



NEW FOREST ASSOCIATION

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Dear Barrie

.National Park Management Plan – Revised Draft October 2009

Thank you for the opportunity to comment on the Management Plan. This letter adds more detail to the concerns that we expressed at the Authority Meeting on 29th October. Forgive me if I re-iterate a number of items but it will be simpler to demonstrate our views in one letter.

Overview

Naturally we have compared the latest version with the public draft produced last year and find that there is a significant weakening in both tone as well as substance. The overall tone reflects the latest document's position as something that has been produced to keep everyone happy and is anodyne. It lacks the thrust that we would expect to see that puts protection of the New Forest culture and landscape in front of everything else, the reasons why the area was designated a National Park in the first place.

Brevity, while laudable as an aspiration, has removed the setting necessary to give meaning in the first part of the Management Plan. The setting should be included to ground the policies of the Plan in the unique physical and cultural context of the New Forest.

The Special Qualities of the New Forest should underpin all that follows, which is why the Authority rightly spent so much time honing them in lengthy discussions and workshops. Likewise the Vision should be sufficiently developed to be a picture of what is sought, not merely an outline sketch. As now presented, the Special Qualities and Vision are “simply” lists. The New Forest Association, along with many other organisations and individuals contributed many hours in workshops and an ongoing dialogue with the Authority to create both of these. While the draft plan has been severely criticised for certain policy issues during its consultation period we cannot find any substantial response questioning the Special Qualities and Vision as set out. They should be reinstated in the Management Plan as set out on pages 6&7 and 18&19 of the draft Plan.

It is of great importance that the Plan (and in turn the Core Strategy, when this is revised) should be clearly underpinned by one simple and unambiguous Strategic Aim overarching everything that follows. Irrespective of any general national park legislation or guidance, it is important that the Management Plan for the New Forest should of itself be unequivocally founded upon the long-term protection of the New Forest. Not to do so would be a considerable weakening of current policy for

the New Forest and be the first such omission in a significant policy document for the Forest produced in the past 50 years. The Association's recommended wording is:

'The long-term protection of the New Forest will be given the highest priority, and within this context, land management and development proposals should enhance the Special Qualities of the New Forest National Park and must not detract from them.'

Whilst we appreciate that there was an intention to simplify things by splitting up the original plan into a Management Plan and a Core Strategy the users of the former (ranging from other government statutory bodies to local Councillors) will have very different levels of understanding and knowledge of the Forest. The Plan would therefore benefit from a setting; and the chapter in the draft entitled 'Portrait of the New Forest National Park' should be re-inserted.

Detailed analysis

The change in tone of the Plan is shown in several ways in the revised wording of its objectives and policies. At various points equal prominence is given to the duty of 'seek to foster...' alongside the National Park purposes of 'to conserve... and... to promote...' We understand the wording is accurate but the prominence that is given to the duty now makes this plan appear more like a document from the Rural Development Agency than a National Park Authority.

Objective 3: Under the third bullet point there is a definite weakening of the protection to back-up grazing land. The clause now refers to 'protecting land used regularly'. It must be understood that once land is lost from the pool of back-up grazing land it is lost for all time. The fact that it hasn't been used for a period doesn't mean it will not be needed again. A look at the fluctuations in pony and cattle numbers over the centuries (Colin Tubbs, *The New Forest*, 2001, pp129-130) demonstrates the need to take the long view.

The fourth bullet point of the same objective of 'supporting diversification...' is dangerous without any limiters. Some diversification practices (music festivals for example) could clearly be in opposition to National Park purposes. The word 'appropriate' would add some strength here.

Objective 7: The sixth bullet point could read as a permission to upgrade all the camping facilities in the Forest. 'A high standard of services and facilities...' is easily taken as moving upmarket and promoting the need for more infrastructure when perhaps a simple service or facility is all that is really necessary.

Objective 8: The first bullet point lacks the important word 'essential'. If this is placed before the word 'community' it acts as a limit on inappropriate rural facilities. A fun fair or leisure centre could be considered community facilities but are neither necessary nor appropriate to encourage in a National Park.

Objective 9: '...local communities' should be replaced by 'the National Park'. Bullet point 1 is too permissive. The precautionary principle enshrined in Sandford has gone; it is phrased the wrong way round.

Conclusions

Our aim is to collaborate with and support the National Park Authority in achieving a robust and clear policy framework in order to seek the long-term protection of the Forest's Special Qualities. We appreciate there is a lot of good material in this Plan, but as currently re-drafted it is lacking in some parts and overall represents a weakening of intent and policy for the protection of the New

Forest compared with previous documents, which this Plan will supersede. It would be a great disappointment for the Association not to be fully supporting the first Management Plan of the new National Park. We are confident that incorporation of our recommended changes set out above would greatly strengthen the Plan without offending others who have objected to certain policy aspects of the August 2008 draft plan and will re-gain our support.

Yours sincerely

Peter Roberts
Chairman of the NFA Planning Committee

P.S. On page 25 Forestry is mentioned 'over the past 150 years...' 200 years would be a better period for many of the modern enclosures stemmed from an Act of 1808 (Tubbs, p. 87)