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## New Forest National Park Plan Consultation response

We are pleased to have the opportunity to comment on the draft plans for the New Forest National Park.

## Who we are

The Game & Wildlife Conservation Trust is a national charity that carries out ecological research into game and wildlife in Britain. We employ 100+ staff of whom about 20 have PhDs – mostly in biological sciences. Our research aims to develop better ways of managing and conserving game and wildlife in our countryside. We have around 20,000 members as paying supporters. We spend £3m annually on field research projects in the UK and a further £1m on extension, demonstration and educational programmes to promote them. These programmes are mainly aimed at farmers and landowners who manage the game and wildlife on their properties. Often their properties have SSSI and other designations and, in the North of England, many of them are in National Parks.

Our headquarters are on the banks of the River Avon in Fordingbridge, and a lot of our staff are familiar with the New Forest and have been for years. Some live in it, exercise themselves and their dogs on it, ride across it and indeed, in some places, fish on the lower reaches of the forest streams.

This response is on behalf of our organisation. Some members of staff also intend to respond as individuals.

## Some general points

 We are very impressed by the draft plan. Although quite a weighty document it avoids the minutiae and sets out clear visions on policy that we applaud. In particular we welcome the assertion of the Sandford Principle and agree that it should be the litmustest for all development within the park.

- 2. National Parks are in the delicate position of trying to influence the management of land that they do not own. They can impose their view by statute (planning rules) or by plain influence. It goes without saying that landowners and farmers tend to be happier with the latter rather than the former. A heavy hand by an agency or planning authority can lead to resentment and stiffle initiative. This is often the case in conservation matters.
- 3. Promoting a common identity for the park is a theme evident in all national parks and is an important element in this plan too. While this is desirable it can perversely suggest to the visiting public that the land is owned by the tax-payer. This tends not to happen on land where fields are enclosed but on open commons it happens all too often indeed most of the public completely misunderstand the term "common" thinking it to mean somehow that it is owned by the community instead of recognizing that it is land over which certain people have "rights held in common". The public are often surprised to learn that land-owners in national parks manage open common land for their own purposes. On the North York Moors, for example, almost the entire upland area is managed as grouse moor. This is barely acknowledged in park literature or signage and gets only a brief mention on the park website. The public might be forgiven for wondering why grouse shooting is even permitted.
- 4. Commendably the New Forest plan places a very high priority on maintaining valuable habitats and their associated wildlife. While we believe that Natural England understands the importance of managing habitats, but we don't think it has the same appreciation about managing animal numbers. The big private estates employ gamekeepers to control deer, rabbits and pigeons to protect trees and crops, and these gamekeepers also control foxes and crows to protect gamebirds. The Forestry Commission also used to control foxes as part of a "good neighbour" policy. This certainly had a positive effect on species like curlew and lapwing which are now in a precarious state in the New Forest. By contrast these same waders abound in great numbers on the national park uplands of the Yorkshire Dales and North York Moors. This is not because of better habitat but because these northern moors are managed by a small army of gamekeepers who keep numbers of foxes, crows and stoats down to benefit grouse. This also protects the vulnerable ground nesting waders like curlew and lapwing. We have proved the signifiance of this in a recent eight year experiment in Northumberland<sup>1</sup>. RSPB are coming to this conclusion too and we anticipate more control of foxes and crows on some of their reserves<sup>2</sup>. In short wildlife management

has had a long tradition in the Forest and should not be discounted. This subject is not discussed in the draft plan. It should be. Indeed it is not just a few birds that could be compromised by a lack of wildlife management; some of the park's other objectives could be too. How will you bring back coppicing to deciduous woodland without deer control? Indeed are the deciduous woodland areas self-sustaining in the face high numbers of deer?

- 5. Managing levels of grazing in the Forest is challenging. For many species, especially some insects like butterflies and stream-side damselfies, the current grazing pressure is probably too high. It is certainly too high for woodland regeneration <sup>3</sup>. We are led to believe, however, that high grazing pressure is essential to maintain the heathland SSSIs. It seems this paradox may only be addressed by fencing off some habitats. For example some streams might benefit from this giving better riparian vegetation which would benefit a range of species including sea-trout which move into the small New Forest streams to spawn.
- Predation control and moorland birds. The Game and Wildlife Conservation Trust, Review of 2007, pp 40-43.
- 2. The Predation of Wild Birds in the UK: a review of its conservation impact and management. RSPB, 2007.
- 3. Peterkin, G.F. & Tubbs, C.R. (1965) Woodland regeneration in the New Forest, Hampshire since 1650. *Journal of Applied Ecology*.

Stephen Tapper 27 October 2008