



Consultation Statement

Mitigation for Recreational Impacts On New Forest European Sites Supplementary Planning Document

The Mitigation for Recreational Impacts on New Forest European Sites Supplementary Planning Document was subject to a six-week period of public consultation from 9th January to 21st February 2021.

Together with publishing the document on the Council's website and issuing of a news release, all contacts on the Local Plan Database were notified of the consultation inviting them to comment. This included all the bodies and groups set out in Appendix 1 of the Council's Statement of Community Involvement (October 2020).

The responses to that consultation and how they were taken in to account are provided in full on the Council's website at <https://www.newforest.gov.uk/article/1938/Mitigation-Strategy>

In total there were 40 respondents to the consultation:

- Local residents and interest groups (20)
- Town and Parish Councils (6)
- Other organisations, including the New Forest National Park Authority (NFNPA), Hampshire County Council Public Health, Sport England and Cranborne Chase AONB Team (7)
- Developers and Landowners (7)

There was broad support of the overall strategy and its ambitions, including recognition of the wider benefits the mitigation strategy will deliver. There were however both positive and negative views made on particular elements of the strategy, and some concerns about the types of project it looks to deliver.

Some of comments received were outside of the scope of the document and included wider issues on the management of the New Forest area itself including car parking, and the future development levels allocated through the Council's Local Plan 2016-2036 Part 1: Planning Strategy (July 2020).

A summary of the main issues raised in those representations and how those issues will be addressed in the final SPD are set out in the table below:

Number of respondents	Summary of issue raised	How the issue was taken into account
5 respondents Including local residents and interest groups.	Effectiveness of mitigation measures used by strategy.	This SPD's approach and the ANRG space standards were confirmed through the recent Local Plan Part 1 examination. This SPD is required to be in conformity with these. The Council continue to monitor the measures set out in the SPD for their effectiveness – the approach agreed by NE and through the Local Plan examination.
3 respondents including local interest groups and the NFNPA.	Alternative approaches to mitigation, including the 'template' set out in appendix 4 or provision of larger strategically placed areas of green space around the outside of the New Forest European sites (Country Parks).	The approach to mitigation used by this SPD was confirmed most recently through the recent Local Plan Part 1 examination.
1 respondent (NFNPA)	Mitigation measures for new visitor accommodation - as distinct from new residential development.	The required mitigation for visitor accommodation is addressed as part of the overall package of measures the SPD sets out.
4 respondents, including local residents, interest groups and Town & Parish Councils	Mitigation project suggestions.	Further work is ongoing on the identification of new off-site mitigation projects.
5 respondents Including local residents and interest groups.	The use and management of access to the wider New Forest - including car parking arrangements, dog walking, etc.	The wider management of all visitors (including car parking arrangements and cycling) within the designated New Forest European sites, is an issue addressed through the work of the NFNPA and other bodies. Introductory text added to the SPD to clarify this scope. Text clarified also in relation to the Access and Visitor Management mitigation the strategy provides (paras 2.10 and 4.21)
4 respondents Including local residents and Developer / Landowners	Level of detail in document is too great.	Section 5 of the document rationalised to simplify the document. Parts of sections 2, 3 and 4 also simplified to remove duplication.

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3 respondents, including local residents and Town & Parish Councils	Greater focus on improving biodiversity needed in the SPD.	Appendix 4 already includes this as a consideration and supporting text to Local Plan Policy ENV1 notes this as an issue to address. The Council is progressing separate work on Biodiversity Net Gain requirements for development to address.
4 respondents, including local interest groups and Town & Parish Councils	Involvement of local groups and organisations in mitigation projects.	Text amended in section 4 to enable Town and Parish Councils, local communities and local interest groups to be involved in the identification of future projects.
2 respondents, including local residents and Town & Parish Councils	Residential extensions should also be required to contribute towards mitigation.	No change to the SPD as subsequent change of uses would trigger the need to provide contributions.
7 respondents Including Developer / Landowners	Scope and status of the SPD – wording too prescriptive, in particular Appendix 4's ANRG design guidance.	Revisions made to section 4 and appendix 4 to clarify the SPD status as guidance rather than policy.
2 respondents, including local residents and Town & Parish Councils	Concerns on the use and maintenance of existing footpaths and mitigation projects.	The SPD requires monitoring of the use of sites as well as the requirement for ongoing maintenance to address these issues.
2 respondents including local residents and the NFNPA	Mitigation measures should include a greater proportion dedicated to ranger provision within the designated sites.	This Council has an established approach and been through two Local Plan public inquiries. Footprint has confirmed evidence base on which the SPD was established.
1 respondent (Developer / Landowner)	Dual use of the ANRG / informal public open space (POS) should be an accepted approach.	The approach to requiring ANRG in addition to informal public open space (POS) as two requirements was confirmed by the Local Plan due to the higher levels needed – covered at the LP examination and the replacement of Policy DM3 by ENV1. The text of section 3 of the SPD clarified to reflect this.
4 respondents Including local residents, local interest groups	Too much focus on specific user groups of the New Forest, i.e. dog walkers, whilst others appear disregarded, i.e. cyclists.	The mitigation projects are focused on diverting the uses that cause the main impacts on the New Forest designated sites, which were further

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and Town & Parish Councils		clarified by the 2020 report from Footprint Ecology.
1 respondent (Sport England)	Existing playing field sites or sports facilities should be protected against designation as alternative natural green space.	The use of existing facilities to provide recreational mitigation projects is not proposed by the SPD. Saved Local Plan Policy CS7 provides protection for such facilities.
1 respondent (Developers / Landowner)	Overprovision of ANRG on strategic sites and mitigation 'credit' scenarios.	The approach to mitigation used by this SPD was confirmed most recently through the recent Local Plan Part 1 examination. Local Plan Policy ENV1 ii(a) is an at least 8 hectares requirement, so cannot be considered overprovision.
1 respondent (NFNPA)	Use of Footprint Ecology's Visitor Study (2020) evidence for calculating the number of visits.	It is considered that the use of 72 visits per annum provides a good representation of the predicted visits and a precautionary estimate of people living in the plan area.
1 respondent (Developer / Landowner)	The assumed occupancy rates used to calculate ANRG need to be amended and updated.	It is necessary to consider the occupation levels of a new development rather than existing dwellings within a given area, for which this SPD uses.
1 respondent (Developer / Landowner)	Lack of evidence to support the proposed charging schedule.	A project list will be published separately to confirm this.
1 respondent (Developers / Landowner)	Cost of monitoring should be subsumed in to CIL administration charges.	Monitoring for the recreational mitigation is a separate requirement to the needs to monitor CIL payments and spending.
6 respondents including local residents, interest groups and the NFNPA	Monitoring requirements, including clarification on how elements will be funded.	Updates made to Appendix 2 for how elements of this will be costed, collected and reported.
1 respondent (Developer / Landowner)	Elements of the monitoring framework do not directly relate to development.	The monitoring of the strategy overall is key to understanding its success in provision mitigation to the designated New Forest sites. Without the mitigation, this would directly affect the delivery of new development.

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1 respondent (Developer / Landowner)	Clarification of the inclusion of woodland areas within ANRG.	Clarification added to section 4 (including 4.13 / 4.47 consistency) and is also referred to in paragraph 5.21 of the Local Plan.
2 respondents (Developer / Landowner)	The SPD should not prohibit off-site ANRG solutions provided that this mitigation meets the locational requirements.	The approach to mitigation used by this SPD was confirmed most recently through the recent Local Plan Part 1 examination. The SPD's overall status is that of guidance and reflects an agreed approach with NE.
1 respondent (Cranborne Chase AONB Team)	Area of Outstanding Natural Beauty and its management is not referred to or addressed in the SPD.	The SPD's scope is to address the specific issue of recreational mitigation for the New Forest and the Habitat Regulations.

In preparing the draft Supplementary Planning Document for consultation in 2021, a preliminary draft was published for public consultation in June 2018 to accompany the publication of the pre-submission Local Plan 2016 -2036: Part 1: Planning Strategy. This was an evolution of the 'Mitigation Strategy for European Sites: Recreational Pressure from Residential Development', previously adopted as SPD in June 2014.

Discussions with Natural England and other stakeholders took place during the preparation of the document including at the annual steering group meeting in June 2017.

Whilst the comments made during this earlier consultation were also taken into account as part of the preparation of the revised draft Supplementary Planning Document (summarised on the Council's website at: Council's website at <https://www.newforest.gov.uk/article/1938/Mitigation-Strategy>), this was balanced with the need to address outcome of the Local Plan Examination and results of the recently published New Forest Visitor Study (2020). Therefore the 2021 consultation considered the full Supplementary Planning Document afresh.

A key element of the preparation and approach of the Supplementary Planning Document was the agreement of a Statement of Common Ground with Natural England on the approach to mitigation (see examination document 'SCOG05 The mitigation of recreational impacts on the New Forest international nature conservation sites arising from planned development', available at: <https://www.newforest.gov.uk/localplanexamination#evidencebase>).

The approach to mitigating the recreational impacts of new development on the New Forest's internationally designated nature conservation sites set out in this Statement of Common Ground was confirmed in the Local Plan Examination. The changes required to the Council's 2014 strategy for mitigation of recreational impacts were primarily in recognition of the significantly higher levels of development being planned for around the New Forest and that most planned housing growth was on larger site allocations.

As a result of this, taking in to account expert advice from Natural England, the key changes from the 2014 SPD are summarised as:

- The requirement for at least 8 hectares of alternative natural recreational greenspace (ANRG) to be made wholly additional to the public open space requirements of Policy CS7 on sites of 50 or more dwellings
- Recognition that occupiers of all new dwellings (irrespective of the number of dwelling on the site) will visit the New Forest protected sites and these visits would need to be mitigated by access and visitor management measures
- Land that already has habitat or biodiversity value will not generally be acceptable for ANRG if the encouragement of additional recreational use would adversely affect its habitat value or protected species
- The 2014 mitigation approach should no longer be considered to mitigate recreational impacts on the Solent international nature conservation sites - the 'Solent Recreation Mitigation Strategy' adopted in April 2018 approach is accepted by Natural England to provide suitable mitigation
- The design approach for ANRGs reproduced in Appendix 4 of the SPD was developed by Council officers working with Natural England