on the Forest's Special Qualities, and until that research is complete any increase in the overall activity levels within the most sensitive and fragile landscapes, which as mentioned above should include the inclosures, must be avoided.

We therefore fully support the actions set out in the plan (PA12, CA6, & UA10) which begin the important process of attempting to establish the facts through research in relation to the impact of existing and any future plans for recreation. However, it should be clearly understood that some of the qualities which comprise the essence of the New Forest are not susceptible to quantification or scientific assessment.

Our only worry, as set out in our response to your consultation in respect of the Draft Recreational Management Strategy, is how this strategic policy seems to conflict with some of the plans for the cycling network within the Forest.

### **A 31**

We believe that, notwithstanding the various ideas in the plan for dealing with the problems that the A31 presents, any expansion of the road should only be supported if it includes a net benefit to the Forest in terms of reduced noise and impact upon the Special Qualities. This requirement should be paramount and must override any plans for expanding the road even if they are deemed to be "exceptional", as set out in CP2.4. On the other hand, only when the road is upgraded are adequate funds likely to be available for a comprehensive solution to the problems. Such upgrading could therefore represent an opportunity to the Forest.

### **Recreational Horse Keeping**

As you know the draft policy in relation to recreational horse keeping (DC12, 13 & 14) has caused widespread concern.

In the context of the draft plan as a whole, we agree with any policy that supports the future viability of commoning, safeguards the existing stock of agricultural land available as back-up pasture, and prevents further losses to other uses, such as recreational horse keeping. We are not convinced that retrospective action against existing (if not strictly lawful) horsekeeping, will be accepted as fair or will be workable. We believe however that further work needs to be done in this area of the plan's policies in order to clarify who is, or is not, "a commoner". A starting point may be to consider creating a special criteria to define a commoner, as has already been done for your Authority's commoners' housing scheme.

The draft policy may well prove to have undesirable long-term consequences for commoning in that it will inadvertently encourage occupiers of land in the Forest to become "commoners" purely for planning purposes. A warning sign that this is already happening is evidenced by the fact that we are receiving a surge in requests for brands to be issued, which will almost certainly translate into an increase in the number of animals that are turned-out. If this happens then there could be negative effects for conservation in the long term.

In addition the policy may well have a serious detrimental effect on the livelihoods of some commoners, including a downturn in the value of their ponies. We strongly feel that these two potential effects need to be considered very carefully before this particular policy is implemented.

### **The Past & the Future**

We believe that there is a serious omission in the introductory section of the plan in that the text fails to recognise that the Forest's Special Qualities are already damaged.

The plan should begin by acknowledging that the National Park is not starting off in a perfect state, mainly as a result of half a century of intensive use. The fact that that damage was being done

was recognised as long ago as 1963 with the introduction of the vigorous controls introduced in the New Forest Act of that year. We also suggest that the plan should remind the reader that the Forest currently has many campsites for which planning permission was never sought, and for which permission would probably never be given if a fresh application was made today. There is also no mention of the pressures that are put upon the agricultural use of the open Forest by the present level of recreation, such as the growing number of complaints by tourists about the behaviour of depastured ponies.

The plan also appears to make the assumption that the New Forest can absorb more use, and has extra capacity to give. We suggest however that the plan should recognise that, like any other fragile and protected landscape, the New Forest has a capacity beyond which it cannot go, and that in the absence of clear evidence showing where that tipping point lies, both the Sandford and Precautionary Principles will apply.

Subject to the comments that we have made above being taken into account in any future version of the plan, we are please to give our support to the draft.

Yours sincerely

Oliver Crosthwaite Eyre  
Official Verderer