



Planning and Transport Committee

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reply to:

Brookley Farmhouse
Sway Road
Brockenhurst
SO42 7RX

grahambrookley@gmail.com

Sent as attachment to Email to planning@hants.gov.uk

Development Management
Universal Services
Hampshire County Council
The Castle
Winchester, SO23 8UD

Dear Team

Application HCC/26/0213

Proposed highway improvements on the A326 between and including the junctions with Michigan Way in west Totton and Main Road at Dibden

The New Forest Association (NFA) is one of the oldest conservation and environmental groups in the UK. Founded in 1867 with aims to protect the Forest's unique quality and the tradition of commoning in the Forest. Those aims remain relevant today.

1. NFA comments on this application
2. NFA notes that this application is a "Major Development" defined In the NFNPA Local Plan as any scheme with the potential to cause significant impacts on the Park's landscape, wildlife, or cultural heritage due to its scale, character, or nature. The Local Plan states that such development is strictly restricted and generally refused unless there are exceptional circumstances and proven public interest.

It seems to NFA that it is thus incumbent on the applicant to prove that the scheme is in the public interest and that the necessary damage to the national park is sufficiently mitigated and compensated. Additionally the applicant must fulfil the obligation regarding a 10%

www.newforestassociation.org
www.facebook.com/NewForestAssociation
Registered Charity No: 260328

Chair: Sarah Neild
Chair.fonf@gmail.com
Hon Secretary: Tracy Gribble
Secretary.fonf@gmail.com

minimum uplift in biodiversity (BNG) and the obligation under the Levelling Up and Regeneration Act 2023 to "seek to further" the statutory purposes of the National Park.

3. Public Interest

NFA does not consider *exceptional circumstances* exist. Given the current world and national trading and political uncertainty, NFA gives little weight to predictions of traffic growth from industrial developments on the Waterside. The traffic project should prove public interest on a local, (New Forest District Council), basis. It may well be that the residents to the east of the A326 will feel satisfied that crossing the A326 is made considerably easier, especially for non-motorised traffic, and there is a clear possibility of traffic being permanently diverted away from residential roads.

For the residents of the National Park however there is only a suggestion that in times of road upheaval, and of its own accord, less traffic might divert through minor Forest roads. The application seeks to add approximately 4km of carriageway in the National Park and NFA consider the most rational, money-saving, tranquillity-enhancing, tourist and resident-friendly compensation would be the closure to motorised traffic of at least as much carriageway within the Forest. NFA is aware that HCC have in the past considered the closure of the Borderwood Arboretum Ornamental Drive through Mark Ash enclosure and, more recently, part of Holmesley Passage. This form of compensation, (a partial precedent exists in the land exchanges at A35 bridge and Ipley Cross), most closely adheres to the policies in LTP4 and HCC's emerging *New Forest Movement Strategy*. HCC may consider other locations more suitable.

4. The solution suggested in 3 would also satisfy, (what would seem to NFA to be a requirement), that the park be compensated for the land lost to a coating of asphalt. If the solution in 3 is not accepted then HCC should find a device that enables land it owns within the Park to be made, (for instance), public access or available to commoners' stock in perpetuity.

5. NFA notes that the use of low noise coating is a core component of the development and relies on HCC to demonstrate that noise disturbance into the Park will not increase.

6. NFA notes the use of strategic tree planting, hedgerow additions and noise barriers to reduce visual disturbance to the National Park and relies on HCC to ensure that visual disturbance will not increase.

7. The scheme diminishes the ecological value of the National Park and NFA recognise that HCC have committed to actions that seek to minimise that damage and provide compensation and/or mitigation not only to negate that damage but also to satisfy BNG requirements and *further the interests* of the Park. NFA relies on Natural England to ensure the ecological value of the National Park is enhanced as required by legislation.

Yours faithfully,

Graham Baker
Secretary New Forest Association - Planning & Transport Committee