

Ms Saira Evans
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Your Ref: S/NPA/7/1

17th October 2008

Dear Ms Evans

Recreation Management Strategy: Consultation Draft

Thank you for your letter of the 15th August 2008, in which you invite our views on the Strategy which is now subject to formal public consultation.

We have had the benefit of examining the draft Strategy and subject to one major and serious reservation and various other observations as detailed below, we are pleased to say that, taken as a whole, the draft Strategy receives our support.

Objective C2.1.

This objective seeks to extend cycling to all "tracks" within the inclosures in Zone 1 on a "trial basis" (please note that at the meeting held last July at which you were present, Mr Trotter accepted that "gravel roads" is intended rather than the word "tracks").

Whilst we have supported cycling in the Forest on an authorised network of gravel roads, hence our consent to the existing waymarked routes, regrettably we cannot accept this objective since it is contrary to our own policies, and conflicts with advice that we gave to the Authority in March 2008 when discussing this particular issue. We believe that such an objective would be damaging to the tranquillity of the Inclosures, and seems to be in direct conflict with the Strategic Policy and Objectives of the Authority, as set out in the draft Management Plan (P3 & UP3).

Extending cycling to all tracks would be liable to lead to increased trespass (i.e. cycling beyond the approved network) and once implemented it would be practically impossible to reverse without considerable opposition.

There would also be further minor disadvantages such as increased litter and further conflicts with those who work within the Inclosures. We fear that this objective appears to have been drawn up without a full understanding of the nature of the tracks to which it refers, or of the character of the Inclosures themselves. As stated in our response to the Management Plan consultation, we believe that the Inclosures should not be treated as sacrificial areas, or second grade parts of the Forest and Crown Lands generally. The Inclosures are just as "sensitive" as the open Forest, and should not be treated in any way as being "robust".

Research needs to be undertaken in order to fully establish the merits or otherwise of this particular objective, and the precautionary principle should be applied in the meantime as set out in the policies contained in the draft Management Plan. In any event there is no urgency in relation to this idea; the cycling public already has 112 miles of way-marked Forestry Commission tracks to use in the meantime and a huge network of bridleways, byways lanes and minor roads which are not taken sufficiently into account.

It also needs to be clarified whether or not this objective is directed also against the Inclosures that are set out in the New Forest Committee's "quiet areas". Other parts of the plan seem to suggest that this is not the case, but as it stands those areas too are at risk.

We would also make the following general points in relation to Objective C2.1.

Character of the Inclosures: the Inclosures contain many of the remaining undisturbed areas of the Forest and as such they should not be treated as a type of landscape that is able to absorb extra pressure.

Nature of the Gravel Roads: many of the gravel roads within the Inclosures are already cycle routes. We have in the past indicated to the Forestry Commission that future amendments to this network resulting in a net gain to the Forest will receive our favourable consideration. However, there does not appear to be any question of gain with the present proposal. Many of the gravel roads within the Inclosures are dead-ends or lead directly onto the open forest. Cyclists who use the gravel roads would therefore be inadvertently encouraged to trespass onto the open forest or grass (as opposed to gravel) tracks. It would be naive to believe that having ridden up a one mile or so cul-de-sac cyclists would simply be prepared to turn around and ride back in the same direction. There are a multitude of examples of such cul-de-sac's in the Inclosures, such as in Oakley between Smokey Hole and Sandy Ridge, Woods Corner and Berry Wood and the Old House Road. Another example is the gravel road in Amberwood, which leads to the pound on the open forest boundary at Gaze Hill (which is a "quiet area").

The "trial basis": we would suggest that as a matter of practical politics it is perfectly clear that if this network is opened up there is very little chance of being able to close it down again. We believe that amendments to the network (if any) need to be designed carefully on a case by case basis. Blanket policies for the intensification of recreation such as this are unacceptable for reasons already stated above.

Future of the Inclosures: many of the gravel roads that would be encompassed by this objective pass through areas which are being returned to open forest, and we believe that the intensification of use that is proposed will prejudice the land that is due to be opened up in the future.

Forestry Works: as an additional point, we are concerned that if this objective is implemented then the increased number of cyclists in the inclosures will cause problems for those conducting forestry works.

Litter: it is a matter of fact that the existing cycling routes within the Forest are lined by high concentrations of litter, especially at gates where cyclist are forced to dismount. The objective does not seem to take this into account, and there are no clear or practical proposals within the Strategy that mention how to deal with this problem.

Control: there is nothing in the Strategy that says how the cycling that already takes place on the open forest is to be properly controlled. It is a fact that whilst the waymarked routes are used and enjoyed by many cyclists, many more leave those routes and openly trespass at will. We accept that whilst it would never be possible to completely control cyclists, more effort is needed to ensure that as many cyclists as possible understand and respect the need for cycling to be restricted to the waymarked network.

In summary therefore we strongly feel that this policy should not be implemented in any way until such time as detailed research is undertaken in order to establish what impact the increased recreational use that the policy would create will have. Until clear researched evidence is available the precautionary principle must apply, as advocated in the draft Management Plan. In addition the strategy should address the conflict that this policy appears to have with the Management Plan's strategic policy P3 which seeks to maintain, extend, and enhance the tranquillity of the National Park.

Other Observations

Vision 2028: to say that people's "needs and expectations" will be catered for wherever possible seems to be unrealistic; some expectations may be totally inappropriate for the New Forest (p.11 item 1), and although item 2 goes on to promise high quality recreational opportunities for everyone, it qualifies those opportunities by stating that they must be "appropriate". We would recommend therefore that some explanation or definition of "appropriate" is needed. It also needs to be stated in the vision where the recreational opportunities will be located – presumably in robust areas and definitely not on Crown Land if they interfere with or damage the Special Qualities.

Guiding principles: the wording for the Sandford principle is different to that used in the draft management Plan at page 33. The Plan states that, in a development context, if there is "conflict" between the two National Park purposes greater weight will be given to conservation, whereas in the draft Strategy conservation will only take precedence if there are "any irreconcilable conflicts" between the purposes. The difference in emphasis between the words used in the two documents is potentially very significant and needs to be clarified.

Reducing the impact of the car: it needs to be recognised that traffic associated with recreation only represents a minority of the traffic volumes passing through the National Park. In consequence initiatives to reduce the volume and impact of traffic-linked recreation will only be of limited impact on the overall traffic levels.

Objectives T1 & T2: these objectives, and the policies which follow, should recognise that there is also non-recreational travel taking place (as mentioned above), including those forms which you wish to encourage. These may not be one and the same, but co-ordination is necessary.

Walking & dog walking: we support the proposals for the placing of restrictions on some car parks in the Forest for the protection of wildlife. The creation of any new recreational routes (or upgrading of others) should be both informed by research which shows evidence of need or demand, and subject to the overriding objective of protecting the Special Qualities. If such research is inconclusive, or the Special Qualities may be at risk then (in line with our own policies) any new routes must be sited off the open Forest. It should also be recognised that any routes which encourage people to drive into the Forest before they start their walk will give rise to additional traffic and demand for parking. It would be preferable if any new routes could be developed close to areas of population so that people can start and finish their walk on their own doorstep without using a car. This is alluded to in Objective W1.

We hope that our major concerns in relation to policy C2.1 will be taken in to account when the Authority considers the final version of its Recreation Strategy, as well as our other observations, subject to which we are pleased to support the draft.

Yours sincerely

Oliver Crosthwaite Eyre
Official Verderer