

Report on Recreational Mitigation in the New Forest ©

By

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New Forest Strategic Access Management
and Monitoring Strategy 2023

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EXECUTIVE SUMMARY

Recreational Mitigation Partnerships have emerged as an efficient and effective means by which a group of local planning authorities, who are all within the zone of influence of a protected area can collaborate to meet part of their obligations under the Conservation of Habitat and Species Regulations 2017. Such obligations call upon these local planning authorities to implement a policy to mitigate the recreational impact of additional new residential accommodation. These policies will often require developers of residential accommodation to make payments to fund such mitigation measures. Those funds are then used for two purposes: first measures to regulate recreation within a protected area for example recreational rangers and educational initiatives, and secondly to support the provision of alternative recreational greenspace outside the protected area to divert recreational pressure. Several local planning authorities within the zone of influence of a protected area may work together to maximise their mitigation efforts through a Recreational Mitigation Partnerships which uses the pooled funds to provide co-ordinated recreational management. These measures are explained in more detail in Section 1 of this Report whilst Section 4 describes the work of three established Recreational Mitigation Partnerships close to the New Forest.

The New Forest is one of the smallest national parks, but it contains at 56% the highest proportion of protected landscapes of any national park. Despite its small size it receives more than 15 million day visits a year, the highest proportion per square kilometre of any national park. Its proximity to urban centres along the south coast contributes to this visitor density. It might thus be expected that the New Forest would be a prime candidate for a Recreational Mitigation Partnership. Indeed, approximately a decade ago funding was secured to develop a Recreational Mitigation Partnership for the New Forest. Empirical research was conducted to assess recreational pressure and expert proposals developed but, despite the efforts of the New Forest National Park Authority and the associated Steering Group, no partnership has yet been established. This journey is described in Section 2 of this Report.

The New Forest Association is the New Forest National Park Society, and, as the second oldest conservation charity, it has campaigned since its founding in 1867 to conserve the New Forest against numerous threats – one of which is currently recreational pressure. It has thus conducted this research both to explore how New Forest recreational mitigation is currently conducted and, more importantly, to press for the immediate formation of the recommended Recreational Mitigation Partnership and the creation of effective alternative recreational greenspace to divert recreation away sensitive habitats within the New Forest National Park.

The key findings emerging from this research are:

1. **Reluctance & Failure** by local planning authorities within the New Forest Zone of Influence to formulate their mandatory recreational mitigation policies and then to fully implement them. Section 3 of the Report examines each local planning authority's policies and their implementation of those policies, so far as we have been able to ascertain from publicly available sources, for example through published financial statements and targeted Freedom of Information requests. The emerging picture is mixed but nevertheless it is clear that some local planning authorities have failed or been slow to articulate a clear effective policy and/or have failed to fully implement those policies. It is particularly concerning that the largest urban centres within the Zone of Influence, namely Bournemouth, Christchurch & Poole Council and Southampton City Council, are the local planning authorities that continue to fall short either in having no clear policy or in failing to implement their policy. Bournemouth, Christchurch and Poole Council have recently partly addressed their failings by entering into an interim agreement with the New Forest National Authority to make payments to support recreational mitigation within the National Park but Southampton City Council, despite having an embryonic policy, have failed to deliver.
2. **Lack of Mitigation Co-ordination** Despite clear research and recommendations, some local planning authorities have continued to resist efforts to form a Recreational Mitigation Partnership. It is understood that local authorities sometimes are reluctant to see funds spent outside of their area and thus may be prone to delay. Yet almost all the affected local planning authorities already participate in Bird Aware Solent, a Recreational Mitigation Partnership successful within its remit, and therefore should appreciate the benefits of collaboration. The experience of the case studies considered in Section 4 demonstrates the significance of pressure from Natural England to the formation of Recreational Mitigation Partnerships. Unfortunately, that pressure is only slowly being applied in the New Forest.
3. **The New Forest is being Short-changed** The New Forest may be open space, but it does not come free. Funds are required to carry out conservation work and to provide recreational facilities and management. Research conducted in 2023 estimated that developer contributions from projected housing growth at that time should generate £22 million to establish and fund a Recreational Mitigation Partnership with responsibility to deliver a range of mitigation measures. Since then, pressure for more homes has grown with resultant increased recreational pressure with the need for mitigation also growing at an ever-faster rate. Yet until co-ordinated and accountable action is taken the New Forest is being shortchanged of vital and considerable funds.

Meanwhile the burden and cost of recreational management is left largely to Forestry England, the National Trust and other New Forest landowners who face their own financial constraints.

4. **Inadequate Suitable Alternative Natural Green Space** The focus of a Recreational Mitigation Partnership is upon mitigation measures within the protected landscape however in section 3 we consider the provision of alternative green space outside the New Forest to divert recreational pressure. We have consistently criticised the existing metric employed as lacking an environmentally rational base. It is totally inadequate to reflect the environmentally rich ecology of the Forest and the Forest's proximity to dense urban centres with consequent high visitor numbers. Even using the existing metric, we found the provision of alternative recreational space lacking in ambition. Funds too often were concentrated on the improvement of existing green space some of which clearly has only minimal capacity to divert recreational pressure from the New Forest. There is an urgent need for co-ordinated efforts both to alter the existing metric and provide new and larger strategic green spaces closer to the urban centres that surround the New Forest. These spaces need to provide attractive locations and facilities for popular recreational activities including dog walking, off-track cycling and family friendly facilities. It is also far from clear how decisions regarding the allocation of mitigation funds are reached. It is difficult to escape the impression that mitigation funds are not always applied for their intended purpose.
5. **Lack of Monitoring and Perpetuity Provision** Recreational mitigation calls for both adequate monitoring of visitors and their impact upon the protected landscape as well as the use and effectiveness of alternative greenspace. There is little evidence that this monitoring is taking place, this serious omission which would be addressed by a Recreational Mitigation Partnership. Our case studies reveal the level of monitoring and consequent review that is necessary both to demonstrate their effectiveness and to inform future mitigation actions. We also could discover only limited evidence of perpetuity provision to ensure that mitigation is ongoing for the foreseeable future. The New Forest National Park Authority is the exception. A Recreational Mitigation Partnership could address these shortcomings.

Conclusion

A Recreational Mitigation Partnership is not a silver bullet. Minimising the impact of recreation on protected landscapes and effecting behavioural change are challenging and complex issues which are difficult to measure. Nevertheless, the inevitable conclusion from this research is that recreational mitigation in the New Forest is not working. Nine local planning authorities operating different interim

policies, with some failing to deliver on those policies, is inefficient and ineffective. A Recreational Mitigation Partnership will offer greater co-operation, transparency and focus with the prospect of a dedicated team to maximising the potential of available resources.

The New Forest has already ‘lost’ almost a decade. It cannot afford to lose any more time in forming a Recreation Mitigation Partnership and in securing alternative and viable recreational facilities to divert growing recreational pressure. In pursuit of Government policy to build 1.5 million new homes, the prospect of a steep increase in housebuilding within the Zone of Influence of the New Forest National Park looms large. So, there is no time to lose. Any New Forest Recreational Mitigation Partnership could hit the ground running by learning from those neighbouring partnerships that have gone before.

Abbreviations

BCP - Bournemouth Christchurch and Poole Council

BAS - Bird Aware Solent

CIL – Community Infrastructure Levy

DCC – Dorset Council

DHP - Dorset Heaths Partnership

EBC - Eastleigh Borough Council

FBC - Fareham Borough Council

FE - Forestry England

Habitat regulations - Habitat Regulations (Conservation of Habitats and Species) Regulations 2017 (as amended)

IFS – Infrastructure Funding Statement

LPA - Local Planning Authority

NE – Natural England

NFDC – New Forest District Council

NFNPA – New Forest National Park Authority

RMS – Recreational Management Strategy

SAC – Special Area of Conservation

SAMM – Strategic Access Management and Monitoring

SANG – Suitable Alternative Natural Greenspace

SCC – Southampton City Council

SPA – Special Area of Conservation

TBH - Thames Basin Heath Partnership

Thames Heaths - Thames Basin Heaths Special Protection Area

TVBC – Test Valley Borough Council

WC – Wiltshire Council

ZOI – Zone of Influence

Introduction

Recreational Mitigation is required by the Habitat Regulations (Conservation of Habitats and Species) Regulations 2017 (as amended)¹ for housing developments within a zone of influence (ZOI) of a Special Area of Conservation (SAC) or a Special Protection Area (SPA). The New Forest falls within both these designations and thus recreational mitigation is required. It is for the Local Planning Authorities (LPA) within the designated ZOI to set their mitigation policies. Mitigation policies usually require developers, as a condition of the grant of planning permission, to make one off payments, to fund two forms of mitigation.

1.1 SANGs

SANGs are areas of Suitable Alternative Natural Green Space beyond the borders of the SAC or SPA. SANGs are intended to provide alternative recreational greenspace of a quality and type to attract residents of new developments away from the protected area. They are a form of recreational off set.

SANGs must be managed and funded in perpetuity by appropriate bodies, for example local authorities or environmental charities, and designed and delivered in accordance with Natural England (NE)'s guidelines.² They can be on the site of a new development where the development is large or more often mitigation is achieved by making a set payment to the LPA to fund the creation or improvement of alternative green space. Strategic SANGs are larger areas which may provide mitigation for several developments.

The New Forest Association has consistently criticised the metric for the calculation of the required area of a SANG which is generally 8 ha of greenspace per 1000 head of population.³ This metric was first developed for the Thames Basin Heaths SPA which has a different ecology and visitor profile to the New Forest. The Forest SPA enjoys a greater diversity of internationally important bird populations, and its SAC designation reflects a wider range of habitats. The use of the 8 ha of alternative greenspace per 1000 head of population was not developed using any empirical methodology but visitor numbers. Even if based upon visitor numbers in the New Forest, the metric would require over 32 ha of alternative greenspace per 1000 head of population ie four times the area.

¹ SI 2010/490).

² Natural England, Compilation and review of evidence leading to SANG and SAMM Provision (2024) available at <https://publications.naturalengland.org.uk/publication/6015060338802688> accessed 22 October 2025.

³ Although we note that this criticism has not been accepted by planning inspectors on ZOI local plan examinations.

The delivery of new SANGs presents a challenge when there are many competing land uses. Housing development is just one but there is also competition from back-up grazing and other environmental schemes. For example, the possibility of landowner being able to combine the functions of a SANG with biodiversity net gain has been suggested yet the extent to which shifting recreational pressure from one protected area to another must be questionable.⁴

1.2 SAMMs

SAMM stands for Strategic Access Management and Monitoring and relates to recreational management within the SAC or SPA itself. SAMM payments, for example, are applied to fund rangers and behavioural education initiatives as well as monitoring the impact of recreation upon the SAC or SPA and any associated SANG.

SAMM funding is not intended to meet direct conservation costs, these remain the environmental responsibility of the landowner with compliance overseen and monitored by NE.

1.3 Infrastructure Funding Statements (IFS)

In addition, to the requirement for a LPA to operate a recreational mitigation policy, they are required to annually account for the payments they receive and apply on SANG and SAMM. SANG and SAMM payments form only a small part of total community infrastructure payments which will also cover developer contributions to finance such community essentials as affordable housing, schools, roads and other traffic infrastructure. SANG and SAMM payments may either be made through a community infrastructure levy (CIL) or by a dedicated section 106 agreement with the developer for a particular site.

The requirement for an IFS flows from the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019.⁵ The detailed requirements as to what should be disclosed are found in Schedule 2 of the Regulations. There are three mandatory elements to an IFS being a CIL report, a section 106 report and details of the infrastructure projects the local authority intends will be, or may be, funded through these payments. Additional disclosure is encouraged through government guidance.⁶

⁴ See <https://the.landtrust.org.uk/suitable-alternative-natural-greenspace-sang-and-biodiversity-net-gain-bng/> accessed 22 October 2025.

⁵ SI1103/19.

⁶ <https://www.gov.uk/guidance/planning-obligations> and <https://www.gov.uk/guidance/publish-your-developer-contributions-data> both accessed 22 October 2025.

CIL Reporting should cover five main elements:

- *Demanded*: The total value of demand notices issued during the reported year.
- *Collected*: Sums collected: including receipts for the reported year, receipts collected before the reported year which have been allocated in the reported year, receipts collected before the reported year which remain unallocated, total of all receipts that have been allocated in the reported year but not spent and summary details of the infrastructure to which CIL has been allocated and the amount.
- *Spent*: Money spent during the reported year and what it was spent on including the amount of CIL spent on administrative expenses.
- *Retained*: CIL receipts retained for the reported year and earlier years; and
- *Passed over*: Money passed to other authorised bodies for example to parish councils.

Section 106 reporting should cover four main categories of data:

- Payment obligations that have been entered into in the reported year;
- Money that has been received in any year but not spent;
- Monies that have been allocated but not spent during the reported year;
- Money that has been spent during the reported year.

Historic planning obligations only need to be reported where money has been received in the reported or in previous years but has not yet been spent.

2. The New Forest Recreational Mitigation Journey

Many LPAs with recreational mitigation duties have adopted a co-ordinated approach. We will look at the experience of these partnerships in our case studies in Part 4. The New Forest has been slow to follow suit despite its environmental sensitivity to recreational pressure. There has been some progress, and in this part, we chart that journey. At the outset it is important to note two factors.

First, co-ordination relates to SAMM payments made to local authorities within ZOI of the protected area. SANG requirements are met within the individual local authority area and thus fall within the decision-making processes of that authority. Limited SANG co-ordination may occur on an ad hoc basis between neighbouring authorities. Partnership working is thus focussed on SAMM measures. Secondly, there is a clear link between SAMM partnership working and recreational management strategy since the SAMM payments can help fund the recreational management strategy. We see this clearly in the New Forest experience.

2.1 The Footprint Ecology Research

The recreational management strategy and mitigation measures are based upon research undertaken by Footprint Ecology who have carried out other similar research in protected areas including in our case studies. There are seven reports in all.⁷

The first three reports published in 2020 are of face-to-face visitor interviews, vehicle counts and telephone surveys of residents living within 25 kilometres of the New Forest. Together they provide data on recreational use in 2018/19 which are brought together in an overview report which also seeks to assess the impact of projected housing growth. It is almost a decade since these surveys were carried out and there is an evident risk that they are now dated. Recreational pressure has not eased rather there are anecdotal reports suggest a sustained increase in recreational pressure after the Covid epidemic 2020-2022.

The three further reports contain recommendations based upon this empirical research.

The first published in 2021 defines the ZOI within which LPAs must mitigate the impact of recreation on the New Forest SAC and SPA. The second provides recommendations for the management of recreational impact within the ZOI which are reflected in elements of the Recreational Management Strategy outlined below. The final report sets out the recommended co-ordinated SAMM Strategy and was published in 2023. Its recommendations are also outlined below.

2.2 The New Forest ZOI

The New Forest ZOI has been set at 13.8 kilometres of the protected areas boundary for smaller developments. Developments of over 200 homes are considered on a case-by-case basis, but mitigation is expected for large developments within 15 kilometres. The New Forest ZOI has been endorsed by NE.⁸ This ZOI is shown in Annex 1. It currently captures 9 local authorities namely: Bournemouth Christchurch and Poole Unitary Authority (BCP), Dorset Council (DCC), Eastleigh Borough Council (EBC), Fareham Borough Council (FBC), New Forest District Council (NFDC), New Forest National Park Authority (NFNPA), Southampton City Council (SCC), Test Valley

⁷ <https://www.newforestnpa.gov.uk/conservation/managing-recreation/managing-recreation/research-into-recreational-use-of-the-new-forests-protected-habitats-footprint-ecology-2020/> accessed 22 October 2025.

⁸ <https://www.newforestnpa.gov.uk/app/uploads/2021/08/New-Forest-zone-of-influence-report-2021.pdf> accessed 22 October 2025.

Bought Council (TVBC) and Wiltshire Council (WC). Although the ZOI captures the north of the Isle of Wight, no mitigation policy is in place given the sea barrier to recreational access. The New Forest ZOI also overlaps to the south with the Solent Mitigation ZOI which extends for 5.6 kilometres from the Solent coast.

2.3 The Recreational Mitigation Proposals

The mitigation recommendations are set out in a Footprint Ecology Report published in 2020.⁹ These fall under four broad headings:

2.3.1 *Alternative Recreational Green Spaces outside the New Forest* ie SANGS with the object of drawing recreation away from the New Forest. The recommended actions call for:

- improvements to existing greenspace following individual site assessments of how these sites could be enhanced for example through provision of free parking, improved facilities and upgraded walks,
- the creation of new green space within large developments or adjoining/close to other new developments with the object of providing short walks close to people's homes.
- creation of new 'destination' greenspace or strategic SANGs with a wider visitor catchment which could provide a wider range of facilities than smaller neighbourhoods SANGS for example bike trails and cafes.
- designated greenspace designed to attract particular recreational users e.g dog walkers or off-road cyclists.
- improved footpaths and walking routes outside the New Forest.

2.3.2 *Access Management within the New Forest* i.e. SAMM measures these are largely focussed upon funnelling visitors away from sensitive sites to more robust areas. The recommended actions include:

- parking revisions to review and redistribute the car parking network. The possibility of parking charging is mentioned along with the need to prevent knock-on verge parking.
- improved visitor access to more robust sites. The report calls for the careful identification and assessment of such sites.
- the management of paths and tracks not only to funnel visitors to more robust sites but also to discourage access to more sensitive area e.g by removing bridges.
- changes to legislation for example PSPOs to discourage verge parking or more effective control of dogs through the Countryside and Rights of Way Act 2000.

⁹ <https://www.newforestnpa.gov.uk/app/uploads/2020/05/New-Forest-Recreation-Impact-Mitigation-report.pdf> accessed 22 October 2025.

It is estimated that between **9.4-12.5** ranger posts are required based upon whether 3 or 4 car parks are visited by wardens each day to achieve 50 car park visits each year – see Annex 3. At present there is only one fully SAMM funded ranger in addition to the rangers funded by the NFNPA and by Forestry England (FE).

2.3.3 Educational and Communications Activities to raise awareness of and promote responsible recreation. The recommended actions include

- Better information and communication through a variety of sources including well designed and coordinated educational campaigns targeted at such issues as feeding livestock, poor dog control, verge parking and groups e.g dog walkers. Each case study provides examples.
- Guided walks and themed events which could be targeted at particular users, promotion of walking routes in more robust locations and other activities to encourage healthy and responsible recreation closer to where people live, activities that inspire young people to care and respect the New Forest and improved management of commercial events. The NFNPA and FE already provide such facilities.
- Face to face engagement from an increased number of rangers. The reports states that “[r]angers are a fundamental element in other strategic mitigation approaches and widely accepted as a means to influence and manage visitor behaviour” with supportive engagement. They can be targeted to popular sites
- Appropriate and proportionate enforcement targeted mainly at dog fouling, dogs off-leads, verge parking and cycling off set routes for instance through Public Space Protection Orders.

2.3.4 Monitoring is a key constituent of mitigation as a means to assessing its success or otherwise, to pick up emerging issues and help target resources. Monitoring looks to visitor, vehicle and activity counts (such as dog walking, horse riding and cycling), incident monitoring (such as livestock interactions, fires, dog fouling, stock and wildlife worrying and water quality) and ecological monitoring of key species and habitats.

The co-ordinated implementation and funding of the recommended SAMM measures are explored in some detail in the Footprint Ecology report published in 2023¹⁰ with a summary found in Annex 2. These measures are costed at £22 million with a breakdown of the contributions from each local authority based upon expected housing growth in each area and visitor numbers in 2023. With increased house building targets these contributions will only increase. As it is, current funding falls well below the projected £22 million funding. The SAMM funding will be collected from the LPAs into a central pot to fund a dedicated partnership team, including a project manager, and a ranger team of between 9-12 wardens. Delivery by this team will be in co-ordination with FE and the National Trust, as landowners

¹⁰ <https://www.newforestnpa.gov.uk/app/uploads/2024/04/New-Forest-SAMM-report-Footprint-Ecology.pdf> accessed 22 October 2025.

and managers and the NFNPA, as the major educational and communications hub for the Forest - see Annex 3. Representatives from each of the ZOI LPAs together with NE will form an oversight body to which the delivery team will need to report. It is suggested that the Verderers should also be represented.

The plans are all in place but still not implemented. There is a Recreational Mitigation Steering Group with representatives from the key local authorities within the ZOI as well as NE and FE. There are reports of delay and negotiations with the LPAs on the edges of the ZOI disputing the impact of their local development upon recreation in the New Forest. Similar partnerships have come together under the threat that NE may block future development unless adequate mitigation is in place. There are signs that NE are pressing more actively for implementation in the New Forest, but this pressure needs to be sustained to ensure LPAs take notice and collaborate.

2.3 Recreational Management Strategy (RMS)

The recreational mitigation proposals largely dovetail with actions within the RMS¹¹ and the NFNPA's 2022-2027 Partnership Plan.¹² The RMS covers the period 2010-2030.¹³ We have commented on the detail of the RMS which we will not repeat here.¹⁴ Still, it is important to point out the key areas where recreational mitigation and the RMS and the Partnership Plan intersect.

2.3.1 A Mitigation Partnership - the RMS specifically endorses “a coordinated approach among LPAs in and around the New Forest to mitigate the impacts of new housing on protected areas – and use developer contributions to support work that protects the Forest.”¹⁵

2.3.2 Development of a spatial plan - which “would complement habitat mitigation strategies”¹⁶ to manage access to the Forest and the distribution of visitor facilities notably car parks and the cycle network. Car park charging and measures to curb damaging activities, such as verge parking, lighting fires, cycling off-network, wild camping and petting livestock, are also mooted.¹⁷

It is noteworthy that FE have brought forward proposals both for a co-ordinated and extended cycle network and for car park charging but without reference to the spatial plan which remains under wraps. These piecemeal initiatives devalue a coordinated approach.

¹¹ See <https://www.newforestnpa.gov.uk/about-us/recreation-management-strategy/>. This strategy is overseen by the Recreational Management Strategy Group which also reports to a Recreational Management Advisory Group see <https://www.newforestnpa.gov.uk/about-us/forums-and-facilities/recreation-management/> accessed 22 October 2025.

¹² <https://www.newforestnpa.gov.uk/conservation/partnership-plan/partnership-plan-2021-2026/> accessed 22 October 2025.

¹³ <https://www.newforestnpa.gov.uk/documents/conservation/recreation-management-strategy-strategic-actions/> accessed 22 October 2025.

¹⁴ see <https://newforestassociation.org/tag/rms/> accessed 22nd October 2025.

¹⁵ Fn 12 at 5.2.

¹⁶ Ibid at 4.1 & 4.2.

¹⁷ Ibid at 2.3.

2.3.3 **Education and Communication** - run through much of the RMS with actions that reflect the mitigation proposals.¹⁸

2.3.4 **Monitoring** - is reflected in the call to collect “data about recreation, its benefits and impacts on the special qualities of the New Forest” and to analyse and publish that data to improve recreational management across the Forest.¹⁹

There is a Recreation Management Steering Group to push forward the RMS with representatives from the NFNPA, FE, NE, NFDC and TVBC. It has met approximately twice a year. Recent meetings have discussed a recreational mitigation partnership but evident progress towards implementation is slow with less frequent meetings in 2025.²⁰ There is also a Recreation Management Advisory Group with representatives from a wider range of Forest groups including the NFA. At their last meeting in October 2024 a presentation was given on the recreational mitigation, but it did not meet in 2025. It is of considerable concern that implementation of the RMS appears to have stalled and it is imperative that there are renewed efforts to put it back on track.

2.4 Increase in Housing Building Targets

The Governments updated National Policy Planning Framework published in December 2024 saw the re-imposition of mandatory housebuilding targets for each local authority in the drive to meet the Governments manifesto commitment to building 1.5 million houses before the end their elected term. LPAs within the ZOI have seen their housing targets increase dramatically – only SCC sees a slight fall and the NFNPA, which is not the housing authority for the New Forest, and thus has not received a revised target.²¹

BCP – from proposed 1600 to 3000 (88% increase)

DCC – from proposed 1310 to 3230 (147% increase)

EBC – from 645 to 902 (40% increase)

FBC – from 498 to 794 (60% increase)

NFDC – from 700 to 1501 (101% increase)

NFNPA – unchanged

TVBC – from 524 to 921 (75% increase)

SCC from 1473 to 1295 (12% decrease)

¹⁸ Ibid 1.1-1.5 and 2.1 & 2.2.

¹⁹ Ibid 6.1& 6.2.

²⁰ See minutes available at <https://www.newforestnpa.gov.uk/documents/recreation-management-strategy-steering-group/> accessed 21 September 2025.

²¹ See <https://www.lgcplus.com/services/regeneration-and-planning/mapped-housing-targets-for-each-council-under-proposed-method-31-07-2024/>. Accessed 22 October 2025.

WC – from 1917 to 3476 (81% increase)

These increases can only swell previous projections of visitor numbers and recreational pressure on the New Forest. They will also trigger a revision of some LPAs Local Plans, for example NFNPA, NFDC and TVBC, in attempts to identify new development sites and necessary infrastructure as well as a re-examination of existing recreational mitigation policies.²²

3. Implementation of New Forest Recreational Mitigation

This section examines the present New Forest Recreational Mitigation Policies of each LPA within the New Forest ZOI and their associated IFS detailing the funds collected, allocated, expended and retained so far as we have been able to ascertain from their publicly available records and targeted freedom of information requests. They paint a patchwork picture of compliance and transparency although all local authorities within the ZOI have indicated their willingness to participate in the co-ordinated SAMM proposals set out in the Footprint Ecology 2023 SAMM Report. The nine LPAs are examined in alphabetical order.

3.1 BCP (Bournemouth, Christchurch and Poole Unitary Authority)

BCP have been slow to meet their environmental obligations under the Habitat Regulations although the dense urban areas of Bournemouth and Poole fall within the ZOI. Their IFS reveals no funds collected, held or expended on New Forest recreational mitigation although the picture has recently changed.

3.1.1 **SANG** Expert guidance from Footprint Ecology prepared to support BCP draft local plan advises that existing SANGs within the BCP area are sufficient to provide suitable alternative green space to mitigate recreational impact in the New Forest.²³ These SANGs must also provide recreational mitigation for the Dorset Heaths and Poole Harbour protected areas. Duplication of SANGs is not required where there are multiple protected areas, but questions arise as to their adequacy in deflecting recreational pressure. The BCP draft local plan details existing strategic SANGs at Upton Country Park, Stour Valley River Meadows, Canford and Two Rivers Meet with further strategic SANGs planned for Roeshot and Merley.²⁴ Upton Park, Merley and Canford lie some way from the New Forest thus their deflecting influence on the recreational draw of the New Forest is likely to be low. Stour Valley River Meadows and Two Rivers Meet are closer, but both are relatively new, and neither are extensive. Two Rivers Meet was created from an old golf course and recreation ground totalling just under 16 hectares whilst the Stour Valley Water Meadows adds a further 12 hectares.

²² See for example that of NFDC at <https://www.newforest.gov.uk/localplan> accessed 28 February 2026.

²³ <https://www.bpcouncil.gov.uk/documents/planning-and-building-control/Local-plan/Evidence-base/Habitats-ReguLPations-Assessment-Draft-Local-PLPAn-Recreational-pressure.pdf> accessed 22 October 2025.

²⁴ <https://www.bpcouncil.gov.uk/documents/pLPAnning-and-building-control/Local-pLPAn/BCP-Local-PLPAn-Consultation-Draft-March-2024-web-version.pdf>.

3.1.2 **SAMM** BCP's draft 2024 local plan included their anticipated participation in proposed co-ordinated SAMM proposals. However, this draft Local Plan was rejected by the planning inspector. Nevertheless, following advice from NE that no new development should be approved, BCP have entered into an interim arrangement with the NFNPA to transfer SAMM contributions equivalent to £300 per dwelling to NFNPA until their own New Forest mitigation package is in place. It is better late than never. However, the development of many new dwellings will have been approved by BCP in the past but escaped the mitigating contributions required by the Habitat Regulations.

3.2 Dorset Council (DCC)

DCC has also been slow in meeting its recreational mitigation duties to the New Forest and their IFS reveals no funds collected, held or expended although again this picture is changing.

3.2.1 **SANG** Its SANG position is similar to that of BCP. Footprint Ecology have also advised that SANGs provided to mitigate recreational impact on the Dorset Heaths should be sufficient to also mitigate recreational pressure on the New Forest.²⁵ There is only a relatively small rural area where the two ZOI do not overlap. Strategic SANGS in East Dorset include Woolslope Farm and Riverside Walk at West Moors (16 acres), at Verwood and at Hurn Forest. That said there is at least one instance, near Alderholt, where the Habitat Regulation Assessment for a development close to the NFNPA boundary noted the additional adverse recreational impact upon the New Forest.²⁶ A case by case assessment may thus be considered. A SANG is also planned associated with the redevelopment of the St Leonard Hospital.

3.2.2 **SAMM** DCC has accepted the need for their mitigation policy to include New Forest SAMM payments but only after independent evidence of visitor numbers to the New Forest from their area.²⁷ They have indicated their willingness to participate in a co-ordinated SAMM strategy and by separate agreement they have required SAMM payments for at least one development.²⁸ They too have recently moved to a more consistent and formalised approach by entered into an agreement to transfer New Forest related SAMM payments to NFNPA.

3.3 Eastleigh Borough Council (EBC)

²⁵ <https://www.dorsetcouncil.gov.uk/documents/35024/307470/FINAL+New+Forest+report+090522.pdf/ccf5246a-8401-0a56-81d6-599fa29d8801>.

²⁶ See Habitat Regulation Assessment for Planning Application P/OUT/2023/01166. Permission was refused.

²⁷ <https://www.dorsetcouncil.gov.uk/documents/35024/307470/FINAL+New+Forest+report+090522.pdf/ccf5246a-8401-0a56-81d6-599fa29d8801>.

²⁸ <https://moderngov.dorsetcouncil.gov.uk/documents/s46695/EAPC%20Decision%20Sheet%2004.06.25.pdf> accessed 22 October 2025.

In 2022 EBC adopted an interim mitigation policy which is due for review in 2027.²⁹ This policy provides for mitigation from new residential dwellings and redevelopments or changes of use which result in a net gain of dwellings. It includes affordable home and gypsy sites, but new hotel developments are not covered by the policy but considered on a case-by-case basis. The policy covers both SANG and SAMM payments. These were initially set at £1610 per dwelling to be index linked. The latest publicly available data is in 2022 when payments were increased to £2,200 with a breakdown per dwelling of:³⁰

Allocation	Contribution
New Forest SANG	£1968.24
New Forest Ranger	£41.07
Monitoring	£9.13
Commercial Risk	£201.84

3.3.1 **SANG** The policy provides for a SANG requirement of 2ha per 1,000 population which, based on a projected requirements for 5,648 dwellings comprising an average of 2.4 people, results in a requirement for 27.1 hectares SANG provision. This will now be inadequate given increased mandatory housing target for EBC.

New SANG provision was originally identified at Allington Lane (14 hectares) but this was abandoned in favour of plans for a solar farm on the site in 2022.³¹ SANG payments have been applied in the extension (12.8 hectares) and improvement of the existing Itchen Valley Country Park. An additional SANG has been newly opened at Stoke Common Park (21 hectares).

Although not within ECB boundaries, there are Plans outlined in TVBC mitigation policy for a new SANG at Hutt Wood, Home Wood and Hicknor Hill to serve both TVBC and ECB residents and IFS data reveals financial contribution by ECB to this initiative.

3.3.2 **SAMM** The policy provides for funding of a New Forest National Park ranger, but IFS data does not itemise this funding, which should be around £45,000 pa. ECB has confirmed “a contribution has been secured on a per dwelling basis to support ... SAMM within

²⁹ <https://www.eastleigh.gov.uk/media/12134/appendix-19-appendix-1.pdf> accessed 22 October 2025.

³⁰ <https://meetings.eastleigh.gov.uk/documents/s50034882/Strategic%20Land%20Report.pdf> accessed 22 October 2025.

³¹ Ibid.

the New Forest. This contributes to the funding of a New Forest Ranger.” Despite this commitment, we understand that no payments have yet been made.

3.3.3 IFS Data Data is only available since 2022 when the policy was adopted and appears incomplete, difficult to reconcile and contains errors.³²

Year	Entered into via s106	Received	Allocated	Spent	Comments
23/24	£1,258,525.89	£161,186.87	£0	£1,122,031.51	Unclear but presumably on creation and improvements of SANGs
22/23	£249,500. 30	£178,229	£1,145,032	£10,449 FOI incorrect	Allocated to Home Wood Improvements – see TVBC

3.4 Fareham BC (FBC)

FBC mitigation policy was adopted in 2021 and is expressed as interim until a co-ordinated mitigation policy is adopted by LPAs within the ZOI. At the time it was expected that the interim policy would be required until 2025.

The policy applies to all forms of new residential development resulting in a net gain of self-contained dwellings. This includes new builds, redevelopment, changes of use, those permitted via prior approval and permitted development, affordable housing, visitor accommodation and gypsy pitches, for example. It assumes that given the rate of projected house building during the period a total additional 23,454.9 visits need to be mitigated. Given the increased housing target, this projection will need updating.

In 2021 the annual cost was estimated at £126,000 and is to be index-linked to the retail price index. That equated in 2021 to £247.05 per new house (based upon a projected 1,530 dwellings per annum) to be collected through individual developer agreements e.g s106, agreements. In 2022 the contribution was increased to £253.23 per dwelling. This is less than half the BirdAware contribution for 2021 of £595 per new house.

3.4.1 SANG Where on site SANG is not provided the interim policy provides for a total contribution of £100,000 per annum index linked towards SANG improvement. There is also £20,000 allocated to monitoring SANGs

³² Admitted in response to a NFA FOI request.

The interim strategy envisages major improvements to Holly Hill Woodland Park and Abbey Meadows, a 36-acre woodland park not formally designated a SANG. The costs of improvements are estimated to cost over £2 million to be funded by a national lottery bid, over £950,000 from CIL monies (£425,000 had already been committed) and £195,000 from New Forest mitigation funds. The Welbourne Garden Village development of over 1,000 dwellings includes onsite dedicated greenspace which has received approval by the Secretary of State as recreational mitigation provision for the New Forest.³³

3.4.2 **SAMM** – The interim policy envisages a payment of £6,000 towards funding a New Forest National Park warden. FBC have confirmed that this sum has been paid annual to NFNPA.

3.4.3 **IFS Data**³⁴

Year	Entered into via s106/111	Received	Allocated	Spent	Comments
23/24	£57,670.56!	£57,670.56	See SANG Policy above	£73,301.00 for Holly Hill + £6,000 on New Forest Warden	EOY Balance in IFS £125,520.35. £42,927.14 of sS106 monies for open space allocated to Holly Hill scheme. AND in 2024/25 - £101,197 of NF mitigation spent on Holly Hill scheme.
22/23	None stated	£43,769.54	ditto	£6,000 on New Forest Warden	EOY Balance in IFS £223,596.21
21/22	£107,587.45	£107,587.45	ditto	£6,000 on New Forest Warden	EYO Balance in IFS £107,834.50

3.5 New Forest District Council (NFDC),

³³ See https://assets.publishing.service.gov.uk/media/686d1c66a08d3a3ca3b678bd/250708_Combined_DL_IR_R_to_C_Longfield_Avenue_Fareham_-_3347627.pdf accessed 21 September 2025.

³⁴ https://www.fareham.gov.uk/pLPAnning/local_pLPAn/ifs.aspx.

The NFDC area hugs the Forest on the east, south and west sides of the National Park and its entire area falls within the ZOI. It thus has the most significant financial contribution to make to recreational mitigation. Its mitigation policy was adopted in 2021 and makes provision for both SANG, where SANG cannot be provided on site, and SAMM payments.³⁵

5.5.1 **SANG** Developments of over 50 units are expected to provide onsite SANG. Payments due for Off Site SANG Contributions are payable for developments of under 50 Units. These payments are index linked.

Bedroom	Assumed Occupancy	Offsite Mitigation payments at 2025
1 bed	1.4	£3,480
2 bed	2.1	£4,595
3 bed	3	£6,822
4 + beds	3.75	£7,657

IFS Reports reveal that money is being spent solely on improvements and monitoring of existing open space rather than on the creation of strategic SANGs. For example, in 2023/24 improvements were made to open space at Oaklands and Challenger Ways in Hythe, Woodside Gardens, Grove Gardens and Withy Woods in Lymington, Carrick Way Woodlands and Ashington Park in New Milton, and in Totton Bartley Park, Testwood and King George Recreation Grounds. The allocation process of bidding for funds tends to favour existing projects over strategic additional provision and there is a temptation for SANG payments to be applied to meet general maintenance expenses.

There is an attempt to monitor the effect of these SANG payments using counters recording the number of users. The NFDC say they hold comparative data, but an FOI has not elicited what that reveals.

5.5.2 **SAMM** SAMM payments are intended to fund a full-time ranger and the monitoring of recreational SANG use but are increasingly being used for SANG improvements – see the IFS information at [5.5.3].

Bedroom	SAMM at 2025 index lined including £83 monitoring
1 bed	£507
2 bed	£719
3 bed	£991

³⁵ <https://www.newforest.gov.uk/article/2003/Mitigation-for-Recreational-Impacts-On-New-Forest-European-Sites> accessed 22 October 2025.

4+ beds	£1,217
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It is striking that considerably more is collected for SANG provision than SAMM. That is borne out in IFA Statements where SANG expenditure is sometimes 5 times more than SAMM expenditure. A reallocation of expenditure in favour of SAMM could fund 2 more rangers.

5.5.3 **IFS** NFDC reports that physical projects are mostly funded through Community Infrastructure Levy (CIL) with monitoring and access management funded through contributions collected via S106 agreements with developers. That is unless a s106 Agreement specifically earmarks funds for a physical project e.g onsite SANG. The disclosed figures reveal that significant s106 fund are utilised for SANG as well.

Year	CIL Demands	CIL Receipts	CIL Allocated	CIL Brought forward	CIL Spend	CIL Receipts retained	CIL Total Retained	Habitat Mitigation Allocation (HM)
2021/22	1,316,757	1,255,145	1,117,527	5,439,718.	268,616	1,077,779	5,326,966	680,000
2022/23	1,729,641	1,154,402	830,000	5,439,718.	720,615	923,476	6,897,137	830,000
2023/24	1,150,161	1,476,267	2,078,815	6,891,502	585,143**	1,153,880	6,522,976	850,000

Year	Total S106 Demands	Total S106 Receipts	Total S106 Allocated	Total S106 Spend	NF Mitigation Spend	S106 HM Total retained ³⁶	Comments NF Mitigation Spend Components
2021/22	762,675	771,610	737,212	418,364	116,680	1,731,083	Forest ranger £44,250 Monitoring, admin £26,073 SANG Works £41,357!
2022/23	2,230,132	1,165,320	560,761	1,651,669	606,800	1,852,134	Forest ranger £44,250 Monitoring £121,257 + Additional counters £4150 +6563+960 Project Management £18,596 SANG Works - £411,024
2023/24	3,087,008	728,393 (HM 518,223)	316,701	1,267,670 (HM 945,066)	844,646 (HM 945,614)	1,190,047	Forest Ranger £44,250 Monitoring £64,830 + counters £4050 + approx. £44,000 inspections Project management £68,296 SANG Works £663,220

3.6 New Forest National Park Authority (NFNPA)

The NFNPA current mitigation policy dates from 2020 having been revised from the initial scheme introduced in 2012. Its concentration is on SAMM measures given the limited opportunities for the creation of new SANGs beyond development sites themselves. It provides for:

- Access management within the designated sites;
- Alternative recreational green space sites and routes outside the designated sites;
- Education, awareness and promotion;
- Monitoring and research;
- In perpetuity mitigation and funding.

³⁶ Plus £437,527 for Gang Warily maintenance in perpetuity

The emphasis on in perpetuity funding is noteworthy and is based upon a 100 year mitigation period with assumptions made on the inevitable future fluctuation of inflation and interest rates. Funds are being accumulated until 2036 to ensure the availability of future funding.

The costs are funded by developer financial index linked contributions for 2025 stand at:

Type of development	2025 contribution
Residential development for each dwelling	£4373
Visitor Accommodation for each bedroom	£3412
Campsites, age related accommodation (eg care homes, boarding places)	Case by case
Permitted development	Possible financial payments on advice

3.6.1 **SANG** The Policy calls for “[n]ew and improved sites, routes and facilities chosen and designed to accommodate recreation, including close to where people live” and notes the RMS calls for new green space and larger country parks. However, it also notes the reality that there is insufficient development within the National Park to promote such facilities. The ambition is thus for small scale ancillary facilities such as signage, surface upgrading and dog-friendly features.

3.6.2 **SAMM** The focus thus is on SAMM measures with the employment of rangers, responsible dog walking and education and behavioural change top of the agenda.

3.6.3 **IFS Data**

Year	Received	Mitigation Allocation	Perpetuity Fund Allocation	Expenditure	Balance -carried forward
2023-2024	£102,130.00	Unavailable	Unavailable	£69,870 Ranger £54,000 Comms £7,500. Access £4,600	£289,661
2022-23	£121,922.56	£20,111.54	£77,453.37	£20,111.54 Rangers £15,111.54, Comms £5,000	£117,233.70

2021-22	£70,635.00	£35,065.00	£35,570	£28,614 Rangers £16,117, Volunteers £500, Comms £5000 Monitoring £2,000	£92,875.00
2020-21	£38,632	£13,750	£24,882	£34,553 Rangers £26,800 Comms £5000 + Film £280 Monitoring £2,473	£ 86,425
2019/20	£46,637 + starting balance £93,858	£44,375	£2,262	£31,005 Rangers £18,005 Comm £5,000 + Film £6,000 Signage £2,000	£107,228

3.7 Southampton City Council (SCC)

SCC does not appear to have a formally published New Forest Recreational Mitigation Policy but there are statements in Habitat Regulation Assessments for various development that SCC ring-fences 5% of its total CIL receipts to apply towards New Forest Mitigation. This contribution is confirmed by SCC's FOI response. By contrast it has a detailed policy to mitigate recreation on the Solent Protected Sites. The Habitat Regulation Assessments referred to, state that the 5% ring fenced CIL fund is applied as to 4% towards SANG improvements and 1% towards SAMM funding to the NFNPA. In the light of SCC's failures detailed below, it is understood that NE are pressing SCC to fulfil their statutory mitigation obligations.

3.7.1 **SANG** FOI answers reports improvements works in:

- 2022/23 to Peartree Green Local Nature reserve involving upgrading the footpath and installing a new link of 1740 meters to create a long circular route and two shorter routes - £73,952.44. Mitigation of recreational impact on the New Forest is likely to be small. The reserve lies to the east side of Southampton beyond the River Itchen and a Bird Aware Solent case study described this site as "ideally located to divert recreational visits away from nearby Weston Shore." This report also notes that the reserve received funds from Solent Mitigation. It is unclear whether this additional funding or merely double reporting.
- 2023/24 & 2024/25 improvements to the northern half of the Shoreburs Greenway- £76,868.48

- 2024/25 improvements to Lordsdale Greenway at Shirley Pond comprising a new entrance with accessible ramp, resurfacing the footpath around the pond (355m) and repairs to the riverbank with a minimum of 1685m of footpath surfacing, new drainage and steps at other parts of this Greenway - budget £98k.

It is doubtful that these Greenway improvements satisfy NE's criteria for an effective SANG or divert recreation away from the Forest.

Southampton is nominated as a National Park City a worldwide movement under the banner of the National Park City Foundation, a charitable foundation.³⁷ The aspiration of a national park city is *“to have a better relationship with nature, culture and heritage and can enjoy and develop ourselves.”* However, it is essentially a volunteer, community-based movement³⁸ which is endorsed and supported, where possible by SCC.³⁹ The aspiration stands in stark contrast to the failures of SCC to fulfil their statutory obligations to the New Forest.

3.7.2 **SAMM** – despite their stated policy an FOI revealed that SCC had made no SAMM payments.

3.7.3 **IFS Data** It is unclear from published data the amount earmarked and spent on New Forest mitigation.⁴⁰ The following information was obtained by FOI request, but the amounts received do not tally with the 5% of total CIL their policy dictates!

³⁷ <https://www.nationalparkcity.org/about-national-park-city/> accessed 22 October 2025.

³⁸ <https://www.southamptonnpc.com/> accessed 22 October 2022.

³⁹ <https://www.southampton.gov.uk/news/article/southampton-national-parks-city-project/> accessed 22 October 2022.

⁴⁰ See for IFS <https://www.southampton.gov.uk/planning/community-infrastructure-levy/spending-cil/> accessed 22 October 2022.

3.8 Test Valley Borough Council (TVBC)

The TVBC updated their New Forest Mitigation Policy in 2025, but this policy remains interim until a co-ordinated mitigation partnership is established. The policy provides that developments may either design a bespoke mitigation package, provide a suitable SANG on site or make a defined contribution for the delivery of a strategic mitigation package as well as the introduction of a SAMM payment. Those contributions are calculated as follows for residential accommodation. Hotels and other tourist facilities contribution are calculated on a case-by-case basis.

Year	Total CIL	Received	Spent on New Forest Mitigation		
24/25		£48,284.07	Budget £98,000 see above		
23/24	Agreed - £1,345,795.12 Received - £1,069,714.43 Spent - £2,703,732.41 Total retained: £4,616,755.08	£51,036.58	Part £76,868 see above		
22/23	Agreed: £1,124,127.54 Received: £1,276,916.97 +£191,537.55 (local CIL) Allocated & Spent: £10,140,103.78 Total Retained £1,258,742.84	£34,932.93	£73,952.44 see above		
21/22	Agreed: £1,766,795.55 Received: £1,410,723.81 + £211,608.57 Spent: £1,591,857.50 Allocated: £13,904,193.00 Total Retained £1,598,813.00	£100,164.30	No details		
No. of bedrooms		SANG contribution		SAMM contribution	Total contribution for Strategic Mitigation Package
1		£2,375		£290	£2,665

2	£4,750	£585	£5,335
3	£5,940	£730	£6,670
4+	£7,125	£875	£8,000
Unknown	£5,700	£700	£6,400

3.8.1 **SANG** TVBC have delivered a strategic SANG targeted at dog walkers at Mill Lane Sherfield English⁴¹ and in 2025 working in partnership with EBC they have opened a SANG on Forestry Commission land at Home Wood. The latter forms part of a proposed forest park proposed by the TVBC local plan. Other SANG possibilities lie around the TVBC and EBC border at Nightingale Wood (north of Rownhams Services), Lords Wood (south of Rownhams Services), Hut Wood (between Chilworth & Chandlers Ford) and Rownhams Wood. Further SANG at Luzbrough Plantation is linked to residential development on two allocations, Whitenap and Hoe Lane whilst a SANG at Beggerspath Wood is linked only to the Whitenap development.

3.8.2 **SAMM** Our FOI request revealed that no SAMM payments have been made. The revised 2025 Mitigation Policy (see above) now introduces the requirement for SAMM payments.

3.8.3 **IFS Data** TVBC Infrastructure Funding Statement contain no specific reference to New Forest Mitigation. By contrast Solent SPA Mitigation payments are separately itemised. However, the response to FOI request revealed the following figures

Year	Amount Received	Allocated & Spent	Comments
2021/22	£109,027.29		
2022/23	£71,532.43		
2023/24	£211,260.70	£15,001.48 + £52,000 Total £67,001.48	Payments for Mill Lane & Home Wood SANGs

3.9 Wiltshire Council (WC)

⁴¹<https://www.testvalley.gov.uk/communityandleisure/naturereserves/sherfield-english>

WC adopted a revised interim New Forest mitigation policy in May 2024. Under their previous policy £750,000 was allocated from CIL payments towards New Forest mitigation measures. The revised policy provides:⁴²

Development class & type	Distance from protected sites	Mitigation approach
Residential greenfield and brownfield sites – 1-49 units	0-13.8km	Contribution of £600 per dwelling for SAMM (via S106 or S111)*
Residential greenfield and brownfield sites - 50+ units	0-13.8km	Provision of SANG and contribution of £600 per dwelling for SAMM (via S106 or S111)
Residential greenfield and brownfield sites - 50+ units	13.8-15km	Mitigation to be determined on a site by site basis for EIA scale development and / or where HRA demonstrates potential for adverse effects
Visitor accommodation 1-49 units	0-13.8km	Contribution of £600 per unit for SAMM (via S106 or S111)
Visitor Accommodation 50+ units	0-13.8km	Contribution of £600 per unit for SAMM (via S106 or S111) and need for mitigation to be determined on a site-by-site basis and / or where HRA demonstrates potential for adverse effects
LP Arger developments - EIA scale development	13.8-15km	Mitigation to be considered on a site-by-site basis for very large developments where HRA demonstrates potential for adverse effects

Thus, all residential and tourist development sites are to pay £600 per dwelling or unit towards SAMM provision. Residential and tourist developments of under 50 units need makes no provision or contribution for SANG whilst for developments over 50 units SANG provision is flexible to be secured on a site-by-site basis via s106 agreements presumably in accordance with Habitat Regulation Assessments. This approach diverges from that adopted under the 2021 policy which looked to CIL payments for developments of under 50 units, development on brownfield sites and tourist accommodation with £750,000 was earmarked from CIL funds to meet New Forest mitigation obligations.⁴³ The expectation was that developments of more than 50 units would provide on-site SANG.

⁴² <https://cms.wiltshire.gov.uk/documents/s225449/Revised%20New%20Forest%20Mitigation%20Strategy%20Master%20Report.pdf>.

⁴³ Can be accessed at <https://www.wiltshire.gov.uk/planning-bio-ecological-survey>.

3.9.1 **SANG** The thrust of the revised policy is on SAMM payments. The provision of SANG applies only to developments of over 50 units with the expectation that SANG will be delivered on site or as determined on a site-by-site basis. Some guidance may be gained from details of onsite SANG delivered under the 2021 Policy found in the following table which relies either on onsite SANG or proximity to a country park.

TABLE 4: Mitigation for WHSAP allocations			
Allocation	Distance from SPA/SAC/ Ramsar site	Planning status (September 2021)	Proximity to SANGs
Netherhampton Road	13 km	Outline approval for 640 dwellings	Country Park provided within the development which links into other open space which is publicly accessible
Hilltop Way	13.7 km	Outline approval for 10 dwellings	Lies immediately next to 51 ha country park at Hampton Park
North of Netherhampton Road	12.5 km	Full application submitted for 106 dwellings	Open space included in application which links into other open space which is publicly accessible
Rowbarrow	10 km	Full application submitted for 101 dwellings	Open space included in application which links into other open space which is publicly accessible
The Yard	13.7 km	Outline approval for 14 dwellings	Lies immediately next to 51 ha country park at Hampton Park

It is clear that development to the south of Salisbury near Harnham will require SANG mitigation the principle seems accepted, but the detail is yet to emerge.⁴⁴ There is evidence from FOI answers that suggests that some SANG provision is being negotiated to the north of

⁴⁴ www.wiltshire.gov.uk/media/14466/SOCG9-New-Forest-DC-Wiltshire-S0CG-Nov2024-Redacted/pdf/SOCG9_New_Forest_DC_Wiltshire_S0CG_Nov2024_Redacted.pdf?m=1732885003910 and https://www.wiltshire.gov.uk/media/15227/SoCG-reLPAting-to-Policy-27-Land-South-of-Harnham-Salisbury-Policy-28-LPAnd-West-of-Coombe-Road-Salisbury-Policy-29-Suitable-Alternative-Natural-Green-space-South-Salisbury/pdf/SOCG25_policy_27_28_29_Wyatt_Homes_Redacted.pdf?m=1741080113573.

the New Forest. This is likely to be near to Franchises Lodge which itself was suggested by WC as a possible SANG despite its acquisition by RSPB which presently is not open to the public.⁴⁵

3.9.2 **SAMM** New developments under the 2024 policy are required to contribute a flat rate of £600 per dwelling being the amount recommended by Footprint Ecology in their SAMM Report see Annex 5.

3.9.3 **IFS Data** Reveals the £750,000 earmarked for New Forest Mitigation⁴⁶ under WC previous policy but FOI answers indicates that only £34,171.24 of this allocation has “come through”. The payment was allocated in respect of a development of 99 dwellings in Downton.⁴⁷ The latest IFS for 2024 states that between 2015 and 2023 this drawdown has increased to £406,656.00.

Section 4 Case Studies of Established Recreational Mitigation Partnerships

In this section we look at three case studies close to the New Forest. The Thames Basin Heaths Partnership was one of the first recreational mitigation partnerships and is thus considered first. The Dorset Heaths Partnership borders the New Forest to the west and Bird Aware Solent overlaps to the south and borders to the east. The latter two Partnerships also share some of the same partner local authorities as the New Forest ZOI.

All these partnerships share common features which reflect the Footprint Ecology’s recommendations for a New Forest Partnership explained at 2.3 above. These include:

- SANG provision to attract visitors away from sensitive sites;
- SAMM funding to support recreational management through, for example, the employment of wardens;
- educational initiatives to inform and guide visitor behaviour; and
- monitoring both of visitor numbers and activities and their impact on protected species and habitats.

How these core elements are delivered across the three partnerships differs according to their history, location, the distinct features of their protected species and habitats as well as their constituent partners. To help inform the formation of any New Forest Partnership,

⁴⁵ See <https://www.wiltshire.gov.uk/planning-bio-ecological-survey>.

⁴⁶ <https://www.wiltshire.gov.uk/article/8757/Infrastructure-Funding-Statements>.

⁴⁷ 14/06561/FUL

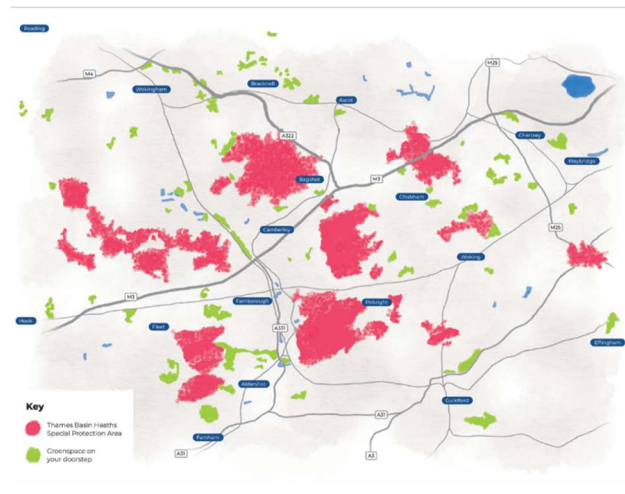
we consider each of these partnerships' formation and structure, how they deliver the key recreational mitigation elements, the successes and challenges they face as well as their current priorities.

All three Partnerships play an active role in the Mitigation Meet Up group held with other collaborative ecological partnerships around the country. This promotes an exchange of ideas for recreational mitigation, allows the sharing of feedback and a channel for dialogue.

4.1: Thames Basin Heaths Partnership (TBH)

(Figure from Partnership website, from link
<https://www.tbhpartnership.org.uk/about-us/>)

Map 1- Distribution of Thames Basin Partnership Special Protection Areas and Greenspaces



4.1.1. Background and Location

The Thames Basin Heaths Special Protection Area (Thames Heaths) was formally designated in 2005 and covers over 8000 hectares across Surrey, Berkshire and Hampshire of ecologically significant heathlands. It is recognised for supporting important populations of

breeding birds as well as all four species of this country's reptiles and important populations of invertebrates.⁴⁸ The focus of conservation efforts are the Dartford Warbler, Woodlark, Nightjar, butterfly and dragonfly species. The Thames Heaths are vulnerable to disturbance and predation by animals, humans and their pets and its close proximity to London and other urban centres generates the predominant recreational pressure.⁴⁹

TBH was established in 2007 and is a partnership of local authorities together with landowners and managers and nature conservation bodies. The incentive for this cooperation was the demands by NE for urgent mitigation measures to permit any further development close to the Thames Heaths. The ZOI around its protected areas extends to 5 km with no development permitted within 400 metres and recreational mitigation measures required of residential developments within the remainder of the ZOI.⁵⁰

4.1.2. Structure and Management

The Thames Heath represents a large and complex conservation challenge in terms of both area and the number of sites, with a correspondingly large partnership comprising many landowners and local authorities. The Partnership consists of 26 local councils, nature conservation bodies including RSPB, NE and FE, and landowners and managers of land falling within the Thames Heaths ZOI. TBH devised its mitigation strategy via a collaborative framework, the Thames Basin Heaths Delivery Framework, which was adopted by partners in 2009.⁵¹

TBH has a Joint Strategic Partnership Board, comprising the heaths' landowners and environmental advisers who work together to oversee the strategy and release half yearly reports.⁵² There is also an executive team involved in project management, education and administration, along with a team of year-round and seasonal wardens. Funding for these staff is paid from payments due from developers on any new residential development built within 5km of the Thames Heaths.⁵³ These funds are held for TBH by one of the partnering local authorities, Hampshire County Council.

⁴⁸ A Very Special Place- About Us- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/about-us> (2025), accessed July 2025

⁴⁹ About Us- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/about-us> (2025), accessed July 2025

⁵⁰ Thames Basin Heaths Special Protection Area, *Waverley Borough Council Website*, <https://www.waverley.gov.uk/services/planning-and-building/planning-strategies-and-policies/thames-basin-heath-spa>

⁵¹ See <https://www.woking2027.info/allocations/sadpdexam/spadelivery.pdf> accessed September 2025.

⁵² Published Reports, *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/published-reports> (2025) accessed August 2025

⁵³ What are we doing?- About Us- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/about-us> (2025), accessed July 2025

4.1.3. SANG and SAMM Delivery

The longstanding existence of the TBH provides for strong links between representative partners. There are established communication channels and regular meetings and opportunities for consultation between the numerous partners to discuss the various challenges from increased development and concomitant recreational pressure.

4.1.3.1 SANG Delivery

A significant part of TBH's mitigation strategy is the designation of SANGS.⁵⁴ TBH uses a ratio requirement 8 hectares of alternative natural green space for every 1000 people, based on average occupancy per bedroom household, the same figure currently applied to the New Forest. More than 80 SANGs have been designated across the 3 counties of Hampshire, Berkshire and Surrey. They differ in size and facilities. Smaller SANGS may lack a car park, for example. Larger sites of 25 hectares offer more facilities and may lie within the Thames Heath ZOI. Larger developments will generally be required to provide onsite bespoke SANG whilst smaller developments pay a levy to Hampshire County Council towards the funding of strategic SANGs. TBH evolved this network of SANGS before SAMM coordination was fully in place, in contrast to Dorset Heaths Partnership (below). Each SANG is under the management of the local authority in which it is located with funding paid directly to the council from the partnership funds.

The main SANG focus is to provide recreational space suitable for dog walkers but they also are used walkers, horse riders and, in some forested areas, cyclists. TBH publishes a directory of dog-friendly, circular and enjoyable walks in surrounding SANGS called the Greenspace on your Doorstep Directory.⁵⁵ It lists 80 entries and is growing in number where it is safe to allow dogs to roam off-lead with minimum wildlife disturbance and car parks with an hour of free parking. In addition, a dog friendly group named the Heathland Hounds provides a constructive community for dog walkers.⁵⁶ The group shares helpful information regarding dog-friendly zones within the area, suggested walks, information on access and wildlife in the area and is supported by a Facebook Group. The Heathland Hounds wardens wear blue uniforms so that they are distinguishable from other wardens.

4.1.3.2 SAMM Delivery

⁵⁴ A Strategic Solution- About Us- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/about-us> (2025), accessed July 2025

⁵⁵ Search for a Greenspace on your Doorstep- Greenspace- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/greenspace> (2025), accessed August 2025

⁵⁶ Heathland Hounds- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/heathland-hounds> (2025), accessed August 2025

SAMM coordination is essential to ensure the continued monitoring, surveying and recreational management of the Thames Heaths, and the primary role of the Partnership is to ensure funding is always available.

SAMM payments cover the funding of the team of wardens, behavioural education initiatives and all surveying and monitoring conducted for the Thames Heaths. There are presently six full time wardens and five seasonal wardens employed from March to September for the bird nesting season.⁵⁷ They are deployed around the different parts of the Thames Heaths with a focus on education to minimise visitor disturbance as well as fire prevention.

Educational initiatives include engagement at visitor events and school visits. The wardens aim to visit all schools within the ZOI with their flagship Junior Citizen programme aimed at 8-16 year olds. A further important educational initiative is Heaths Week held each summer when a series of events is held, including talks, guided walks and treasure hunts. The Butterfly and Reptile Walk, and the night tours held to spot Nightjars, are examples of well attended events.

4.1.4 Monitoring

Monitoring both of the Thames Heath itself and associated SANGs is an important task. Habit surveys and monitoring of the ecological markers for biodiversity within the Thames Heaths are conducted every five years. Visitor numbers are also monitored via annual surveys and footfall monitors. Large amounts of data are gathered which requires significant resource to collate and analyse and TBH is seeking to employ a dedicated data analyst.

Citizen Science is a group which encourages members of the public to participate in important biodiversity surveys conducted on and around the Thames Heath through national campaigns such as Butterfly Conservation's Big Butterfly Count or RSPB's Big Garden Bird Watch.⁵⁸

4.1.5 Successes and Challenges

The Partnership's approach to achieving public cooperation focuses on encouraging positive behaviour through the fostering of education, understanding and interest in the unique habitats and rare species of the Thames Heath. Through the SAMM measures outlined above, the TBH ground team have engaged with more than 8,000 members of the public, more than half are children.

⁵⁷ What are we doing?- About Us- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/about-us> (2025), accessed July 2025

⁵⁸ Citizen Science- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/citizen-science> (2025), access August 2025

Social media has proved successful to spread key messages and to advertise the opportunities for public participation. During Heath Week 2024, more than 100,000 members of the public engaged on social media.

The pressures on the heathland habits exerted by dog walking continue to be a point of focus for the Partnership, particularly since the licensing of commercial dog walking on adjacent land, such as the Crown Estate, has had a displacement effect to the Thames Heath.

With 10% of the Thames Heaths suffering fire damage in 2024, TBH partners with SFRS Wildlife Prevention Advocates, a wildfire prevention group run by Surrey Fire and Rescue Service.⁵⁹ The group focuses on giving advice to minimise the threat to the heathland, responsible land management, publicising strict regulations against open burning and community engagement. Whilst also focussing on raising public awareness, for instance through its Junior Citizen Workshops, it is still estimated that only 25-30% of visitors are aware of the dangers posed to the heathlands by wildfire or are familiar with wildfire prevention.

There are challenges presented by the large number of partner local authorities with different recreational mitigation strategies. Consistency across TBH is at times difficult to achieve, for example, common signage & messaging. The same issues are present with consistency of access for monitoring across the sites. The goal is therefore to standardise approaches and to encourage cooperation and dialogue between the local authorities and landowners.

4.2 Dorset Heaths Partnership (DHP)

⁵⁹ SFRS Wildfire Prevention Advocates- Fire Patrol- *Thames Basin Heaths Partnership Website*, <https://www.tbhpartnership.org.uk/k9-fire-patrol> (2025), accessed August 2025

Map 1: Boundaries of the relevant heathland SPA, SAC and Ramsar sites within the context of Local Authority boundaries.



Contains Ordnance Survey data © Crown copyright and Database Right 2021. Contains map data © OpenStreetMap contributors. Terms: www.openstreetmap.org/copyright Designated site boundaries download from the Natural England website © Natural England.

(Figure from Footprint Report Dorset Heath Partnership 2022, from link <https://www.dorsetheaths.org.uk/wp-content/uploads/2023/02/Dorset-Heaths-long-term-analysis-report.pdf>)

4.2.1 Background and Location

DHP was established in 2001 as the Urban Heaths Partnership with EU funding and rebranded as Dorset Heaths Partnership in 2024 with the purpose of managing and minimising recreational pressure on the Dorset Heathland. The impetus was the again the restriction on development imposed by NE without appropriate recreational mitigation following the lead of the Bern Convention.

DHP is funded by local developer contributions collected by the two Local Planning Authorities, namely BCP and DCC, from residential development within its ZOI. This Zone is determined with the same limits as the Thames Heaths being a 5km zone of a protected

heathland site with no development is permitted within 400m of the heathland. This ZOI overlaps to the east with the New Forest 13.8km ZOI.

Originally the mitigation funds were collected centrally with funding decisions taken by DHP but since 2014 BCP and DCCI have retained their contributions from which they have met DHP costs. This change of financial structure overcame councillors' concerns as to the purpose and destination of mitigation funds. They can now easily identify mitigation outcomes which it is less efficient for the councils to deliver e.g educational, recreational control, monitoring.

4.2.2 Structure and Management

DHP has 10 partners, representing NE, the Dorset police and fire service as well as the landowners of the Dorset Heaths including BCP, DCC, conservation charities (e.g RSPB the National Trust and Dorset Wildlife Trust), FE and a single private owner. Each partner has a representative on the DHP steering group. Operational delivery groups manage ground level work and any urgent matters. For example, fire control by the Firewise Project and recreational dog control by Dorset Dogs.

The DHP mitigation work is delivered through an agreement with BCP and DCC with their core staff employed by DCC. Each council also employs their own mitigation officer with whom DHP can engage as necessary. The partnership has 1 annual warden and 2 seasonal wardens. Furthermore, the agreement provides for mutual assistance and the sharing of resources in times of need.

4.2.3. SANG and SAMM Delivery

DHP adopts a collaborative approach. Funding is formalised in the Dorset Heathlands Planning Framework Supplementary Document,⁶⁰ which sets out BCP and DCC's agreed recreational mitigation policy including the level of developer contributions, how funding is to be collected and apportioned by each authority. A Heathland Mitigation Delivery Report⁶¹ is released annually by DHP reporting delivery on agreed objectives of the Dorset Heaths Core Delivery Plan.⁶²

4.2.3.1 SANG Delivery

⁶⁰ Dorset Heathlands Planning Framework, *Dorset Council Website*, <https://www.dorsetcouncil.gov.uk/w/dorset-heathLPAnds-planning-framework> (2025), accessed August 2025

⁶¹ Monitoring, *Dorset Heaths Website*, <https://www.dorsetheaths.org.uk/monitoring>, (2024), accessed July 2025

⁶² <https://www.dorsetheaths.org.uk/wp-content/uploads/2024/08/DHP-Delivery-Plan.pdf> accessed September 25.

The prime responsibility for the delivery of SANGS remains with BCP and DCC although DHP works alongside these authorities and local developers. Specifically, it has a role in SANG design. For example, when a new SANG is proposed, DHP conducts public perception surveys to establish the most accessible and effective areas to divert visitors away from the Dorset heaths. DHP also has an important role in subsequent monitoring of SANGs with DHP assisting with recording of wildlife and habitat information via their monitoring and warden team.

DHP is also party to the promotion of SANGS to attract recreation away from sensitive heathland. To date, these infrastructure projects focus on making existing sites more attractive to the public with effective strategic SANGs at Upton Country Park and Canford Park. On-site SANGS at larger developments have shown similar value.

4.2. 3.2 SAMM Delivery

The DHP's work is focussed on SAMM mitigation. In contrast to the pattern of development of TBH (see 4.1 above) DHP has developed SAMM funding and delivery ahead of creation of SANGs. A central aspect of partnership working is SAMM coordination, to ensure funding is present for the staff to engage in ongoing monitoring, surveying and management of the protected sites. DHP has stressed the importance of ensuring that SAMM payments are ringfenced and kept completely distinct from normal maintenance costs. They are kept purely for mitigation expenditure, such as the funding of wardens, monitoring and behavioural education initiatives. There is some tension in use of the SAMM funds. They are not intended to be applied on conservation work as such but on managing and monitoring recreational impact.

The approach of DHP to recreation mitigation centres on encouraging public enjoyment of and respect for the heathland habitats. Visitor engagement and education underpin these efforts. Communication with the public is considered paramount for example through print leaflets and web and social media presence and pop-ups to promote campaigns at popular visitor sites. Care is taken to ensure all messaging and on-site signage is consistent, appealing and up to date.

Dorset Dogs is an important SAMM measure aimed at dog walkers. This project has been running for 15 years and seeks raise dog owners' awareness of wildlife disturbance from walking their dogs on the heathland. The scheme is especially important during bird nesting season. Information is balanced with of a dog-friendly message to promote nature friendly behavioural change. For example, signage encourages dog walkers to remove their dog's faeces to prevent nutrient imbalance.

Efforts to reduce refuse left on the heathland by visitors is promoted through Litter Free Dorset group.

4.2.4 Monitoring

Monitoring and surveys are key to the DHP's heathland management. Carpark count surveys are regularly taken to establish visitor numbers, popular times of day and other trends in visiting different heathland sites. Establishing the pattern for visitor frequency allows targeted use of resources to the busiest times of day or days of the week. Drones are also used in a new strategy for monitoring visitor behaviour and assess risk and mitigation in the most sensitive and fire-susceptible areas of Dorset heathland.

DHP worked with Footprint Ecology in 2022 to establish whether their mitigation strategies and associated investments were effective. The resultant report concluded that the DHP and LPAs mitigation strategies were largely working to protect the heathland habitats.⁶³ However, it recommended emphasis on public education.⁶⁴ The result was the proposal for the full time DHP publicity officer. A long-term assessment was similarly conducted to review the DHP's monitoring practices.

4.2.5 Successes and Challenges

The strong, established partnership between DHP and the two partner LPAs results in effective and easily maintained channels of communication, coordinated land management, environmental monitoring and consistent dialogue. A good example can be seen in the setting up of dog areas.

Dorset Dogs and Firewise UK are important elements of DHP strategy. The Firewise UK is partly funded by Dorset and Wiltshire Fire and Rescue Service and is part of an international programme for the study and control of wildfires. In response to high risk of wildfires across the UK, and especially the Dorset Heaths, DHP holds webinars to publicise this threat.⁶⁵ Concerted efforts are made to raise public awareness of the ways in which wildfires can inadvertently start as well as to establish a local communication network to provide alerts if smoke is seen and recruit volunteer wildfire watchdogs.

⁶³ Panter, Liley, Caals, Saunders & Clarke *Urban Development and the Dorset Heaths* Footprint Ecology (2022) see <https://www.footprint-ecology.co.uk/reports/Panter%20et%20al.%20-%202021%20-%20Urban%20development%20and%20the%20Dorset%20Heaths%20long%20term.pdf> accessed 1 March 2026.

⁶⁴ Monitoring, *Dorset Heaths Website*, <https://www.dorsetheaths.org.uk/monitoring>, (2024), accessed July 2025.

⁶⁵ Firewise Communities- *Dorset Heaths Website*, <https://www.dorsetheaths.org.uk/firewise> (2024), accessed June 2025

4.3 Bird Aware Solent (BAS)



Figure from Partnership website, from link <https://birdaware.org/solent/about-us/>

4.3.1 Background and Location

As its name suggested BAS's focus is upon reducing recreational disturbance to birds in the Solent area. It thus has a specific remit but over a geographically extensive area.

Extensive research conducted between 2009-2013 assessed the impact of recreational disturbance on birds within three SPA's in the Solent region and led to NE calling upon the region's LPAs to implement mitigation measures to enable new development. Footprint Ecology drew up recommended mitigation measures leading to the establishment of The Solent Recreation Mitigation Partnership (now rebranded as BAS) in 2014. The Partnership initially operated under an Interim Strategy before a full strategy was agreed in 2017. This in turn was revised and updated in 2024 following a robust and positive review.⁶⁶

Three SPAs lie within the Solent region – the Solent and Southampton Water, Portsmouth Harbour and Chichester Harbour. The ZOI for these areas extends 5.6 kilometres beyond their boundaries with slight variation in winter and the breeding season. It thus forms an

⁶⁶ See relevant Consultations, Strategies and Reviews at <https://birdaware.org/solent/about-us/our-strategy/> accessed 21 September 2025.

almost continuous line from Hurst Castle in the west to Chichester Harbour in the east taking in Southampton Water and the northern coastline of the Isle of Wight. It is a long and thin chain extending to 245 kilometres with 96 operationally vulnerable sites. These hotspots are identified from collected data and allow the efficient targeting of resources.

4.3.2 Structure and Management

BAS works with 15 LPAs as well as NE and three conservation bodies namely RSPB, Hampshire and Isle of Wight Wildlife Trust and Chichester Harbour Conservancy.⁶⁷

Governance is provided by the Partnership for South Hampshire to whom BAS regularly reports. BAS has its own Project Board and Steering Group to oversee the strategic direction and delivery. The Project Board, with a smaller and more focussed membership, tends to provide more direction than the larger and more diverse Steering Group.

The operational team is headed by a partnership manager supported by a team of rangers to cover the extensive coastline and headed by a Team Manager. Other employees have responsibilities for outreach and education, prevention of wildlife disturbance, monitoring and data analysis and all forms of communications including codes of conduct and print and social media. A dedicated team under the flag of Coast and Country Canines focuses on dog control, education and outreach given that dogs are a major cause of wildlife disturbance.⁶⁸ The use of volunteers is being explored under the guidance of a dedicated volunteer co-ordinator.

Funding is provided by developer contributions which are consistent across all 15 LPAs with only slight variation (less 1%) introduced in 2025/26 where mitigation is for wintering and breeding birds or for wintering birds only. Funding levels are based upon projected housing delivery and the number of bedrooms and are increased annually in line with the retail price Index. The funding is collected by the LPAs and paid to BAS to meet its operating costs, monitoring, capital support costs and in perpetuity provision. The projected budget for 2024/25 totals almost £3.7 million.⁶⁹

4.3.3. SANG and SAMM Delivery

⁶⁷ See <https://birdaware.org/solent/about-us/our-partners/> accessed 21 September 2025.

⁶⁸ See further <https://birdaware.org/solent/about-us/our-team/> accessed 21 September 2025.

⁶⁹ BAS Revised Strategy 2024 available at <https://birdaware.org/solent/about-us/our-strategy/> accessed 21 September 2025.

BAS's strategy is SAMM focussed but with a growing interest in SANG related initiatives.

4.3.3.1 SANG Delivery Each participating local authority makes provision for alternative recreational greenspace. In addition BAS has supported a 200 acre SANG at Alver Valley Country Park between Gosport and Lee-on-Solent by securing finance to upgrade facilities. It is estimated that the park is deflecting over 1,300 would be coastal visits per week during the winter months with a 60% increase in visitors, 70% of whom are dog walkers.⁷⁰ Other initiatives include financial biannual support of £2 million for SANG capital projects as well as monitoring. For example, all weather paths improved a local nature reserve at Peartree Green near Woolston.⁷¹ Research has been conducted to identify the key criteria for a successful SANG which will help guide the allocation of funding.

4.3.3.2 SAMM Delivery BAS provides a wide array of SAMM measures all of which take a collaborative approach to nudge visitors into behavioural change. Just one PSPO has been supported to deal with dog walking over a small stretch of foreshore at Hillhead. In terms of public engagement each year there are over 650 warden patrols, 6,000 leaflets distributed, 30 guided walks, over 50 pop-up events and an annual Arts Fest.

Given that dogs are the major source of bird disturbance, the Coast and Canine Team is a key element of public guidance and has a dedicated website.⁷² It provides information on where to walk, a newsletter and guidance on wildlife friendly walking. A further targeted initiative is Wildlife with Watersports to limit wildlife disturbance with a map to highlight wildlife-friendly entry and exit points and areas of the coast where birds are particularly sensitive to disturbance.⁷³

4.3.4 Monitoring

Monitoring of bird, visitor numbers and the use of SANGs along with other important conservation statistics is crucial to BAS work. They have a dedicated data analyst, with plans to employ another, and have developed software applications to assist in the efficient targeting of resources.

⁷⁰ See <https://birdaware.org/solent/about-us/our-successes/alver-valley-country-park-sang/> accessed 21 September 2025.

⁷¹ See <https://birdaware.org/solent/about-us/our-successes/peartree-green-site-specific-project/> accessed 21 September 2025.

⁷² <https://coastandcountrycanines.org/> accessed 21 September 2025.

⁷³ <https://birdaware.org/solent/about-us/our-successes/harmony-watersports-and-wildlife/> accessed 20 September 2025.

The monitoring of BAS's own performance is conducted through periodic reviews and oversight by its Project Board and Steering Group. The last review was conducted in 2023 and led to a revised strategy published in 2024.⁷⁴

4.2.5 Successes and Challenges

BAS prominently display their operational successes on their website.⁷⁵ These include the SANG and SAMM initiatives described above. Their work has been described as “ground-breaking ...and has provided a mould for many other mitigation schemes,” its “ranger team are well known and respected” and it “is perceived as well run.”⁷⁶

The last review conducted in 2023⁷⁷ sadly revealed a continuing decline in bird numbers which it attributed to national decline and climate change rather than any direct correlation between increased development as mitigated by BAS's work. Significant amongst the range of measures recommended by the review is the need to increase ranger numbers and their profile, the consideration of the potential for ‘harder’ mitigation measures (e.g. enforcement, restricting access, reducing parking opportunities) and a focus on SANGs. Other recommendations are already in hand e.g the use of volunteers, widening mitigation to include breeding as well as wintering birds, an increased resource for dog and watersport mitigation and plans to increase staffing levels once funds are released.

Section 5 Observations and Evaluation

The information gleaned from publicly available sources and targeted FOI requests presents a very concerning picture of the current implementation and operation of New Forest Recreational Mitigation duties. We set out below our preliminary evaluation.

5.1 Reluctance & Failure

Some LPAs have embraced their duties as least so far as the prompt adoption of mitigation policies but by no means all. BCP and DCC stand out as LPAs that have not fully engaged with New Forest mitigation although change is being implemented. DCC has only a

⁷⁴ All reviews and strategies are available on the BAS website see <https://birdaware.org/solent/about-us/our-strategy/> accessed 20 September 2025.

⁷⁵ See <https://birdaware.org/solent/about-us/our-successes/> accessed 20 September 2025.

⁷⁶ See Liley, Panter, Saunders & Caals, Initial review of the effectiveness of the Bird Aware Solent Strategy (Footprint Ecology March 2023) available at <https://birdaware.org/solent/about-us/our-strategy/> accessed 20 September 2025.

⁷⁷ Ibid.

relatively small area within the ZOI but BCP can have no such justification for limited action. Others have been slow to adopt clear policies, WC for example only agreed their detailed mitigation policy in 2024 and SCC policy is difficult to find and is not being followed.

Perhaps more worrying is evidence of window dressing with policies in place but with poor implementation. Indeed, in some cases there has been a failure to implement parts of stated policies. SCC again stands out with an apparent failure to make agreed SAMM contributions to fund Forest rangers. ECB too have not made full SAMM contributions. Drilling down into compliance has been a challenge with a frequent lack of transparency despite the statutory IFS requirements and targeted FOI requests. IFS errors have also been uncovered. We detail further compliance weaknesses below. It is also apparent that in some cases, e.g both by FBC and SCC, that there is no clear separation leading to confusion between New Forest and BAS mitigation.

NE have an important role in ensuring compliance. Indeed, it is their actions in objecting to any further planning permissions that finally brought BCP to accept their duty to adopt a SAMM payment policy. NE have also been essential to the formation of the three Mitigation Partnerships that form our case studies. Without NE's robust stance to require LPAs to fulfil their statutory duties, none of these Partnerships would have been established. NE thus needs urgently to do more to require a Mitigation Partnership in the New Forest.

5.2 Lack of SAMM Co-ordination

Our cases studies examine just three examples of a co-ordinated approach to the SAMM elements of recreational mitigation. There are many more similarly effective partnerships working across other Protected Landscapes.⁷⁸ Thus it is both disappointing and surprising that a co-ordinated approach has not yet been achieved for such a sizeable SAC and SPA as the New Forest. The NFA believe that it is essential that a co-ordinated partnership be established without delay if recreational mitigation measures are to have any real impact with attendant transparency, accountability and monitoring. The current ad hoc approach has failed and is still manifestly failing the Forest. A mitigation partnership would also be an important component in delivering the RMS and the NFNPA Partnership Plan. Urgency is needed with the data, upon which the Footprint Ecology recommendations are based, rapidly becoming out of date in the face of recreational pressure and increased house building targets.

⁷⁸ Natural England, Compilation and review of evidence leading to SANG and SAMM Provision (2024) available at <https://publications.naturalengland.org.uk/publication/6015060338802688> accessed 22 October 2025.

The NFNPA and TVBC have led attempts to achieve co-ordination with the 2023 Footprint Ecology SAMM Report providing a blueprint scheme. There is in principal willingness from the nine LPAs to participate in a SAMM mitigation partnership. Their policies are labelled interim with that in mind, but progress is painfully slow. The recommendations have been before various committees. Particularly telling is the Partnership for South Hampshire Joint Committee Meeting held in September 2023 at which the NFNPA gave a presentation on a co-ordinated approach to recreational mitigation.⁷⁹ Although the represented authorities agreed to work together on a co-ordinated approach, there was disquiet expressed by some LPAs over the ZOI methodology which looks to distance rather than accessibility. Consequently, we are given to understand that certain LPAs on the fringes of the ZOI are still reluctant to agree their contribution. It is particularly frustrating that almost all the LPAs have shown themselves able to co-ordinate their recreational mitigation responsibilities to the Solent SPA and the Dorset Heaths, yet they have failed to work together on New Forest mitigation.

5.3 Inadequate SANG Provision

Mitigation partnerships look primarily to co-ordinate SAMM measures with the provision of SANGs left to individual LPAs although mitigation partnerships are generally tasked with monitoring the effectiveness of SANG provision.

Individual LPAs data examined above displays three concerns. First, a lack of ambition in the creation of new strategic SANGs which could effectively draw recreational pressure away from the New Forest. There is some evidence of co-operation between TVBC and EBC with proposed SANGs on their boundary. However, this is not enough. With housing pressures increasingly being felt and urbanisation surrounding the New Forest, there is a need to explore the provision of sizeable SANGs in the east, north and west of the New Forest. BCP and DCC have so far escaped attention relying on SANG provision for the Dorset Heaths, but the adequacy of this approach must be challenged given housing expansion in the Christchurch and Avon Valley areas.

Secondly, we too often see funds being spent on the improvements of existing greenspace with relatively minor provision of additional facilities and upgrading. These ‘improvements’ might be expected to fall within LPAs existing open space budgets rather than parade under the façade of New Forest mitigation. Transparency in the decision-making process by which recreational mitigation funds are

⁷⁹ Recreational mitigation appears regularly on the agendas of the Recreational Management Steering Group see <https://www.newforestnpa.gov.uk/documents/recreation-management-strategy-steering-group/> accessed 22 October 2025.

allocated and applied is needed to ensure accountability. IFS reveal the figures but not infrastructure delivery information which is difficult to find and often lacks detail or justification.

Lastly, in the allocation of recreational mitigation payments we see an over emphasis on SANG payments with relatively little attention paid to SAMM measures. The Footprint Ecology SAMM report calls for the employment of 9-12 wardens yet at present only two authorities fully fund a ranger through SAMM contributions whilst other promise but have not delivered. Local councillors perhaps prefer to keep and allocate funds within their constituencies but to do so smacks of self-service and fails to adequately recognise and discharge their statutory responsibilities to the New Forest's protected areas. It needs to be remembered that public authorities also owe a duty to "further the purposes" of national parks. Providing recommended SAMM measures would help fulfil that duty.⁸⁰

5.4 Lack of Monitoring and Perpetuity Provision

Monitoring the effectiveness of measures is an essential element of recreational mitigation yet we have found little publicly available evidence of meaningful monitoring by LPAs or evidence of what provision they are making for in perpetuity funding. As might be expected the NFNPA is an exception with clear accounting for perpetuity provision and annual reports of the Implementation of their recreation mitigation measures under the guidance of a dedicated steering group.⁸¹ There is also some evidence that NFDC has been monitoring their SANGs but even, so we have been only able to trace a report of 2019 which analyses this data.⁸² Other evidence (if any) of monitoring by other LPAs is purely descriptive with no meaningful evaluation. The same can be said for evidence of in perpetuity funding.

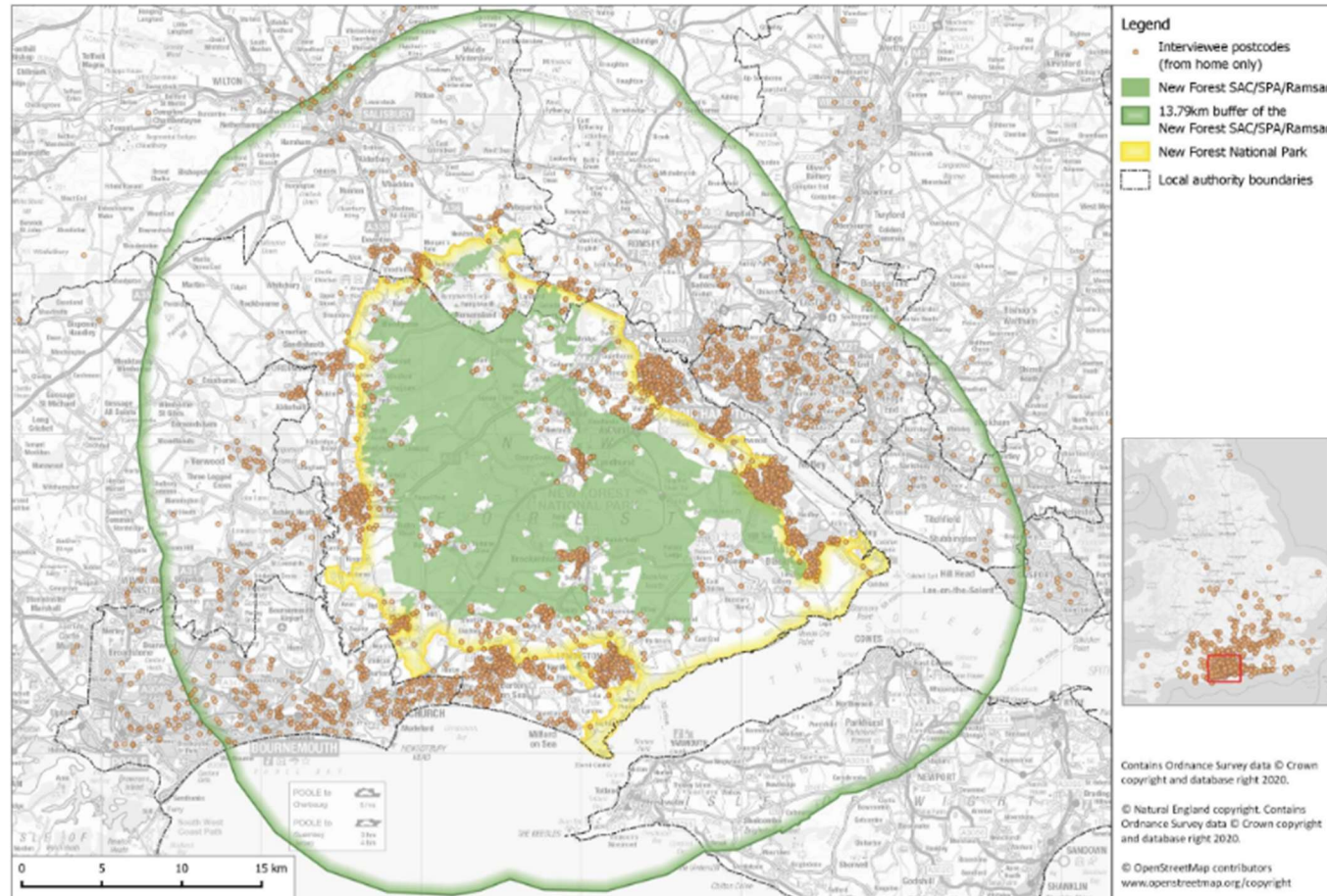
⁸⁰ S11A National Parks & Access to the Countryside Act 1949.

⁸¹ See <https://www.newforestnpa.gov.uk/planning/development-impacts-on-protected-areas/> accessed 22 October 2025.

⁸² New Forest District Council: Local Plan Review 2016-36 Examination Document Matter 8 Protecting the Environment.

Annex 1

Map 1: Home postcodes of those on a short visit directly from home with the 13.79km buffer of the New Forest SAC/SPA/Ramsar site



Annex 2

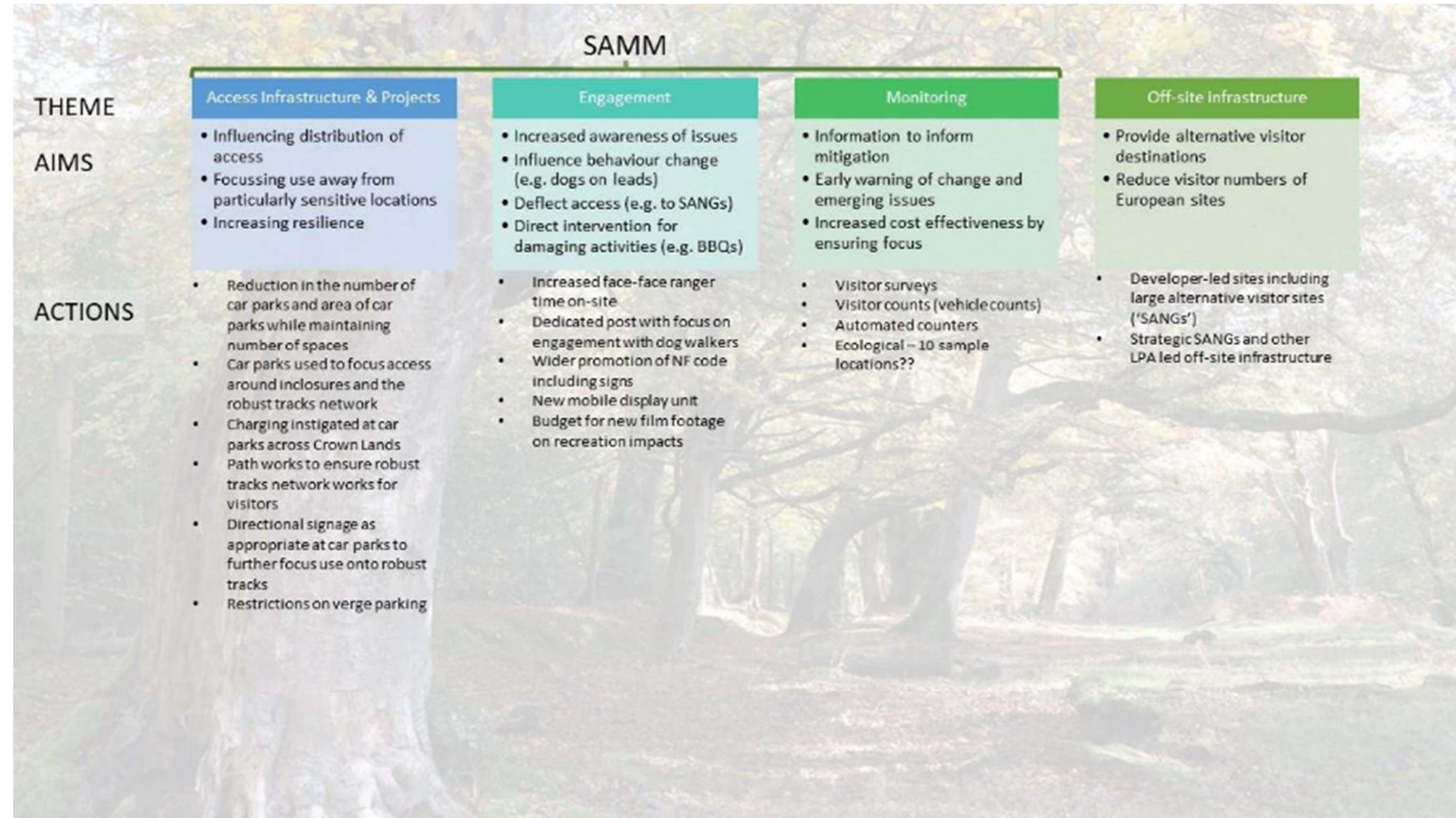


Figure 1: Overview of SAMP package

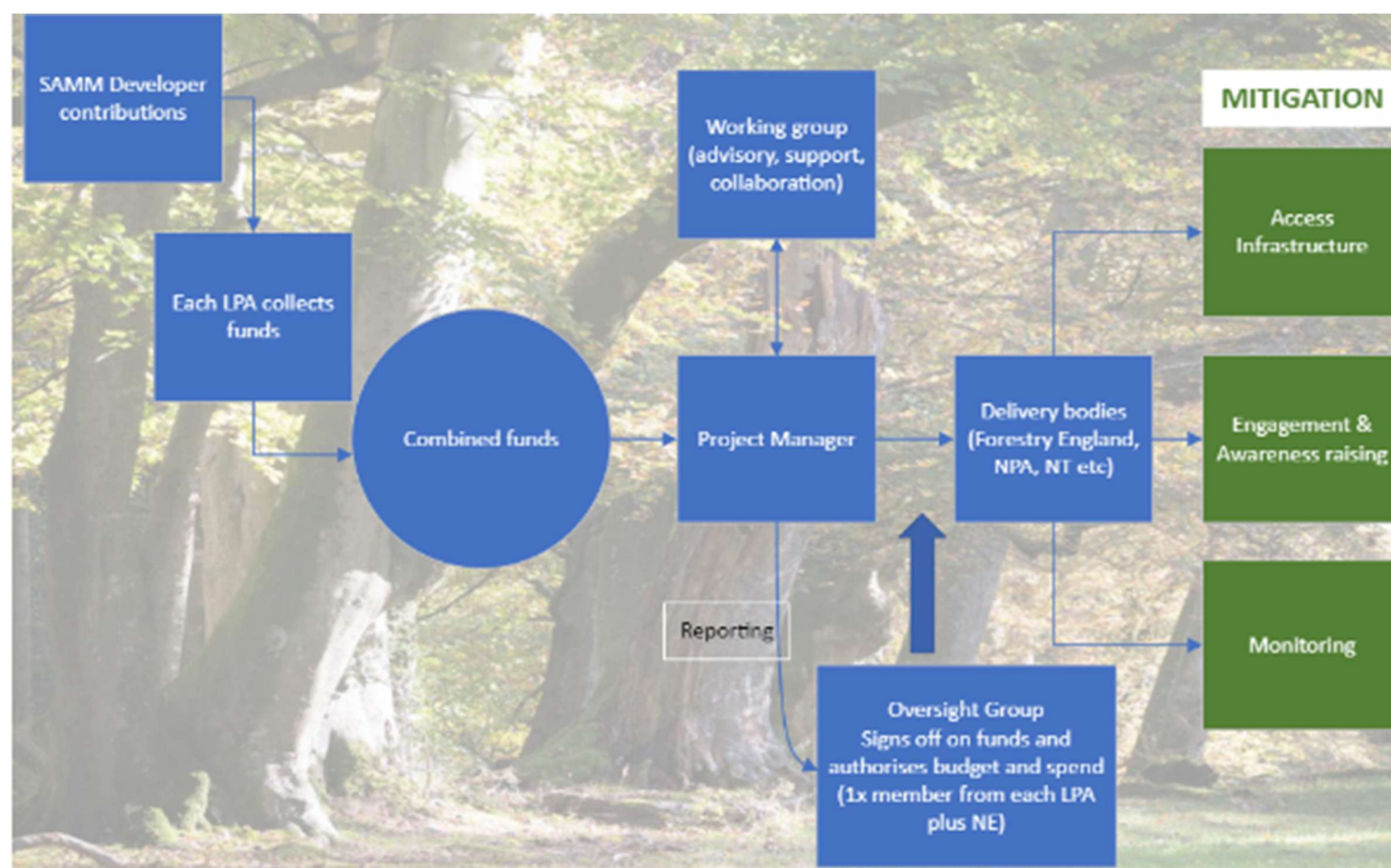


Figure 2: Overview of governance

Annex 4

Estimates of ranger posts to achieve different levels of coverage of New Forest car parks.

	Scenario 1 3 car parks covered per day	Scenario 2 4 car parks covered per day
Ranger days per yr per post	200	200
Car parks visited per day	3	4
Car parks total	150	150
Visits to each car park per year	50	50
Number ranger posts required	12.5	9.4

Annex 5 : Summary of visitor data, levels of housing growth anticipated for each authority that will require mitigation and the tariffs per authority.

Local PLPA Planning Authority	Interviewees from home in original survey and within 13.8km	Interviewees from home in original survey per 1000 dwellings “visit rate”	Potential amount of housing need to be mitigated (%)	Suggested tariff per dwelling	Overall contribution per authority based on suggest tariff and level of housing needing to be mitigated
New Forest National Park	874 (23)	56.0	260 (1)	£2,700	£702,000
New Forest District	1781 (48)	26.2	3204 (7)	£2,700	£8,650,800
Test Valley	154 (4)	6.3	1650 (4)	£700	£1,155,000
Wiltshire	147 (4)	5.8	2710 (6)	£600	£1,626,000
Dorset	108 (3)	3.9	3144 (7)	£400	£1,257,600
Southampton	268 (7)	2.5	14,464 (32)	£300	£4,339,200
BCP	290 (8)	2.4	10,313 (23)	£300	£3,093,900
Eastleigh	84 (2)	1.7	6663 (15)	£200	£1,332,600
Fareham	25 (1)	0.7	2572 (6)	£100	£257,200
TOTAL	3731 (100)		44,980 (100)		£22,414,300

Abbreviations

BCP - Bournemouth Christchurch and Poole Council

BAS - Bird Aware Solent

CIL – Community Infrastructure Levy

DCC – Dorset Council

DHP - Dorset Heaths Partnership

EBC - Eastleigh Borough Council

FBC - Fareham Borough Council

FE - Forestry England

Habitat regulations - Habitat Regulations (Conservation of Habitats and Species) Regulations 2017 (as amended)

IFS – Infrastructure Funding Statement

LPA - Local Planning Authority

NE – Natural England

NFDC – New Forest District Council

NFNPA – New Forest National Park Authority

RMS – Recreational Management Strategy

SAC – Special Area of Conservation

SAMM – Strategic Access Management and Monitoring

SANG – Suitable Alternative Natural Greenspace

SCC – Southampton City Council

SPA – Special Area of Conservation

TBH - Thames Basin Heath Partnership

Thames Heaths - Thames Basin Heaths Special Protection Area

TVBC – Test Valley Borough Council

WC – Wiltshire Council

ZOI – Zone of Influence