

South Downs

Local Access Forum

Draft Hampshire Countryside Access Plan 2025 to 2035 - Formal Advice from the South Downs Local Access Forum

The South Downs Local Access Forum (SDLAF) welcomes the opportunity to provide formal advice on Hampshire County Council's (HCC) draft Countryside Access Plan (CAP) 2025.

Under Section 94(5) of the Countryside and Rights of Way Act 2000, HCC is required to have regard to this advice. Furthermore, the strengthened duty in Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by the Levelling-up and Regeneration Act 2023, Section 245) requires all local authorities to further National Park purposes and to give greater weight to conserving and enhancing natural beauty, wildlife, and cultural heritage where purpose conflicts arise.

1. Duty to Further the National Park Purposes

- Comments had already been made at earlier stages of the CAP but the current draft still under-represents the two National Parks (South Downs and New Forest). Although the Section 245 duty is now mentioned, there are no different policies for the national parks, and the plan is still aiming to have district-based policies rather than policies focused on protected landscapes.
- There is concern that the status of the National Parks is inadequately recognised in the Plan and that there should be bespoke guiding principles and delivery strategies to ensure that these nationally-designated protected areas (and their statutory purposes and special qualities) are fully recognised and taken into account in all the actions.
- There should be a strong and clear recognition of these points in the Plan's Executive Summary and throughout the document.

2. National Park Recognition and Governance

- Wherever the Plan refers to "District/Borough Council areas", amend wording to recognise that National Park Authorities are the planning authorities within their boundaries and that distinct legislation applies in Protected Landscapes, requiring bespoke policies for South Downs NPA and New Forest NPA areas.
- Ensure that the CAP's district-aligned sub-plans explicitly include a South Downs National Park focused plan, matching the approach for Districts/Boroughs.

3. Policies and Guiding Principles

- The two statutory National Park purposes, the South Downs' Special Qualities, and the South Downs Partnership Management Plan (PMP) should underpin distinct policies in National Park areas, different from the rest of Hampshire.
- The Universal Approach to PRow Management described in the Plan is felt to be inappropriate and the County Council should be aiming to provide higher standards within the National Parks.

These should include a greater emphasis on accessibility but also enhanced maintenance regimes and sensitive repairs and improvements which respect the landscape character and meet public expectations of National Parks. Examples of importing inappropriate materials (such as hardcore, cement and concrete) for repairs have been cited with no regard shown for whether these are suitable for fragile protected landscapes and whether they wash out into equally fragile water catchments, streams and aquifers.

- The same concerns arise in relation to vegetation cutting. Deprioritising routine maintenance is likely to lead to adverse effects across the network, making paths less attractive, less usable and less safe. This would be of particular concern in the National Park where the attractiveness and usability of PRoWs is vital to delivering Statutory Purposes. At the very least there should be a proactive maintenance regime in the National Park and this should help to reduce the lack of confidence people have in using the network which is acknowledged in Delivery Area C: Listening, Informing, Educating.
- the County Council should be identifying the unique opportunities that National Parks offer as it is likely that bespoke funding may be available from Government for initiatives which assist the delivery of green social prescribing as well as for enabling underrepresented communities to discover protected landscapes. The CAP can also play a greater role in attracting visitors to the county, thereby assisting with economic development: but people from outside the county are likely to have different needs and expectations from residents, particularly in National Parks. For all these reasons the Universal Approach to PRoWs in the CAP is inappropriate and there should be different policies in National Park areas as distinct from the rest of Hampshire.
- Guiding Principle P7 (balancing access, nature recovery, and climate resilience) must explicitly recognise that in Protected Landscapes this balance shifts toward conservation and enhancement.
- Actions to attract new and more diverse users, especially vulnerable groups, are essential for the National Park areas. We urge stronger policies on safety, waymarking, and promotional activity to address discouragement by real or perceived risks
- On conflicts (page 31), the management of byways must differentiate between Protected Landscapes and the wider county: motorised rights in national parks should be strictly limited in favour of quieter, non-motorised enjoyment. Findings from the SDNPA's recent Partnership Management Plan survey showed that 49% of the free-text comments that were about access cited dangerous byways as a barrier for walkers and cyclists.
- This issue is also relevant to Delivery Area A (Approach to Network Management) where the document explains that "In order to achieve these priorities, resources need to be focused so that investment is targeted where it will have the most benefit to most people". It is felt that scheduled vegetation cutting work, in the National Park, would have a much greater impact on a much larger number of potential users than carrying out expensive repairs on Byways Open to All Traffic.

4. Action Tables and Outputs

- A2 (Review of vehicle management policy): change from "Long Term Output" (10 years) to "Short Term Output" (1–4 years), reflecting near completion.

- A12 (Byways safety improvements): reclassify as a short-term priority, with accelerated implementation in National Parks.
- A8 (Mapping layers): specify distinct mapping layers for each National Park in addition to district maps.
- C1 (Coastal priority): it is noted that there is an explicit priority for Coastal Areas but not for nationally protected landscapes such as National Parks. An equivalent high-priority action for National Park areas should be introduced.
- C10 (Performance data and annual monitoring): welcome this commitment and recommend inclusion of National Park-specific metrics, visitor satisfactions survey, and annual monitoring.

5. Structure and Flow of the Document

- The sequence of Delivery Areas, new Areas of Focus, and Action Tables is confusing with little detail of the new 'areas of focus' until later in the Appendices. The four new 'areas of focus' (and their guiding principles) would be better placed immediately before the relevant Action Tables, ensuring each principle directly maps to corresponding actions.

6. Health, Wellbeing, and Access for All

- The Action Tables give insufficient emphasis to Health and Wellbeing (P3, P4) and Access for All (P5, P6). Actions should:
 - Identify and remove physical and perceptual barriers to rights-of-way use.
 - Develop targeted outreach and volunteer-led audits with health partners and disability advocates.
 - Expand the commitment to 'stile-free routes' into broader 'accessible routes' programme, co-designed with partners and user groups.

7. Public Transport and Information

- Public transport provision deserves greater detail: explain how HCC can seek to improve bus, train, and shuttle links to key rights of way, particularly to/from National Park gateways.
- More sustainable transport will be vital in delivering the CAP's 'Access for All' and its Climate Change aims. Benefits also include reducing car dependency and associated environmental effects, ensuring residents without access to a car can enjoy the countryside in the National Parks and helping visitors arriving in the area by train who can assist the local economy.
- Delivery Area C (information) must ensure materials are produced in accessible formats (large-print, easy-read) and that digital mapping tools highlight accessibility features.

8. Auditing Strategically Important Routes

- Commit to regular, multi-criteria audits of strategic routes to assess surface condition, safety, signage, and accessibility.

The SDLAF trusts that these recommendations will help Hampshire County Council refine the CAP to meet both county-wide and National Park-specific needs.

The submission by the South Downs National Park Authority (dated 11 July) has been noted and it is hoped that all the points within it will be considered in detail to help deliver shared ambitions for countryside access and landscape protection.

Yours faithfully,
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On behalf of
Doug Jones
Chair of the South Downs Local Access Forum

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