



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

Consultation Draft, January 2021

Schedule of full responses

April 2021

Respondent	Comment ID	Document Section	Comments
New Forest National Park Authority	10827_SPD21Mit_1	1 Executive Summary 1.1	It is helpful to have it clarified up front that the SPD relates to the Local Plan for New Forest District outside of the National Park. This should avoid any potential confusion with the Authority's separate Habitat Mitigation Scheme SPD (2020).
New Forest National Park Authority	10827_SPD21Mit_2	1 Executive Summary 1.5 and 2.16	Support the requirement in Policy ENV5 of the adopted NFDC Local Plan (2020) - expanded upon in this draft SPD - that all developments will now be required to contribute to access and visitor management (this was previously only a requirement for developments under 50 dwellings).

Respondent	Comment ID	Document Section	Comments
Pennington and Lymington Lanes Society	10864_SPD21Mit_1	2 Introduction and background to the Strategy	<p>The Pennington and Lymington Lanes Society (PALLS) commented on the previous iteration of this SPD in September 2018. As then, we welcome the initiative to provide guidance for mitigating recreation impacts on the New Forest European wildlife sites. We note that some of our concerns raised in 2018 have been addressed. In particular we welcome the separation of mitigation measures for the New Forest from those of the Solent coastal European sites. We agree that the use of alternative greenspace to mitigate impacts on the coastal European sites is inappropriate and we are glad to see that the Council have removed mitigation the Solent European sites from this revised SPD.</p> <p>The Council have adopted a mitigation policy that has four elements which can be broadly characterised as a stick and carrot approach through the provision of alternative greenspaces and walking routes and management of access within the European wildlife sites.</p> <p>PALLS is broadly in support of this approach, but are concerned that the quantum and quality of the proposed green infrastructure will be inadequate and the measures taken to manage access within the New Forest are too weak and will prove to be ineffective.</p> <p>As a consequence, we are not satisfied the that provisions will ensure the substantial increases in housing planned within the New Forest will be mitigated and there will be continued erosion of the special qualities of the National Park and degradation of the wildlife habitats and species populations of European importance.</p> <p>[See comments under chapters 2, 4 and Appendix 4 for main points made]</p> <p>Conclusion</p> <p>PALLS welcomes the removal of mitigation of the Solent European sites from this SPD as we agree that this should be considered within the Solent Recreation Mitigation Strategy.</p> <p>We believe the measures provided to divert visitors away from the New</p>

			<p>Forest European sites proposed in this SPD will be ineffective. Our view is that the provision of the proposed small areas of suburban greenspace termed ANRG will provide few if any of the features that attract visitors to the New Forest European sites. As a result, SPD will not provide mitigation for recreational impacts on the New Forest European sites.</p> <p>We agree that access management measures should be a key element in the mitigation strategy, but are disappointed to see that the SPD includes no mention of the need to improve the management of car parking within the New Forest European sites. We do not believe that any access management measures will be effective until and unless this issue is fully and comprehensively addressed by all those with a responsibility for the management of the New Forest.</p> <p>Lastly, we propose an alternative approach to the provision of alternative greenspace. We believe that there is a need to provide much larger strategically placed areas of green space around the outside of the New Forest European sites that will be effective in diverting visitor pressure. Whereas local 'pocket parks' proposed in the ANRG may have some role to play in mitigation, we do not believe that these alone will be successful in mitigating the pressures of growing recreation pressure on the New Forest.</p>
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Respondent	Comment ID	Document Section	Comments
<p>New Forest National Park Authority</p>	<p>10827_SPD21Mit_3</p>	<p>2 Introduction and background to the Strategy</p>	<p>Approach to new visitor accommodation in New Forest District</p> <p>The approach to visitor accommodation is reasonable and it is appropriate for new visitor accommodation to make a proportionate contribution towards habitat mitigation measures. This is consistent with the conclusions of the HRA/AA of the Council's adopted Local Plan (2020) and is supported. By factoring in occupancy rates, the proposed approach is balanced and based on similar principles to the National Park Authority's own revised Habitat Mitigation Scheme SPD (2020).</p> <p>Consideration could be given to including an indication within the SPD of the likely measures to be used to mitigate the recreational impacts of new visitor accommodation (as distinct from new residential development). Measures such as new accessible natural recreational greenspace provision and other green infrastructure improvements away from the designated sites are less likely to be effective given the draw of the New Forest heathlands to visitors. This would indicate mitigation measures within the designated sites themselves would be more appropriate to address the impacts of new visitor accommodation.</p>

Respondent	Comment ID	Document Section	Comments
Beeton	11006_SPD21Mit_1	2 Introduction and background to the Strategy	<p>I do wonder, though, whether there may, fairly soon, be major changes to recreational pressures and tourism generally within and on the boundary of the New Forest NP.</p> <p>In 1984 Milford still had some sixty proper shops (as opposed to businesses) with a voting population in the region of 4000 +. But a considerable number of tourists from Spring to late Summer.</p> <p>We now have only a handful of shops but a much larger population. We are no longer the `village` I used to visit in 1948/49 but now a small and rather straggly town that is still rapidly expanding town. Milford is decreasing as a tourist attraction.</p> <p>Much the same is happening all around the border of the NFNP. Even within the NP there are more and more restrictions which result in a lessening attraction to tourists.</p> <p>I fully appreciate that you are bound by central government building policies but that doesn't alter what is happening to the local tourism potential!</p> <p>Sorry to comment in such general terms but, as a `locked down` nonagenarian now well out of touch with detailed policies and no NFDC resident in Milford, it's the best I can offer.</p>

Respondent	Comment ID	Document Section	Comments
Marsh	11018_SPD21Mit_1	2 Introduction and background to the Strategy	<p>My overriding concern is traffic. As it is there's been a sharp increase in both volume and noise levels in recent years. This impacts on both wildlife and residence alike, destroying the ambience of a national park. The roads are narrow and windy in places, we have a constant stream of traffic from Ringwood, Bransgore and the Avon causeway all going through the village including juggernauts. The village is not safe to walk around.</p> <p>There's no effective traffic calming in place on any of the roads that converge, for example chicanes, as seen in Burley. If it was possible for traffic to bypass the village it might help relief the situation for Sopley and the surrounding villages of Ripley, Winkton, Bransgore etc</p> <p>In addition there would be the added strain on existing, Victorian in some places, services. We have no natural gas in the area so there's the continuous need for oil tankers and propane gas deliveries. We have no public green spaces.</p>
Cox	11020_SPD21Mit_1	2 Introduction and background to the Strategy	<p>I can see no mention of the opportunity to utilise the open access land that will be created by the proposed designation of the section of the Solent Way, know as Hart Hill, as part of the England Coastal Path.</p>

Respondent	Comment ID	Document Section	Comments
Sidwell	11019_SPD21Mit_1	2 Introduction and background to the Strategy	<p>We really love the New Forest area & would support all the measures to improve car parks, footpaths, signage, information boards ,seating & accessibility. I would suggest that car parks should be clearly signed in the interests of road safety. I consider car parks should be designed to limit numbers using them to that which which will not result in overuse of the footpaths, cycle ways & bridle ways .More smaller car parks should be introduced in locations which preserve the character of the Forest area to spread users around more.</p> <p>We also really enjoy seeing the ponies, deer & other animals & birds. Measures to allow more would be welcome. Maybe wild boar & otters could be introduced to add futher interest..</p> <p>It appears that housing development has already been earmarked in some places. I would like to see residential development minimised. Not only will it detrimentally affect the character of the new Forest area the increase in residents within & close to the New Forest will inevitably lead to more traffic & over use of hot spots.</p> <p>I totally agree that when residential development is permitted replacement of open areas lost or mitigating measures should be required by means of legal agreements.</p> <p>I was a Senior Town Planning Officer & am used to dealing with these sort of issues & reading Planning Policy Documents. For a time I was the Area Officer which covered Sutton Coldfield Park in Birmingham, This is a mini New Forest Park with similar issues & pressures so I am well versed in them.</p> <p>I found this Document very heavy going & full of jargon.& legislation. I suggest that if you really want the general public to comment & understand the proposals there should be a short summary of the main issues & proposals published alongside this document.</p>

Respondent	Comment ID	Document Section	Comments
Webster	11021_SPD21Mit_1	2 Introduction and background to the Strategy	<p>My Comments:- I have have experienced a massive increase in visitor numbers to the New Forest ,along with dogs , horses and cars and bicycles , causing much disturbance , erosion and noise and loss of wildlife including wildflower meadows , birds , invertebrates and reptiles .This came about through the housing expansion at Ringwood , Poulner , Verwood , West Moors , Alderholt etc.</p> <p>It is vital that action has to be taken to prevent yet further harm to the New Forest with the additional housing proposed within the NFDC in the next 20 years . You only have to look at lbsley and Rockford Commons , close to where I live that have been reduced to play areas for dog walkers , Horse riders and cyclists , such that you are very lucky to see small birds or reptiles now .</p> <p>The first priority is to designate parts of the New Forest ,` Wilderness Areas ` where access is banned , except in the cases of an emergency such as fires , in order to help wildlife make some sort of recovery from the present low point .</p> <p>This consultation must respect the findings of the New Forest National Park Tranquil Area Mapping Report and ensure that the quiet areas remain quiet , ie Latchmore Brook and Dockens Water areas and light pollution is kept to a minimum , so as to have dark skies for viewing of stars.</p> <p>There must be controls on horse riding in the New Forest restricting horses to designated tracks and charging liveries for the use of the New Forest .</p> <p>Dog walkers must be forced to keep dogs on leads at all times and remove all dog litter . Commercial dog walkers must be restricted to walking at most 4 dogs and subject to a licence and charge</p> <p>Cyclists must be restricted to designated tracks that are linked up ,so as to avoid cycling on roads . There has been a massive increase in the numbers of people cycling for pleasure and in races , which is very concerning .</p>

			<p>Public houses should only be allowed to continue if they have off road parking for customers and are charged an annual fee for encouraging cars in to the New Forest .</p> <p>Contributions from Developers must be used to finance the review the Blashford Lakes Strategic Management Plan , 2006 (BLSMP) which used to be overseen by regular meetings of the Forum and Footpath Committees but was dropped by NFDC in about 2016 . There should be ample scope for the complex of Lakes in the Avon Valley to take the pressure off the New Forest which was one of the proposals of the Blashford Ibsley Local Plan , 1977 - see first attachment. However, despite all the promises made in the BLSMP , we still have no network of paths and there remains to this day no direct access to the Blashford Lakes from Ibsley , Mockbeggar and South Gorley - see second enclosure . What paths there are , often have poor surfaces and little or no views and many of the lakes are dominated by angling and fish have been moved to a number of consevation lakes such that four are now turbid - see photograph of Ibsley North Lake taken last November .</p> <p>It is an absolute disgrace that in order for local people here to take pressure off the New Forest and visit the lakes , we have to negotiate deep mud such as in the attached photograph , at Newlands Livery , Moyles Court .</p> <p>There must be a concerted effort by all parties to encourage improvements at Blashford Lakes , by way of better and extended paths , access to a view point over the river Avon aand Water Meadows and circular paths through the lakes and up on to Ibsley and Rockford Commons to take in the views , different habitats and the Second World War old buildings , including the former Ibsley Airfield Control Tower which must be restored urgently through financial help from developers.</p> <p>Further to my comments [above] , I would like to add some additional points :-</p> <p>1 Cyclists must refrain from talking loudly whilst on public highways and also on designated tracks , as it disturbs local residents and wildlife .</p>
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Christchurch Bicycle Club	11025_SPD21Mit_1	2 Introduction and background to the Strategy	<p>The mitigation measures - which the NFDC are implementing as part of new development - focus on reducing recreational impacts on the New Forest SPA, SAC and Ramsar site.</p> <p>From the Footprint Ecology research, we know that most visitors using the New Forest are dog walkers (55%) and walkers (26%). The Mitigation Strategy looks at mitigating the impacts of these visitors through new greenspace provision as part of new development.</p> <p>Cycling is the main activity undertaken by only around 5% of visitors to the New Forest's protected sites. Presumably, because this represents an insignificant impact compared to walking and dog-walking - and hence does not need to be mitigated - cycling has not been considered by the strategy. It is assumed the same applies to horse riding, which is also not mentioned.</p> <p>The introduction should state the rationale for not needing to mitigate any impact of cycling or horse riding.</p>

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Syratt	10551_SPD21Mit_1	2 Introduction and background to the Strategy	<p>The document is too long and conveys too little. Sections 2 and 3 are overly repetitive and there is much regurgitation of documentation which could have been taken as read. The overly complex monitoring programme, in the final analysis, boils down to how many local people actually use the areas. That is the only figure that matters. The success, or otherwise, of a particular ANRG rests solely on that point.</p> <p>The document fails to address a number of important points.</p> <p>1 Whilst it might be true that the provision of alternative natural recreational greenspace (ANRG) areas may reduce visits to the NFNP, the main reasons people visit is to experience either the unparalleled beauty of the woodland areas, the open vista, broad horizon landscape or the wildlife for which the New Forest is renown, none of which would be present in an ANGR. Many newcomers to the area will wish to experience that on a regular basis so, even with ANRGs, pressure will increase substantially. It will be exacerbated by ever more non-local visitors to the area, especially as more people have got used to staying locally as a result of the Covid-19 pandemic. Just look at what happened in the Brecon Beacons National Park during lock-down!</p> <p>2 Dog walking is a major concern in the New Forest, particularly in the conservation areas. While dog walkers have the freedom to allow their dogs off the lead, damage will continue to increase. What has not been factored in is the large increase in dog ownership brought about by the lock-down and loneliness of the Covid-19 pandemic. Dogs off the leash are able to roam, disturb wildlife and foul unnoticed. The average dog excretes about 125 kg a year which takes about 1 year to fully break down in the environment. In heavily used dog areas this becomes a significant problem, not only from a health aspect but also from the nutrient enrichment in areas that are otherwise naturally nutrient poor.</p> <p>3 I appreciate the thinking behind that provision of ANRG attractive to dog walkers, with the provision of dog bins, to encourage people to walk their dogs locally. But, the fact is, there is a substantial hardcore of local residents who will continue to use the New Forest for dog walking, especially as places like Wilverly Plain and Wilverly Inclosure are exalted in dog walking circles. In</p>

			<p>order for the ANRG initiative to succeed there has to be complementary policies introduced in the National Park. For example, dogs must be on leads at all time in the Conservation Areas, except in designated sites. All fouling must be recovered (easier if the dog is on a lead, or in a designated area with little natural cover) and disposed of in strategically placed bins, not just kicked into undergrowth or hung on branches in polythene bags!</p> <p>4 The examples given for ANRG development also miss the point if one of the principles, as stated, is to enhance biodiversity. The very act of ill-planned development which, despite the best efforts of NFDC, abound particularly west of the National Park, decreases biodiversity by destroying many of the feature which the ANRGs then seek to redress. That is putting the cart before the horse. It is easier to retain existing biodiversity than it is to try and recreate it elsewhere. Before any development plans are considered, all areas with biodiversity and conservation interest, including those identified by knowledgeable local people, need to be registered. Whether they are designated or not is irrelevant as development needs to be geared around these areas. Some, particularly habitats in short supply in an area, like semi-natural rough grassland north west of Fordingbridge, need to be incorporated as natural habitats with no development or infrastructure and no `enhancement` to make them more `attractive`. Provide footpaths through these areas and information boards by all means, but dogs must only be allowed on leads, children discouraged from playing in these areas and there should be no formal landscaping or tree planting. Dogs off lead and children's recreational areas need to be elsewhere. These areas are for wildlife and we humans are only observers whilst in them.</p> <p>5 This document does not plan far ahead. HMG now considers retention and enhancement of biodiversity a high national priority. NFDC needs to do the same. Although the Local Plan has a limited life span (2036), there is a need to plan far beyond that for the natural environment. Retention of biodiversity, as has become all too evident recently, is essential for human health and well-being. As more and more development takes place in the future, beyond the Local Plan lifespan, more and more pressure will be applied to local biodiversity. That is why it is essential to identify and conserve wildlife corridors through areas where substantial development is planned, like</p>
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			<p>around Fordingbridge, earmarked for 10% of the Local Plan housing increase. Furthermore, it is doubly essential because any move to deflect recreational use of the New Forest to local ANRGs risks impacting other areas of conservation importance. This has been recognised for the Solent area, but totally ignored in this document for the Avon Valley SAC, SPA and Ramsar Site. Pressure on this area will increase, for example from pollution.</p> <p>6 In the context of the Conservation Areas of the National Park, these wildlife corridors will become essential. They will provide the natural linkages for avian species and many invertebrates, allow wildlife migration between biodiverse areas and, importantly, conserve the habitat of Red Data book species such as bats. Several bat species are known to have satellite colonies in the area outside the New Forest and use the wilder areas for feeding. The habitats of Red Data Book bat species are also protected. In the future, there is a very real prospect that the National Park will become an island in the middle of sprawling conurbations (developers already have their eye on a substantial area north west of Fordingbridge). The NP Conservation Areas have to be able to communicate through wildlife corridors with other natural areas. That has to be planned NOW, because, unless they are planned, the presently identified network of isolated SINC, etc., will become islands themselves. They need to remain connected to the NFNP and the wider countryside beyond.</p>
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Respondent	Comment ID	Document Section	Comments
<p>Hythe and Dibden Parish Council</p>	<p>10178_SPD21Mit_1</p>	<p>2 Introduction and background to the Strategy</p>	<p>Hythe and Dibden Parish welcomes any efforts to mitigate the impact of all development on the New Forest and in particular, the areas used for recreation by our residents and those further afield. We welcome the designs and strategy over open spaces in the New Forest, and would encourage focus on accessible walking and cycling routes for all abilities, and safe parking areas.</p> <p>The impact of on road parking and parking on verges will need to be a key focus, especially for managing the additional numbers of local residents visiting the recreational areas over the next few years. We need to ensure the Forest remains accessible and safe for its inhabitants and natural wildlife, but ensure it can be accessed safely by all visitors and local residents. We would welcome more public transport access to reduce cars around the forest and protect verges and parking areas.</p> <p>Furthermore, there needs to be safe areas to let dogs off leads in the forest and we don't see a simple ban of off lead dogs as the answer, but understand the protection of the animals in our national park is of vital importance.</p> <p>One key area is education and enhancing the park ranger programme is something we welcome. New development funding though while important, must also be used to support impacts on the local villages and towns they are being built in, rather than solely cover the full National Park area.</p> <p>Furthermore, targeted trails and car parks with more natural playgrounds and kids trails, would engage families and diversify the popular walking routes in the Forest. A consideration of creating a theme of running, cycling, families etc. on certain routes may allow for some areas to be better managed.</p> <p>Overall, we welcome this work to ensure that our important New Forest is protected and managed for many years to come.</p>

		background to the Strategy	<p>long as it is adhered to.</p> <p>Many of our local residents will continue to use the forest, but local recreational areas can only be of benefit, especially with the number of residents due to increase so dramatically.</p> <p>One point is that 'parking should be provided' to encourage use of these areas, there hasn't been much sign of that.</p> <p>Pathways should be of a suitable surface so they can be used all year round. Again, this is lacking, two examples that spring to mind are the old railway line and linking path to Avon Meade which will have increased use for children walking to school and the foot path at rear of the Whitsbury Road development to the Junior school.</p> <p>NFDC have also spent money on Sweatford water meadows to encourage use, but already one cannot walk a circuit there without muddy or wet feet, not really fit for purpose.</p> <p>Developers can provide funds for mitigation if they do not feel they have space on site. If developers do provide funding instead, local councils need to be involved with these discussions at an early stage to ensure the local area gets what is wanted and is not just giving way to larger housing numbers.</p>
Hordle Parish Council	10826_SPD21Mit_1	2 Introduction and background to the Strategy	The proposals seem to be reasonable to implement the mitigation of new developments on the more sensitive areas for recreation, ie the New Forest and the Solent coastal areas.

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Gill	11027_SPD21Mit_1	2 Introduction and background to the Strategy	<p>In response to an article in the Lymington Times inviting Residents to share their views on ways to counteract recreational/visitor pressures from new build properties built in and around the New Forest.</p> <p>I have been a resident in the New Forest for 38 years and my children were borne here and had the privilege of growing up in this amazing place.</p> <p>Over the years it is without doubt that the number of visiting cars, bicycles and walkers has rocketed. Access was made easy when roads were cut through Twyford down and the visitors and commuters poured in. This and the subsequent escalation of building on the edges of the National Park have meant that many more visitors can enjoy the wonders of this special place.</p> <p>But, the increased footfall and wheels are taking their toll. So:- Monitoring, 4.24. No more monitoring, the damage is happening now. Please don't wait until mud runners and extreme cyclists have carved up the heath and grass paths and nesting birds are scared off by out of control people and dogs, and the cars parking on any grass that they can get their wheels onto have turned grass verges into mud or dust depending on the season. As I am lucky enough to look out over the National Park I know these activities happen day and night.</p> <p>I don't blame the public, they are enjoying outside healthy fun and don't know the impact they are having. Unless you live here, and not always then, you are unaware of the knock on effect. One person leaving deep tyre tracks across grassland and through gateways, what is the harm? But multiply that by just 10 or so from each car park most days of the week and the impact is huge. There are a lot of bikes out there now and a lot of them don't want to cycle on gravel paths. They want to get deep into the forest where it would take hours to get to on foot, and taking pounds of forest mud away on their clothes is a badge of how extreme their journey was.</p> <p>What can we do? Make a clear plan, then Educate, Inform and Enforce.</p>

Respondent	Comment ID	Document Section	Comments
Bolton	11028_SPD21Mit_1	2 Introduction and background to the Strategy	<p>It is to be welcomed that NFDC has addressed the ever increasing recreational pressures in the district both upon the Crown lands and the surrounding area.</p> <p>My response to this lengthy and detailed document is brief but I would like to make the following comments.</p> <p>The principle of providing more recreational spaces within easy distance of habitation is excellent both for the health and welfare of the residents of the district and as an attempt to alleviate the enormous pressures upon the Crown lands and fulfil the legal obligations of protecting the habitats.</p> <p>The main problems within the New Forest District are too many people, in particular day visitors, too many dogs, many out of control, and a lack of alternative venues for fresh air and exercise. And these measures, if achieved, may help to address some of this though any benefits will be outweighed by the extra development of course.</p> <p>I also think it is essential, as highlighted in the Footprint Ecology Report 2008, that a larger scheme for the south of Hampshire needs to be included in which one or more new Country Parks, offering alternative sites for natural recreation, be made on land which is not already designated as of conservation value.</p>

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_1	2 Introduction and background to the Strategy	<p>Pennyfarthing Homes (PH) recognises and accepts the principle behind the need to mitigate the recreational impacts of residential schemes and developments incorporating overnight stays on the European nature conservation sites within the New Forest. Whilst PH supports the provision of relevant guidance in the form of an updated supplementary planning document (SPD), and supports much of the document content / approach, it has the following fundamental concerns with elements of</p> <p>the draft consultation document:</p> <p>SPD is not consistent with national or local policy</p> <p>The move away from the dual use of open space</p> <p>No consideration of overprovision of ANRG</p> <p>Lack of flexibility in ANRG design</p> <p>Lack of evidence to support charging rates</p> <p>SPD goes beyond the scope of recreational mitigation requirements</p>

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_8	2 Introduction and background to the Strategy	<p>Scope of Mitigation</p> <p>PH wishes to raise a general point about the scope of the SPD. The purpose of the document is to set out the mitigation of recreation impacts on the European designated sites. However, it currently goes far beyond this focused element, incorporating a significant level of detail relating to the approach and design of landscape and open space. Whilst the broad link between these elements and ANRG is not disputed, the level of detail included makes the document overcomplex and excessive in length. This in turn makes the draft SPD somewhat unwieldy to use and risks the critical elements of mitigation becoming lost to the user.</p>

			7. Conclusion

			<p>The Friends of the New Forest welcome the removal of mitigation of the Solent European sites from this SPD as we agree that this should be considered within the Solent Recreation Mitigation Strategy.</p> <p>We believe the measures provided to divert visitors away from the New Forest European sites proposed in this SPD will be ineffective. Our view is that the provision of the proposed small areas of sub-urban greenspace termed ANRG will provide few if any of the features that attract visitors to the New Forest European sites. As a result, SPD will not provide mitigation for recreational impacts on the New Forest European sites.</p> <p>We agree that access management measures should be a key element in the mitigation strategy, but are disappointed to see that the SPD includes no mention of the need to improve the management of car parking within the New Forest European sites. We do not believe that any access management measures will be effective until and unless this issue is fully and comprehensively addressed by all those with a responsibility for the management of the New Forest.</p> <p>We are concerned the proposals for monitoring the Strategy will not provide a good measure of its effectiveness and believe that systematic monitoring of visitor behaviour should form an important element of the plan to monitor the success or failure of the Strategy.</p> <p>Lastly, we propose an alternative approach to the provision of alternative greenspace. We believe that there is a need to provide much larger strategically placed areas of green space around the outside of the New Forest European sites that will be effective in diverting visitor pressure. Whereas local 'pocket parks' proposed in the ANRG may have some role to play in mitigation, we do not believe that these alone will be successful in mitigating the pressures of growing recreation pressure on the New Forest.</p>
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Respondent	Comment ID	Document Section	Comments
Cranborne Chase AONB	10087_SPD21Mit_1	2 Introduction and background to the Strategy	<p>1. Thank you for the invitation to respond to your consultation on this updated Supplementary Planning Document. I apologise for the very slight delay in responding to you, occasioned by the very limited resource is available to this AONB Partnership and the significant number of policy consultations being issued by AONB Partner Authorities and Government.</p> <p>2. The AONB acknowledges the usefulness of your updated SPD. However, there is no mention within the document of this Area of Outstanding Natural Beauty and I strongly recommend that it should be shown on Figure 1, the Plan Area. The status of AONBs in general and this AONB in particular, are set out in Annex B to this letter.</p> <p>3. It should be noted that National Parks and Areas of Outstanding Natural Beauty are equally important elements of the nation's national capital in landscape terms. Nevertheless, the New Forest National Park does have a statutory duty to provide for recreation whereas this Area of Outstanding Natural Beauty is not required by statute to provide recreational opportunities.</p> <p>4. There have been some relatively recent misunderstandings in connection with holiday accommodation and that such arrangements for visitors that are not appropriate in the National Park could be located within the AONB. This is clearly a significant misunderstanding. Nevertheless, I see that in the definition of development, paragraph 2.27, visitor accommodation falls within the definition.</p> <p>5. Furthermore, in connection with the AONB part of your District your Council has, in addition to those responsibilities set out in paragraph 2.2, a duty to consider the effects of all decisions relating to land in this Area of Outstanding Natural Beauty with regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, required by Section 85 of the Countryside and Rights of Way Act 2000.</p> <p>6. Having reviewed your draft document, the lack of consideration of the AONB designation seems to be a significant omission. It appears that as things are currently proposed a small development within your District's part of this Area of Outstanding Natural Beauty would be required to make</p>

Respondent	Comment ID	Document Section	Comments
			<p>payments to offsite provision of alternative green space for recreational uses, monitoring, and management, but not required to make any contribution to the management of this AONB itself.</p> <p>7. There appears to be a simple lack of logic in requiring financial contributions to sites some significant distance away and not making a contribution to the management of a nationally designated and nationally important Area of Outstanding Natural Beauty. In effect, development within this AONB and your District would be subsidising the New Forest Ranger Service which, when one compares the funding systems for National Parks and Areas of Outstanding Natural Beauty, seems to require the poor to support the rich! All that, this AONB strongly recommends, needs to be corrected.</p> <p>8. In a similar vein it seems strange that offsite alternative natural recreational green space could be provided within this AONB for development elsewhere in your District that might not comply with this AONB's Management Plan which is, of course, your Council's policies for the management of this AONB. This AONB Partnership recommends that it should be made clear in your SPD that the provision of offsite alternative natural recreational green space should only be provided in this AONB in exceptional circumstances and then that should be done in cooperation with the AONB.</p> <p>9. Tables 10 and 11 set out the expected financial contributions in relation to the different sized dwellings in development. As I have indicated above, it seems more appropriate for such contributions to be made to AONB Management Plan objectives and aims rather than for possible impacts on sites in other parts of your District and the New Forest National Park some distance from the actual locations that are directly impacted upon by the development.</p> <p>I hope these comments are helpful to you and I would, of course, be happy to discuss any of the issues raised in this consultation response, and look forward to discussing with you the directing of payments as compensation for impacts to the designations that are directly impacted upon.</p>

			<p>New Forest, due to its status as a site of special scientific interest and hence the need to protect and conserve it.</p> <p>Wider benefits arising from the need to mitigate (pp. 6)</p> <p>We welcome the consideration to improve existing open spaces, and creating new alternative recreational opportunities. This is because green, blue, open and recreational spaces are important for maintaining and prolonging health - both mental and physical. This is because they provide opportunities to reconnect with nature, to play, to exercise and to socialise, as well as provide attractive and safe commuting routes. These benefits are summarised by Fields in Trust in their 2018 guidance on Revaluing Parks & Green Spaces.</p> <p>We are encouraged by the proposals to provide Alternative Natural Recreational Greenspace (ANRG). Amongst the benefits outlined above, it ensures that there is accessible green space of an adequate size, and distance from new and existing developments - and welcome motions to ensure this meets guidance as set out in Fields in Trust guidance for Outdoor Sport and Play.</p>
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Respondent	Comment ID	Document Section	Comments
Fordingbridge Town Council	10106_SPD21Mit_3	2 Introduction and background to the Strategy 2.12, 2.13, 2.42	<p>Wider benefits arising from the need to mitigate</p> <p>2.12 New areas of Alternative Natural Recreational Greenspace</p> <p>“as well as reducing the need to travel.</p> <p>This statement may not be accurate. First-hand experience has shown us that local people drive to the SANG on Whitsbury Road.</p> <p>2.13 The environmental benefits through the creation and landscaping of the ANRGs on a new development, when also combined with the wider open space provision, will further assist in addressing climate change, water quality and an overall improvement to the ecological value on the site.</p> <p>This statement may not be accurate. The amount of dogs mess left behind may change the nutrient levels in the soil surrounding the river Avon. It is hard to see how an area high in biodiversity can be improved by adding people and dogs.</p> <p>2.42. Sites to attract dog walkers should provide safe off-road parking, a range of routes, and be in locations perceived to maximise enjoyment of the dog.</p> <p>This statement was in the earlier SPD and yet no parking provision was made at the Whitsbury Road SANG</p>
New Milton Town Council	10850_SPD21Mit_1	2 Introduction and background to the Strategy 2.27	We are very glad to see the requirements extend to those developments that are permitted development and prior approval schemes.
New Milton Town Council	10850_SPD21Mit_2	2 Introduction and background to the Strategy 2.29	The Committee felt there was an argument for residential extensions exceeding a certain level, to be included in the obligation.
New Milton Town Council	10850_SPD21Mit_3	2 Introduction and background to the Strategy 2.38	Business visitor development should be identified through NNDR evidence or similar, as it could be used as a loophole to the mitigation.

Respondent	Comment ID	Document Section	Comments
Whalley	11031_SPD21Mit_1	2 Introduction and background to the Strategy 2.4	<p>reliance could be placed on the mitigation provided by Policy ENV1 and the Recreational Mitigation Strategy to adequately mitigate potential recreation pressure from development proposed though the Local Plan and that adverse effects on integrity due to recreation pressure can be ruled out for all European sites both alone and in combination.</p> <p>Lake et al (2020) Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches. Footprint Ecology commissioned on behalf of Eastleigh Borough Council, NFDC, NFNPA, Southampton City Council and Wiltshire Council states:</p> <p>4.56 “In the absence of significant mitigation measures increases in housing around the SAC/SPA/Ramsar site in the coming years will exacerbate the issues and result in a marked increase in use and potential impacts on the protected sites”</p> <p>So before any approval please give your public assurance there will be properly detailed written evidence in consultation that development will satisfy the Habitats Directive by meeting the Precautionary Principle in all respects including absolutely clear completion/delivery timings taken from the START date of the development (not the end) of</p> <p>Without expressed legitimate cause there is no apparent reason why a complete detailed site specific Infrastructure Delivery Plan should not be made public with adequate time for scrutiny before approval is granted. That must include how all the general requirements listed in this document will be meet in detail with financial provision and sources, including maps, detailed description, dates to deliver by from a clearly stipulated fully understood start date including which threat each proposal will protect the integrity of European sites from and how the proposal will achieve the aim, including those in perpetuity.</p> <p>There are some excellent ideas as to what mitigation (if the integrity of the EU sites can survive the development) should look like.</p>

Respondent	Comment ID	Document Section	Comments
			<p>What is needed is a detailed costed legally binding proposal that the developer is willing to pay and implement.</p>

		<p>Strategy 2.44 - 2.48</p>	<p>We welcome the reference to the various Footprint Ecology research reports published in 2020. These reports recommend a strategic, proportionate and co-ordinated approach to avoiding and mitigating impacts is developed.</p> <p>The report entitled Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches is particularly pertinent to the District Councils work and sets out a range of options for mitigation. While this work will be taken forward strategically by a partnership of planning authorities, the District Councils SPD could include greater reference to the mitigation measures recommended by Footprint Ecology and how the SPD responds.</p> <p>Footprint Ecology recommended that a package of avoidance and mitigation measures is developed to address the cumulative impacts from recreation associated with new housing around the New Forest. This package would include on- and off-site mitigation measures, comprising alternative recreational greenspace sites and routes outside the New Forest SAC/SPA/Ramsar; access management within the designated sites; educational and communications activities, both within and outside the designated sites; and monitoring. We recognise that the Council is prioritising new alternative recreational greenspace provision as part of new development as the principal form of mitigation within its SPD. We would also highlight the need for complementary measures within the designated sites as part of an overall package to mitigate a level of planned development that has increased from less than 200 dwellings per annum under the Councils previous Core Strategy to over 500 dwellings per annum under the new Local Plan (2020). A balanced package of measures would include a greater proportion dedicated to ranger provision within the designated sites.</p>
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<p>Pennington and Lymington Lanes Society</p>	<p>10864_SPD21Mit_5</p>	<p>2 Introduction and background to the Strategy 2.49 - 2.50</p>	<p>An alternative approach</p> <p>The representations we made in September 2018 regarding the need for an alternative or additional approach to mitigation remain valid in our view of the proposed provision of ANRG.</p> <p>We believe that to provide a real alternative to the New Forest European sites, much larger areas or networks of recreational green spaces are also required. These may be termed Country Parks, Nature Parks or some similar designation. As an example, the popular Dibden Inclosure within the New Forest SPA and SAC is about 90 ha in size and provides a range of walks of at least 4km in length. It is close to the urban centres of Dibden and Hythe, has a good-sized car park and attracts large numbers of dog walkers from these centres of population. To provide a real alternative to the New Forest European sites, we believe it is necessary to provide similar sized strategically located areas of alternative natural recreation space that will offer a real alternative to both existing users of the New Forest and new residents of housing development. These should be areas that can be developed into semi-natural habitats of high nature conservation value where public access and wildlife conservation are joint objectives of management.</p>
		<p>Strategy 2.5</p>	<p>recreational impacts on the Solent sites are dealt with through the separate Solent Recreation Mitigation Strategy; and (c) mitigation of effects on water and air quality are also addressed separately.</p>

Respondent	Comment ID	Document Section	Comments
Lord	11026_SPD21Mit_1	2 Introduction and background to the Strategy Para 2.29	Some extensions need to be included. Many properties have been known to extend the building footprint by 100% in some cases. Already large properties, when extended by this amount may open the way for conversion to Guest House or B&B accommodation in future. It may be necessary to put a figure on this, for example any "extension" that seeks to increase the building footprint by more than 50%, will be subject to appropriate mitigation measures.

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_3	3 Local Plan Policies and other relevant documents 3.3	<p data-bbox="1115 263 1232 287">Dual Use</p> <p data-bbox="1115 327 2004 383">There is no justifiable reason as to why there should not be dual use of the ANRG / informal public open space (POS).</p> <p data-bbox="1115 422 2027 662">In fact the SPD itself spells out that POS can be delivered in many forms and again there is no evidence that ANRG become less effective because it also functions as POS. Of course, it is imperative that the ANRG mitigates as it should, effectively, but in many respects dual use could make the spaces more attractive to users, not less attractive. Indeed, people would be more inclined to use the ANRG if it is set out as dual use, making it attractive to a wider section of the community by being multi-functional, as are many of our existing country parks and recreational spaces.</p> <p data-bbox="1115 694 2027 845">Paragraph 1.5 of the draft SPD identifies the main changes between Policy ENV1 and the previously adopted approach, including the identification that the “The 2ha informal open space element of saved policy CS7 can no longer offset the 8ha of recreational mitigation requirements for sites over 50 dwellings”.</p> <p data-bbox="1115 877 2027 965">Further, paragraph 3.3 of the SPD states that “The policy [ENV1] also clarifies that informal open space required to be provided under saved Policy CS7 is wholly additional to mitigation land required under Policy ENV1.”</p> <p data-bbox="1115 997 2027 1157">However policy ENV1 does not take this approach. This is not a clarification but a change to policy / new policy approach. The SPD can only provide detail to policy it cannot be used to amend the policy. In any event, the SPD presents no evidence to support the principle that the dual usage of ANRG and areas of informal public open space is no longer inappropriate.</p> <p data-bbox="1115 1189 2027 1340">This position would appear to be inconsistent with a number of core design principles for the provision of integrated greenspace on larger scale sites, set out in appendix 4. Indeed, appendix 4 is extremely clear that ANRG mitigation land should be an integral part of the wider green infrastructure of a development site, and paragraph A4.5.11 identifies that there is no</p>

			separate distinction between the design submissions for ANRG and public open space.

Respondent	Comment ID	Document Section	Comments
Lisher	11017_SPD21Mit_1	4 Recreation Mitigation requirements for new development	Overall in the document far too much consideration seems to be given to dogs and their owners. I would like to see specific areas for exercise and walking that exclude dogs. Dogs are not only allowed to disturb wildlife and birds but also human users who do not like or have dogs. Sadly dog owners are oblivious to the damage their dogs do when running free, nor the impact they have on non dog owners.

Respondent	Comment ID	Document Section	Comments
O'Callaghan	11022_SPD21Mit_1	4 Recreation Mitigation requirements for new development 4.18 – 4.20	<p>After reading the aforementioned document, I'm disappointed to read that there is a section entitled:</p> <p>Enhancement of Recreational Walking Routes</p> <p>Once again, there appears to be a complete disregard for cyclists in the proposals. I have to admit to a complete lack of comprehension to any strategy within the New Forest to cater properly for off road cycling. Considering the number of visitors taking up the activity when visiting and the potential in the area, the lack of any joined up thinking on providing safe and accessible routes is simply incomprehensible.</p> <p>The New Forest has a wide selection of Bridleways suitable for walking and cycling, but the lack of a connected network is off putting for many people as many popular routes are only accessible via busy main roads. As a regular motorist and cyclist in the area, I'm frequently taken aback by the number of families with small children on very busy routes.</p> <p>To miss further opportunities by upgrading access to cater for walkers and not making it dual use so that cyclists can also enjoy that access just speaks volumes about the priorities of NFDC.</p> <p>I would urge the Council to further investigate a properly linked cycling area for both locals and visitors which would benefit all parties.</p>

Respondent	Comment ID	Document Section	Comments
Hart	11023_SPD21Mit_1	4 Recreation Mitigation requirements for new development	<p>I am writing after having read the above document. The most striking aspect of the paper is that it proposes New areas of Alternative Natural Recreational Greenspace (ANRG) which will be contrived places for recreation when, on the doorstep, will still be the real thing - the New Forest. It is naive in the extreme to think that these created green spaces will stop new residents (or existing ones) from venturing to the Forest. This will be a complete waste of our money.</p> <p>Where is the joined-up thinking? The NPA has been promoting the New Forest as it's main objective and that for which it was set up. Now, you are talking about wardens (rangers) to police people doing what they have been encouraged to do for the past few years. The following quote confirms that there has been a lack of joined-up working between the key players and only now has it been thought a good idea.</p> <p>`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, including relevant projects within the New Forest National Park Recreational Management Strategy and the overarching Partnership Plan.`</p> <p>Who is responsible for this mess? My interest is mainly cycling and a limited amount of walking in the Forest. I have been doing this in a responsible way for over 50 years, during which time I have paid rates and subsequently council tax to NFDC. I expect better than having my money wasted on unnecessary, contrived green spaces. Please record this as a strong vote against this proposal.</p>

Respondent	Comment ID	Document Section	Comments
Thomas	11024_SPD21Mit_1	4 Recreation Mitigation requirements for new development	<p>I have read the basic points of the above Strategy and broadly agree with its substance and the reasoning behind it. I have noticed the increase in usage of the National Park over the last few years (excluding the present pandemic in which the level of use is approaching its ability to cope) and no longer cycle from my house into the National Park but am forced to drive to roads which remain quiet throughout the year, namely around East End and East Boldre. I carry out this action from Easter until September as the traffic levels are too dangerous to do otherwise. I have also noted the increase in car parking by dog owners at Marchwood Inclosure, the small layby to the left of the road entering the National Park from Applemore Roundabout just beyond the cattle grid and at Noads Wood. I do walk into the National Park from the house but avoid Marchwood Inclosure owing to the number of dogs present. I have also noted the pressure on the heathlands between the above mentioned layby and Noads Wood, again mainly caused by dog walkers. At this time of the year the paths become mud baths and become much wider as walkers attempt to avoid the mud by walking parallel to the existing paths but at some distance from them. I have also seen dogs chasing herds of deer in the area in the past. I have noticed that few, if any, animals and birds are now present in Noads Wood and believe this is due to the pressure of walkers and dogs. A friend of mine has told me that he used to visit Noads Wood in the evening to listen to the nightjars but has not heard one for years.</p> <p>The provision of alternative green spaces would help to reduce these pressures, especially if they could be made attractive to the dog owners and walkers who now frequent the areas mentioned above, as well as other areas elsewhere in the National Park. The main problem would be to make these alternative green spaces more attractive to both dog owners and walkers (those being without a dog). The main problem would be that these alternative green spaces may be seen to be less attractive than the National Park for walkers who could easily walk a fair distance, say 5 to 10 miles, or for large dogs who would need a long distance to walk to receive adequate exercise. The policy of providing a good surface to walk on would help as both dogs, their owners and walkers would find a clean surface to walk on during the winter months. The heathlands, as you know, are now saturated. This good walking surface could also help in the eradication of Alabama Rot which is now again mentioned in the Lynton Times. I know no more than</p>

			<p>I read about this problem but wet conditions underfoot seem to be a cause of a dog catching the virus, or whatever it is. The problem, as I see it, would be to make the alternative green space attractive during the spring and summer months when the heathlands dry out and the National Park becomes attractive through the varied bird song and plants which abound. One way to do this is to restrict car parking but that would promote verge parking as seen during the spring and summer of last year. Better monitoring and Police action is the only way to reduce this problem. The only way that I can see to make the alternative green spaces attractive is to promote tree planting and growth to entice song birds back into the area. The heathland birds, curlews and lapwings, will not be seen but the sound of song birds would be most attractive.</p> <p>I would think that it will be more difficult to persuade dog owners and walkers who live in the Waterside not to visit the National Park during the summer months due to its proximity to Dibden and Dibden Purlieu. It is easy to walk into the National Park using the Pegasus Crossing north of the Heath Roundabout and it is no distance to drive to the National Park from Hythe and Marchwod. That said, the areas just to the west of the A326 where most of these members of the public have not been designated as of special interest as far as I know. Towns and villages further away from the borders of the National Park would be easier to influence as the distance needed to travel to the Park from New Milton and Milford-on-Sea is further. I am not suggesting that the alternative green areas in the Waterside will not be used but that the use of them may be seen to decrease in the spring, summer and autumn months.</p> <p>To allow these alternative green areas to be used as intended maintenance of the vegetation must occur regularly and the areas kept clean without litter. My brother and I were cycling in Brittany some years ago and stayed in a town with a large pond on the edge of it. The pond was about the size of Hatchet Pond and had a path laid out circumventing it. Along the path had been placed gymnasium equipment (places to do pull-ups, press-ups, sit-ups, etc, along with notices instructing all as to their correct use). Members of the public would either run or walk around the lake carrying out these exercises. The equipment had not been broken, the notices not defaced, nor was there</p>
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			<p>any litter around the lake. At one spot there was a shower unit - two walls about 7 ft high with an internal angle, the walls not being over long, with a shower head on one wall and the other containing a push button tap on a spring. All were in pristine condition - no graffiti. Can you see the same situation in this country? The whole lake and equipment would look as if an army had marched through and the place covered in litter. I do hope that the green areas will not be defiled as soon as they are created</p> <p>I note that developers are expected to provide areas within their developments for these alternative green spaces and strong steps will be needed to enforce this action. The provision of such spaces cannot be seen as an `add on` to the granting of planning permission and the developers cannot be left to try to avoid the provision of such areas by leaving the creation of the area until the last possible moment. I am thinking of Redrow at this point trying to avoid building the footbridge linking their development in Lymington and Lymington railway station, thus allowing pedestrians, cyclists and the disabled to reach Lymington when the floodgates are closed at the level crossing. An occurrence which will surely be more common as the sea level rises as a result of climate change. Developers must be forced to abide by the contract signed between them and the District Council and not to disappear at the end of the development never to be seen again.</p> <p>Overall, I feel that the Mitigation Strategy is acceptable and I hope that it serves its purpose to reduce the pressure on the National Park as house building increases in the areas surrounding the boundary of the Park.</p>
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Respondent	Comment ID	Document Section	Comments
Bolton	11028_SPD21Mit_2	4 Recreation Mitigation requirements for new development 4.10 – 4.13	<p>Alternative Natural Recreational Greenspaces</p> <p>There are large tracts of poor quality agricultural land which, without future EU subsidies, could be returned to nature and recreation while providing an income for the land owner and could be designed to give a good 'country experience' without the many disadvantages of the Forest (long traffic queues, biting flies, biting ponies, prickly gorse and no available WC facilities).</p>
Sport England	10840_SPD21Mit_1	4 Recreation Mitigation requirements for new development	<p>Sport England is a statutory consultee in the planning process where development affects or prejudices the use of playing field land which has been used as playing field land within the last 5 years.</p> <p>We are also a non-statutory consultee on other developments as set out in National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306.</p> <p>Sport England would wish to ensure that any existing playing field sites or sports facilities eg golf courses are protected against designation as suitable alternative natural green space as part of any mitigation of recreational impacts on New Forest European Sites.</p> <p>Sport England has experienced issues in other local authority areas where land previously used as playing field land and other land used for sport either formally or informally has been designated as alternative natural greenspace. The designation has then precluded use of the site for formal sport in order to ensure that the site can be used for wider recreational use eg dog-walking. The designation has therefore prejudiced use of the land for formal sport. Sport England would strongly oppose such an approach unless suitable replacement provision is made available.</p>

Respondent	Comment ID	Document Section	Comments
New Forest Association	11034_SPD21Mit_2	4 Recreation Mitigation requirements for new development 4.1	<p data-bbox="1115 258 1778 288">3. Alternative Natural Recreational Greenspace (ANRG)</p> <p data-bbox="1115 320 2029 995">The provision of alternative greenspace is a widely adopted method of mitigating impacts on European designated wildlife sites. The concept was first developed in the Thames Basin Heaths SPA where an arithmetical calculation was used to identify the quantum of greenspace required to mitigate for the increase in population. This calculation was based on the density of visitors made to the Thames Basin Heaths SPA and gave the resultant 8 ha of greenspace per 1000 head of population. This was adopted in the Thames Basin Heaths SPA to mitigate recreation impacts on three species of heathland breeding birds. Whereas the New Forest has these three species of birds in common with the Thames Basin Heaths SPA, the New Forest also qualifies as an SPA for a far greater diversity of internationally important bird populations. Further more, it is also designated as a Special Area of Conservation (SAC) on account of a wide range of internationally important woodland, grassland, heathland and wetland habitats. Many of these do not occur within the Thames Basin Heaths. The use of the 8 ha of alternative greenspace per 1000 head of population in the New Forest has no scientific basis. It has not been developed using any empirical methodology but is based upon an out-dated and inappropriate calculation for the Thames Basin Heaths. The New Forest has a very different ecology and visitor use to the Thames Basin Heaths and we do not believe that this rate of alternative natural recreational green space has any relevance to the New Forest.</p> <p data-bbox="1115 1027 2029 1182">To better illustrate this, we have applied the Thames Basin Heaths method for calculating the quantum of alternative greenspace to the comparable area of heathland habitat and visitor density within the New Forest. This gives a requirement of over 32 ha of alternative greenspace per 1000 head of population. This is four times the area being proposed in the SPD.</p> <p data-bbox="1115 1214 2029 1366">Another feature of the Thames Basin Heaths approach to mitigation was to ensure that each area of alternative greenspace could provide for a walk of at least 2.5 km. This again is related to visitor patterns within the Thames Basin Heaths SPA. Similar surveys within the New Forest have shown that the average distance walked is between 3km (dog walkers) and 4km (walkers).</p>

Respondent	Comment ID	Document Section	Comments
			<p>This is considerably further than the distances walked in the Thames Basin Heaths.</p> <p>The reasons why visitors are attracted to the New Forest has been considered by a number of studies. These show that it is the New Forest scenery, peace and quiet, good walking, ease of accessibility and wildlife value that are the principal reasons why people visit the New Forest.</p> <p>By contrast, the landscape design illustrated in Appendix 3 and 4 of the SPD provides for the creation of non-descript sub-urban green spaces lacking any features of the New Forest, termed Alternative Natural Recreational Greenspace (ANRG).</p> <p>The layout of the ANRG illustrated in Appendix 4 proposes a series of connected circular patches of open space. These further reinforce the character of a gang-mown green desert devoid of naturalness or nature. With the addition of the sub-urban clutter of benches, surfaced paths, signs and interpretation boards the envisaged areas of land proposed will be totally ineffective in providing an attractive alternative to the New Forest European sites. Their design betrays a lack of understanding of either the character of the New Forest landscape, its wildlife value or any analysis of the reasons why local residents of the New Forest visit the internationally important protected landscapes in the National Park.</p> <p>The ability of the ANRG to divert visits away from the New Forest European sites is identified in the SPD as one of the key performance criteria for monitoring the effectiveness of the mitigation (Table 1, page 20). Given that the ANRG will not provide any of the features that attract visits to the New Forest, we believe this method of mitigation will be ineffective and will not prevent further damaging recreational use of the New Forest European sites.</p>

Respondent	Comment ID	Document Section	Comments
Pennington and Lymington Lanes Society	10864_SPD21Mit_2	4 Recreation Mitigation requirements for new development 4.10 - 4.13	<p data-bbox="1115 258 1749 288">Alternative Natural Recreational Greenspace (ANRG)</p> <p data-bbox="1115 323 2024 997">The provision of alternative greenspace is a widely adopted method of mitigating impacts on European designated wildlife sites. The concept was first developed in the Thames Basin Heaths SPA where an arithmetical calculation was used to identify the quantum of greenspace required to mitigate for the increase in population. This calculation was based on the density of visitors made to the Thames Basin Heaths SPA and gave the resultant 8 ha of greenspace per 1000 head of population. This was adopted in the Thames Basin Heaths SPA to mitigate recreation impacts on three species of heathland breeding birds. Whereas the New Forest has these three species of birds in common with the Thames Basin Heaths SPA, the New Forest also qualifies as an SPA for a far greater diversity of internationally important bird populations. Further more, it is also designated as a Special Area of Conservation (SAC) on account of a wide range of internationally important woodland, grassland, heathland and wetland habitats. Many of these do not occur within the Thames Basin Heaths. As we stated in our 2018 submission, the use of the 8 ha of alternative greenspace per 1000 head of population in the New Forest has no scientific basis. It has not been developed using any empirical methodology but is based upon an out-dated and inappropriate calculation for the Thames Basin Heaths. The New Forest has a very different ecology and visitor use to the Thames Basin Heaths and we do not believe that this rate of alternative natural recreational green space has any relevance to the New Forest.</p> <p data-bbox="1115 1032 2024 1182">To better illustrate this, we have applied the Thames Basin Heaths method for calculating the quantum of alternative greenspace to the comparable area of heathland habitat and visitor density within the New Forest. This gives a requirement of over 32 ha of alternative greenspace per 1000 head of population. This is four times the area being proposed in the SPD.</p> <p data-bbox="1115 1217 2024 1367">Another feature of the Thames Basin Heaths approach to mitigation was to ensure that each area of alternative greenspace could provide for a walk of at least 2.5 km. This again is related to visitor patterns within the Thames Basin Heaths SPA. Similar surveys within the New Forest have shown that the average distance walked is between 3km (dog walkers) and 4km (walkers).</p>

			<p>This is considerably further than the distances walked in the Thames Basin Heaths.</p> <p>The reasons why visitors are attracted to the New Forest has been considered by a number of studies. These show that it is the New Forest scenery, peace and quiet, good walking, ease of accessibility and wildlife value that are the principal reasons why people visit the New Forest.</p> <p>By contrast, the landscape design illustrated in Appendix 3 and 4 of the SPD provides for the creation of nondescript suburban green spaces lacking any features of the New Forest, termed Alternative Natural Recreational Greenspace (ANRG).</p> <p>The layout of the ANRG illustrated in Appendix 4 proposes a series of connected circular patches of open space. These further reinforce the character of a gang-mown green desert devoid of naturalness or nature. With the addition of the suburban clutter of benches, surfaced paths, signs and interpretation boards the envisaged areas of land proposed will be totally ineffective in providing an attractive alternative to the New Forest European sites. Their design betrays a lack of understanding of either the character of the New Forest landscape, its wildlife value or any analysis of the reasons why local residents of the New Forest visit the internationally important protected landscapes in the National Park. If these 'pocket parks' are to provide any useful function in terms of mitigation far greater effort needs to be focused on attempting to ensure that they mirror the qualities that attract visitors to the protected areas.</p> <p>There is a wide variation in the estimate of ANRG requirements set out in Table 4 in para 5.4 of the consultation draft with no satisfactory explanation of the variation. Footnote 19 states the estimates of ANRG have been calculated using the mix of housing as evidenced from the Strategic Market Housing Assessment 2014 and footnote 18 states occupancy is based on Figure 6.1 in the adopted Local Plan - Indicative need for different sizes and tenures of homes. Neither of these provide any explanation as to why some sites have a far greater ANRG proportionate to site capacity than others. This needs to be explained and fully justified.</p>
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			<p>The ability of the ANRG to divert visits away from the New Forest European sites is identified in the SPD as one of the key performance criteria for monitoring the effectiveness of the mitigation (Table 1, page 20). Given that the ANRG as proposed will not provide any of the features that attract visits to the New Forest, we believe that, in isolation, this method of mitigation providing alternative greenspace will be ineffective and will not prevent further damaging recreational use of the New Forest European sites.</p> <p>PALLS believes that substantially more alternative greenspace is needed to provide adequate mitigation for the effects of housing development on the New Forest European sites. This becomes evident when the method used to calculate the required quantum of alternative greenspace that was developed for the Thames Basin Heaths, is applied to the New Forest. Local neighbourhood parks may provide an element of this provision, but will not, in themselves, be sufficient to provide effective mitigation.</p>
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Respondent	Comment ID	Document Section	Comments
<p>Public Health, Adults Health and Care, Hampshire County Council</p>	<p>11035_SPD21Mit_2</p>	<p>4 Recreation Mitigation requirements for new development 4.10-4.13</p>	<p>Provision of alternative natural recreational greenspace on new developments over 50 net additional dwellings (pp.17-18)</p> <p>We welcome the recognition of the key features of well-designed ANRGs. We are encouraged by the motions to create these spaces as an integral part of any new development of this description, and to ensure that these spaces are close to people's homes. We also welcome recognition that ANRGs should have safe pedestrian connections with residential areas; linkages / connectivity with other open spaces and walking routes; provision of attractive walking routes with appropriately surfaced paths; be accessible for dog-walking with provision of safe areas for dogs to be let off leads, including secure boundaries against nearby roads, and special features to attract dog-walkers to the area, such as dog activity areas or trails; retention, enhancement and creation of a variety of habitats to ensure a net increase in biodiversity and seating areas. We encourage the Council to ensure that these places are well-lit, and that benefit from surveillance from nearby developments in the local area to discourage anti-social behaviour. We would welcome any new ANRGs including some provision for play spaces for children and young people, this would include Local Areas for Play (LAPs) aimed at very young children; Locally Equipped Areas for Play (LEAPs) aimed at children who can go out to play independently; and Neighbourhood Equipped Areas for Play (NEAPs) aimed at older children as per the guidance mentioned previously from Fields in Trust.</p> <p>We encourage financial contributions towards developing future ANRGs as part of developments under 50 dwellings, as well as maintenance and improvement of existing green space as an alternative to ANRG where ANRG development is not necessary or feasible.</p>

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_5	4 Recreation Mitigation requirements for new development 4.12	<p>Over-provision of ANRG</p> <p>PH is pleased to see that the SPD specifically considers circumstances where smaller individual parcels of a strategic allocation can be being brought forward through planning applications, whilst the associated ANRG might be delivered through a separate application, within the wider allocation, provided it is delivered concurrent with the overall housing delivery of the site. The approach is welcomed and facilitates delivery.</p> <p>However, NFDC needs to provide clarity and consistency with regards to the approach and two matters arise.</p> <p>First, it is noted that the draft SPD does not appear to recognise the potential mitigation 'credit' scenario which would in effect exist if an individual application development site is able to overprovide ANRG and a different landowner able to benefit from provision off-site in order to deliver housing. Depending on the specific location of overprovision of ANRG, this could be beneficial in terms of providing some flexibility to mitigation measures required at other nearby sites and also potentially deflecting visits to the European sites from the existing population - a clear positive move to "restoring the 'status quo' in terms of impacts on the designated European sites" identified in paragraph 1.7. The potential benefits to detracting visits from the existing population further supported in paragraph A4.3.1, which identifies ANRG as being most effective where spaces provided are easily accessible to both new and existing populations and that maximising the number of recreational visits will be the main criterion for decision regarding the location of ANRG. It is therefore the view of PH that there should be some form of arrangement to formally recognise the overprovision of ANRG, where it is both feasible and appropriate.</p> <p>Second, PH is concerned that the SPD's current wording lacks sufficient flexibility to really facilitate the approach in site-specific situations, to fully respond to matters such as safety and long-term maintenance. For example, PH is particularly concerned that there is an assumption that runs through the SPD that ANRG must be provided adjacent or close to a development. However, there is no basis for this requirement. The overall concept on which</p>

Mitigation for Recreational Impacts SPD - Schedule of full responses			
			<p>mitigation is based is that ANRG should ensure that there is no increase in visits to European sites as result of new development. Therefore, ANRG located further from the development in question may be acceptable if its visitor catchment includes enough existing visitors (dwellings) to achieve this overall cumulative outcome.</p> <p>i.e. for the existing visits that will be diverted to clearly outweigh any new visits that might not be caught. Indeed, this is the principle on which the proposed off- site mitigation contributions for sites of less than 50 dwellings is based. A more wholistic 'strategic ANRG' approach should be followed and could be adopted in the SPD.</p>

Respondent	Comment ID	Document Section	Comments
Cranborne Chase AONB	10087_SPD21Mit_2	4 Recreation Mitigation requirements for new development 4.14 - 4.16	<p>7. There appears to be a simple lack of logic in requiring financial contributions to sites some significant distance away and not making a contribution to the management of a nationally designated and nationally important Area of Outstanding Natural Beauty. In effect, development within this AONB and your District would be subsidising the New Forest Ranger Service which, when one compares the funding systems for National Parks and Areas of Outstanding Natural Beauty, seems to require the poor to support the rich! All that, this AONB strongly recommends, needs to be corrected.</p> <p>8. In a similar vein it seems strange that offsite alternative natural recreational green space could be provided within this AONB for development elsewhere in your District that might not comply with this AONB's Management Plan which is, of course, your Council's policies for the management of this AONB. This AONB Partnership recommends that it should be made clear in your SPD that the provision of offsite alternative natural recreational green space should only be provided in this AONB in exceptional circumstances and then that should be done in cooperation with the AONB.</p>

Public Health, Adults Health and Care, Hampshire County Council	11035_SPD21Mit_3	4 Recreation Mitigation requirements for new development 4.18 - 4.20	<p>Enhancement of Recreational Walking Routes (pp. 18-19)</p> <p>We encourage the measures proposed to enhance existing recreational walking routes.</p>
		development 4.18 - 4.20	<p>The Supplementary Planning Document https://newforest.gov.uk/media/757/Mitigation-Strategy-for-European-Sites/pdf/ dealt with about 140 dwelling to the east of the A338 and included some detail of the National Park visits to be mitigated and costing of some proposed mitigation measures.</p> <p>The consultation documents https://www.newforest.gov.uk/article/2003/Mitigation-for-Recreational-Impacts-On-New-Forest-</p>

			<p>European-Sites#Location https://www.newforest.gov.uk/article/1938/Mitigation-Strategy do not contain the same detail.</p> <p>The Local Plan 2016 – 2036 https://www.newforest.gov.uk/article/1643/Local-Plan-2016-2036-Part-One-Planning-Strategy-New-Forest-District-outside-the-New-Forest-National-Park contains additional proposed developments outlined in policy SS16, SS17 and SS18 that would give an extra 870 dwellings.</p> <p>Housing development to the west of the A338 is already having an impact on Rights of Way in the area due to increased use. Heavy vehicles accessing the site at SS18 are crossing Fordingbridge Footpath 83, causing concern to users of this path. None of the planning applications submitted for any of the sites indicate how Rights of Way bordering or within the sites will be protected or improved to withstand the greatly increased use. We are concerned that some of the existing Rights of Way such as Fordingbridge Bridleway 77, Puddleslosh Lane and Fordingbridge Bridleway 80, Marl Lane will in fact become roads unless definite measures to restrict further vehicle access are put in place.</p> <p>It is inevitable that existing Rights of Way in the National Park to the east of the A338 will also become much more used resulting in increased pressure on the National Park, unless mitigation measures are put in place to the west of the A338.</p> <p>The improvements in the first supplementary planning document, although welcome, do not seem to provide sufficient walking routes to the west of the A338, although there are many possibilities for improving walking routes in the area. A primary example is Fordingbridge Footpath 76, which goes north east from Puddleslosh Lane and connects to Rockbourne Whitsbury and Breamore this is already being used much more and should be a priority for improvement as it will no doubt be used even more as the developments progress and it would seem to meet the criteria of providing walking routes to take the pressure off the National Park. Another example is Rockbourne Footpath 29 which at its eastern end on Whitsbury Road has no easy</p>
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			<p>connection to other walking routes and could be linked into existing routes or to any developments in SS18.</p> <p>The Ringwood & Fordingbridge Footpath Society are committed to maintaining and improving Rights of Way and always seek to work in co-operation with councils and landowners in order to achieve these aims. We would welcome any chance to discuss the above with NFDC and HCC also to suggest other improvements to walking routes in order to comply with the aims of your Supplementary Planning Documents.</p>
New Forest Association	11034_SPD21Mit_3	4 Recreation Mitigation requirements for new development 4.21	<p>4. Access management measures</p> <p>The New Friends of the New Forest agree that Access Management Measures are necessary and vitally important to the success of the mitigation. The SPD envisages these as comprising the provision of a ranger team and associated education and awareness raising initiatives. Whereas we agree these are important and necessary attributes of access management, we believe these fail to address the main issue of access management, that is the provision of car parking within the New Forest European sites. As most visitors arrive in the New Forest by car, car parks need to be the focus of improved access management. This may include the introduction of car parking charges, seasonal closure of car parks in sensitive locations and reduction in car park size. Until this element of access management is successfully addressed, the mitigation measures proposed will not prevent adverse impacts of recreation on the New Forest European sites.</p>

Respondent	Comment ID	Document Section	Comments
Gill	11027_SPD21Mit_2	4 Recreation Mitigation requirements for new development 4.21 - 4.22 - 4.23	<p>We need more wardens/rangers/volunteers out everyday making sure that people understand how to live with the national park. Information/tickets/leaflets need to be left on the windscreen of parked cars or handed out. Maybe more information in our schools and on local radio to clarify rules with locals. A campaign!</p> <p>We need lots of CLEAR signage in car parks. When I say 'clear' I mean NOT, Cyclists please keep to marked tracks that you might or might not have a map of. But:- 'CYCLISTS ARE NOT ALLOWED ON GRASS FOOTPATHS AND OPEN GRAZING LAND. KEEP TO CYCLE TRACKS ONLY Please take a photo of cycle tracks from the board. Â£500 FINES APPLY'. Then very large clear maps on a board. It would need to be enforced. Most visitors drive before walking or cycling. Clear signs at the entrance to, in, and on exits from every car park, and ranges/wardens/volunteers available to answer questions at peak times, weekends, bank holidays, summer. Signs on forest gates/barriers within The Park as well. To pay for this, a parking charge for forest car parks. Residents permit clock.</p> <p>Thank you for the opportunity to share my thoughts with you, which I know echo many of your own. I would only ask that this happens fast, because things are changing fast.</p>

Respondent	Comment ID	Document Section	Comments
Pennington and Lymington Lanes Society	10864_SPD21Mit_4	4 Recreation Mitigation requirements for new development 4.21 - 4.23	<p>Access management measures</p> <p>PALLS agrees that Access Management Measures are necessary and vitally important to the success of the mitigation. The SPD envisages these as comprising the provision of a ranger team and associated education and awareness raising initiatives. Whereas we agree these are important and necessary attributes of access management, we believe that these fail to address the main issue of access management, that is the provision of car parking within the New Forest European sites. As most visitors arrive in the New Forest by car, car parks need to be the focus of improved access management. Until this element of access management is successfully addressed, the mitigation measures proposed will not prevent adverse impacts of recreation on the New Forest European sites.</p>

		<p>development 4.21 - 4.23</p>	<p>the People & Wildlife Ranger within the draft SPD. This is currently provided by the National Park Authority and funded through contributions from development in New Forest District. Ranger provision forms the central element of the mitigation schemes developed by the Authority for development inside the National Park, and the Solent Recreation Mitigation Scheme. It is important that planned development in New Forest - which is increasing significantly under the new Local Plan compared to the previous Core Strategy - continues to support ranger provision within the designated sites. This measure currently makes up a small element of the Council's mitigation package and we suggest a larger proportion of the contributions received could be directed towards ranger provision.</p> <p>Support for on-site measures, as well as new greenspace provision as part of new development, is provided by Table 4 in the Footprint Ecology report 'Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches'. This report ranks on-site rangers as one of the most effective mitigation measures (alongside revisions to parking within the protected sites; and a presumption against development close to the protected sites). Increased ranger provision could also assist with monitoring the implementation and effectiveness of the District Council's mitigation strategy.</p>
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Gill	11027_SPD21Mit_3	4 Recreation Mitigation requirements for new development 4.24	Monitoring, 4.24. No more monitoring, the damage is happening now. Please don't wait until mud runners and extreme cyclists have carved up the heath and grass paths and nesting birds are scared off by out of control people and dogs, and the cars parking on any grass that they can get their wheels onto have turned grass verges into mud or dust depending on the season. As I am lucky enough to look out over the National Park I know these activities happen day and night.
		requirements for new development 4.3	We believe that to provide a real alternative to the New Forest European sites, much larger areas or networks of recreational green spaces are required. These may be termed Country Parks, Nature Parks or some similar designation. As an example, the popular Dibden Inclosure within the New Forest SPA and SAC is about 90 ha in size and provides a range of walks of at least 4km in length. It is close to the urban centres of Dibden and Hythe, has a good-sized car park and attracts large numbers of dog walkers from these centres of population. To provide a real alternative to the New Forest European sites, we believe it is necessary to provide similar sized strategically located areas of alternative natural recreation space that will offer a real alternative to both existing users of the New Forest and new residents of housing development. These should be areas that can be developed into semi-natural habitats of high nature conservation value where public access and wildlife conservation are joint objectives of management.

Ringwood Town Council	10825_SPD21Mit_1	4 Recreation Mitigation requirements for new development 4.36	<p>Although there is mention of partnership working in the document, there is no specific mention of Town and Parish Councils.</p> <p>Town and Parish Council should be consulted on the programme of off-site mitigation projects and be invited to i) put forward suggestions for projects to be included and ii) participate in the regular review.</p>
		requirements for new development 4.36	<p>Councils included in this strategy, with specific regard to the location and the future use of alternative natural recreational greenspace (ANRG). In particular, Milford-on-Sea Parish Council wishes to be consulted with regard to the ownership and facilities to be included in the ANRG associated with MOS2 (Land North of Manor Lane) - Strategic Site 7 in the Local Plan 2016-2036. With an increased population in Milford the area has an increased pressing requirement for recreational facilities. The Parish Council wishes to be able to exploit the opportunities for the ANRG associated with Strategic Site 7.</p>
New Forest National Park Authority	10827_SPD21Mit_7	4 Recreation Mitigation requirements for new development 4.44	<p>Paragraph 4.44 states, "The mitigation strategy gives scope for 'alternative' mitigation projects to be considered and suggestions for alternative projects will be considered, evaluated for effectiveness and where appropriate added to the programme of mitigation projects." This approach is pragmatic and it is appropriate for the Council to provide a degree of flexibility within their mitigation scheme to react to alternative measures and projects that might come forward.</p>

		<p>development 4.5</p>	<p>study which demonstrated that the estimated visits per household per year (on average) to the designated New Forest European sites by New Forest District residents is 72.”</p> <p>The Council’s efforts to quantify how many visits to the New Forest’s designated sites require mitigation are commended. The Footprint Ecology report ‘Recreation use of New Forest SAC/SPA/Ramsar: Results of a telephone survey with people living with 25km’ concluded that across all interviewees, the average number of visits to the New Forest’s designated sites (for those people that do visit the New Forest) was 72 visits per annum. This is the average figure for people living across the 0 - 25km distance band and the report goes onto state, “those interviewees within New Forest District (but outside the National Park) had the second highest mean, of around 106 visits per annum” (paragraph 4.10 and Table 8). We would therefore recommend that the Council review the basis for their SPD calculations, as the use of the ‘72 visits per annum’ average figure from across the 0 - 25km distance band may under-estimate the scale of impact on the New Forest’s designated sites from residents and new development in New Forest District.</p> <p>Consideration also needs to be given to the fact that the housing figures set out in the Council’s adopted Local Plan are minimums. The strategic housing allocations that have started to come forward in the District since the Local Plan was adopted are typically proposing a scale of development significantly higher numbers than the “at least” figures in the Local Plan. The Council’s Local Plan allocations at SS6 (Pennington), SS10 (New Milton), SS14 (Ringwood), SS16 (Fordingbridge) are coming forward as pre-application proposals or full applications with dwellings numbers well in excess of the minimums set out in the Local Plan. It is acknowledged that a precautionary 20% buffer is added in the SPD, but it is queried whether this is sufficient given the large uplift in dwelling numbers proposed on these strategic site allocations.</p>
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Respondent	Comment ID	Document Section	Comments
Lord	11026_SPD21Mit_2	4 Recreation Mitigation requirements for new development Para 4.3/4.17	<p>Improvement and enhancement of existing green spaces as recreational mitigation. What does this mean on the ground? It could include:</p> <p>Reduce cutting of urban road verges by NFDC and Town Councils (on behalf of HCC Highways), allowing plants to flower for pollinators. This is a huge resource of existing “greenspace”, much of it rich in wild flowers that could be better managed for wildlife, particularly in New Milton and Barton on Sea.</p> <p>Reduce cutting on public open spaces to allow wild flower, tall grass, scrub habitats to develop and be managed appropriately for wildlife.</p> <p>Re-think the management of the clifftop grassland?</p> <p>The above will encourage wildlife to colonise “closer to home” and may therefore encourage more people to stay local for their wildlife “fix”. Most important, are nature conservation management plans, detailing long-term management actions which integrates non-detrimental access.</p>

		<p>requirements for new development Table 1 Performance of mitigation proposals 4.24-4.26</p>	<p>The Friends of the New Forest welcome the Council’s intention to monitor the effectiveness of the Mitigation Strategy. However, we are concerned by the performance indicators proposed for monitoring the success or failure of the Strategy. We agree that the range of performance indicators proposed in Table 1 are valid to demonstrate that the Strategy is being implemented, but there are few measures that actually test if it is effective. Monitoring the condition of the European sites is identified as an important measure although the Strategy only suggests monitoring of indicator bird populations will ‘be considered’. We think monitoring indicator bird populations will be fundamental and must be central to any monitoring strategy. However, changes in biological indicators can be influenced by many factors in addition to recreational impacts and it is therefore important that other measures are also monitored.</p> <p>We believe the most important of these should be the monitoring of recreation activity and in particular visitor behaviour within the New Forest. Our members report regular and significant breaches of the Forestry England byelaws that are designed to protect the Forest from recreation damage. The New Forest commoners face a constant struggle maintaining their livestock on the Forest due to the impact of visitors and their un-controlled dogs. These incidents provide evidence of the current real threats to the New Forest from visitor pressure. We believe systematic monitoring of visitor behaviour is essential and must form a fundamental component of the monitoring plan.</p>
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Respondent	Comment ID	Document Section	Comments
West P	10743_SPD21Mit_1	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan	<p>I strongly applaud the ambition of this document and I support it. My comments below aim to improve and strengthen the quality against those developers who would seek to provide short cuts or minimum levels of compliance.</p> <p>Has the council considered that in creating these spaces, more people from the local area will be encouraged to use them and mitigate use of the national park? When calculating, I think a % of the property immediately neighbouring the new development should also be added to the Ha. It will need to be larger than just for the new development.</p>

Respondent	Comment ID	Document Section	Comments
Taylor Wimpey Strategic Land	11030_SPD21Mit_1	5 The delivery of alternative natural recreational green spaces through strategic site allocations in the Local Plan Table 2 Assumed occupancy rate for dwelling size 5.1 - 5.3	<p>[see attached report for table details, etc.]</p> <p>1.0 Introduction</p> <p>1.1 The following representations are submitted on behalf of Taylor Wimpey Strategic Land and relate to the Mitigation for Recreational Impacts on New Forest European Sites Supplementary Planning Document (SPD) - Consultation Draft (January 2021).</p> <p>1.2 The Consultation Draft SPD seeks to update the earlier Mitigation Strategy for European Sites SPD (June 2014) in order to provide supplementary planning guidance to the Local Plan 2016-2036. Specifically, it gives detailed guidance on the implementation of Policy ENV1: Mitigating the impact of development on International Nature Conservation Sites.</p> <p>2.0 Assumed Occupancy Rate for Dwelling Size</p> <p>2.1 The SPD states that sites of 50 net additional dwellings or more are required to provide ANRG to mitigate the recreational impacts on the New Forest European sites to a standard of no less than 8ha per 1,000 population. The exact amount of ANRG that will be provided by a development on-site is to be determined at the planning application stage, with the quantity of space calculated based on the estimated population of a development. Table 2 on page 24 of the draft SPD sets out the assumed occupancy rates per dwelling according to the SPD.</p> <p>2.2 There is no figure given for an average household size for the district, which makes it difficult when calculating quantum of ANRG when the housing mix of a proposal is not known or when it is an outline planning application. The principle of accepting an average household figure was accepted by the Chief Planning Officer in pre-application discussions on Taylor Wimpey's planning application at North of Hightown Road, Ringwood (reference 21/10042).</p> <p>2.3 Averaging the Assumed Occupancy from Table 2 above, gives an average household size of 2.56 persons.</p>

			<p>2.4 These figures are derived from Hampshire County Council Home Movers Survey 2010, so are eleven years old and should be updated prior to the SPD being adopted, particularly given this SPD is to support the local plan which covers the plan period to 2036 and more up-to-date information is available.</p> <p>2.5 The Council itself submitted document HOU02 'Demographic Projections' July 2017 to the Local Plan Examination in the summer of 2019. Figure 3.5 of that document shows the average household size, in 2016, to be as follows:</p> <p>Avon Valley & Downlands - 2.29</p> <p>South Coastal Towns - 2.08</p> <p>Totton and the Waterside - 2.31</p> <p>New Forest (ex. NP) - 2.22</p> <p>New Forest NP - 2.27</p> <p>New Forest Total - 2.23</p> <p>2.6 This more up-to-date figure of 2.23 persons per household was also accepted the Chief Planning Officer in pre-application discussions on planning application at North of Hightown Road, Ringwood.</p> <p>2.7 Further to this, the Environmental Statement submitted in support of the North of Hightown Road, Ringwood planning application, sets out in Table 8.9 of the Socio-Economic Chapter the following table, which shows 2016-based subnational household projections from the DCLG:</p> <p>2.8 This clearly shows an average household size of 2.22 in 2019 reducing to 2.11 by 2039, just beyond the local plan period.</p> <p>2.9 It seems justified that given the requirements for housing provision in the</p>
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			<p>local plan are based on population projections, that the average household size should also be based on projections. As such, it is suggested that an average household size over the local plan period, using the figures in Table 8.9 above from 2019-2034, is used to create the household size averages.</p> <p>2.10 As such, the district average household size would be 2.18 $(2.22+2.19+2.16+2.14/4)$.</p> <p>2.11 This would translate to the average occupancy in Table 2 of the SPD being revised to:</p> <p>1 bedroom - 1.2</p> <p>2 bedroom - 1.8</p> <p>3 bedroom - 2.5</p> <p>4 bedroom - 3.2</p> <p>Average - 2.18</p> <p>2.12 It is important to use up-to-date information and Government projections, where available, particularly when average household size is also used to calculate public open space and nutrient neutrality.</p> <p>3.0 Conclusion</p> <p>3.1 Taylor Wimpey welcomes the guidance on mitigation for recreational impacts set out in the draft SPD. However, it is necessary to use up-to-date information that is robust for the time period the SPD is expected to used for. As such, the assumed occupancy rates need to be amended as suggested in paragraph 2.10 above.</p>
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Respondent	Comment ID	Document Section	Comments
Lisher	11017_SPD21Mit_2	6 Implementation and Funding	<p>Maintenance. The existing network of footpaths and walkways is very poorly maintained and in some areas the uneven surface is dangerous. Based on existing experience the expectation that future planned paths will be managed at the costs suggested appear unlikely. So it would be better to have fewer paths that are well managed.</p> <p>Enforcement. NFDC in my experience are poor, slow and often reluctant to enforce agreements with developers and property owners. More money should be planned for this activity, so that NFDC can be more effective.</p>
Persimmon Homes South Coast	10990_SPD21Mit_2	6 Implementation and Funding 6.17	<p>For Sites Below 50 Dwellings</p> <p>The SPD indicates that CIL payments will be used to fund the provision of offsite recreational mitigation projects. As this is covered by CIL, monitoring costs (see below for comments on appropriateness of monitoring costs) should be subsumed within the administration fee that is charged with CIL.</p>

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_7	6 Implementation and Funding 6.25	<p data-bbox="1115 258 2029 568">Charging Schedule</p> <p data-bbox="1115 322 2029 568">PH is extremely concerned by the lack of transparency and evidence presented in the SPD in support of the proposed charging schedule, particularly in respect of the off-site contributions for sites of less than 50 dwellings and the new introduction of fees associated with site of more than 50 dwellings. It is understood that these contributions will be used to fund appropriate projects that will provide equivalent benefits to the settlement where the development site is located, with a list of projects to be produced separately to the SPD and updated annually.</p> <p data-bbox="1115 600 2029 721">With no details of the proposed mitigation projects it is impossible to understand how the charging schedule has been reached and if the levels of financial contributions being sought are appropriate. This renders the SPD ineffective.</p> <p data-bbox="1115 753 2029 874">The evidence base for the proposed charging regime should be presented and the Council must be able show and explain how the proposed charging rates will contribute towards the implementation of effective mitigation schemes.</p> <p data-bbox="1115 906 2029 970">In the meantime it would be entirely inappropriate to implement these charges.</p>
New Milton Town Council	10850_SPD21Mit_4	6 Implementation and Funding 6.4	<p data-bbox="1115 1080 2029 1201">Do NFDC intend on passing management of ANRG to local councils? If so, will the land be up to the standard defined before any transfer? Will detailed management plans also be forthcoming which would ensure mowing, hedge cutting etc. methods are clearly defined for biodiversity net gain?</p>

Respondent	Comment ID	Document Section	Comments
New Forest National Park Authority	10827_SPD21Mit_8	6 Implementation and Funding Table 10 Contribution rate per dwelling for access management 6.19 - 6.20	<p>The National Park Authority supports the requirement in the draft SPD for all residential development in the District to contribute towards access management measures. Table 10 indicates an average cost of £586 per new home, which means the Council may receive over £300,000 per annum towards the 'People & Wildlife Ranger' provision (£586 x 521 planned new dwellings per annum).</p> <p>This level of increased funding from new development in the District for access management measures indicates the Council could potentially support a proportionate increase in the ranger resource their mitigation fund delivers above the single ranger post currently funded. While recognising that the District Council is prioritising new greenspace provision as their main mitigation measure, with the level of planned development in the District increasing significantly under the new Local Plan, there is a case that the ranger provision should also be scaled proportionately. Published reviews of potential mitigation measures rank ranger provision within designated sites as a particularly effective mitigation measure.</p>
Persimmon Homes South Coast	10990_SPD21Mit_4	6 Implementation and Funding Table 11 Contribution rate for development less than 50	<p>The approach to calculating overall cost is complicated, particularly for those less familiar with the planning system. Example calculations of how costs would be worked out for smaller (<50 dwellings) and larger (>50 dwellings) would be beneficial. For smaller developments (i.e. those <50 dwellings), an example of how to calculate mitigation costs for affordable housing (which is exempt from CIL), and how costs are calculated when the CIL receipts from a development fall below the cost of mitigation as set out in Table 11 of the SPD would be beneficial.</p>

Cranborne Chase AONB	10087_SPD21Mit_3	6 Implementation and Funding Table 11 Contribution rate for development less than 50 6.25	9. Tables 10 and 11 set out the expected financial contributions in relation to the different sized dwellings in development. As I have indicated above, it seems more appropriate for such contributions to be made to AONB Management Plan objectives and aims rather than for possible impacts on sites in other parts of your District and the New Forest National Park some distance from the actual locations that are directly impacted upon by the development.
			<p>including:</p> <p>Information from surveys of key species such as Nightjar, Woodlark and Dartford Warbler.</p> <p>Information on the development of recreational management approaches within the New Forest National Park.</p> <p>Carry out survey of visitor numbers and distributions of visitors within the SPA.</p> <p>The monitoring of bird numbers within the New Forest's protected sites requires a partnership approach and is not something the National Park Authority can undertake alone. Monitoring over the last decade has been funded through the New Forest Higher Level Stewardship scheme, but this scheme is coming to an end. The costs of monitoring bird numbers will need to be borne by a range of organisations and it is suggested that development within New Forest District could make a proportionate financial contribution to this monitoring.</p>
Cox	11020_SPD21Mit_2	Appendix 2 - Monitoring Requirements	Table 4.1 refers in the future tense to surveys carried out some years ago
Syratt W	10551_SPD21Mit_2	Appendix 2 - Monitoring Requirements	table 4, Line 4.1. Under `Further information and data required`. The entry is obsolete and needs updating.

Respondent	Comment ID	Document Section	Comments
Bolton	11028_SPD21Mit_3	Appendix 2 - Monitoring Requirements	<p>It is to be hoped that monitoring of any schemes takes place and is learned from. The indicator species used by the Footprint Ecology team do not seem to reflect a deep knowledge of the area and should include existing damage and potential of the many places on and adjacent to the Crown lands which are already over used or earmarked for extra recreational use. There is a lot of knowledge already in existence gathered from years of experience which, if used, would prevent strange statements such as in</p> <p>1.3 ' mitigations are to enable further development to take place without a harmful impact on the integrity of protected sites' - this is impossible, and</p> <p>1.7 'this aims to restore the 'status quo'!</p>
Persimmon Homes South Coast	10990_SPD21Mit_3	Appendix 2 - Monitoring Requirements	<p>Paragraph 6.5 (amongst other references) of the SPD indicate that a maintenance and monitoring fee will need to be paid by an applicant. With regards to monitoring, Appendix 2 sets out a monitoring framework and overall costs associated with it. It is understood that such costs will be paid through s106. The Council will be aware that Planning obligations must only be sought where they meet all of the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. With regards to parts 1 and 3 of the monitoring framework, it is accepted that these met the CIL tests. However, for the remaining elements, these relate to monitoring of the Council's Mitigation Strategy more generally, which not directly related to the development. As such, it would not be appropriate for the Council to seek planning obligations in respect of part 2, 4, 5 and 6. It is further noted that part 4 of the monitoring framework relates to the monitoring of condition of protected sites. Monitoring of the condition of protected site falls within the remit of Natural England, where funding is provided centrally to carry out such duties. To seek to charge applicants for monitoring part 4 would constitute double counting.</p>

Respondent	Comment ID	Document Section	Comments
Cox	11020_SPD21Mit_3	Appendix 3: Design considerations for recreation walking route enhancements	A3.4 Signage for restricted byways needs to adequately show the restrictions of use. A3.8 Fails to take into account that there is no longer a requirement for dedicated dog waste bins.

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>Consistency</p> <p>The NPPF (2019) is clear that SPDs can be used to add further detail to policies in the local plan, which can include providing further design guidance for the development of specific sites or with respect to particular issues. However, it is not the role of SPDs to prescribe how individual sites will be developed.</p> <p>Paragraph 126 of NPPF (2019), with regards to design expectations set in SPDs, states:</p> <p>“However, their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.”</p> <p>There are likely to be a number of ways in which individual sites can be developed, all of which would meet planning policy requirements. A one-size fits all approach to the design of green infrastructure should be resisted, in the same way as a one-size fits all is being resisted with regards to the architectural approach of each allocated site. This will not lead to distinctive places.</p> <p>Further, there is no evidence that the ‘ready-made template’, with set dimensional / concentric requirements, will be more effective than other design approaches. There is evidence regarding the general requirements for quantum and achieving attractive walking routes but there is no research basis for the overly-prescriptive concentric-circle approach, it is arbitrary and it is thus unjustified.</p> <p>From the text at A4.5.9 it would appear that the Council is seeking to utilise the SPD to reintroduce a prescriptive approach to master planning, an approach that was rejected by the Inspectors examining the local plan.</p> <p>Accordingly, whilst it is helpful to set some key principles and framework, PH consider that the level of detail fails to provide for a suitable degree of variety and goes far beyond adding detail to the relevant policy, by straying onto</p>

			<p>wider landscape and design issues, entirely unrelated to the function and effectiveness of ANRG. The length of the document in itself, at 63 pages long, is a clear indicator that the document goes well beyond the role of adding detail to the primary policy.</p> <p>The document should be simplified and focused and be sufficiently flexible to encourage variety and a design-led approach to each individual site, and the circumstances, context and physical characteristics of each site, whereby the ANRG design should respond positively to, for example, the dimensions and shape of the site, wider connections and its principal function which is to accommodate housing to meet local need, making effective use of the land resource.</p> <p>These matters are addressed further below but as a point of principle, the SPD will not form part of the development plan and will only be of significant weight in decision taking where it is consistent with and accords with the local plan and national policy. Any inconsistency in the document will undermine its purpose and effectiveness and will be open to challenge when development proposals are being brought forward through planning applications.</p>
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Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_4	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>Dual Use</p> <p>There is no justifiable reason as to why there should not be dual use of the ANRG / informal public open space (POS).</p> <p>In fact the SPD itself spells out that POS can be delivered in many forms and again there is no evidence that ANRG become less effective because it also functions as POS. Of course, it is imperative that the ANRG mitigates as it should, effectively, but in many respects dual use could make the spaces more attractive to users, not less attractive. Indeed, people would be more inclined to use the ANRG if it is set out as dual use, making it attractive to a wider section of the community by being multi-functional, as are many of our existing country parks and recreational spaces.</p> <p>Paragraph 1.5 of the draft SPD identifies the main changes between Policy ENV1 and the previously adopted approach, including the identification that the “The 2ha informal open space element of saved policy CS7 can no longer offset the 8ha of recreational mitigation requirements for sites over 50 dwellings”.</p> <p>Further, paragraph 3.3 of the SPD states that “The policy [ENV1] also clarifies that informal open space required to be provided under saved Policy CS7 is wholly additional to mitigation land required under Policy ENV1.”</p> <p>However policy ENV1 does not take this approach. This is not a clarification but a change to policy / new policy approach. The SPD can only provide detail to policy it cannot be used to amend the policy. In any event, the SPD presents no evidence to support the principle that the dual usage of ANRG and areas of informal public open space is no longer inappropriate.</p> <p>This position would appear to be inconsistent with a number of core design principles for the provision of integrated greenspace on larger scale sites, set out in appendix 4. Indeed, appendix 4 is extremely clear that ANRG mitigation land should be an integral part of the wider green infrastructure of a development site, and paragraph A4.5.11 identifies that there is no</p>

Respondent	Comment ID	Document Section	Comments
			separate distinction between the design submissions for ANRG and public open space.

Respondent	Comment ID	Document Section	Comments
Pennyfarthing Homes	10916_SPD21Mit_6	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p data-bbox="1115 260 1361 288">Location and Design</p> <p data-bbox="1115 323 2007 564">PH has previously raised concerns about the wholesale exclusion of ecologically sensitive sites from ANRG, on the basis that consideration should be given as to whether the qualifying features of the site are likely to be affected by its use as ANRG and potential biodiversity gains that may arise from the ongoing management of ANRG land. PH is therefore encouraged to see from paragraph A4.3.2 the Council appear to recognise the importance of considering the suitability of designated nature conservation sites for inclusion in ANRG based on their individual merits.</p> <p data-bbox="1115 600 2029 810">Whilst the design guidance on integrated greenspace set out in Appendix 4 is broadly welcomed, PH is extremely concerned with the apparent lack of flexibility in the proposed designs for ANRG. The prescribed circular and linkage approach and associated sizing requirements set out in the SPD may well be appropriate on larger-scale sites, but is often much less suitable on the smaller sites of 50 or more dwellings, where site design is significantly more constrained.</p> <p data-bbox="1115 845 2029 1086">It is PH's experience that a limited design approach of this nature leads to the overprovision of ANRG, to detriment of other aspects of the scheme, such as landscape, amenity, urban design and architectural considerations. Indeed, in some cases it will have a direct influence on the housing numbers (both market and affordable) that smaller strategic sites will be able to deliver. PH would therefore like to see greater flexibility in the wording of the design guidance to enable site-specific situations to be taken into consideration for evolving more bespoke ANRG designs.</p> <p data-bbox="1115 1121 2007 1362">On another design point, it is noted that diagram 3 in appendix 4, identifies that SuDS features that remain wet (i.e. ponds) are not normally counted as ANRG, but that with appropriate planting and access they could, at the discretion of the LPA, be included. This seems at odds with the text in paragraph A4.5.13 which indicates that reactional mitigation land offers an good opportunity to integrate drainage design with open space. Given the importance of a varied and attractive landscape in the design of ANRG to encourage residents to use the area, PH would like to see clarity on the</p>

			<p>inclusion of SuDS features within ANRG provision.</p> <p>PH also seeks further confirmation, and absolute certainty, on the inclusion of woodland areas within ANRG. It is noted that the supporting text in the local plan (paragraph 5.21) suggests that densely wooded areas may not be attractive to users concerned about personal safety. Given that significant areas of the European designations of the New Forest are woodland (natural/semi-natural and plantation), PH is of the view that woodland ANRG would be attractive to users, particularly dog walkers, subject to provision of paths and management.</p>

Respondent	Comment ID	Document Section	Comments
Pennington and Lymington Lanes Society	10864_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>Alternative Natural Recreational Greenspace (ANRG)</p> <p>The provision of alternative greenspace is a widely adopted method of mitigating impacts on European designated wildlife sites. The concept was first developed in the Thames Basin Heaths SPA where an arithmetical calculation was used to identify the quantum of greenspace required to mitigate for the increase in population. This calculation was based on the density of visitors made to the Thames Basin Heaths SPA and gave the resultant 8 ha of greenspace per 1000 head of population. This was adopted in the Thames Basin Heaths SPA to mitigate recreation impacts on three species of heathland breeding birds. Whereas the New Forest has these three species of birds in common with the Thames Basin Heaths SPA, the New Forest also qualifies as an SPA for a far greater diversity of internationally important bird populations. Further more, it is also designated as a Special Area of Conservation (SAC) on account of a wide range of internationally important woodland, grassland, heathland and wetland habitats. Many of these do not occur within the Thames Basin Heaths. As we stated in our 2018 submission, the use of the 8 ha of alternative greenspace per 1000 head of population in the New Forest has no scientific basis. It has not been developed using any empirical methodology but is based upon an out-dated and inappropriate calculation for the Thames Basin Heaths. The New Forest has a very different ecology and visitor use to the Thames Basin Heaths and we do not believe that this rate of alternative natural recreational green space has any relevance to the New Forest.</p> <p>To better illustrate this, we have applied the Thames Basin Heaths method for calculating the quantum of alternative greenspace to the comparable area of heathland habitat and visitor density within the New Forest. This gives a requirement of over 32 ha of alternative greenspace per 1000 head of population. This is four times the area being proposed in the SPD.</p> <p>Another feature of the Thames Basin Heaths approach to mitigation was to ensure that each area of alternative greenspace could provide for a walk of at least 2.5 km. This again is related to visitor patterns within the Thames Basin Heaths SPA. Similar surveys within the New Forest have shown that the average distance walked is between 3km (dog walkers) and 4km (walkers).</p>

Respondent	Comment ID	Document Section	Comments
			<p>This is considerably further than the distances walked in the Thames Basin Heaths.</p> <p>The reasons why visitors are attracted to the New Forest has been considered by a number of studies. These show that it is the New Forest scenery, peace and quiet, good walking, ease of accessibility and wildlife value that are the principal reasons why people visit the New Forest.</p> <p>By contrast, the landscape design illustrated in Appendix 3 and 4 of the SPD provides for the creation of nondescript suburban green spaces lacking any features of the New Forest, termed Alternative Natural Recreational Greenspace (ANRG).</p> <p>The layout of the ANRG illustrated in Appendix 4 proposes a series of connected circular patches of open space. These further reinforce the character of a gang-mown green desert devoid of naturalness or nature. With the addition of the suburban clutter of benches, surfaced paths, signs and interpretation boards the envisaged areas of land proposed will be totally ineffective in providing an attractive alternative to the New Forest European sites. Their design betrays a lack of understanding of either the character of the New Forest landscape, its wildlife value or any analysis of the reasons why local residents of the New Forest visit the internationally important protected landscapes in the National Park. If these 'pocket parks' are to provide any useful function in terms of mitigation far greater effort needs to be focused on attempting to ensure that they mirror the qualities that attract visitors to the protected areas.</p> <p>There is a wide variation in the estimate of ANRG requirements set out in Table 4 in para 5.4 of the consultation draft with no satisfactory explanation of the variation. Footnote 19 states the estimates of ANRG have been calculated using the mix of housing as evidenced from the Strategic Market Housing Assessment 2014 and footnote 18 states occupancy is based on Figure 6.1 in the adopted Local Plan - Indicative need for different sizes and tenures of homes. Neither of these provide any explanation as to why some sites have a far greater ANRG proportionate to site capacity than others. This needs to be explained and fully justified.</p>

Respondent	Comment ID	Document Section	Comments
			<p>The ability of the ANRG to divert visits away from the New Forest European sites is identified in the SPD as one of the key performance criteria for monitoring the effectiveness of the mitigation (Table 1, page 20). Given that the ANRG as proposed will not provide any of the features that attract visits to the New Forest, we believe that, in isolation, this method of mitigation providing alternative greenspace will be ineffective and will not prevent further damaging recreational use of the New Forest European sites.</p> <p>PALLS believes that substantially more alternative greenspace is needed to provide adequate mitigation for the effects of housing development on the New Forest European sites. This becomes evident when the method used to calculate the required quantum of alternative greenspace that was developed for the Thames Basin Heaths, is applied to the New Forest. Local neighbourhood parks may provide an element of this provision, but will not, in themselves, be sufficient to provide effective mitigation.</p>

			<p>[See submitted PDF for full text of this comment]</p>
<p>Cox</p>	<p>11020_SPD21Mit_4</p>	<p>Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)</p>	<p>A.4.6.13 & A.4.17 fail to take into account that there is no longer a requirement for dedicated dog bins.</p>

Respondent	Comment ID	Document Section	Comments
Syratt W	10551_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>paragraph 3.2. Refer to paragraphs 5 and 6 of main response [reproduced below].</p> <p>5 This document does not plan far ahead. HMG now considers retention and enhancement of biodiversity a high national priority. NFDC needs to do the same. Although the Local Plan has a limited life span (2036), there is a need to plan far beyond that for the natural environment. Retention of biodiversity, as has become all too evident recently, is essential for human health and well-being. As more and more development takes place in the future, beyond the Local Plan lifespan, more and more pressure will be applied to local biodiversity. That is why it is essential to identify and conserve wildlife corridors through areas where substantial development is planned, like around Fordingbridge, earmarked for 10% of the Local Plan housing increase. Furthermore, it is doubly essential because any move to deflect recreational use of the New Forest to local ANRGs risks impacting other areas of conservation importance. This has been recognised for the Solent area, but totally ignored in this document for the Avon Valley SAC, SPA and Ramsar Site. Pressure on this area will increase, for example from pollution.</p> <p>6 In the context of the Conservation Areas of the National Park, these wildlife corridors will become essential. They will provide the natural linkages for avian species and many invertebrates, allow wildlife migration between biodiverse areas and, importantly, conserve the habitat of Red Data book species such as bats. Several bat species are known to have satellite colonies in the area outside the New Forest and use the wilder areas for feeding. The habitats of Red Data Book bat species are also protected. In the future, there is a very real prospect that the National Park will become an island in the middle of sprawling conurbations (developers already have their eye on a substantial area north west of Fordingbridge). The NP Conservation Areas have to be able to communicate through wildlife corridors with other natural areas. That has to be planned NOW, because, unless they are planned, the presently identified network of isolated SINC, etc., will become islands themselves. They need to remain connected to the NFNP and the wider countryside beyond.</p>

Respondent	Comment ID	Document Section	Comments
Syratt W	10551_SPD21Mit_4	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>paragraph 5.3. Several areas, e.g., around Fordingbridge, that are not designated in any way, have a high degree of biodiversity value. These, naturally, have most of the characteristics listed as being desirable Quality Criteria for an ANRG. Such areas need to be identified well in advance of any development and registered as unsuitable for development and reserved as ANRGs for wildlife, thus saving development costs.</p> <p>On the last point [in this paragraph], under no circumstances should dead wood be removed. It is too valuable for biodiversity. Make it safe, yes!</p>
New Milton Town Council	10850_SPD21Mit_5	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>There seems a general assumption in the document that recreation only extends to pedestrians with or without dogs, yet leisure cycling is also known to be impactful to sites.</p> <p>We understand that cycling routes should form part of the Local Cycling and Walking Infrastructure Plan and this needs to be mentioned or detailed as an appendix to take account of the activity, as it is conspicuous by its absence.</p>

Respondent	Comment ID	Document Section	Comments
Currie B	10875_SPD21Mit_1	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>This representation is made on behalf of Mr B Currie with respect to land interests in Strategic Site SS18 - Land at Middle Burgate, Fordingbridge</p> <p>Supplementary Planning Documents (SPDs) are not subject to the same rigorous examination process as Development Plan documents. As a result, they should be used to guide or expand upon existing policies within the development plan and not to create new policy or constraint which has not been tested by way of the formal process of external examination by an independent body.</p> <p>Any SPD should be in accordance with the Local Plan approach and appropriately evidenced and justified to provide an appropriate basis upon which to inform development proposals.</p> <p>It is important that the Council recognise that the SPD is just guidance. It is not itself formal planning policy or a rigid basis which development must accord to. Its purpose is to set out a series of guidelines to help direct the development and how policies should be interpreted. It is important that this does not include a fixed or pre-determined solution. The Council will need to determine any application which comes before it on its merits and against adopted policies; if the scheme differs from what is set out within an SPD, this will not comprise a sufficient reason to refuse permission in itself if the policy requirements set out within the Development Plan are otherwise met. The SPD is guidance and explains how policy should be interpreted; it should not place an unreasonable constraint on development representing ideal circumstances which whilst existing in a hypothetical scenario are not realistic on the ground and do not take account of the constraints of actual development sites.</p> <p>With respect to the Mitigation for Recreational Impacts (MRI) SPD we have a particular concern with respect to the level of prescription, without reasonable justification, of the guidance for the delivery of Alternative Natural Recreational Greenspace (ANRG) set out within Appendix 4 to the SPD.</p> <p>It should be noted, that no objection is raised to the overarching purpose of the SPD, and indeed to the need to consider the important features and</p>

Respondent	Comment ID	Document Section	Comments
			<p>characteristics which will render ANRG spaces effective which are delivered by Appendix 4. The issue however is the level of inflexibility that it built into the guidance which will result in poor quality outcomes and inefficient development on strategic sites as a result of a need to comply with arbitrary constraints which do not take account of site-specific considerations. The delivery of ANRG, and what is and is not acceptable, beyond the high level and overarching requirement in terms of the total area of the space, should be dealt with on a case by case basis and not generically as the same for all development sites. To do otherwise assumes a hypothetical set of sites which are of a perfect size and shape capable of accommodating perfectly prescribed areas of ANRG. This is not based in reality and will not delivery high quality development on the ground.</p> <p>The following sections deal specifically with the provisions of Appendix 4 to the MRI SPD and the principal concerns of our client; summarised as follows:</p> <ul style="list-style-type: none"> -Prescriptive and arbitrary dimensional criteria for ANRG as per Section A4.4; -Prescription of what is and is not ANRG 'compliant', the location of ANRG and the quality of ANRG as per section A4.5; <p>[See separate entries and the PDF response for full details of this submission]</p> <p>Conclusions In response to the Council's consultation on the Management of Recreational Impacts on New Forest European Sites SPD, we have identified those sections of the document which are of concern to our client and which we would ask the Council to consider either an amendment to, or wholesale removal where applicable.</p> <p>For the purposes of ease of reference these are summarised within the bullet point list below:</p> <ul style="list-style-type: none"> - Delete dimensional constraints within Section A4.4 relating to what can be classified as ANRG.

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			<ul style="list-style-type: none"> - Delete from Paragraph A4.5.9 prescriptive reference to what land can and cannot be open space with reference to The Inspectors' requirement that the Council's masterplans be purely illustrative not be prescriptive. - Delete ANRG Diagrams 1-3 (pgs 52-54) which impose restrictive dimensional constraints in accordance with Section A4.4. <p>With respect to the principal objectives of the SPD, we raise no concerns or objections. It is however the detail of the document and those sections which diminish flexibility and seek to impose an undue and unrealistic level of prescription where we consider that appropriate changes should be made in order to render the document sound and a reasonable basis upon which to direct development within the District, and in particular the delivery of the Council's strategic site allocations in a sustainable and realistic manner.</p>

Respondent	Comment ID	Document Section	Comments
Currie B	10875_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>Background and Appendix 4 - Design Guidance</p> <p>The background to the production of the MRI SPD is set out below, with reference to the Council's adopted Policy ENV1, within the frame of which the SPD has been constructed. It is important to understand fundamentally what the Local Plan, as the adopted development plan document, states, and where the SPD as proposed either sits in accordance with this, or goes beyond what is reasonable for the level of policy direction that an SPD, as a document which is not subject of independent examination, and ultimately comprises guidance, can be expected to provide.</p> <p>[See submitted PDF for full text of this comment]</p>

Respondent	Comment ID	Document Section	Comments
<p>New Forest National Park Authority</p>	<p>10827_SPD21Mit_11</p>	<p>Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)</p>	<p>It is noted that the guidance set out in Appendix 4 has been developed in liaison with Natural England to provide appropriate mitigation to meet the requirement of the Habitat Regulations.</p> <p>Paragraph A4.1.12 states, “mitigation land should be considered and laid out as an integral part of the fabric of new development. It will form a major part of a network of green space and the green setting for new residential development. Site capacities and landscape sensitivities of the strategic housing allocation sites have been assessed and land allocated on the basis that recreational mitigation will be provided within the defined allocation sites.” The National Park Authority supports this statement and the emphasis in the District Council’s Local Plan and SPD on new greenspace provision being an integral part of the new development.</p> <p>Paragraph A4.1.13 states, “It may be possible in some circumstances to extend the offer of ANRG beyond the development site boundary.” We would suggest that wording is added to the SPD to state that the land in question should be within the District Council’s planning area (rather than extending into the National Park). This would ensure consistency with the Authority’s local planning policies.</p> <p>Although not currently a central component of the Council’s mitigation approach, the Authority believes that the mitigation strategy should not preclude the provision of new strategic greenspace (such as a country park). This mitigation measure is included in Table 4 of Footprint Ecology’s report on Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches’ as a longer term potential strategic mitigation measure.</p>

Respondent	Comment ID	Document Section	Comments
Cicero Estates	10852_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>This representation is made on behalf of Cicero Estates as developer and with respect to their controlling interest in Strategic Site SS6 - Land east of Lower Pennington Lane, Lymington</p> <p>Supplementary Planning Documents (SPDs) are not subject to the same rigorous examination process as Development Plan documents. As a result, they should be used to guide or expand upon existing policies within the development plan and not to create new policy or constraint which has not been tested by way of the formal process of external examination by an independent body.</p> <p>Any SPD should be in accordance with the Local Plan approach and appropriately evidenced and justified to provide an appropriate basis upon which to inform development proposals.</p> <p>It is important that the Council recognise that the SPD is just guidance. It is not itself formal planning policy or a rigid basis which development must accord to. Its purpose is to set out a series of guidelines to help direct the development and how policies should be interpreted. It is important that this does not include a fixed or pre-determined solution. The Council will need to determine any application which comes before it on its merits and against adopted policies; if the scheme differs from what is set out within an SPD, this will not comprise a sufficient reason to refuse permission in itself if the policy requirements set out within the Development Plan are otherwise met. The SPD is guidance and explains how policy should be interpreted; it should not place an unreasonable constraint on development representing ideal circumstances which whilst existing in a hypothetical scenario are not realistic on the ground and do not take account of the constraints of actual development sites.</p> <p>With respect to the Mitigation for Recreational Impacts (MRI) SPD we have a particular concern with respect to the level of prescription, without reasonable justification, of the guidance for the delivery of Alternative Natural Recreational Greenspace (ANRG) set out within Appendix 4 to the SPD.</p> <p>It should be noted that no objection is raised to the overarching purpose of</p>

			<p>the SPD, and indeed to the need to consider the important features and characteristics which will render ANRG spaces effective which are delivered by Appendix 4. The issue however is the level of inflexibility that it built into the guidance which will result in poor quality outcomes and inefficient development on strategic sites as a result of a need to comply with arbitrary constraints which do not take account of site-specific considerations. The delivery of ANRG, and what is and is not acceptable, beyond the high level and overarching requirement in terms of the total area of the space, should be dealt with on a case by case basis and not generically as the same for all development sites. To do otherwise assumes a hypothetical set of sites which are of a perfect size and shape capable of accommodating perfectly prescribed areas of ANRG. This is not based in reality and will not delivery high quality development on the ground.</p> <p>The following section deals specifically with the provisions of Appendix 4 to the MRI SPD and the principal concerns of our client; summarised as follows:</p> <ul style="list-style-type: none"> - Prescriptive and arbitrary dimensional criteria for ANRG as per Section A4.4; - Prescription of what is and is not ANRG 'compliant', the location of ANRG and the quality of ANRG as per section A4.5; <p>[See separate entries and the PDF response for full details of this submission]</p> <p>Conclusions In response to the Council's consultation on the Management of Recreational Impacts on New Forest European Sites SPD, we have identified those sections of the document which are of concern to our client and which we would ask the Council to consider either an amendment to, or wholesale removal where applicable.</p> <p>For the purposes of ease of reference these are summarised within the bullet point list below:</p>
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			<ul style="list-style-type: none">- Delete dimensional constraints within Section A4.4 relating to what can be classified as ANRG.- Delete from Paragraph A4.5.9 prescriptive reference to what land can and cannot be open space with reference to The Inspectors' requirement that the Council's masterplans be purely illustrative not be prescriptive.- Delete ANRG Diagrams 1-3 (pages 52-54) which impose restrictive dimensional constraints in accordance with Section A4.4. <p>With respect to the principal objectives of the SPD, we raise no concerns or objections. It is however the detail of the document and those sections which diminish flexibility and seek to impose an undue and unrealistic level of prescription where we consider that appropriate changes should be made in order to render the document sound and a reasonable basis upon which to direct development within the District, and in particular the delivery of the Council's strategic site allocations in a sustainable and realistic manner.</p>
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Respondent	Comment ID	Document Section	Comments
Reeves Family and Merlion Capital	11032_SPD21Mit_1	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>Background and Appendix 4 - Design Guidance</p> <p>The background to the production of the MRI SPD is set out below, with reference to the Council's adopted Policy ENV1, within the frame of which the SPD has been constructed. It is important to understand fundamentally what the Local Plan, as the adopted development plan document, states, and where the SPD as proposed either sits in accordance with this, or goes beyond what is reasonable for the level of policy direction that an SPD, as a document which is not subject of independent examination, and ultimately comprises guidance, can be expected to provide.</p> <p>[See submitted PDF for full text of this comment]</p>
BREO Ringwood Limited	11033_SPD21Mit_1	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>Background and Appendix 4 - Design Guidance</p> <p>The background to the production of the MRI SPD is set out below, with reference to the Council's adopted Policy ENV1, within the frame of which the SPD has been constructed. It is important to understand fundamentally what the Local Plan, as the adopted development plan document, states, and where the SPD as proposed either sits in accordance with this, or goes beyond what is reasonable for the level of policy direction that an SPD, as a document which is not subject of independent examination, and ultimately comprises guidance, can be expected to provide.</p> <p>[See submitted PDF for full text of this comment]</p>

Respondent	Comment ID	Document Section	Comments
Reeves Family and Merlion Capital	11032_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>This representation is made on behalf of the Reeves Family and Merlion Capital with respect to land interests in Strategic Site SS1 - Land to the north of Totton.</p> <p>Supplementary Planning Documents (SPDs) are not subject to the same rigorous examination process as Development Plan documents. As a result, they should be used to guide or expand upon existing policies within the development plan and not to create new policy or constraint which has not been tested by way of the formal process of external examination by an independent body.</p> <p>Any SPD should be in accordance with the Local Plan approach and appropriately evidenced and justified to provide an appropriate basis upon which to inform development proposals.</p> <p>It is important that the Council recognise that the SPD is just guidance. It is not itself formal planning policy or a rigid basis which development must accord to. Its purpose is to set out a series of guidelines to help direct the development and how policies should be interpreted. It is important that this does not include a fixed or pre-determined solution. The Council will need to determine any application which comes before it on its merits and against adopted policies; if the scheme differs from what is set out within an SPD, this will not comprise a sufficient reason to refuse permission in itself if the policy requirements set out within the Development Plan are otherwise met. The SPD is guidance and explains how policy should be interpreted; it should not place an unreasonable constraint on development representing ideal circumstances which whilst existing in a hypothetical scenario are not realistic on the ground and do not take account of the constraints of actual development sites.</p> <p>With respect to the Mitigation for Recreational Impacts (MRI) SPD we have a particular concern with respect to the level of prescription, without reasonable justification, of the guidance for the delivery of Alternative Natural Recreational Greenspace (ANRG) set out within Appendix 4 to the SPD.</p> <p>It should be noted, that no objection is raised to the overarching purpose of</p>

Respondent	Comment ID	Document Section	Comments
			<p>the SPD, and indeed to the need to consider the important features and characteristics which will render ANRG spaces effective which are delivered by Appendix 4. The issue however is the level of inflexibility that it built into the guidance which will result in poor quality outcomes and inefficient development on strategic sites as a result of a need to comply with arbitrary constraints which do not take account of site-specific considerations. The delivery of ANRG, and what is and is not acceptable, beyond the high level and overarching requirement in terms of the total area of the space, should be dealt with on a case by case basis and not generically as the same for all development sites. To do otherwise assumes a hypothetical set of sites which are of a perfect size and shape capable of accommodating perfectly prescribed areas of ANRG. This is not based in reality and will not delivery high quality development on the ground.</p> <p>The following sections deals specifically with the provisions of Appendix 4 to the MRI SPD and the principal concerns of our client; summarised as follows:</p> <ul style="list-style-type: none"> - Prescriptive and arbitrary dimensional criteria for ANRG as per Section A4.4; - Prescription of what is and is not ANRG 'compliant', the location of ANRG and the quality of ANRG as per section A4.5; <p>[See separate entries and the PDF response for full details of this submission]</p> <p>Conclusions</p> <p>In response to the Council's consultation on the Management of Recreational Impacts on New Forest European Sites SPD, we have identified those sections of the document which are of concern to our client and which we would ask the Council to consider either an amendment to, or wholesale removal where applicable.</p> <p>For the purposes of ease of reference these are summarised within the bullet point list below:</p>

Respondent	Comment ID	Document Section	Comments
			<ul style="list-style-type: none"> - Delete dimensional constraints within Section A4.4 relating to what can be classified as ANRG. - Delete from Paragraph A4.5.9 prescriptive reference to what land can and cannot be open space with reference to The Inspectors' requirement that the Council's masterplans be purely illustrative not be prescriptive. - Delete ANRG Diagrams 1-3 (pgs 52-54) which impose restrictive dimensional constraints in accordance with Section A4.4. <p>With respect to the principal objectives of the SPD, we raise no concerns or objections. It is however the detail of the document and those sections which diminish flexibility and seek to impose an undue and unrealistic level of prescription where we consider that appropriate changes should be made in order to render the document sound and a reasonable basis upon which to direct development within the District, and in particular the delivery of the Council's strategic site allocations in a sustainable and realistic manner.</p>

Respondent	Comment ID	Document Section	Comments
BREO Ringwood Limited	11033_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG)	<p>This representation is made on behalf of BREO Ringwood Limited as freeholder owner of the land shown in Appendix 1 and is made with respect to their controlling interest in Strategic Site SS13 - Land at Moortown Lane, Ringwood.</p> <p>Supplementary Planning Documents (SPDs) are not subject to the same rigorous examination process as Development Plan documents. As a result, they should be used to guide or expand upon existing policies within the development plan and not to create new policy or constraint which has not been tested by way of the formal process of external examination by an independent body.</p> <p>Any SPD should be in accordance with the Local Plan approach and appropriately evidenced and justified to provide an appropriate basis upon which to inform development proposals.</p> <p>It is important that the Council recognise that the SPD is just guidance. It is not itself formal planning policy or a rigid basis which development must accord to. Its purpose is to set out a series of guidelines to help direct the development and how policies should be interpreted. It is important that this does not include a fixed or pre-determined solution. The Council will need to determine any application which comes before it on its merits and against adopted policies; if the scheme differs from what is set out within an SPD, this will not comprise a sufficient reason to refuse permission in itself if the policy requirements set out within the Development Plan are otherwise met. The SPD is guidance and explains how policy should be interpreted; it should not place an unreasonable constraint on development representing ideal circumstances which whilst existing in a hypothetical scenario are not realistic on the ground and do not take account of the constraints of actual development sites.</p> <p>With respect to the Mitigation for Recreational Impacts (MRI) SPD we have a particular concern with respect to the level of prescription, without reasonable justification, of the guidance for the delivery of Alternative Natural Recreational Greenspace (ANRG) set out within Appendix 4 to the SPD.</p>

			<p>It should be noted, that no objection is raised to the overarching purpose of the SPD, and indeed to the need to consider the important features and characteristics which will render ANRG spaces effective which are delivered by Appendix 4. The issue however is the level of inflexibility that it built into the guidance which will result in poor quality outcomes and inefficient development on strategic sites as a result of a need to comply with arbitrary constraints which do not take account of site-specific considerations. The delivery of ANRG, and what is and is not acceptable, beyond the high level and overarching requirement in terms of the total area of the space, should be dealt with on a case by case basis and not generically as the same for all development sites. To do otherwise assumes a hypothetical set of sites which are of a perfect size and shape capable of accommodating perfectly prescribed areas of ANRG. This is not based in reality and will not delivery high quality development on the ground.</p> <p>The following section deals specifically with the provisions of Appendix 4 to the MRI SPD and the principal concerns of our client; summarised as follows:</p> <ul style="list-style-type: none"> - Prescriptive and arbitrary dimensional criteria for ANRG as per Section A4.4; - Prescription of what is and is not ANRG 'compliant', the location of ANRG and the quality of ANRG as per section A4.5; <p>[See separate entries and the PDF response for full details of this submission]</p> <p>Conclusions</p> <p>In response to the Council's consultation on the Management of Recreational Impacts on New Forest European Sites SPD, we have identified those sections of the document which are of concern to our client and which we would ask the Council to consider either an amendment to, or wholesale removal where applicable.</p> <p>For the purposes of ease of reference these are summarised within the bullet</p>
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			<p>point list below:</p> <ul style="list-style-type: none">- Delete dimensional constraints within Section A4.4 relating to what can be classified as ANRG.- Delete from Paragraph A4.5.9 prescriptive reference to what land can and cannot be open space with reference to The Inspectors' requirement that the council's masterplans be purely illustrative not be prescriptive.- Delete ANRG Diagrams 1-3 (pgs 52-54) which impose restrictive dimensional constraints in accordance with Section A4.4. <p>With respect to the principal objectives of the SPD, we raise no concerns or objections. It is however the detail of the document and those sections which diminish flexibility and seek to impose an undue and unrealistic level of prescription where we consider that appropriate changes should be made in order to render the document sound and a reasonable basis upon which to direct development within the District, and in particular the delivery of the Council's strategic site allocations in a sustainable and realistic manner.</p>
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Respondent	Comment ID	Document Section	Comments
Hordle Parish Council	10826_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.1.10 - A4.1.14	<p>The two sites within our area are the land at Hordle Lane (160 proposed dwellings) and the land east of Everton Road (100 proposed dwellings). The provision for green space would need to be 3 ha per development. There are specific requirements in relation to the type of land and its usage for recreation by walkers, children and dogs. The extract reflects those requirements.</p> <p>'A4.1.10 The approach to mitigation in the New Forest District (outside of the National Park) involves, amongst other measures, the provision of a network of natural greenspaces located close to people's doorsteps, which will form a desirable alternative to visiting the New Forest for recreational purposes, including dog walking. This has the benefit of also providing attractive and healthy places to live.</p> <p>A4.1.11 To successfully perform as recreational mitigation land, it is important that all the spaces provide a natural green space that is inviting and comfortable for people to visit and use. These spaces should be suitable for well-behaved dogs to be walked, with places where dogs can be safely let off the lead.</p> <p>A4.1.12 In master planning terms, mitigation land should be considered and laid out as an integral part of the fabric of new development. It will form a major part of a network of green space and the green setting for new residential development. Site capacities and landscape sensitivities of the strategic housing allocation sites have been assessed and land allocated on the basis that recreational mitigation will be provided within the defined allocation sites.</p> <p>A4.1.13 It may be possible in some circumstances to extend the offer of ANRG beyond the development site boundary, provided that: the land in question can provide effective recreational mitigation; the land is within the control of the site promoter; and that its inclusion would support the principles of an integrated green infrastructure approach (being directly adjoining and well connected to the site). However, it will not normally be acceptable to offer an area of land nearby as ANRG, simply in order to expand the proportions of built land within the allocation area to an unreasonable degree</p>

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			<p>or to the detriment of landscape character.</p> <p>A4.1.14 Each of the strategic housing allocations will be treated on its own merits and it is expected that the proposed recreational mitigation strategy for a site should be illustrated at planning application stage by a Landscape Framework. The best outcomes will be achieved by joint working between all parties involved in bringing a strategic site forward. Piecemeal approaches are unlikely to deliver the most effective and satisfactory forms of development.'</p> <p>There are sufficient proposals to cover the implementation and funding of the green space as well as its continued management and maintenance which would be monitored by the Council.</p> <p>Recommendation: Support for adoption of the Strategy with strong reference to the above issues.</p>

Respondent	Comment ID	Document Section	Comments
Fordingbridge Town Council	10106_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.2.7	Fordingbridge Town Council agrees with all the things that should be considered in A4.2.7

Respondent	Comment ID	Document Section	Comments
<p>Persimmon Homes South Coast</p>	<p>10990_SPD21Mit_1</p>	<p>Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.3.1</p>	<p>For Sites Above 50 Dwellings</p> <p>- The SPD indicates that off-site ANRG provision is not acceptable. Whilst it is accepted that on-site provision for large sites (i.e. >50 dwellings) is preferable, the SPD should not prohibit off-site ANRG solutions provided that this mitigation meets the locational requirements set out paragraph A4.3.1 of the SPS and the design/specification requirements set out in Appendix 3 and 4 of the SPD. A key test of whether a ANRG will be effective is set out in bullet point one of paragraph A4.3.1 of the SPD which states that: 'ANRG will be most effective where the spaces provided are easily accessible to both new and existing populations.'. Should a ANRG be located close to a site, but not physically within it, and the ANRG would effectively deflect visits to protected sites, this should be sufficient to pass the requirements of the Habitat Regulations. The principle of off-site provision is appropriate for sites below 50 dwellings, and should be equally acceptable for sites above 50 units. In Dorset, which has similar disturbance issues, the Council is seeking to implement 'Strategic SANGs' that can be used to mitigate sites (including those above 50 units) when on-site provision is not possible; this approach is considered consistent with the Habitats Regulations. In light of the above, in its current form, this aspect of the SPD is too restrictive. Amending the SPD, as suggested above, will provide added flexibility that may be necessary should the Council need to permit sites (for example, where a five year housing land supply cannot be demonstrated) that are not allocated in the Plan and which are not capable of delivering ANRG within the site boundary.</p>

Respondent	Comment ID	Document Section	Comments
Fordingbridge Town Council	10106_SPD21Mit_5	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.3.2	<p>A4.3.2 Each site will be considered on its individual merits but designated nature conservation sites, including Sites of Importance for Nature Conservation (SINCs) sites, are unlikely to be improved by allowing increased human activity through them and will not normally be considered as suitable for ANRG recreational mitigation land.</p> <p>The original 2018 simply stated Designated nature conservation sites will not normally be considered as alternative natural green spaces.</p> <p>“Each site will be considered on its individual merit”. This seems to suggest that these conservation sites could be considered and it is unclear who would consider the merits.</p> <p>These sites should not be considered in isolation. The SPD mentions linkage by footpaths. It is hard to see how these sites and maintain a high level of biodiversity if wildlife cannot migrate between these sites and to the open countryside beyond. They need to be connected by a green corridor with trees and planting.</p> <p>Any plans need to consider the effect these sites have on the area surrounding them. Wildlife that lives in the neighbouring land is disturbed and forced to move away. The human neighbours of these sites have their enjoyment of a quiet open space ruined by the invasion of visitors</p>

Respondent	Comment ID	Document Section	Comments
Currie B	10875_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.4	<p data-bbox="1115 260 1653 288">Section A4.4 - Dimensional Criteria for ANRG</p> <p data-bbox="1115 323 2033 568">The Council used the guidance set out within Appendix 4 to the SPD to prepare its 'concept masterplans' for the strategic sites, which, as the Inspectors in making their recommendations for main modifications to the then submission Local Plan confirmed at Main Modification MM17, should not be utilised as a blueprint for development, but rather should be 'illustrative and not prescriptive requirements'. The weight to be attributed to these plans was significantly diminished and instead they are now referred to only as 'illustrative concept masterplans'.</p> <p data-bbox="1115 603 2033 874">The Council's masterplans are not intended to be a means of stifling innovation or directing the manner in which the strategic development sites must be brought forwards. Such a level of prescription would not be reasonable and in any event, the illustrative masterplans do not take account of any physical constraints of the development sites which will be determined by detailed technical work undertaken by the developer parties. The development of strategic sites will be appropriately informed by technical work and discussions with the authority during the course of pre-application discussions and ultimately planning applications.</p> <p data-bbox="1115 909 2033 1058">Recognising that an undue level of prescription does not promote high quality design or innovation in the design or arrangement of development sites which respond to the specific constraints of that site at a detailed design stage, is important. In this respect we raise specific concern and objection to the requirements of Section A4.4 to Appendix 4 of the MRI SPD.</p> <p data-bbox="1115 1093 1688 1121">[See submitted PDF for full text of this comment]</p> <p data-bbox="1115 1157 2033 1305">We propose therefore that the Council delete the restrictive and prescriptive requirements set out within Section A4.4 of Appendix 4 as a whole, and instead focus on the design quality and appearance of the ANRG spaces and the infrastructure which should be delivered in order to make these attractive and functional public spaces.</p>

Respondent	Comment ID	Document Section	Comments
BREO Ringwood Limited	11033_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.4	<p data-bbox="1115 260 1653 288">Section A4.4 - Dimensional Criteria for ANRG</p> <p data-bbox="1115 323 2033 568">The Council used the guidance set out within Appendix 4 to the SPD to prepare its 'concept masterplans' for the strategic sites, which, as the Inspectors in making their recommendations for main modifications to the then submission Local Plan confirmed at Main Modification MM17, should not be utilised as a blueprint for development, but rather should be 'illustrative and not prescriptive requirements'. The weight to be attributed to these plans was significantly diminished and instead they are now referred to only as 'illustrative concept masterplans'.</p> <p data-bbox="1115 603 2027 874">The Council's masterplans are not intended to be a means of stifling innovation or directing the manner in which the strategic development sites must be brought forwards. Such a level of prescription would not be reasonable and in any event, the illustrative masterplans do not take account of any physical constraints of the development sites which will be determined by detailed technical work undertaken by the developer parties. The development of strategic sites will be appropriately informed by technical work and discussions with the authority during the course of pre-application discussions and ultimately planning applications.</p> <p data-bbox="1115 909 2033 1058">Recognising that an undue level of prescription does not promote high quality design or innovation in the design or arrangement of development sites which respond to the specific constraints of that site at a detailed design stage, is important. In this respect we raise specific concern and objection to the requirements of Section A4.4 to Appendix 4 of the MRI SPD.</p> <p data-bbox="1115 1093 1688 1121">[See submitted PDF for full text of this comment]</p> <p data-bbox="1115 1157 2033 1305">We propose therefore that the Council delete the restrictive and prescriptive requirements set out within Section A4.4 of Appendix 4 as a whole, and instead focus on the design quality and appearance of the ANRG spaces and the infrastructure which should be delivered in order to make these attractive and functional public spaces.</p>

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Cicero Estates	10852_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.4	<p data-bbox="1115 258 1653 288">Section A4.4 - Dimensional Criteria for ANRG</p> <p data-bbox="1115 323 2033 568">The Council used the guidance set out within Appendix 4 to the SPD to prepare its 'concept masterplans' for the strategic sites, which, as the Inspectors in making their recommendations for main modifications to the then submission Local Plan confirmed at Main Modification MM17, should not be utilised as a blueprint for development, but rather should be 'illustrative and not prescriptive requirements'. The weight to be attributed to these plans was significantly diminished and instead they are now referred to only as 'illustrative concept masterplans'.</p> <p data-bbox="1115 603 2033 874">The Council's masterplans are not intended to be a means of stifling innovation or directing the manner in which the strategic development sites must be brought forwards. Such a level of prescription would not be reasonable and in any event, the illustrative masterplans do not take account of any physical constraints of the development sites which will be determined by detailed technical work undertaken by the developer parties. The development of strategic sites will be appropriately informed by technical work and discussions with the authority during the course of pre-application discussions and ultimately planning applications.</p> <p data-bbox="1115 909 2033 1058">Recognising that an undue level of prescription does not promote high quality design or innovation in the design or arrangement of development sites which respond to the specific constraints of that site at a detailed design stage, is important. In this respect we raise specific concern and objection to the requirements of Section A4.4 to Appendix 4 of the MRI SPD.</p> <p data-bbox="1115 1093 1688 1123">[See submitted PDF for full text of this comment]</p> <p data-bbox="1115 1158 2033 1307">We propose therefore that the Council delete the restrictive and prescriptive requirements set out within Section A4.4 of Appendix 4 as a whole, and instead focus on the design quality and appearance of the ANRG spaces and the infrastructure which should be delivered in order to make these attractive and functional public spaces.</p>

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Reeves Family and Merlion Capital	11032_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.4	<p data-bbox="1115 260 1653 288">Section A4.4 - Dimensional Criteria for ANRG</p> <p data-bbox="1115 323 2033 568">The Council used the guidance set out within Appendix 4 to the SPD to prepare its 'concept masterplans' for the strategic sites, which, as the Inspectors in making their recommendations for main modifications to the then submission Local Plan confirmed at Main Modification MM17, should not be utilised as a blueprint for development, but rather should be 'illustrative and not prescriptive requirements'. The weight to be attributed to these plans was significantly diminished and instead they are now referred to only as 'illustrative concept masterplans'.</p> <p data-bbox="1115 603 2027 874">The Council's masterplans are not intended to be a means of stifling innovation or directing the manner in which the strategic development sites must be brought forwards. Such a level of prescription would not be reasonable and in any event, the illustrative masterplans do not take account of any physical constraints of the development sites which will be determined by detailed technical work undertaken by the developer parties. The development of strategic sites will be appropriately informed by technical work and discussions with the authority during the course of pre-application discussions and ultimately planning applications.</p> <p data-bbox="1115 909 2033 1058">Recognising that an undue level of prescription does not promote high quality design or innovation in the design or arrangement of development sites which respond to the specific constraints of that site at a detailed design stage, is important. In this respect we raise specific concern and objection to the requirements of Section A4.4 to Appendix 4 of the MRI SPD.</p> <p data-bbox="1115 1093 1688 1121">[See submitted PDF for full text of this comment]</p> <p data-bbox="1115 1157 2033 1305">We propose therefore that the Council delete the restrictive and prescriptive requirements set out within Section A4.4 of Appendix 4 as a whole, and instead focus on the design quality and appearance of the ANRG spaces and the infrastructure which should be delivered in order to make these attractive and functional public spaces.</p>

Respondent	Comment ID	Document Section	Comments
Currie B	10875_SPD21Mit_4	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.5	<p data-bbox="1115 260 1491 288">Section A4.5 - Quality of ANRG</p> <p data-bbox="1115 323 2029 568">The general provisions set out by the Council with respect to the quality of ANRG space with respect to providing a variety of walking routes, different areas of planting which provide a diverse character and an interesting environment and the base need for public infrastructure elements such as signage, bins, benches and other equipment are not matters which we raise concerns of objection to. The guidance in this respect is reasonable and appropriate and provides a clear framework on which to provide the detail which demonstrates how these spaces will be arranged and utilised.</p> <p data-bbox="1115 603 2029 691">Where we do however raise concerns with section A4.5 is with respect to its crossover with what the Council deem will be an appropriate location for the ANRG and where it expects it will be delivered.</p> <p data-bbox="1115 726 1727 754">[See submitted PDF for full details of this comment]</p> <p data-bbox="1115 790 2029 970">We would propose therefore, with reference specifically to the ANRG diagrams 1-3 which follow on from Section A4.5, that the Council delete these from the SPD. The Landscape Framework diagram at Figure 4 is more than sufficient to indicate the type and quality of space which is expected and alongside the detailed design considerations at A4.6 provides an appropriate framework for considering ANRG and POS provision on sites.</p> <p data-bbox="1115 1005 2029 1249">The ANRG diagrams are being utilised as a prescriptive framework to artificially judge what will and will not be considered acceptable with reference to minimum and maximum dimensions. These have no place when working within the constraints of a real site and the need to balance all aspects of a development from: landscape quality, to quantum of development, infrastructure, on and off-site relationships and viability, to name but a few. They are not necessary and as confirmed above, in our view should be removed.</p>

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Reeves Family and Merlion Capital	11032_SPD21Mit_4	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.5	<p data-bbox="1115 260 1491 288">Section A4.5 - Quality of ANRG</p> <p data-bbox="1115 323 2029 568">The general provisions set out by the Council with respect to the quality of ANRG space with respect to providing a variety of walking routes, different areas of planting which provide a diverse character and an interesting environment and the base need for public infrastructure elements such as signage, bins, benches and other equipment are not matters which we raise concerns of objection to. The guidance in this respect is reasonable and appropriate and provides a clear framework on which to provide the detail which demonstrates how these spaces will be arranged and utilised.</p> <p data-bbox="1115 603 2029 687">Where we do however raise concerns with section A4.5 is with respect to its crossover with what the Council deem will be an appropriate location for the ANRG and where it expects it will be delivered.</p> <p data-bbox="1115 722 1727 751">[See submitted PDF for full details of this comment]</p> <p data-bbox="1115 786 2029 967">We would propose therefore, with reference specifically to the ANRG diagrams 1-3 which follow on from Section A4.5, that the Council delete these from the SPD. The Landscape Framework diagram at Figure 4 is more than sufficient to indicate the type and quality of space which is expected and alongside the detailed design considerations at A4.6 provides an appropriate framework for considering ANRG and POS provision on sites.</p> <p data-bbox="1115 1002 2029 1246">The ANRG diagrams are being utilised as a prescriptive framework to artificially judge what will and will not be considered acceptable with reference to minimum and maximum dimensions. These have no place when working within the constraints of a real site and the need to balance all aspects of a development from: landscape quality, to quantum of development, infrastructure, on and off-site relationships and viability, to name but a few. They are not necessary and as confirmed above, in our view should be removed.</p>

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BREO Ringwood Limited	11033_SPD21Mit_4	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.5	<p data-bbox="1115 258 1489 288">Section A4.5 - Quality of ANRG</p> <p data-bbox="1115 323 2011 568">The general provisions set out by the Council with respect to the quality of ANRG space with respect to providing a variety of walking routes, different areas of planting which provide a diverse character and an interesting environment and the base need for public infrastructure elements such as signage, bins, benches and other equipment are not matters which we raise concerns of objection to. The guidance in this respect is reasonable and appropriate and provides a clear framework on which to provide the detail which demonstrates how these spaces will be arranged and utilised.</p> <p data-bbox="1115 603 2011 687">Where we do however raise concerns with section A4.5 is with respect to its crossover with what the Council deem will be an appropriate location for the ANRG and where it expects it will be delivered.</p> <p data-bbox="1115 722 1720 753">[See submitted PDF for full details of this comment]</p> <p data-bbox="1115 788 2027 968">We would propose therefore, with reference specifically to the ANRG diagrams 1-3 which follow on from Section A4.5, that the Council delete these from the SPD. The Landscape Framework diagram at Figure 4 is more than sufficient to indicate the type and quality of space which is expected and alongside the detailed design considerations at A4.6 provides an appropriate framework for considering ANRG and POS provision on sites.</p> <p data-bbox="1115 1003 2027 1248">The ANRG diagrams are being utilised as a prescriptive framework to artificially judge what will and will not be considered acceptable with reference to minimum and maximum dimensions. These have no place when working within the constraints of a real site and the need to balance all aspects of a development from: landscape quality, to quantum of development, infrastructure, on and off-site relationships and viability, to name but a few. They are not necessary and as confirmed above, in our view should be removed.</p>

Respondent	Comment ID	Document Section	Comments
Cicero Estates	10852_SPD21Mit_4	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.5	<p data-bbox="1115 260 1489 288">Section A4.5 - Quality of ANRG</p> <p data-bbox="1115 323 2029 568">The general provisions set out by the Council with respect to the quality of ANRG space with respect to providing a variety of walking routes, different areas of planting which provide a diverse character and an interesting environment and the base need for public infrastructure elements such as signage, bins, benches and other equipment are not matters which we raise concerns of objection to. The guidance in this respect is reasonable and appropriate and provides a clear framework on which to provide the detail which demonstrates how these spaces will be arranged and utilised.</p> <p data-bbox="1115 603 2029 691">Where we do however raise concerns with section A4.5 is with respect to its crossover with what the Council deem will be an appropriate location for the ANRG and where it expects it will be delivered.</p> <p data-bbox="1115 726 1727 754">[See submitted PDF for full details of this comment]</p> <p data-bbox="1115 790 2029 970">We would propose therefore, with reference specifically to the ANRG diagrams 1-3 which follow on from Section A4.5, that the Council delete these from the SPD. The Landscape Framework diagram at Figure 4 is more than sufficient to indicate the type and quality of space which is expected and alongside the detailed design considerations at A4.6 provides an appropriate framework for considering ANRG and POS provision on sites.</p> <p data-bbox="1115 1005 2029 1249">The ANRG diagrams are being utilised as a prescriptive framework to artificially judge what will and will not be considered acceptable with reference to minimum and maximum dimensions. These have no place when working within the constraints of a real site and the need to balance all aspects of a development from: landscape quality, to quantum of development, infrastructure, on and off-site relationships and viability, to name but a few. They are not necessary and as confirmed above, in our view should be removed.</p>

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West P	10743_SPD21Mit_2	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) A4.5.3 & A4.5.5	<p>Should' include needs to be more prescriptive. Must would be better.</p> <p>Overhanging growth is not always a bad thing, so I don't understand why it is necessary to call out that there should be none. What is the rationale? Existing growth should always be retained and enhanced.</p> <p>I have noticed other developments where good efforts have been made in design, but then hedgerows are reduced from 2.5-3m natural growth down to 1.2-1.5m, with consequent loss of nesting sites for small birds. This completely ruins the natural aspect and makes the area look very contrived. It is very simple and cheap to just leave natural hedgerows alone and this must be encouraged in my view.</p> <p>The 120m/60m view is a good starting place. I would like to see encouragement for retention/ planting that creates a natural, hedgerow / tree aspect on say 270 degrees of line of sight. Particularly, in order to cover housing from view and create a natural island. Wherever possible this include coverage of existing properties to give the viewer a more natural scene. This will encourage use in my view. See earlier comments about cutting down hedgerows.</p>
Lord	11026_SPD21Mit_3	Appendix 4 - Design guidance for the provision of integrated greenspace on large scale sites, including Alternative Natural Recreational Greenspace (ANRG) Para A4.5.4 / A4.5.13	<p>More robust species in a meadow, particularly when planting bulbs, should be those which are known to be attractive to pollinators as well as visually attractive for people. They're not mutually exclusive.</p> <p>SUDS - There should be a presumption against the installation of conventional gridded drain covers to remove excess water from residential developments. It is well known that these trap small mammals, herptiles (amphibians and reptiles) and thousands of invertebrates, unable to get out. An alternative system could be shallow gullies/depressions leading to the ditches, swales, attenuation ponds etc mentioned in the text.</p>

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New Forest Dog Owners Group	11029_SPD21Mit_1	Appendix 5 - Managing dogs on recreational sites	<p>The New Forest Dog Owners Group represents some 1200 members, active walkers with their dogs, across the New Forest. Our overarching aim is 'On the Forest, Off the Lead', but with a strong emphasis on responsible walking and welfare reinforced through education and communication. This includes visitors, and for example producing posters and leaflets for campsites (which we have done) to let those unaware know of our special environment and the need to adopt different approaches, such as around wild animals and livestock.</p> <p>We believe the (sometimes competing) interests of recreation, versus nature, the environment, and other forest uses such as livestock, should be actively maintained in balance. All are important. No one interest should dominate and mean that others lose out and are downgraded in importance.</p> <p>In this context NFDog welcomes this draft report covering NFDC (non-NPA areas), which is sensible and necessary, and section A.5.2 is a very helpful summary of the recreational assets and access dog walkers seek and require.</p> <p>The key concern is about having 'designated areas for dogs to walk off lead'. Section A5.6 mentions this. This possibly implies the introduction of other areas where dogs should be walked on lead (at all times, and not seasonally which is understandable), or indeed that walking on leads is the 'norm' in wide areas and walking off lead is exceptional. We would oppose this fundamental change to the status quo.</p> <p>Section A4.2.6 also suggests this, in as much as 'Access for dog walking with off-lead areas and facilities to attract dog walkers.' clearly suggests a norm that dogs should always be on a lead unless otherwise allowed. Again NFDog opposes this.</p> <p>Another comment concerns education of dog walkers and communication which is absent. Section AS.4 highlights the issue and correctly identifies the negative response if messages are proscriptive. We seek to reach dog walkers and promote responsible behaviour through understanding. As above we promote responsible dog ownership and walking.</p>

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			<p>For example; NFD OG does not oppose the use of leads - but as appropriate. At times they are necessary, even essential, in sensitive areas such as ground nesting birds, around livestock and wild animals, and especially if the dog and owner haven't trained together and have developed and practiced recall skills.</p> <p>But this needs to be communicated, and a key part of recreation in the New Forest is explaining that the environment is different, special, and those who enjoy it have a duty to respond appropriately and responsibly to the environment and the situation of their activity.</p> <p>Signposting and alerting to local circumstances (such as ground nesting birds, or drifts) is important as recognised in AS.5. But it needs to be clear and managed. Other bodies who place their own 'signs' alongside official ones, concerning dog behaviour, simply undermine the effect as dog walkers feel demonised and are more likely simply to ignore the messages.</p> <p>We agree that rangers (AS.6) is important (NFD OG helps to fund the NPA rangers), as is provision of bins for waste, and especially dog waste. Section A4.5.5 is also very important in the latter respect, and far from what is offered at this time. Provision for bins is not only hit and miss, but some have been taken away in recent years and not replaced</p> <p>Washing facilities are also mentioned in A5.6. We agree this is not always practical, and budgets may not allow this. But we would highlight as a contribution to discussion that this isn't just about dirt. The New Forest is one of the hot spots for Alabama Rot (CRGV). There have been at least four reported local cases in the winter 2020-21 to date. CRGV is mitigated by washing the legs and feet of dogs as soon as possible after walks and thus there is an animal welfare and health aspect to this suggestion, in addition to the 'niceness' or not putting a dirty dog in the car.</p> <p>Finally, access is important. We live in or near the New Forest, but this can mean that surrounding towns and villages have fewer green areas, precisely because of their proximity to open space in the forest. However, to access</p>

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			<p>this, for example from Ringwood, New Milton, or Hythe, it is necessary to drive, and these are the areas specifically included in this report. Therefore car parking should at least be maintained at the current level and if, for example, it is necessary to close a car park such as Hatchett Pond, in the longer term NFDC, (and the NPA and FE) should consider offset, and opening equivalent new car parks and areas to ensure the provision doesn't die through the death of a thousand cuts.</p>

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Historic England	10145_SPD21Mit_1		<p>Thank you for consulting Historic England on the above document.</p> <p>We do not wish to comment.</p>
Marine Management Organisation	10327_SPD21Mit_1		<p>I am writing to make sure you received the MMO standard response to this consultation. As this is a supplementary planning document I do not believe this needs an additional bespoke response from us. This especially as I have looked over your local plan (2016-2036) Planning Strategy and you have reference to the South Marine Plan documents which is great to see as it is clear you are aware you need to have regard to the marine plan under Section 58 of the Marine and Coastal Access Act 2009.</p>
Highways England	10820_SPD21Mit_1		<p>Thank you for inviting Highways England to comment on the above consultation.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A31, A36 and M27.</p> <p>We have reviewed this consultation and its supporting documentation and have no comments. However, please do continue to consult Highways England as this SPD progresses.</p>

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