

BROCKENHURST PARISH COUNCIL

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Mr. C. Chatters, Chairman
New Forest National Park Authority
South Efford House
Milford Road
Lymington
SO41 0JD.

13th November 2008

Dear Mr. Chatters

New Forest National Park Plan: Consultation Draft

Brockenhurst Parish Council has carefully studied this draft plan. As an elected body we have conducted a thorough consultative process, seeking views from residents. Please do not treat this response as an additional observation to be indexed and amalgamated into a set of meaningless generalisations. It is rather a summary of the collective and considered concerns of one of the four largest villages within the National Park.

Indeed we are concerned. We find the process deficient and the content worrying.

Given the much criticized democratic deficit which from the NPA inherently suffers, it is surely incumbent on the Authority to involve the widest possible democratic consultation and to be very visibly seen to be listening to the representative views of those bodies that are elected and speak for a substantial proportion of the inhabitants of the National Park.

Yet, for whatever reason we do not consider that we were involved in any systematic or thorough attempt to seek, let alone to incorporate, the views of Parish Councils. Nor were we sent any drafts or "scoping" documents.

The draft refers (pp. 24, 76 and 91) to the "essential role of Parish Councils", not least in producing "parish plans (incorporating actions to improve the local area)" which "will require improved means of direct communication between communities and the relevant statutory bodies". Like other villages, we have worked hard to produce such a plan. Nowhere in the draft is any account taken of any point in any plan!

There has been widespread publicity for further defects in the consultative process, not least the non-availability to the general public of sufficient copies of the document itself and the related shortage of time in which to formulate considered and representative comments.

Turning to the content, there are many passages of purple prose with which we, like others, can readily identify. But unfortunately much of the impact of the "motherhood and apple pie" is rendered meaningless by the lack of cost estimates and supporting evidence, the absence of prioritisation and inter-dependence, the blurring of timescales, and the ignoring of the responsibilities of other statutory bodies.

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We have taken note of the often damning criticism from Hampshire County Council, the NFDC, the Verderers, leading members of the Authority itself, and of course other Parish Councils, not to mention community interest groups such as NF DOG, Forest Uprising and commoners.

If there is a vision it is no more than a projection of what exists. But worryingly this is regularly threatened in the draft by vague phrases and concepts that might, if explained, be acceptable, but which in the absence of example, details and costing look frightening - hence all the fuss about "service villages", "relocation from elsewhere in the Park", road pricing, dog walking, pony keeping, social housing, village shops and cycle tracks.

This lack of detail extends to such basic issues as the map on page 36. This does not inform or reassure, let alone inspire any sort of vision. Moreover, residents of the New Forest cannot possibly be asked for serious opinions on the basis of this crude outline which appears to show part of Brockenhurst as being as urban as the Waterside, and which omits all precision when identifying the village itself. Our request to the Authority for clarification and detail produced neither.

Even where we can find objectives that we share there are no credible paths (in terms of costs or the responsibility of other statutory bodies) to suggest the practical achievement of hitherto unattainable goals such as those surrounding the A31, light pollution from conurbations, local affordable housing and the forecast increase in traffic across the New Forest.

Some detailed comments are attached, and we (along with the other "service villages") have of course already been in separate correspondence with the NPA about the concept of service villages and some related issues such as social housing and the character of village shops. We have asked for an extension of the time limit for consultation to 31st December. In the absence of sufficient extra time to comment, we reserve the right to raise further points as the consultative process unfolds.

Please now go back to the drawing board and give us a draft plan that has a vision that inspires, partnerships to which we can aspire, realistic methods of delivery and identified, affordable costs. Please focus on your statutory duty to "foster the economic and social well-being of local communities".

For our part, we are ready to participate in the vision, in the drafting and over the years in its implementation so as to enhance the traditions and history of the New Forest, to keep a viable balance between conservation and preservation, to foster the natural growth of living and working communities, and to provide a National Park for all to enjoy.

Yours sincerely,

J.T. Masefield
Chairman.

c.c. PCs: Sway, Lyndhurst, Ashurst and Colbury

**NEW FOREST NATIONAL PARK PLAN: CONSULTATION DRAFT
SOME DETAILED COMMENTS FROM BROCKENHURST PARISH COUNCIL
ANNEXED TO THEIR LETTER OF 13TH NOVEMBER**

General

The process has been deficient; the content is worrying. There are no costings, in outline or detail. No evidence, scientific, statistical or based on public opinion surveys is provided.

There are no detailed annexes to show either how the draft was produced, or what it would mean if the draft Plan were to be adopted.

There is no recognition of the responsibilities of other Statutory Bodies - and no indication of how they might be persuaded to subscribe to the NPA's draft goals, or how they might prioritise and cost such actions and activities.

No mention is made of the means, or costs of compliance and enforcement.

The New Forest is not Dartmoor or Exmoor; it is the smallest National Park, with the greatest population density. A "one size fits all" approach cannot work. The NFNPA has a statutory "duty to foster the economic and social well being of local communities". The draft plan signally fails to do so. There are of course five New Forest Acts from 1867 to 1970, and a long-standing set of responsibilities discharged by the Verderers.

Parish Councils, in particular, were not appropriately involved in the consultation or drafting process.

Service Villages

The draft contains no vision or explanation of what Service Villages might be, or why they would be beneficial. There are no costings and no evidence of residents' wishes.

We are now told that Service Villages are a continuation of "Defined Villages". But there is no assessment of the success or failure of this concept and its practical implementation. Why should it continue? In the case of Brockenhurst, the Defined Village approach has played a large part in tearing the heart out of a village that has left it "under siege", as the Leader of Hampshire CC has characterised it.

The Service Village concept, blurred and unhelpfully imprecise, would appear to direct too much new development (of various sorts) to the four villages, where there has already been overdevelopment, while not permitting enough elsewhere to allow for natural adaptation.

Unspecified references to "relocation from elsewhere in the National Park" and to such things as gypsy sites cause profound and understandable concern. Everything in Brockenhurst is overflowing, from schools to sewers, and from car parks to road use by vehicles and pedestrians alike.

In this context it is astonishing that there is no reference to the planned total redevelopment of Brockenhurst College and the many thousands who attend it full-time or part-time.

Nor are Service Villages set in the context of exponential traffic growth on the periphery of the Park, bigger ferries to the Isle of Wight, more closures of the level crossing etc.

Development Control

Social housing/Affordable housing. Are these terms interchangeable in the draft? How will any social housing be truly local? - the relocation of families from the Waterside for example would add to the problems rather than solve them. We need homes for our young people ie, Brockenhurst dwellings and levies for affordable housing should be used for housing Brockenhurst people in Brockenhurst.

Why should social housing be restricted to the four Service Villages? Brockenhurst already has new units recently constructed.

Why in proposed policy DC6 are extensions to existing dwellings limited to 30% based on the size in April 1974, instead of 1982 as hitherto? What is the aim? What is the likely benefit/downside?

Routine improvements and alterations seem to be being stopped. Yet they are often welcomed by the community as improving the housing stock and its appearance, and the Government is publicising its wish for less control over minor improvements, conservatories etc.

Equally, as Lyndhurst PC have asked, why "preclude sensible development for building one small property into which a couple would downsize, thereby releasing a family home" in support of the local community?

Why, in what sets out to be a visionary and aspirational document looking ahead 20 years, is there nothing about the problems of second homes and holiday homes which do so much to destroy the viability of affected villages?

Why are more hotels to be diverted to the Service Villages?

What other new "visitor facilities" are envisaged, and why restrict them to the Service Villages?

Indeed, why concentrate the majority of new development Forest-wide on the Service Villages? And what "new development" does the NPA expect?

What Brockenhurst has asked for and needs are policies that will foster the growth and success of truly local businesses such as plumbers and starter business units, cf paragraph 5.5 of the response from Hampshire CC, as well as Lyndhurst's comments.

It is unclear what impact the new proposals will have on the saved policies used in the Development Control process, in particular, the New Forest District Local Plan (Adopted 2005) that affects Brockenhurst. Until these are identified and replacements drafted, we cannot provide our detailed comments.

Zoning

Where is the scientific evidence for assertions about robustness? Is it not merely convenient to designate areas round the four Service Villages as robust, whereas in practice they are amongst the most vulnerable to over-use by people? What is the reasoning of the "urban" representation of part of Brockenhurst in the map on page 36?

Cycle Routes

There are sporadic, disjunctive references to cycle routes but no coherent plan, certainly no vision. Yet there needs to be both. We have consistently urged the development of connected plans, connecting national routes with intra-village routes and with the Forestry Commission routes on Crown land. The Verderers have also raised some key issues here.

Connected cycle routes are needed for health, safety, recreation, energy-saving, education, transport and parking policies etc.

Dog walking and pony keeping

We have followed the furore and uproar with interest and concern. We will not comment as a PC until we have seen the NPA response including the evidence, the rationale, and details on enforcement (by whom) and costs.

Commoning, tradition, history and continuity combined with viable, vital and evolving communities

There are some welcome signs of positive ideas, but we need detail, precision and dialogue.

Greater democratic involvement

There are references to the Village Plans as being desirable but no references to any plans or any elements in them. This is very important given the non-elected status of the NPA and the long-running concerns of PCs and others.

So what form will the "greater democratic involvement by PCs and local opinion" take? How will the "strong and distinctive local communities with a real pride and sense of identity with their local area" be fostered? (NB - the lumping together of the four Service Villages hardly helps!)

Shops

If this is meant to be supportive we are glad. But why 50%? 60% is fine for Brockenhurst in Brookley Road as there are areas for offices and businesses elsewhere.

Road closures, road pricing

We await further clarification of what is intended - and who would support, pay for and implement. We would have views. In any event there are much more serious traffic issues that need addressing now, and which will loom ever larger over a 20 year period eg, Lyndhurst, the level crossing on the A337 at Brockenhurst, the A31, and increasing cross-Forest travel.

Time for consultation

This has been too short. We have already asked for an extension to 31st December.

External pressures

Little is said on what the NPA will do on its own or with Stakeholders/Statutory Bodies to tackle such problems as increased flights at Bournemouth Airport, NATS air corridors, development on the Waterside, Dibden Bay, new large ferries, the level crossing on the A337 at Brockenhurst. Yet the NFNPA was set up to address the increasing pressures on the Forest, many of which are external. There are battles too to fight for such as the retention of Post Offices, doctors surgeries, fire stations, primary schools and local hospitals.