



**Mitigation for Recreational Impacts on New Forest European Sites**  
**Supplementary Planning Document**  
Consultation Draft, June 2018

Summary of the main points received and Council response

<b>Respondent</b>	<b>Document Section</b>	<b>Summary of Comments</b>	<b>Council Response</b>
<b>Southern Water</b>	General Comment	No Comment	Noted.
<b>Lymington and Pennington Town Council</b>	General Comment	Emerging Neighbourhood Plan will look to include mitigation projects	Noted.
<b>Meyrick Estate Management Ltd</b>	General Comment	Need to consider the impact of the quality of the mitigation space - no criteria for quality of the mitigation is provided.	This is covered by the ANRG Design Guidance appendix.

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<p><b>Bloor Homes &amp; Trustees of the Barker Mill Estate</b></p>	<p>General Comment</p>	<p>Clarification on Natural England involvement in the preparation of the document</p> <p>Double counting concerns for developers of 50+ schemes paying through CIL and provision onsite</p>	<p>Comments noted.</p> <p>Reference to Natural England's involvement is set out in a Statement of Common Ground, now referred to in the SPD.</p>
<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>General Comment</p>	<p>Quantum of development proposed through the Local Plan unsustainable.</p>	<p>This issue was addressed through the examination of the Local Plan 2016-3036 Part 1.</p>

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<b>Southern Gas Networks</b>	General Comment	No comment on the document.	Noted.

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<b>Highways England</b>	General Comment	No comment on the document.	
<b>Ringwood Town Council</b>	General Comment	Suggest additional mitigation measures and projects related to the Castleman Trailway	Noted. Will be considered as part of the review of projects, to be published separately.
<b>Marchwood Parish Council</b>	General Comment	Supports the document Solent Recreation Mitigation Strategy – no further comments on this SPD	Noted.

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<b>Gladman Developments Limited</b>	General Comment	Clarification on who should pay the mitigation contributions	This would be report back as part of the monitoring of project delivery and spending
<b>Totton &amp; Eling Town Council</b>	General Comment	<p>Support of the proposed mitigation strategy.</p> <p>Concerns with longer term maintenance cost for schemes within their parish.</p>	Maintenance costs will need to be factored into the project costs.

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Cox	General Comment	Alternative approach should be considered - much larger areas or networks of sites are required. These need to be provided as large strategically located Countryside Parks or Nature Parks.	The SPD sets out an approach to providing mitigation to meet the requirement of the Habitat Regulations, which has been agreed with Natural England and which was used throughout the preparation of the Local Plan Strategic Site concept master plans. It was agreed and found sound during the examination of the Local Plan Part One.

Respondent	Document Section	Summary of Comments	Council Response
Cox	General Comment	The proposals for mitigating impacts to European protected sites cannot be relied upon to divert recreation pressure away from both the New Forest and Solent European and Sites.	The approach was agreed and found sound during the examination of the Local Plan Part One. Monitoring will continue of the strategy as the continued effectiveness. Monitoring is an important aspect of the strategy in order to manage uncertainty and inform future refinement of direct mitigation measures.



Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennington and Lymington Lanes Society (PALLS)</b></p>	<p>General Comment</p>	<p>Approach of relying on ANRGs is flawed.</p>	<p>The approach was agreed and found sound during the examination of the Local Plan Part One. Monitoring will continue of the strategy as the continued effectiveness. Monitoring is an important aspect of the strategy in order to manage uncertainty and inform future refinement of direct mitigation measures.</p>

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<p><b>Pennington and Lymington Lanes Society (PALLS)</b></p>	<p>General Comment</p>	<p>Alternative approach should be considered - much larger areas or networks of sites are required. These need to be provided as large strategically located Countryside Parks or Nature Parks.</p>	<p>The SPD sets out an approach to providing mitigation to meet the requirement of the Habitat Regulations, which has been agreed with Natural England and which was used throughout the preparation of the Local Plan Strategic Site concept master plans. It was agreed and found sound during the examination of the Local Plan Part One.</p>

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<p><b>Pennington and Lymington Lanes Society (PALLS)</b></p>	<p>General Comment</p>	<p>The proposals for mitigating impacts to European protected sites cannot be relied upon to divert recreation pressure away from both the New Forest and Solent European and Sites.</p>	<p>The SPD sets out an approach to providing mitigation to meet the requirement of the Habitat Regulations, which has been agreed with Natural England and which was used throughout the preparation of the Local Plan Strategic Site concept master plans.</p>

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<p><b>Christchurch Environmental Management Limited</b></p>	<p>General Comment</p>	<p>No certainty that the proposed strategy will deliver the mitigation, due to:</p> <p>No reference to in perpetuity funding</p> <p>No performance guarantee for the LPA to deliver</p> <p>No new additional physical recreational capacity provided by the strategy</p> <p>Qualitative aspects of mitigation not referred to</p> <p>No intention of mitigation being in place in advance of first occupation</p> <p>No mechanism to guarantee that monies collected will actually be spent on effective mitigation</p> <p>Private sector mitigation provision not referred to in the document.</p>	<p>The SPD sets out an approach to providing mitigation to meet the requirement of the Habitat Regulations, which has been agreed with Natural England and which was used throughout the preparation of the Local Plan Strategic Site concept master plans.</p> <p>Funding for the in perpetuity funding is addressed and added to the project costs. The mitigation strategy approach sets out the new areas of ANRG to be delivered by the strategic sites. These will sit alongside the new and enhanced approach.</p> <p>The SPD sets out there are opportunities to provide for alternative recreational mitigation projects.</p>

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<p><b>Pennyfarthing Homes</b></p>	<p>General Comment</p>	<p>Given the detail set out in the draft SPD, it would be more appropriate for this SPD to be a DPD.</p> <p>Object to the SPD, which it considers to be overly prescriptive in terms of the level of detail provided.</p>	<p>Clarification has been provided in the document as to the status of the guidance.</p> <p>Alternative approaches to recreational impact mitigation may be put forward, but must fulfil the requirements of the Habitat Regulations and demonstrate their effectiveness with sufficient supporting evidence and justification. This is also set out in supporting text to Policy ENV1.</p>

<b>Respondent</b>	<b>Document Section</b>	<b>Summary of Comments</b>	<b>Council Response</b>
<b>Taylor Wimpey</b>	1 Executive Summary 1.3	Supports the preparation of a specific SPD related to the mitigation of recreational impacts.	Noted.
<b>Natural England</b>	1 Executive Summary 1.6	Support changes to Local Plan Policy 10.	Noted.

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<p><b>New Forest National Park Authority</b></p>	<p>1 Executive Summary 1.6, 1.5</p>	<p>Support the approach that all developments will be required to contribute to access and visitor management.</p> <p>A monitoring programme (including visitor surveys) will be required to ensure the effectiveness of this approach, particularly as there is little evidence to date of its operation in the New Forest.</p>	<p>Noted. The SPD sets out a comprehensive programme of monitoring to ensure the effectiveness of the strategy going forward.</p>
<p><b>Pennyfarthing Homes</b></p>	<p>2 Introduction 2.22</p>	<p>Clarify that mitigation measures also include access and visitor management and monitoring</p>	<p>Paragraph now removed as repeats earlier text.</p>

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<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>2 Introduction 2.22 (Page 8)</p>	<p>Welcome that the proposed approach recognises both on-site and off-site solutions are needed to proving mitigation, funded by developers' contributions.</p>	<p>Noted. Whilst Paragraph now removed as repeats earlier text, it still remains a key principle of the strategy.</p>
<p><b>New Forest National Park Authority</b></p>	<p>2 Introduction 2.24 - 2.26</p>	<p>Support the requirement that dwellings delivered through the GPDO route will be required to provide mitigation.</p> <p>Recommends that the District allows for sufficient flexibility in the scheme to consider measures to manage recreation in the National Park Authority's Recreation Management Strategy (RMS), which is currently under review.</p>	<p>Noted. The SPD contains text setting out that the Council will also work closely with agencies such as the Forestry Commission and the New Forest National Park Authority to explore options for implementing other areas of work on access management.</p>



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<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>2 Introduction 2.27 &amp; 2.9 (Page 6)</p>	<p>Support the overall measures set out in this section, if deployed effectively, but note that there is an upper limit to the number of additional visitors that the New Forest can sustain and this needs to be determined to understand how long the measures will continue to be effective.</p> <p>New evidence may come forward in future suggesting that alternative, more strategic, approaches are taken and we await the findings of the New Forest Mitigation study in particular. In our experience providing alternative recreational opportunities to deflect visits away from sensitive European sites must be done strategically.</p> <p>Keen to expand discussion of options around the inclusion of Testwood Lakes as part of any Green Infrastructure (GI) strategy to provide site-based mitigation.</p>	<p>The SPD contains text recognising the continued need to co-operate in taking a strategic approach to ensure significant effects are avoided.</p> <p>Overall, the results of the recent New Forest Visitor Study did not indicate a need for a revised approach to mitigation in this Council's planning area (the district outside of the National Park).</p>
<p><b>Natural England</b></p>	<p>2 Introduction 2.27-2.29</p>	<p>Paras 2.27 – 2.29 (Hotel Development), clarification is required to confirm that hotel developments will only need to provide contributions, irrespective of whether they are delivering a net gain of above or below 50 units.</p>	<p>Text amended to take this in to account.</p>

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<b>Pennyfarthing Homes</b>	2 Introduction 2.27-2.29	The draft SPD provides little or no evidence to justify the application of paragraph 2.29, that is to seek a contribution based on one new hotel/serviced accommodation bedroom equating to a one-bedroom dwelling.	Section of the SPD amended to cover other forms of visitor accommodation, and also introduce further details of occupancy based on evidence from Visit England.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	2 Introduction 2.31 (Page 9)	Suggest can move beyond the precautionary approach to a more conclusive standpoint based on more recent evidence.	Refence to recent New Forest Visitor Survey (2020) now provided.
<b>Pennyfarthing Homes</b>	2 Introduction 2.32	Whilst it is acknowledged that the Footprint Ecology report provides a useful starting point for consideration of impacts on New Forest European Sites and the need for mitigation, this report was completed in 2008, ten years ago.	Refence to recent New Forest Visitor Survey (2020) now provided. Overall, the results of this New Forest Visitor Study did not indicate a need for a revised approach to mitigation in this Council's planning area (the district outside of the National Park)

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Cox	2 Introduction 2.35	<p>RAMSAR is not an acronym but the city in Iran where the Ramsar Convention on the Conservation of Wetlands of International Importance was signed in 1971.</p> <p>The provision of secure habitats for birds should be seen as a different and separate mitigation measure not to be mixed with the provision of better visitor management.</p>	<p>Reference to Ramsar amended.</p> <p>Scope of the SPD has been refocused solely on to the New Forest designated European Sites.</p>

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<p><b>Pennington and Lymington Lanes Society (PALLS)</b></p>	<p>2 Introduction 2.35</p>	<p>Do not accept that the provision of alternative greenspace will act to mitigate recreation impacts on the coast.</p>	<p>Scope of the SPD has been refocused solely on to the New Forest designated European Sites.</p>
<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>2 Introduction 2.35 (Page 10) and Policy 10 (Page 13-14)</p>	<p>Should not attempt to deliver conflicting purposes on a single site. We also believe that refuge sites for the Solent's SPA birds may sit outside of the European site, are functionally linked to it, and therefore a key approach to providing mitigation.</p>	<p>Scope of the SPD has been refocused solely on to the New Forest designated European Sites.</p>

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e-COM Projects Ltd	2 Introduction 2.37	<p>RPS considers that SANGs on larger sites like at Strategic Site No. 1 will be delivered in stages, and which will broadly demonstrate the connectiveness that is shown in the Concept Masterplan.</p> <p>However, it is necessary to recognise that 'interim' SANGs provisions on a site-by-site basis may be required, prior to the wider site being completely developed, noting that there are different developers and it is in the interests of the Council to deliver various parts simultaneously. A provision for 'temporary' SANGs which can be replaced by 'permanent' SANGs should be introduced.</p>	<p>Section 4 and supporting text in the Local Plan Policy ENV1 provides further guidance on individual developments on larger sites.</p> <p>However, the delivery of ANRG will quire to be concurrent with the overall housing delivery of the site to meet the Habitat Regulations, supported by clear evidence.</p>

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<p><b>Wyatt Homes</b></p>	<p>2 Introduction 2.8, 2.17</p>	<p>There are no transitional arrangements set out within the NPPF for the preparation of SPDs - therefore these will need to be prepared and adopted on the basis of the latest NPPF.</p> <p>Based on NPPF guidance, consider SPDs should not be used as tools for restricting a proposal's ability to respond to site specific circumstances in the most appropriate way. Also, they should not add unnecessarily to the financial burdens on development.</p> <p><b>Section 2</b> No reference made to formal engagement with Natural England as a factor which has informed the proposed approach.</p> <p>It is essential that the Council is clear on how NE has been engaged and the extent to which they support the emerging proposals within the draft SPD, including the detailed design considerations set out within the appendices to the document.</p> <p>Para 2.17: As the local plan policies and sites have been subject to HRA, undertaking a further AA at application stage for policy complaint schemes is considered unnecessary duplication.</p>	<p>Wording of the SPD has clarified the status of the guidance contained within it.</p> <p>Further information regarding NE's involvement is provided via reference to SoCG prepared for the examination of the Local Plan 2016-2036 Part 1.</p>

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<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	3 Local Plan Policies and other relevant documents 3 - Policy 9 (Page 12)	A typographical error is noted in this section as follows: "...and habitats of species of principal importance for biodiversity)" should be written as "...and habitats or species of principal importance for biodiversity)".	Noted.
<b>Pennyfarthing Homes</b>	3 Local Plan Policies and other relevant documents 3.3	It is unclear on what basis open space has been excluded from that land which can be counted as mitigation; the evidence for this amended approach is absent.	The approach was examined and agreed through the Local Plan Part 1, as set out in the HRA, which brought together wider evidenced on the impacts new developments were shown to be having, and therefore the need to make the two open space requirements separate.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	3 Local Plan Policies and other relevant documents 3.7 (Page 14)	Given the uncertainty surrounding the effects of recreation on the designated features of the New Forest, we strongly believe that development cannot continue at the scale proposed in the Local Plan.	This issue was addressed in the examination of the Local Plan 2016-2036 Part 1

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<b>Natural England</b>	3 Local Plan Policies and other relevant documents 3.8	Para 3.8 – whilst agree with statement that ANReG will contribute to the mitigation of effects on both New Forest and Solent SPA sites, needs to be made clear that the strategic mitigation measures for each remain separate and both need to be adhered to as appropriate to ensure Habitat Regulations compliance.	The scope of the SPD has been focused on to the New Forest European Sites, with cross references to the Solent Recreational Mitigation Strategy
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	3 Local Plan Policies and other relevant documents 3.8 (Page 14)	In order to be effective, new recreational spaces should be of a sufficient scale and quality. As mentioned above, Testwood Lakes could feature here as part of the mitigation strategy for both coastal and New Forest European Sites, but more sites of a similar nature must be secured and delivered as a matter of urgency if impacts are to be offset in time for housebuilding at the scale proposed to proceed.	The strategy sets out the how ANRGs that meet this criteria will be delivered on strategic sites.
<b>e-COM Projects Ltd</b>	4 Recreation Mitigation requirements for new development 4.1	RPS considers that SANGs on larger sites like at Strategic Site No. 1 will be delivered in stages, and which will broadly demonstrate the connectiveness that is shown in the Concept Masterplan. However, it is necessary to recognise that 'interim' SANGs provisions on a site-by-site basis may be required, prior to the wider site being completely developed, noting that there are different developers and it is in the interests of the Council to deliver various parts simultaneously. A provision for 'temporary' SANGs which can be replaced by 'permanent' SANGs should be introduced.	Further wording has been included in the SPD to explain the issue of smaller portions of a larger site coming forward. However, it must be ensured the delivery of ANRG is concurrent with the overall housing delivery of the site to meet the Habitat Regulations, supported by clear evidence.



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<b>Pennyfarthing Homes</b>	4 Recreation Mitigation requirements for new development 4.11	Greater flexibility must be incorporated into the SPD to enable an approach of potential for sites to provide SANG nearby, potentially through other developments that are providing SANG or through a joint approach by a number of smaller sites, which would need to be supported by appropriate evidence.	The SPD does allow for alternative approaches to be proposed, but as set out in the Local Plan 2016-2036 Part One (supporting text to Policy ENV1), should an alternative approach to mitigation be proposed, evidence will be needed to demonstrate its effectiveness. It will need to be evaluated by the 'competent authority' (the decision-making authority) through an Appropriate Assessment process.
<b>Cox</b>	4 Recreation Mitigation requirements for new development 4.13	Confusion over the provision of alternative natural greenspace to mitigate impacts on the New Forest and Solent Coastal European sites.	The scope of the SPD has been focused on to the New Forest European Sites, with cross references to the Solent Recreational Mitigation Strategy

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<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>4 Recreation Mitigation requirements for new development 4.13 (Page 17)</p>	<p>In order to be effective, new recreational spaces should be of a sufficient scale and quality. As mentioned above, Testwood Lakes could feature here as part of the mitigation strategy for both coastal and New Forest European Sites, but more sites of a similar nature must be secured and delivered as a matter of urgency if impacts are to be offset in time for housebuilding at the scale proposed to proceed.</p>	<p>The strategy sets out the how ANRGs that meet these criteria will be delivered on strategic sites.</p>
<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>4 Recreation Mitigation requirements for new development 4.14 (Page 17)</p>	<p>It should also be acknowledged, however, that there is an objectively analysed Local Ecological Network map which extends beyond the designated sites. This map should be used to complement projects relating to a network of paths</p>	<p>Noted.</p>
<p><b>Ringwood Town Council</b></p>	<p>4 Recreation Mitigation requirements for new development 4.14, 4.15 and 4.16</p>	<p>With regards to PROW networks:                      NFDC commit to working with relevant Town / Parish Council which also undertake or fund PROW work in their parish                       Reference to ‘improvement’ should include essential maintenance work                       Refer to HCC Parish Lengthsman Scheme – it will need extending in order to maintain new developments.</p>	<p>Alternative approaches to mitigation are acceptable through this strategy, as are. Issue of maintenance is address in other areas of the document.</p>

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<b>Cox</b>	4 Recreation Mitigation requirements for new development 4.17	Should be recognised that many of these impacts are derived from water borne craft such as kayaks, kite and wind surfers that are able to make close approaches to coastal birds, especially birds roosting or breeding on otherwise remote and inaccessible coastal marshes, shingle spits and islands.	The scope of the SPD is now focused on the New Forest European designated sites.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	4 Recreation Mitigation requirements for new development 4.17 (Page 18)	With the existing issues and those predicted as a result of increased development, if the rangers are to be effective more are required than the single ranger currently deployed in the New Forest. We applaud that Ranger roles under other schemes in the area are coordinated in terms of messages provided and approach taken, but would urge an assessment of whether a model of Behaviour Change may be helpful in directing rangers' activities.	The monitoring framework of the SPD will continually review the work of the rangers.
<b>Ringwood Town Council</b>	4 Recreation Mitigation requirements for new development 4.17 to 4.32 inclusive	Support visitor management and monitoring proposals, but suggest making specific provision to address the following issues: Fires started accidentally or deliberately Impact of organised recreational or sporting events Impact of car parking outside designated areas	Noted.

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<b>New Forest National Park Authority</b>	4 Recreation Mitigation requirements for new development 4.19, 4.37, 6.4 etc.	support the principle of securing mitigation in 'perpetuity', however greater clarity of the in-perpetuity funding for access management measures and the maintenance of alternative greenspaces is needed to demonstrate how mitigation will continue beyond the end of the Plan period.	Offsite mitigation projects require to take account of the in perpetuity funding, and the ranger funding has been calculated to ensure the 80 year period can be funded.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	4 Recreation Mitigation requirements for new development 4.21 & 4.31 (Page 18)	In order for further development to proceed monitoring should be undertaken as a matter of urgency in order to evidence whether mitigation is effective and therefore housebuilding able to proceed on a sound and compliant basis	Monitoring work is continually progressing, including a full schedule of footfall counter data, used to analyse the success of the mitigation projects.
<b>Trustees of the Barker Mill Estate</b>	4 Recreation Mitigation requirements for new development 4.26	The phasing of delivery of the alternative green spaces does have a significant impact on the viability of a development and it is essential that a balanced approach is taken that allows for the provision of infrastructure alongside the construction of residential units.	Wording of the SPD sets out that the Council will work with developers to agree this. Any approach agreed however would need to be evidenced that it will meet the Habitat Regulations and Local Plan Policy ENV1.
<b>Richborough Estates</b>	4 Recreation Mitigation requirements for new development 4.26	The phasing of delivery of the alternative green spaces does have a significant impact on the viability of a development and it is essential that a balanced approach is taken that allows for the provision of infrastructure alongside the construction of residential units.	Wording of the SPD sets out that the Council will work with developers to agree this. Any approach agreed however would need to be evidenced that it will meet the Habitat Regulations and Local Plan Policy ENV1.

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<b>Natural England</b>	4 Recreation Mitigation requirements for new development 4.3	Para 4.3, suggest a wording change to the final bullet to clarify requirement of New Forest SPA and Solent SPA sites.	The scope of the SPD has been focused on to the New Forest European Designated sites.
<b>Pennyfarthing Homes</b>	4 Recreation Mitigation requirements for new development 4.36	People and Wildlife Ranger and the Bird Aware Ranger overlap would be unreasonable and would result in the inappropriate seeking of funding from developers and thus would be unacceptable. There should be clear distinction between the two roles.	The scope of the SPD has been focused on to the New Forest European Designated sites.
<b>Trustees of the Barker Mill Estate</b>	4 Recreation Mitigation requirements for new development 4.37	Paying for 80 years of maintenance in advance implies that monies will be placed well in advance of their actual need.	In order to meet the requirements of ENV1, the Council need to be certain that the mitigation will be available in perpetuity.
<b>Ringwood Town Council</b>	4 Recreation Mitigation requirements for new development 4.37	Transfer of land – add flexibility to include transfer to a relevant town or parish council where it is practicable and best serves public interest. This would need to include an agreed management / maintenance plan.	Management would need to be agreed at the time of handover.

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<b>Richborough Estates</b>	4 Recreation Mitigation requirements for new development 4.37	Paying for 80 years of maintenance in advance implies that monies will be placed well in advance of their actual need.	In order to meet the requirements of ENV1, the Council need to be certain that the mitigation will be available in perpetuity.
<b>Pennyfarthing Homes</b>	4 Recreation Mitigation requirements for new development 4.37 and 4.38	Whilst acknowledge the need for SANG to be available in perpetuity, it considers it appropriate that there is flexibility as to how this is achieved	The SPD allows for a range of options, which will be negotiated through the planning application process
<b>Trustees of the Barker Mill Estate</b>	4 Recreation Mitigation requirements for new development 4.38	There is little value in seeking to prioritise the alternatives and it should be left to discussion at the planning application stage as to what alternative mechanism would work best for the site.	Noted.
<b>Richborough Estates</b>	4 Recreation Mitigation requirements for new development 4.38	There is little value in seeking to prioritise the alternatives and it should be left to discussion at the planning application stage as to what alternative mechanism would work best for the site.	Noted.

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<b>Pennyfarthing Homes</b>	4 Recreation Mitigation requirements for new development 4.39	<p>Clarification is required as to how the council intends to deal with applications that involve the provision of standalone alternative natural recreational greenspace or improvements to existing public open space or enhancements to walking routes.</p> <p>Clarification is also required as to whether it is also intended that this approach will apply to identified sites.</p> <p>PH is particularly concerned that there is an assumption that runs through the SPD that SANG must be provided adjacent or close to a development.</p>	<p>These would be site specific issues to consider on a site-by-site basis.</p> <p>Mitigation close to larger sites would be the first consideration, using the same principles of ANRGS used throughout the preparation of the Local Plan.</p>
<b>Trustees of the Barker Mill Estate</b>	4 Recreation Mitigation requirements for new development 4.4	The base date of this information is 2004	This section has now been updated using visitor data from the 2020 New Forest Visitor Study.
<b>Richborough Estates</b>	4 Recreation Mitigation requirements for new development 4.4	The base date of this information is 2004	This section has now been updated using visitor data from the 2020 New Forest Visitor Study.

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<b>Pennyfarthing Homes</b>	4 Recreation Mitigation requirements for new development 4.4	The base date of this information is 2004	This section has now been updated using visitor data from the 2020 New Forest Visitor Study.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	4 Recreation Mitigation requirements for new development 4.4 (Page 15)	Question whether this visitor survey data from 2014 is still reliable given recent demographic changes and consequent recent visitor trends to the New Forest. We are aware of a new survey that has commissioned, and which will be undertaken by Footprint Ecology. We suggest that provision should be made in this mitigation document for the findings of this study to be taken into consideration as they emerge.	This section has now been updated using visitor data from the 2020 New Forest Visitor Study.



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<p><b>New Forest National Park Authority</b></p>	<p>4 Recreation Mitigation requirements for new development 4.4, 4.5</p>	<p>Cconcern about the interpretation of the data to support the conclusions of Paragraph 4.4 and 4.5.</p> <p>The Authority recommends that the scheme be adjusted if the data from the recently jointly commissioned work on visitor patterns in the New Forest designated sites by Footprint Ecology shows that the proportion of visits is likely to be higher than the 32.4% assumed in the scheme.</p>	<p>This section has now been updated using visitor data from the 2020 New Forest Visitor Study.</p>
<p><b>Pennyfarthing Homes</b></p>	<p>4 Recreation Mitigation requirements for new development 4.41</p>	<p>Whilst support the potential to provide alternative recreational mitigation projects, it is concerned with the reference to ‘substitute’ projects being identified where delivery of identified projects proves problematic. PH is concerned that the implication of this is that projects identified in Appendix 2 may not be deliverable.</p>	<p>To ensure the programme of projects is responsive to changing circumstances and opportunities, the programme of specific projects will be maintained separately</p>

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<b>Meyrick Estate Management Ltd</b>	4 Recreation Mitigation requirements for new development 4.42	Parameters set out to assess ANRG and recreational routes not listed in the document is not sufficient and should instead refer to exist NE guidelines and Appendix 4	The approach set out in the SPD is one agreed. Clarification has been provided as to its status and the detailed wording.
<b>HCC Property Services</b>	4 Recreation Mitigation requirements for new development 4.42	<p>Support para 4.42 point 3, through its provision of a criteria-based policy.</p> <p>However, suggested adding a further point of 'water bodies'. This is because it is considered that features such as lakes, SuDs features and ponds can for parts on ANReG areas. This could particularly be the case in respect of mitigation for solent / coastal protection sites.</p>	SuDS is addressed in the supporting appendix 4.

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<b>Pennyfarthing Homes</b>	4 Recreation Mitigation requirements for new development 4.42	Criteria should be applied with flexibility.	Clarification has been added to the SPD regarding the status of the guidance.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	4 Recreation Mitigation requirements for new development 4.42 (Page 22)	Support these criteria, and believe that they are practical	Noted.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	4 Recreation Mitigation requirements for new development 4.6 (Page 16)	Pleased to see recognition of this and look to the emerging New Forest Mitigation study to define a way forward in this regard.	Noted.
<b>Bloor Homes &amp; Trustees of the Barker Mill Estate</b>	4 Recreation Mitigation requirements for new development 4.8	Flexibility for where transferred to NFDC at nil cost required to consider other means of management is necessary, and we have concerns about this being expressed as only being acceptable 'exceptionally'.	Wording clarified.

Respondent	Document Section	Summary of Comments	Council Response
<b>Hordle Parish Council</b>	4 Recreation Mitigation requirements for new development 4.8	Note ANReG land is transferred to the Council with appropriate funding, but concerned with the further 'exceptional' suggestions that other means could be appropriate if unrestricted public access can be secured	Paragraph wording amended to avoid duplication
<b>Colten Developments Ltd</b>	4 Recreation Mitigation requirements for new development 4.8	With regards the transfer of SANG land to NFDC, there may be other options to ensure its availability for use in perpetuity – therefore there should be flexibility in the mechanism securing this.	Paragraph wording amended to avoid duplication
<b>Taylor Wimpey</b>	4 Recreation Mitigation requirements for new development 4.8	It is assumed that the final contribution would be calculated on a site-specific basis, taking account of the amount of SANG required for the proposed quantum of housing	Paragraph wording amended to avoid duplication with later section of the SPD

Respondent	Document Section	Summary of Comments	Council Response
Cox	4 Recreation Mitigation requirements for new development 4.8	<p>There are a number of fundamental reasons why it is not appropriate to apply the 8 ha per 1000 head of population calculation to the New Forest European sites:</p> <p>The number of visits made to the New Forest by its residents per year is much greater than to the Thames Basin Heaths</p> <p>The density of visitors to the New Forest is much lower than the Thames Basin heaths</p> <p>The New Forest is also designated a SAC and Ramsar site as well as SPA.</p>	The standard was considered and found sound through the examination of the Local Plan and supporting evidence – including the HRA.

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennington and Lymington Lanes Society (PALLS)</b></p>	<p>4 Recreation Mitigation requirements for new development 4.8</p>	<p>There are a number of fundamental reasons why it is not appropriate to apply the 8 ha per 1000 head of population calculation to the New Forest European sites:</p> <p>The number of visits made to the New Forest by its residents per year is much greater than to the Thames Basin Heaths</p> <p>The density of visitors to the New Forest is much lower than the Thames Basin heaths</p> <p>The New Forest is also designated a SAC and Ramsar site as well as SPA.</p>	<p>The standard was considered and found sound through the examination of the Local Plan and supporting evidence – including the HRA.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Hampshire &amp; Isle of Wight Wildlife Trust</b></p>	<p>4 Recreation Mitigation requirements for new development 4.8 (Page 16)</p>	<p>Calculations for SANGs derived from the Thames Basin Heaths (TBH) do not apply uniformly to the New Forest and that a far higher provision per capita may be necessary.</p>	<p>The standard was considered and found sound through the examination of the Local Plan and supporting evidence – including the HRA.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Wyatt Homes</b></p>	<p>4 Recreation Mitigation requirements for new development 4.8, 4.37, 4.38</p>	<p>Regarding ANReGs provided as part of a development and the long term management and maintenance, concern at the inconsistency between paragraphs 4.8 on the one hand and 4.37/4.38 on the other. Whilst the former allows for the alternative options to be considered only 'exceptionally', the latter presents the alternative options as being available in any given case where the Local Planning Authority is satisfied that continued free and unrestricted access can be secured in perpetuity without public ownership of the land.</p>	<p>Paragraph 4.8 has been amended to avoid duplication.</p>



Respondent	Document Section	Summary of Comments	Council Response
<b>Taylor Wimpey</b>	4 Recreation Mitigation requirements for new development 4.9	whilst Appendix 4 should be used as the basis for this provision, it represents Guidance to assist in the determination of planning applications, as opposed to Policy. SPDs should not be used as a way of introducing new policy and should be in line with national guidance. Site-specific matters may therefore require a different approach or some departure from the Council's preferences.	Wording of the SPD has been amended to clarify appendix 4 is an agreed approach to meet the Habitat Regulations, and other approaches may be acceptable subject to the appropriate evidence, etc.

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Cranborne Chase Area of Outstanding Natural Beauty</b></p>	<p>5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review Overview - Focus on Fordingbridge and Ringwood areas</p>	<p>Propose that the AONB should be included within the payments for off-site recreation mitigation projects and access management.</p> <p>Concerned that opportunities for mitigating recreational impacts on other statutory sites are not included. Designation should be included in the SPD.</p> <p>Using the principle of 5.6km for the AONB, this would include the Fordingbridge strategic sites.</p> <p>NFDC has adopted the AONB Management Plan 2014-2019, and objectives and policies within that Management Plan indicate that contributions from developments should be directed towards AONB Management Plan objectives.</p> <p>Higher than average property prices in AONB. Draft review of Management Plan is being more explicit about developer contributions. This can be used to ensure some contribution is made to sustaining the high quality environment that new residents seem prepared to pay for to live in the area.</p> <p>Acknowledging that recreational space could be provided by the AONB could, in turn, reduce the requirement for on-site or nearby recreational space.</p>	<p>Comments noted. The scope of the SPD is focused on the New Forest European Sites.</p>

Respondent	Document Section	Summary of Comments	Council Response
<b>Fawley Parish Council</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review Table 8 saved recreation mitigation land Allocations in the Local Plan Part 2 5.8	Table 8 - HYD6 New Public open space south of Hardley Lane, west of Fawley Road is actually in Fawley not Hythe & Dibden	Error noted.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.6 (Pages 24)	Without new, large and strategic provision in addition, pressure will mount on the European sites. As implied above, a piecemeal approach to greenspace provision will not satisfactorily offset recreational pressures.	The overall approach of the strategy was considered sound through the examination of the local plan. The SPD also refers to the further work with adjoining authorities regarding the wider zone of influence.
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.7 & 5.8 (Pages 24-26)	we are concerned that the quantum of planned development in the District is too high and is unsustainable, and in accord with Jonathan Cox's analysis we believe the per capita size of SANGs used here is too low.	The standard was considered and found sound through the examination of the Local Plan
<b>Trustees of the Barker Mill Estate</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.6	Given the range of densities and the use of the planning application as the means of determining the extent of green space required, the estimates should be identified as a minimum figure, rather than a range.	Table has been amended to show the anticipated amount based on the SHMA recommended housing mix.

Respondent	Document Section	Summary of Comments	Council Response
<b>New Forest National Park Authority</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.3	Paragraph 5.3 of the Monitoring section will be carried out by the partnership of local authorities that have commissioned Footprint Ecology to do this work.	Table amended.
<b>Taylor Wimpey</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.6	Table 7 is not consistent with Table 4 or Policy SS.14, with the former referring to 300 homes at our client's land (Strategic Site Allocation SS.14 'Land to the north of Hightown Road, Ringwood') as opposed to 270 homes in the latter.	Tables text amended. They are included to act as a guide for what is anticipated to be delivered on the site when it is brought forward.

Respondent	Document Section	Summary of Comments	Council Response
<b>Richborough Estates</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.6	Given the range of densities and the use of the planning application as the means of determining the extent of green space required, the estimates should be identified as a minimum figure, rather than a range.	Table has been amended to show the anticipated amount based on the SHMA recommended housing mix.
<b>Pennyfarthing Homes</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.2 and 5.3	The occupancy rates used in the SPD differ from those used in the HRA of the Local Plan Review. Clarity is required as to which figures are correct or how the two relate	Occupancy rates in the SPD were also used for the work in preparing the ANRG requirements in the Local Plan
<b>Pennyfarthing Homes</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.5	<p>Errors in table 3 calculations. In particular, the 'general SHMA mix' does not appear to reflect Draft Policy 16. It is also noted that the number of units adds up to 102, not 100 and therefore the figures derived from this table are incorrect and cannot be relied upon.</p> <p>The 'mostly' small/medium bed dwellings' mix purports to include small and medium dwellings yet does not include any one bed units, but does include large four bed dwellings.</p>	Table has been amended and general SHMA mix added. However, its primary purpose is to show examples of how the tenure of dwellings on a development will affect the ANRG size.

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennyfarthing Homes</b></p>	<p>5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review Table 4 Estimates of on-site alternative natural recreational green spaces to be provided 5.6</p>	<p>There are significant differences between what the council is suggesting is required and what is actually required based on its own suggested housing mixes. It is wholly unacceptable for such an overexaggeration of requirements to be included in the SPD. Furthermore, this does not take into account that the SHMA mix.</p>	<p>Table 4 has been updated to correspond with the anticipated figures arising from the general SHMA mix of tenures</p>

<b>Respondent</b>	<b>Document Section</b>	<b>Summary of Comments</b>	<b>Council Response</b>
<b>Pennyfarthing Homes</b>	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Review 5.1	Necessary to outline the evidence upon which the intensity of use is based in order to ensure that the justification for the figure quoted is clear and transparent.	The SPD reflects the evidence used to support the Local Plan
<b>Pennyfarthing Homes</b>	6 Implementation and Funding	Footpaths to be surfaced which appears to be contrary to the intention for alternative recreational provision to be more naturalistic, attracting visitors away from European designations.	Text updated though the SPD and appendix the clarify its status as guidance in support of Policy ENV1.
<b>Richborough Estates</b>	6 Implementation and Funding 6.1	The provision of fees for monitoring should be assessed specifically against the CIL tests.	Monitoring is a key element of the strategy and critical to its success.
<b>Pennyfarthing Homes</b>	6 Implementation and Funding 6.1	Nothing presented within the SPD or elsewhere for the level of fee Proposed.	Information provided in Appendix considered sufficient, with further published as it is reported via the AMR
<b>Pennyfarthing Homes</b>	6 Implementation and Funding 6.17	The contribution per dwelling figures set out in Table 9 are higher than those contained in the 2014 mitigation SPD.	Comments noted. The figure takes account of the higher housing requirement in the Local Plan Part One with the contribution figures are calculated from the total cost of the required off-site mitigation measures divided between the residential development sites not providing on-site mitigation.

<b>Respondent</b>	<b>Document Section</b>	<b>Summary of Comments</b>	<b>Council Response</b>
<b>Pennyfarthing Homes</b>	6 Implementation and Funding 6.18	Paragraph does not contain this information.	See above comment
<b>Trustees of the Barker Mill Estate</b>	6 Implementation and Funding 6.2	See comments on para. 4.26 and 4.37.	See earlier officer comment
<b>Richborough Estates</b>	6 Implementation and Funding 6.2	See comments on para. 4.26 and 4.37.	See earlier officer comment
<b>Trustees of the Barker Mill Estate</b>	6 Implementation and Funding 6.26	The benefit of the green infrastructure and SRMP activity extend beyond the new residents created by future development. The benefits will also relate to existing residents, with scope to capture impacts that would otherwise be made by existing residents.	The approach of the strategy is for developer provided on-site ANRG to focus on the residents of the new development.
<b>Richborough Estates</b>	6 Implementation and Funding 6.26	The benefit of the green infrastructure and SRMP activity extend beyond the new residents created by future development. The benefits will also relate to existing residents, with scope to capture impacts that would otherwise be made by existing residents.	The approach of the strategy is for developer provided on-site ANRG to focus on the residents of the new development.
<b>Pennyfarthing Homes</b>	6 Implementation and Funding 6.26	Nothing presented as to how this cost has been derived.	Information provided in Appendix considered sufficient at this stage, further will be published as it is reported via the AMR



Respondent	Document Section	Summary of Comments	Council Response
<p><b>Wyatt Homes</b></p>	<p>6 Implementation and Funding 6.3</p>	<p>Propose amendment to wording of para 6.3 to allow for the consideration of alternatives to the transfer of land to public ownership to reflect section 4 comments.</p>	<p>A more comprehensive rewording of the paragraph has been made, which addresses this point.</p>
<p><b>Hordle Parish Council</b></p>	<p>6 Implementation and Funding 6.3</p>	<p>The Parish Council support the provision of this open space but requires reassurance on the ongoing management and maintenance and who would be responsible for this. If land is given to a third party, then it needs to be done fully, with complete legal ownership, to enable appropriate funding to be secured for its ongoing maintenance.</p> <p>Parish will need to be fully involved in the process of the delegation of open space and would wish to see the responsibility for maintenance / management clarified through legal agreements. Appropriate wording would be required to ensure that it would not open up the possibility of negotiation. Compliance would also need monitoring as set out in Paras 6.9 &amp; 6.10</p>	<p>This will need to be fully agreed and set out, normally in the legal agreement accompanying the planning permission.</p>

<b>Respondent</b>	<b>Document Section</b>	<b>Summary of Comments</b>	<b>Council Response</b>
<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	6 Implementation and Funding 6.5 (Page 28)	We are pleased to see that the habitat management will seek to achieve optimum biodiversity.	Noted.
<b>Trustees of the Barker Mill Estate</b>	6 Implementation and Funding 6.8	These figures should be identified as part of the SPD and should be subject to consideration by way of a further period of public consultation	Comments noted. The contribution figures are calculated from the total cost of the required off-site mitigation measures divided between the residential development sites not providing on-site mitigation.
<b>Richborough Estates</b>	6 Implementation and Funding 6.8	These figures should be identified as part of the SPD and should be subject to consideration by way of a further period of public consultation	Comments noted. The contribution figures are calculated from the total cost of the required off-site mitigation measures divided between the residential development sites not providing on-site mitigation.
<b>Pennyfarthing Homes</b>	6 Implementation and Funding 6.8	Welcome the intention to monitor whether levels of commuted sums for maintenance and monitoring have been set at appropriate levels and expect the results on this and any other monitoring to be published	Comments noted.

Respondent	Document Section	Summary of Comments	Council Response
<b>Fawley Parish Council</b>	6 Implementation and Funding Appendix 2 Summary of offsite mitigation proposals fa1 Elizabeth II Recreation Ground	fa1 Elizabeth II Recreation Ground - opposed to project due to the extensive amount of dog mess on sports fields and the health and safety concerns especially to children.	Following NFDC Cabinet approval, a replacement to this project is being prepared.
<b>Fawley Parish Council</b>	6 Implementation and Funding Appendix 2 Summary of offsite mitigation proposals fa3 Church Lane - provide surfaced footpath route, and enhancing existing space for young people and encourage increased informal; recreation. 50k	Fa3: Query whether it relates to the area owned by NFDC or the area leased to Fawley Parish Council by NFDC or both. Query who will be responsible for maintaining the proposal.	Project now replaced as agreed by NFDC Cabinet.
<b>Trustees of the Barker Mill Estate</b>	Appendix 1 Monitoring Requirements	The total costs should be reconsidered on this basis and only where there is a clear need (of a form that meets the CIL tests) should additional monitoring costs be sought from developers.	Monitoring specifically relates to the Mitigation Strategy

Respondent	Document Section	Summary of Comments	Council Response
<b>Richborough Estates</b>	Appendix 1 Monitoring Requirements	The total costs should be reconsidered on this basis and only where there is a clear need (of a form that meets the CIL tests) should additional monitoring costs be sought from developers.	Monitoring specifically relates to the Mitigation Strategy
<b>Pennyfarthing Homes</b>	Appendix 1 Monitoring Requirements	There is an assumption that runs through the SPD that SANG must be provided adjacent or close to a development. However, there is no basis for this requirement. The overall concept on which mitigation is based is that SANG should achieve 'no net increase' in visits to European sites.	Comments noted. Mitigation Hierarchy is an accepted national approach. However, there is a need to meet proximity of development.

Respondent	Document Section	Summary of Comments	Council Response
<b>Ringwood Town Council</b>	Appendix 2 Summary of offsite mitigation proposals	Project ri1 should refer to the Avon Valley Path and the need to improve the route to include safe crossing of the B3081	The project programme will now be published separately to the SPD
<b>Pennyfarthing Homes</b>	Appendix 2 Summary of offsite mitigation proposals	<p>The 2014 SPD provides further detail in respect of each project proposed which aids both their and the public's understanding of those projects.</p> <p>It would be useful if this information continued to be provided within the emerging SPD.</p>	The project programme will now be published separately to the SPD
<b>Trustees of the Barker Mill Estate</b>	Appendix 3 Design considerations for recreation mitigation	Requirements are considered to be too onerous	Wording has been clarified throughout the appendix and SPD to better explain its status and which elements are more critical than others to provide on a given space.

Respondent	Document Section	Summary of Comments	Council Response
<b>Wyatt Homes</b>	Appendix 3 Design considerations for recreation mitigation	<p>Confusion on the contents of Appendix 3 and 4 which appear to overlap.</p> <p>Question extent to which the detail has been agreed with NE.</p>	<p>Appendix 3 and 4 now clarified and highlighted an error.</p> <p>Reference to the Statement of Common Ground agreed with Natural England now provided in the main document.</p>
<b>Richborough Estates</b>	Appendix 3 Design considerations for recreation mitigation	Requirements are considered to be too onerous	Wording clarified throughout the appendix and SPD to better explain its status and which elements are more critical than others to provide on a given space.

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Meyrick Estate Management Ltd</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>No evidence to support the concept that ‘mitigation compliant’ space will be laid out as an integral part of a network of greenery and green setting for new developments.</p> <p>It would not in replicate or substitute for experiences in the New Forest.</p>	<p>ANRG is designed as an alternative to the New Forest being attractive in this own right and on the doorstep of the new residents.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Bloor Homes &amp; Trustees of the Barker Mill Estate</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>The rationale / justification for an alternative approach to SANGs is not clear – including NE’s agreement with it.</p> <p>Landscape framework-led approach underestimates the complexity where there are multiple land interests.</p> <p>Greater flexibility in the detail set out in the Appendix may be necessary in practice – SPD should indicate the scope for flexibility.</p>	<p>Wording of the appendix has been amended to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p> <p>Reference to the Statement of Common Ground agreed with Natural England now provided in the main document.</p>



Respondent	Document Section	Summary of Comments	Council Response
<p><b>Metis Homes</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Proposed guidance for the size and form of main and secondary spaces and links is too specific and should be more flexible to allow for site specific constraints and opportunities.</p> <p>Quality of the whole SANGS design should be considered on a case by case basis, with the guidance a starting point.</p> <p>Flexibility for sites in multiple ownership in form of land designation swap between ANRG and other open space.</p>	<p>Wording of the appendix has been amended to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p> <p>Supporting text of the Local Plan (para 5.19) addresses approach to sites within a larger development.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Trustees of the Barker Mill Estate</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Some matters of detail that go beyond what is realistically needed at that stage, such as planting, dog waste bins, etc. (particularly as part of an outline application). Better dealt with at planning application stage, or through condition.</p> <p>Specific radius shaped spaces and the distance of links between them may not always work in site specific terms – so flexibility is needed.</p> <p>Concern that use of tarmac will be overly urbanising and flexibility should be provided to consider a range of finishes for footpaths.</p> <p>Some information duplicates advice from a previous appendix in the document, and some references to other sections in the document are incorrect.</p> <p>Some flexibility should be given to allow underground water storage, particularly where land is not transferred to the Council</p>	<p>Wording of the appendix has been amended with paragraph numbers added to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p> <p>Appendix 3 and 4 now clarified</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Wyatt Homes</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Given the importance of the detail within the appendix, would be better integrated into the main document.</p> <p>Unclear whether this approach has been agreed with Natural England.</p> <p>Do not agree that designated nature conservation sites will not normally be considered as alternative natural green spaces - consider there are cases where the uses are mutually compatible.</p>	<p>Wording of the appendix has been amended to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p> <p>Reference to the Statement of Common Ground agreed with Natural England now provided in the main document.</p>
<p><b>Ringwood Town Council</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Regarding the inclusion on SUDs, suggest adding flexibility that its use could include surface water arising off-site or pre-existing uses.</p>	<p>This issue is beyond the scope of the SPD.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Harvington Properties</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space Page 52, Fig 1: A connected network of alternative natural recreational green spaces.</p>	<p>Guidance for the size and form of main and secondary spaces and links are too specific and should be more flexible to allow for site specific constraints and opportunities.</p> <p>The quality of the whole SANGS design should be considered on a case by case basis, using the guidance as a starting point.</p> <p>The ability of the SANGS to attract use by both new and existing residents should also be considered.</p>	<p>Wording of the appendix has been amended to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p>
<p><b>Colten Developments Ltd</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Support a reduced radius size of areas on non-strategic developments (less than 100 dwellings), though suggest a better example is used in the appendix.</p>	<p>Comments noted.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Taylor Wimpey</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Supportive of scope to deliver SANG on other suitable land that is located close to development sites.</p> <p>The detail, particularly in relation to specific minimum requirements is too specific, some flexibility is suggested in liaison with the Council.</p> <p>Understand the guidance will enable above ground SuDS to be integrated into land proposed as SANG and open space – this is supported.</p>	<p>Comments noted.</p> <p>Wording of the appendix has been amended to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Cox</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Confusion running through this report between mitigation of recreation impacts to the New Forest and those to the Southampton Water and Solent Coast is carried through to this Appendix.</p> <p>No analysis in this section of the guidance of the visitor studies in the New Forest and other areas of heathland that attract visitors.</p> <p>A summary of the studies suggest that new alternative natural recreational green spaces need to be very well designed to provide a real alternative to the New Forest European sites.</p> <p>The areas of land proposed in Appendix 4 will be totally ineffective in providing an attractive alternative to the New Forest European sites.</p>	<p>The SPD now only addresses the recreational mitigation impacts for the New Forest Designated sites.</p> <p>The approach to mitigation used by this SPD was confirmed most recently through the recent Local Plan Part 1 examination.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennington and Lymington Lanes Society (PALLS)</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Confusion running through this report between mitigation of recreation impacts to the New Forest and those to the Southampton Water and Solent Coast is carried through to this Appendix.</p> <p>The areas of land illustrated in Appendix 4 will be totally ineffective in providing an attractive alternative to the New Forest European sites.</p>	<p>The SPD now only addresses the recreational mitigation impacts for the New Forest Designated sites.</p> <p>The approach to mitigation used by this SPD was confirmed most recently through the recent Local Plan Part 1 examination.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Richborough Estates</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>Some matters of detail that go beyond what is realistically needed at that stage, such as planting, dog waste bins, etc. (particularly as part of an outline application). Better dealt with at planning application stage, or through condition.</p> <p>Specific radius shaped spaces and the distance of links between them may not always work in site specific terms – so flexibility is needed.</p> <p>Concern that use of tarmac will be overly urbanising and flexibility should be provided to consider a range of finishes for footpaths.</p> <p>Some information duplicates advice from a previous appendix in the document, and some references to other sections in the document are incorrect.</p> <p>Dog activity area guidance should be set out in a form that is more digestible in the context of the layout and design of the green space.</p>	<p>Wording of the appendix has been amended with paragraph numbers added to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p> <p>Appendix 3 and 4 now clarified</p>



Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennyfarthing Homes</b></p>	<p>Appendix 4 A combined approach to the provision of Recreational mitigation, Natural Greenspace and Public Open Space</p>	<p>A comprehensive response to this appendix is provided from Pennyfarthing Homes, which is supported by a technical note from consultants EPR.</p> <p>Site-wide approach to proposed recreational mitigation strategies is not always possible e.g. where there is fragmented land ownership - Some flexibility is necessary.</p> <p>The council's intention to be flexible in relation to the offer of alternative areas of natural greenspace close to, rather than as part of, a site needs to be reflected in the SPD.</p> <p>A blanket approach of avoiding ecologically sensitive sites is inappropriate as there could be biodiversity gains through improved management. Where these areas exist, disagree additional land should be included in the SANG unless it is suitably evidenced.</p> <p>In a number of areas of the Appendix, object to the level of detail requested as being unnecessary and inappropriate at the outset as part of a landscape framework plan.</p> <p>Adequate mitigation can be achieved through the use of a framework of requirements which do not include the level of prescriptive detail set out in the draft SPD – for example around the main and</p>	<p>Comments notes.</p> <p>The approach to mitigation used by this SPD was confirmed most recently through the recent Local Plan Part 1 examination.</p> <p>Section 4 and supporting text in the Local Plan Policy ENV1 provides further guidance on individual developments on larger sites.</p> <p>Wording of the appendix has been amended to make clear the status of the guidance – however, the guidance remains an approach agreed with Natural England to meet the Habitat Regulations.</p>

Respondent	Document Section	Summary of Comments	Council Response
		<p>secondary space dimensions, planting types specified. to furniture and facilities, and the 'Detailed design considerations'.</p> <p>Many of the specific criteria are not supported by evidence in particular the application of minimum radii and minimum / maximum link dimensions.</p> <p>The criteria generally in this appendix must be applied flexibly to reflect site circumstances.</p> <p>Reference in the appendix to an Open Space SPD, which does not appear to exist.</p>	

<b>Respondent</b>	<b>Document Section</b>	<b>Summary of Comments</b>	<b>Council Response</b>
<b>Pennyfarthing Homes</b>	Appendix 5 Allocated Sites yet to be implemented	Discrepancies within the Coastal Towns and Village table with regard to the number of dwellings that will be provided at some sites.	Appendix now completely removed.
<b>Ringwood Town Council</b>	Appendix 7 European Site Descriptions	Seventh and eighth paragraphs appear to duplicate.	Appendix now completely removed, with reference provided to the detail contained in the HRA.
<b>HCC Property Services</b>	Appendix 7 European Site Descriptions	Suggest the inclusion of maps to show the international designations described in this appendix.	Appendix now completely removed, with reference provided to the detail contained in the HRA. Maps are also included within the HRA.
<b>Natural England</b>	Table 10 Contribution rate per dwelling for access management	Agree with the amounts set out in Table 10.	To avoid duplication with the SRMS, the figures have been removed from this SPD.
<b>Pennyfarthing Homes</b>	Table 10 Contribution rate per dwelling for access management	Consideration should be given to allowing for the potential for 'no net increase' in recreation in certain circumstance in this SPD	To avoid duplication with the SRMS, this SPD now relates to New Forest designated sites only.
<b>Pennyfarthing Homes</b>	Table 11 Contribution rate for development less than 50 within 5.6km of Southampton Water and Solent Coast European Sites	Contributions set out in these tables have not been sufficiently justified.	The list of mitigation projects and costing will be published separately to the SPD.

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennyfarthing Homes</b></p>	<p>Table 6 Mitigation required South Coastal Towns</p>	<p>Tables 5, 6 and 7 inaccuracies.</p>	<p>These tables have been simplified, and details updated.</p>

Respondent	Document Section	Summary of Comments	Council Response
<p><b>Pennyfarthing Homes</b></p>	<p>Table 8 saved recreation mitigation land Allocations in the Local Plan Part 2</p>	<p>NMT12 New public open space south of Lymington Road, north of Chestnut Avenue is not included in Table 8</p>	<p>Table updated</p>