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12 April 2026

Dear Minister and Mr Seddon

### **Forestry England Car Park Charging Proposal EIR Response and Next Steps**

Thank you for Forestry England's letter of 31 March 2026 and for the documentation provided in response to our Environmental Information Regulations (EIR) and Public Sector Equality Duty (PSED) requests. We acknowledge receipt of these materials. This letter sets out our initial assessment while reserving our position pending further review and engagement with New Forest parish and town councils.

We have addressed this letter jointly to the Minister for Nature and the CEO of Forestry England, given the seriousness and urgency of the issues identified.

For the avoidance of doubt, the views set out in this letter represent the considered opinion of Beaulieu Parish Council, based on the information currently available to us. They are provided in good faith, in the context of our statutory role and our responsibility to represent the interests of our community. This letter is intended as a constructive

and evidence-based appraisal of the proposed scheme, reflecting our view that there are significant areas where further work, engagement and refinement are required to ensure that the scheme is implemented lawfully, safely and fairly. Nothing in this letter is intended to suggest improper conduct, but rather to highlight areas where, in our view, the current evidence base and process require further development.

In the interests of transparency, this letter has been placed on our website<sup>1</sup> alongside other New Forest car park charging correspondence and Forestry England disclosed documents and circulated to all New Forest Town and Parish Councils.

### **1. Executive Summary**

The material now disclosed reveals a series of significant and interrelated concerns regarding the Forestry England car park charging proposal in the New Forest. These concerns extend beyond individual issues and, when taken together, raise serious and reasonable doubt as to whether the proposal has been developed on a sufficiently robust, transparent, and legally compliant basis to support implementation at this stage.

In summary:

#### **Consultation and engagement**

While Forestry England refers to extensive engagement activity, the evidence indicates that much of this has been informational rather than genuinely consultative, with limited opportunity for stakeholders, including town and parish councils, to influence outcomes. In particular, there is in our opinion insufficient evidence of structured, transparent consultation in line with the expectations of the Minister's Mandate<sup>2</sup> for the New Forest.

#### **Material risk of PSED non-compliance**

The Forestry England Equality Impact Assessment (EqIA), when considered across all three disclosed EqIA documents, does not demonstrate that the duty has been exercised with the required level of rigour, evidence, or formative engagement. There is a clear absence of meaningful consultation with affected groups, including disabled people and those experiencing socio-economic disadvantage, together with a risk that discretion has been unlawfully fettered. This gives rise to a material risk of non-compliance with the PSED and with s149 of the Equality Act 2010 which requires public authorities to have 'due regard' in delivering the requirements of the Act. Our detailed findings on the EqIA are set out at Annex B.

We respectfully suggest that the Minister arrange for DEFRA to obtain independent specialist legal advice, including to review our findings, given the significant legal

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<sup>1</sup> <https://beaulieu-pc.org.uk/new-forest-parking>

<sup>2</sup> <https://www.verderers.org.uk/wp-content/uploads/2024/11/Ministers-Mandate.pdf>

concerns raised and the potential reputational implications of proceeding with the scheme without clear compliance with section 149 of the Equality Act 2010.

### **Disability impacts insufficiently understood**

The assessment is materially incomplete in its treatment of disability. It is largely framed around disabled drivers and does not properly consider the position of disabled individuals who rely on carers for access. There is no evidence of engagement with disabled users or representative organisations, and no meaningful assessment of how the scheme affects disabled people with very limited disposable income. In particular, the absence of real-world affordability analysis means that the conclusions reached cannot be considered robust.

### **Socio-economic disadvantage and Government policy trajectory**

The Forestry England analysis relies heavily on high-level deprivation data and does not reflect the lived reality of socio-economic disadvantage across the New Forest. Critically, it does not acknowledge or assess the Government's current policy trajectory<sup>3</sup> to bring into force the socio-economic duty under s.1 of the Equality Act 2010, nor the expectation that public bodies actively consider how decisions may reduce these inequalities.

### **Failure to reflect established best practice**

There is no evidence that Forestry England has considered or adopted established best practice from comparable National Parks, importantly Exmoor and Dartmoor, which are the only other parks with free-roaming feral animals, and where charging is typically targeted rather than universal, and is accompanied by important concessionary arrangements for disabled users and those experiencing socio-economic disadvantage.

### **Displacement parking and safety risks**

There is inadequate disclosed assessment of, and insufficient consultation about, displacement parking risks, either within the Forest or into surrounding villages and towns. This is a critical omission given the New Forest's unique characteristics.

### **Impact on villages, towns, and the visitor economy**

There is no disclosed robust assessment of how displacement parking may affect local communities, visitor behaviour or the local economy - including businesses, and the critically important tourist industry - nor evidence of meaningful consultation with those directly affected.

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<sup>3</sup> Source: <https://questions-statements.parliament.uk/written-questions/detail/2025-01-06/22208>

### **Transparency, business case, and sequencing of expenditure**

Forestry England has not disclosed the business case, restricting stakeholder assessment of its justification and value. Significant funds have clearly been spent before key requirements, such as legal assessments, risk analysis and two-way consultation were completed, raising significant concerns about the use of public funds in a reversed decision-making process.

### **Alignment with Management Plan and Minister's Mandate**

There is no evidence that the proposed charging scheme—despite its scale and the introduction of a new income stream from Crown lands—has been reflected in, or aligned with, Forestry England's approved and published 2019-2029 Management Plan for the New Forest. This raises questions about whether the proposal has been developed within the appropriate governance, transparency and consultation framework envisaged by the Minister's Mandate.

### **Habitats Regulations and rollout approach**

While a simultaneous rollout has been presented as necessary, there is no clear disclosed HRA evidence that this is a legal requirement, nor that alternative approaches have been properly assessed.

### **Conclusion**

Taken together, these issues give rise to a credible risk that the proposal has been advanced without fully satisfying key legal, procedural, governance and evidential requirements.

The volume and complexity of the material—together with the outstanding information—require a minimum of six weeks (once all materials have been disclosed) for proper review and engagement across New Forest town and parish councils. The proposed end-April implementation timetable does not allow for this.

We therefore formally request that implementation be paused to allow for a legally robust and evidence-based EqIA, full disclosure of all remaining relevant information, and proper, structured consultation on those key aspects of the proposal which have not yet been subject to meaningful consultation.

Beaulieu Parish Council remains fully committed to working constructively with Forestry England and all relevant stakeholders to help ensure that the proposal is developed in a way that is lawful, proportionate, and appropriate to the unique characteristics of the New Forest, while also recognising the need to support Forestry England in addressing its financial challenges and operational responsibilities.

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## 2. Timing

The information now provided was originally requested at the SE Quadrant meeting on 28 January 2026 and has only now been disclosed on 31 March 2026. Given the volume, complexity, and areas where information still remains absent, a minimum six-week review and consultation period is necessary starting from when a complete set of disclosures has been made.

The proposed end-April implementation timetable is therefore not aligned with the purpose of the EIR process, which is to enable informed scrutiny and engagement. A pause is essential to ensure that 'due regard' can be properly exercised before any final decision or implementation.

## 3. Consultation and Engagement

Forestry England states it has carried out extensive engagement in the New Forest through approximately 85 meetings. While we acknowledge the number, the quality of these sessions is essential.

Feedback indicates that most were informational, based on partial disclosure, rather than genuine two-way consultations grounded in fuller disclosure, with limited opportunities for stakeholders to discuss, constructively challenge, or influence proposals.

Effective consultation should be open, inclusive, and responsive, enabling participants to contribute in a respectful environment. Without this, local frustration is growing as many feel their views have not been adequately considered.

We believe a new, more structured, consultative process is needed, based on comprehensive information and a clear and agreed engagement plan, to ensure all key stakeholders' perspectives are genuinely raised in a controlled, open environment and thoroughly evaluated before proceeding, ideally with consensus.

#### **4. Public Sector Equality Duty**

This section covers the following:

- (a) EqlA documents reviewed**
- (b) Assessment of the EqlAs**
- (c) Disabled people**
- (d) Socio-economic disadvantage**
- (e) Timing of assessments**
- (f) Mitigations**

##### **(a) EqlA documents reviewed**

For the record, the documents disclosed by Forestry England and the links to those documents are as follows:

- Equality Impact Assessment for Forestry England Car Park Charging: dated Feb 2020  
[https://beaulieu-pc.org.uk/images/PPG\\_44\\_-\\_Equality\\_Impact\\_Assessment\\_-\\_Introduction\\_of\\_parking\\_charges\\_Redacted.pdf](https://beaulieu-pc.org.uk/images/PPG_44_-_Equality_Impact_Assessment_-_Introduction_of_parking_charges_Redacted.pdf)
- Equality Impact Assessment for New Forest Car Park Charging: dated 27/09/24  
[https://beaulieu-pc.org.uk/images/Appendix\\_9\\_Official\\_Sensitive\\_Equality\\_Impact\\_Assessment\\_NFCPC\\_Redacted.pdf](https://beaulieu-pc.org.uk/images/Appendix_9_Official_Sensitive_Equality_Impact_Assessment_NFCPC_Redacted.pdf)
- New Forest Car Parking Charging Proposals – Supplementary Document: dated 31/03/26  
[https://beaulieu-pc.org.uk/images/Supplementary\\_Document\\_to\\_Accompany\\_the\\_National\\_Parking\\_EqlA.pdf](https://beaulieu-pc.org.uk/images/Supplementary_Document_to_Accompany_the_National_Parking_EqlA.pdf)

##### **(b) Assessment of the EqlAs**

###### ***(i) National EqlA (February 2020)***

The National EqlA provides a high-level framework that identifies broad categories of potential impact, particularly in relation to age and disability. However, its analysis is generic and primarily focused on the mechanics of implementing a charging scheme, especially how users might access and pay for parking. It does not engage with the broader statutory requirement to understand the needs of affected groups or to assess how disadvantage might be removed or minimised. Nor does it include any localised evidence, user profiling, or engagement with affected groups.

As such, while it may serve as an initial policy reference point, it cannot demonstrate that 'due regard' has been exercised in a site-specific context such

as the New Forest. In particular, it does not address the Forest's unique characteristics, patterns of use, or the profile of affected users.

**Conclusion:** the National EqIA, on its own, is insufficient to support a lawful discharge of the PSED in relation to this proposal.

***(ii) New Forest EqIA (27 September 2024)***

The New Forest-specific EqIA should, in principle, address these gaps, but it does so in a manner that is neither sufficiently robust nor evidence-based. While it identifies that certain groups—including older people, disabled people, and those experiencing socio-economic disadvantage—may be affected, this is not developed into a coherent or evidence-led analysis. Key sections of the document are incomplete, including those relating to evidence gaps and consultation, and there is no meaningful record of engagement with affected groups. The assessment relies heavily on assumptions, including the assumption that costs for socio-economically disadvantaged people will be “budgeted into a trip”. This does not reflect the realities of affordability or access for many such users.

The document records an outcome of “no major change” despite acknowledging adverse impacts and gaps in understanding. In our view, this conclusion does not follow from the evidence presented and reflects a focus on payment mechanisms rather than on the broader needs and circumstances of affected groups.

**Conclusion:** the New Forest EqIA is materially deficient and poses a serious risk that the requirements of section 149 of the Equality Act 2010 have not been properly met.

***(iii) Supplementary EqIA Document (31 March 2026)***

The supplementary document provides additional narrative but does not constitute a re-assessment of the proposal. It does not materially strengthen the evidence base, does not address the absence of meaningful consultation, and does not provide a substantive analysis of the impacts on disabled users or those experiencing socio-economic disadvantage. In particular, it asserts that disability levels in the New Forest are “in line with national averages” and, on that basis, applies the National EqIA without providing supporting evidence or undertaking any localised analysis of need. As concluded above the National EqIA, on its own, is insufficient to support a lawful discharge of the PSED in relation to this proposal.

The document also suggests that introducing charges may divert those experiencing socio-economic disadvantage away from the New Forest Special Protection Area towards Suitable Alternative Natural Greenspaces (SANGs)

outside the New Forest. It is unclear how this approach aligns with Forestry England's obligation under the Minister's Mandate to provide access and recreation opportunities on Crown land. In practice, this risks displacing those least able to afford access from the New Forest itself, thereby reducing—rather than supporting—equitable access. There is also no evidence that such displacement would be effective, proportionate, or sustained.

This approach raises a concern that a national policy has been applied without sufficient regard for local circumstances. While public bodies are entitled to adopt general policies, it is well established (*British Oxygen Co Ltd v Minister of Technology*) that they must not apply them rigidly or without considering whether the particular circumstances require a different approach. On the available evidence, there is a clear risk that this has occurred.

**Conclusion:** the supplementary document does not remedy the deficiencies in the earlier assessments and reinforces the risk that 'due regard' has not been exercised in a sufficiently rigorous or evidence-based manner.

#### ***(iv) Overall conclusion***

Taken together, the three EqIA documents do not provide a coherent, evidence-based, or legally robust assessment demonstrating that the PSED has been properly discharged. There are persistent and unresolved deficiencies in relation to evidence, consultation, disability and socio-economic analysis, and the application of the statutory duty. In these circumstances, the assessments do not provide a sufficient basis to support the implementation of the proposal without further work.

### **(c) Disabled people**

The Forestry England EqIA incorrectly assesses the protected characteristic of disability only from the perspective of a disabled driver. While this is important, it unfairly disadvantages a large group of disabled people who cannot drive and rely on carers for access. In such cases, the carer drives, but the disabled person is the one affected by the policy. The evidence in the EqIA is therefore substantially incomplete and will require a full reassessment on this basis alone.

The EqIA does not include any evidence of the lived reality of many disabled people. Individuals in receipt of Disability Living Allowance or Personal Independence Payment may have little or no disposable income, particularly where mobility components are committed to Motability schemes. For those in residential care, the situation is even bleaker, with most income typically going towards care costs under local authority rules, leaving minimal discretionary income.

We illustrate two highly relevant scenarios below that typify the evidence that is currently lacking in the Forestry England EqIA:

### **Scenario 1**

Individuals in residential care are typically required, following a local authority financial assessment, to contribute the vast majority of their income towards care costs. In England, they can be left with only a statutory minimum Personal Expenses Allowance (PEA). For 2026/27 this is £31.80 per week<sup>4</sup> (£1,653.60 annually). This sum is intended to cover all remaining personal expenses—such as clothing, toiletries, social activities, travel, gifts, and maintaining a basic quality of life. It is not discretionary income in any meaningful sense. Against this background, Forestry England’s proposed annual parking fee (currently £96) would, for someone making regular visits to the New Forest, represent 5.8% of their total available income. This constitutes a very significant proportion of available income and is discriminatory against people with the protected characteristic of disability who may rely on regular access to the New Forest for their well-being and mental health.

### **Scenario 2**

A further relevant consideration, which has not been addressed in the Forestry England EqIA, is the practical impact of the charging structure on disabled users in terms of time, mobility, and access to the New Forest. Disabled individuals—whether using wheelchairs, mobility scooters, walking aids, or requiring assistance—are, in many cases, unable to move at the same pace or cover the same distance as able-bodied visitors. As a result, a visit to the New Forest may require more time to achieve an equivalent level of access or benefit.

In these circumstances, applying a uniform parking charge, regardless of mobility constraints, risks placing disabled users at a relative disadvantage. They may, in effect, pay the same charge for a materially reduced level of access, or require longer parking durations to undertake the same activity. This raises a clear concern that the scheme may, in practice, operate what could reasonably be described as a “disability tax”, whereby those with reduced mobility face a disproportionate financial burden in accessing the New Forest. In our view, this is a further example of where the absence of user-specific analysis and meaningful engagement with disabled groups undermines confidence that the PSED has been properly discharged.

Further evidence that needs to be considered includes the concessions available at other similar locations, including:

- Exmoor National Park, where there is a 50% discount for those receiving Disability Living Allowance. In such cases, the reduced cost of an annual

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<sup>4</sup> Gov.UK Guidance: Social care – charging for care and support 2026 to 2027 published 17 February 2026

pass is £32.50, a 66% reduction on Forestry England's planned annual pass of £96; and

- Dartmoor National Park, where Blue Badge holders pay £3.40 (all-day parking) for those car parks where charging applies, a 57.5% reduction on Forestry England's proposed full-day charge.

The absence of this type of grounded, real-world financial evidence in the Forestry England EqlA means that conclusions about affordability lack supporting evidence on how the scheme would affect disabled people who are most financially constrained.

The above are examples of the core, user-specific evidence we would expect to see in a robust EqlA; other important aspects will be identified through a thorough consultation process, particularly with those charities and other bodies that provide essential support to disabled people.

Where a policy is likely to affect people with the protected characteristic of disability, including but not exclusively those on very limited incomes, the duty to have 'due regard' will normally require meaningful and direct engagement with those affected. Forestry England has had no recorded engagement with people with the protected characteristic of disability, and without that, the duty appears not to have been properly discharged.

We have recently been copied into a letter from a disabled user of the New Forest, which we have attached in redacted form as Annex A. While we do not comment on this individual's concerns, it exemplifies the kind of engagement that is needed and, in our opinion, is currently entirely absent.

#### **(d) Socio-economic disadvantage**

The financial analysis relies heavily on the New Forest being placed in "one of the least deprived local authority areas in England". Whilst the EqlA identifies 6 neighbourhoods that fall into the most deprived in England, the analysis is far too high-level. For instance, there is no evidence obtained from the two local food banks. That, for instance, would have confirmed that many across the area, outside the 6 identified neighbourhoods, particularly in the more rural areas of the New Forest, fall squarely into the socio-economically disadvantaged category. That includes an unfortunately high level in the small parish of Beaulieu.

This is especially relevant given the Government's current work to implement the socio-economic duty under section 1 of the Equality Act 2010. As confirmed in a written answer to Parliament on 9 January 2025<sup>5</sup>, this duty requires public bodies, when making strategic decisions, to actively consider how their actions may reduce inequalities

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<sup>5</sup> Source: <https://questions-statements.parliament.uk/written-questions/detail/2025-01-06/22208>

related to socio-economic disadvantage. We understand that the Government is currently developing guidance to support its implementation.

We would also observe that the Government's current focus on socio-economic disadvantage is not itself acknowledged or assessed as evidence, including in the 31 March 2026 supplementary EqlA. This document post-dates the Government's stated intention to bring into force the socio-economic duty and the associated policy direction set out in Parliament.

In these circumstances, we would have expected this issue to have been more fully assessed with proposed steps to meet the needs of this category of people. Its absence from EqlA analysis, which we find particularly surprising given that Forestry England is an executive agency of the Forestry Commission (being a government body), reinforces the need to reconsider the proposal to ensure it properly accounts for all potential impacts on those experiencing socio-economic disadvantage.

Further evidence that has not been considered is the concessionary passes available at Exmoor National Park where there is a 50% discount for those receiving Personal Independent Payment (PIP) or Pensioner Guarantee Credit<sup>6</sup>. In such cases, the reduced cost of an annual pass is £32.50, a 66% reduction on Forestry England's planned annual pass of £96.

There is no disclosed evidence for Forestry England to conclude in assessing socio-economically disadvantaged people in its EqlA dated 27 September 2024 that "car park charging is likely to be factored into budgeted into a trip [sic]". Such an unsupported conclusion completely fails to take into account the real hardship that is faced by people with socio-economic disadvantage.

Where a policy is likely to affect people at a socio-economic disadvantage, we would expect a meaningful engagement with those affected. Forestry England has had no recorded engagement with people with the characteristic of socio-economic disadvantage, and without that, its public duty is unlikely to have been properly discharged.

### **(e) Timing of assessments**

The timing of the supplementary EqlA document, dated 31 March 2026, further raises concern that equality considerations may have been revisited after key decisions had already been made, rather than informing those decisions at the outset. In this context, it is well established (see *R (Brown) v Secretary of State for Work and Pensions* [2008]) that the PSED must be exercised at a formative stage of decision-making, with rigour and an open mind, not as a retrospective exercise. If the 31 March 2026 document

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<sup>6</sup> Source: [https://shop.exmoor-nationalpark.gov.uk/products/enpa-annual-parking-permit?srsId=AfmBOor\\_pFl5USQShglBZ6uVnnO21tsxSexaq1jgxogUKuK53n-f8yY5](https://shop.exmoor-nationalpark.gov.uk/products/enpa-annual-parking-permit?srsId=AfmBOor_pFl5USQShglBZ6uVnnO21tsxSexaq1jgxogUKuK53n-f8yY5)

post-dates key decisions, there is a clear question as to whether it constitutes a lawful discharge of the duty or a post hoc justification. If the latter, this would expose the process to legal challenge, with the likely consequence of further disclosure requirements and the need to revisit the assessment properly—as this letter now requests—resulting in a corresponding delay to implementation while those steps are undertaken before the car park charging scheme is implemented.

#### **(f) Mitigations**

We are pleased that Forestry England has extended exemption from car parking charges to practising Commoners (although we understand these are currently not yet fully agreed by the commoning community) and “other key working forest activities”. Forestry England correctly records in its 31 March 2026 Supplementary Document that these groups do not have a protected characteristic under the PSED. However, this exemption demonstrates a vital and helpful principle: that an exemption is available to those who need it, and we believe it should be extended to people with disabilities and characteristics of socio-economic disadvantage.

#### **5. Displacement Parking and Safety Risks on the Forest**

The high-level Verge Protection Risk Map now disclosed covers the entire forest on a single page. Its scale makes it unhelpful and, in any case, not interpretable without the supporting risk analysis from the project risk register, which Forestry England has chosen not to disclose. Since mitigation measures such as 'dragon's teeth' and ditches are already being implemented, this information cannot reasonably be regarded as a 'live' issue justifying withholding it.

There is limited evidence in the disclosures that Forestry England has adequately considered the safety issues at hand and the unique characteristics of the New Forest, including unfenced roads, free-roaming feral animals, and a very large, dispersed network of small car parks.

We recognise that Forestry England does not manage any other national parks with free-roaming feral animals, but Dartmoor and Exmoor National Parks, which have introduced targeted rather than universal car park charging, are important references for this project.

We are concerned that no evidence has been provided to assess the merits, focus, and cost-effectiveness of the approaches adopted by these two National Park Authorities. In particular, there is no analysis of whether those more targeted models—where revenue generation and parking enforcement are inherently easier to manage—would be more appropriate in, and profitable for, the New Forest, whilst minimising the significant risk of displacement parking.

The safety implications for both the public and free-roaming animals are significant. In our view, the public interest in disclosure to parish and town councils clearly outweighs any reason to withhold this information. We therefore request that the full

displacement parking risk assessments be provided, or alternatively confirmation that no additional risk assessments have been carried out.

## **6. Displacement parking risks in towns and villages**

A further important omission is the lack of an assessed explanation of how displacement parking affects New Forest villages and towns. The New Forest differs from many other national parks in that it contains numerous inhabited villages and towns within its boundaries. Parking capacity in these settlements is already limited and inevitably plays a crucial role in supporting both local communities and the visitor economy that the area depends on. The implementation of widespread car park charging and the accompanying risk of displacement parking could place extra, unsustainable burden on these communities. Specifically:

1. increased demand for limited on-street and village-centre parking might displace residents and visitors from existing spaces;
2. local car parks, which visitors often use to access shops, cafés, and services, may become congested or inaccessible; and
3. there is a real risk that visitors might be discouraged from visiting altogether or choose to shorten their stay due to diminished accessibility and convenience.

This could have direct economic impacts on village businesses such as shops, cafés, and other local services, as well as on key tourist attractions reliant on local parking to maintain visitor numbers.

However:

- we have not found any robust assessment of the likely scale or locations of displacement into villages and towns
- there is no evidence of structured engagement with parish and town councils, local businesses, or visitor attractions regarding these issues
- there is no clear plan to mitigate the impacts on local infrastructure, residents, businesses, or the wider visitor economy

We believe that Forestry England should conduct a transparent consultation with the town and parish councils of the New Forest to obtain robust evidence on local parking capacity, usage patterns, and potential behavioural responses before proceeding further. The current absence of meaningful two-way consultation on this issue highlights a notable gap in Forestry England's evidence base.

This is not a minor issue. It directly relates to whether the proposal's impacts have been properly understood, including how they might affect the economic sustainability of New Forest communities. Based on the current disclosures, we have concluded that they are not properly understood by Forestry England.

## 7. Business Case

We note that Forestry England has declined to disclose the business case underpinning the proposed car park charging scheme.

Forestry England has clearly committed significant public expenditure to this programme. In these circumstances, and given that implementation work is well advanced, the case for urgent transparency is particularly strong.

It is a matter of concern that, having reportedly spent a significant amount on developing this scheme, the fundamental underpinnings—namely a transparent business case, robust equality and environmental assessments, and comprehensive, lawful consultation—do not appear to have been fully established or evidenced. These are not optional stages but essential components of sound public decision-making, ensuring that any proposal is properly shaped to balance financial objectives with the needs and interests of those who live in, work in, and visit the New Forest.

There is an unacceptable risk that significant sunk costs may now be exerting undue pressure to proceed at pace, rather than allowing the time required to address these foundational issues. It would be wholly inappropriate for prior expenditure, however substantial, to be relied upon—explicitly or implicitly—as justification for progressing a scheme that has not yet demonstrably met the necessary legal and procedural standards.

Under the Environmental Information Regulations 2004, there is a clear presumption in favour of disclosure. Any exception—such as commercial confidentiality—must be interpreted narrowly, and the public authority must demonstrate that disclosure would give rise to real and substantial harm, and that such harm outweighs the public interest in disclosure.

In this case, we do not consider that this threshold has been met. In particular:

- a) this is a public policy initiative, not a commercially competitive process involving third-party bidders;
- b) the scheme has already progressed to implementation, reducing any argument that disclosure would prejudice decision-making;
- c) the scale of public expenditure is material and already partly in the public domain; and
- d) there is a strong public interest in understanding the evidential basis for a proposal which has significant implications for public access, local communities, protected groups, and the New Forest economy.

We also note that, even where elements of a document may legitimately fall within an exception, the Regulations require public authorities to consider partial disclosure. It would therefore be expected that, at a minimum, a redacted version of the business case—removing any genuinely sensitive material—should be made available.

Given that the issue of funding has also been raised with Forestry England at Parliamentary level by Sir Julian Lewis MP, we consider it particularly important that the position is clarified transparently.

We therefore request disclosure of:

- 1) the business case for the New Forest car park charging scheme; and
- 2) any supporting financial or cost-benefit analysis underpinning the proposal.

In the absence of such disclosure, it is difficult to see how stakeholders, including Members of Parliament and local authorities, can properly assess the justification for the scheme or the proportionality of its impacts.

### **8. Habitats Regulations Assessment (HRA)**

We note from Forestry England's response of 5 March 2026 to Sir Julian Lewis MP that the decision not to adopt a phased or pilot approach was said to be due to a legal requirement under the Habitats Regulations, requiring simultaneous rollout across all car parks as part of an agreement with Natural England.

From our review of the published HRA and supporting material, displacement risk is clearly identified and mitigation proposed. However, the documentation appears to assess a simultaneous rollout as the chosen model, rather than demonstrating that such an approach is a legal requirement. Our conclusion at present is:

- There is no clear evidence that the Regulations require simultaneous rollout
- That the material indicates adaptive monitoring and targeted mitigation, suggesting flexibility
- That there is no clear disclosed documentation evidencing Natural England's requirement for simultaneous rollout

Given this has been raised at Parliamentary level, we request disclosure of:

1. Any agreement or correspondence with Natural England supporting this position; and
2. Any assessment of alternative approaches (including phased or pilot options).

### **9. Minister's Mandate<sup>7</sup>**

We note Mr Seddon's comments in his letter of 31 March that the majority of engagement sessions attended by Forestry England have been forums convened by others and are therefore not led or controlled by Forestry England. While we recognise

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<sup>7</sup> Source: <https://www.verderers.org.uk/wp-content/uploads/2024/11/Ministers-Mandate.pdf>

this distinction, it is itself a matter of concern. Reliance on externally organised and informal forums does not obviate the need for Forestry England to ensure that engagement is structured, properly recorded, and capable of demonstrating how issues raised have been considered and have influenced the development of the scheme. It is incumbent upon Forestry England, as the decision-making body, to maintain a clear and auditable record of consultation and its impact, rather than relying on the format or constraints of third-party meetings.

We are grateful for Mr Seddon's reference to the minutes of the New Forest Consultative Panel, and have reviewed them carefully. While Forestry England has engaged with the Consultative Panel on a regular basis, the published record suggests that this engagement has primarily taken the form of updates and information-sharing, rather than the kind of early, open and formative consultation envisaged by the Minister's Mandate. In particular, there is limited evidence that the Consultative Panel has been used to shape the development of the scheme, or that stakeholder feedback has been transparently considered and reflected in the evolution of the proposals.

On that basis, it is difficult to conclude from the published materials that the consultation obligations placed on Forestry England under the Minister's Mandate have been fully met.

We wish to make clear that we fully support the much-valued role of the New Forest Consultative Panel and the Verderers in providing scrutiny and informed input on matters affecting the New Forest. These bodies are central to the governance framework envisaged by the Minister's Mandate. However, their ability to discharge this role effectively depends on the quality, completeness, and timeliness of the information made available to them. In the absence of full and timely disclosure of the underlying evidence base—including detailed risk assessments and supporting analysis—their consideration can only be partial. It is therefore incumbent on Forestry England to provide this information in a complete, transparent, and timely manner, so that these bodies are properly equipped to scrutinise the proposals, with time to consult others, including town and parish councils, and enable Forestry England to respond constructively and adapt its plans in light of that scrutiny.

We have also reviewed Forestry England's published 2019-2029 Management Plan<sup>8</sup> for the New Forest and have been unable to identify any reference to the introduction of a network-wide car park charging scheme of the scale now proposed.

Given that this proposal represents such a material change to public access arrangements and introduces a significant new income stream from Crown land, it is not clear how it aligns with the expectations set out in the Minister's Mandate,

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<sup>8</sup> Source: <https://www.forestryengland.uk/forest-planning/new-forest-inclosures-forest-plan-2019-2029>

particularly in relation to transparency, consultation, and the clear articulation of income-generating activities.

In these circumstances, there is a question as to whether the proposal has been developed within the appropriate governance and policy framework. The absence of any clear linkage to the Management Plan raises a significant concern that the scheme has been progressed outside the intended structure for consultation and oversight, as envisaged by the Minister's Mandate.

## **10. Conclusion and Way Forward**

Beaulieu Parish Council has considered the information disclosed by Forestry England carefully and in good faith. We recognise Forestry England's important role in managing and protecting the New Forest, and we remain supportive of its wider objectives.

However, the cumulative evidence now available indicates that the current proposal has been progressed with significant gaps in consultation, transparency, and statutory compliance, and without a sufficiently robust evidential foundation to support implementation at this stage. In particular:

- a) The engagement undertaken to date does not clearly meet the standard of extensive, structured, and formative consultation envisaged by the Minister's Mandate, nor does it demonstrate how stakeholder feedback has been systematically considered and reflected in the development of the scheme;
- b) The requirements of the PSED have not been demonstrably fulfilled, with insufficient evidence, limited local analysis, and an absence of meaningful engagement with affected groups;
- c) The assessment of disability impacts is materially incomplete, including a failure to consider non-driving disabled users and the absence of real-world affordability analysis;
- d) The treatment of socio-economic disadvantage is insufficient, and does not reflect the Government's current policy trajectory towards implementation of the socio-economic duty under section 1 of the Equality Act 2010;
- e) There is no clear evidence that Forestry England has considered or adopted established practice from comparable National Parks, where charging is more targeted and accompanied by concessionary arrangements for those most affected;
- f) The potential impacts on public safety, free-roaming animals, local communities, and the visitor economy—particularly arising from displacement parking—have not been sufficiently assessed and/or disclosed;
- g) The justification for a simultaneous rollout has not been clearly demonstrated, nor supported by disclosed evidence of any requirement arising from the Habitats Regulations or agreement with Natural England;

- h) Key supporting information, including detailed risk assessments and the business case, has not been disclosed, restricting proper scrutiny of a proposal involving significant public expenditure; and
- i) The apparent commitment of substantial public funds in advance of completing key legal, evidential, and consultative steps raises concern as to whether the proposal has been developed in the appropriate sequence.

These are not isolated concerns. Taken together, they go to the heart of whether the proposal has been developed in a manner that is lawful, proportionate, and appropriate to the unique characteristics of the New Forest.

Proceeding to implementation in these circumstances would, in our view, be premature and would carry a material risk of legal challenge, as well as reputational consequences on DEFRA, Forestry Commission and Forestry England.

In summary we therefore respectfully request that:

1. Implementation of the scheme is paused;
2. A legally robust and evidence-based EqIA is prepared, supported by meaningful engagement with affected groups;
3. A full and transparent evidence base is provided, including the business case and relevant risk assessments; and
4. Structured disclosure and consultation is undertaken through appropriate New Forest governance bodies, including the Consultative Panel and Verderers' Court, in line with the Minister's Mandate.

Beaulieu Parish Council remains fully committed to working constructively with Forestry England and all relevant stakeholders to help ensure that the proposal is developed in a way that is lawful, proportionate, and appropriate to the unique characteristics of the New Forest, while also recognising the need to support Forestry England in addressing its financial challenges and operational responsibilities.

Yours sincerely,

*Nick Hubbard*

**Cllr. Nick Hubbard  
Chair**

E: [nick.hubbard@beaulieu-pc.org.uk](mailto:nick.hubbard@beaulieu-pc.org.uk)

M: 07714 302525

*Nicky Deering*

**Nicky Deering  
Clerk**

Contact details above

cc: The Rt Hon Bridget Phillipson MP, Minister for Women and Equalities  
Baroness Kishwer Falkner, Equalities and Human Rights Commission  
Richard Stanford, Chief Executive, Forestry Commission  
Rt Hon Sir Julian Lewis MP  
Rt Hon Sir Desmond Swayne TD MP  
Cllr. Keith Mans, Hampshire County Council  
Cllr. Dan Poole, New Forest District Council  
Victoria Mander, NFNPA Chair  
Brian Tarnoff, New Forest Consultative Panel Chair  
Brice Stratford, New Forest Association of Local Councils  
Edward Heron, Official Verderer  
Hilary Harper, New Forest Commoners Defence Association  
The Rt Hon Lord Montagu of Beaulieu  
Leonard Loughlin, Forestry Commission Information Rights Manager  
Craig Harrison, Forestry England  
Richard Burke, Forestry England

## Annex A

### Redacted Letter from disabled driver

7th April 2026

The Deputy Surveyor of the New  
Forest Forestry England,

The  
Queen's  
House,  
Lyndhurst

SO43 7NH

Dear Deputy Surveyor,

### Formal request for Reasonable Adjustment – Access to Natural Surfaces for Disability Management

I am writing to formally request a **Reasonable Adjustment** under the **Equality Act 2010** regarding the recent introduction of widespread parking charges and the associated highway waiting prohibitions across the New Forest.

#### The Barrier to Access

I am a Blue Badge holder with a mobility disability. While I am aware of the "accessible" infrastructure provided at various Forestry England sites, the standard use of **hard-packed gravel and "hoggin" surfaces** is medically unsuitable for my condition. Walking on these

high-impact, often rigid surfaces is excruciatingly painful and poses a direct risk to my physical well-being.

As the user of a road tax-exempt Motability car, my mobility requirements are formally recognised at a national level. My car is not merely a mode of transport, but an essential mobility aid that allows me to reach areas where I can safely transition to the soft, natural surfaces I require.

### **The Impact of the New Restrictions**

For my disability, the only safe and manageable walking surfaces are **natural grass or dirt**, which provide the necessary impact-absorption to manage my mobility. Historically, I have accessed the forest by parking in safe roadside locations, typically gateways - being mindful not to cause an obstruction - where I can more easily transition from my vehicle onto soft ground.

The recent implementation of **Temporary Prohibition of Waiting** orders by Hampshire County Council (under Section 14(1)(b) of the Road Traffic Regulation Act 1984) has effectively removed my ability to access the forest safely.

### **Legal Context and Precedent**

I wish to draw your attention to the **Press Statement issued by Beaulieu Parish Council on 31st March 2026**. That council has formally raised concerns that Forestry England may not have fulfilled its **Public Sector Equality Duty (PSED)**, specifically noting the absence of concessionary arrangements for disabled people and the failure to account for those whose needs do not fit a "one-size-fits-all" accessibility model.

### **Requested Adjustment**

To ensure I am not at a "substantial disadvantage" compared to non-disabled visitors, I request that Forestry England and the Highway Authority provide a formal adjustment. This could include:

1. **A specific waiver or permit** allowing me to park in designated, safe roadside locations (wholly on the tarmac to avoid verge damage) where I have immediate access to natural soft-ground walking.
2. **A review of the current restrictions** to identify "Soft-Ground Access Zones" for Blue Badge holders where the "likelihood of danger" cited in the Council notice is demonstrably low.

I look forward to your response detailing the specific reasonable adjustments you will facilitate so as to ensure that I may continue to access the natural soft-ground surfaces of the New Forest without penalty.

This is a matter of ensuring that the forest remains accessible to me in a way that minimises the significant and excruciating pain caused by your new and restrictive 'one-size-fits-all' hogging infrastructure.

Yours sincerely,



**Copies sent to:**

- **Patrick Blogg**, Director of Universal Services, Hampshire County Council
- **The Rt Hon Bridget Phillipson MP**, Minister for Women and Equalities
- **Sir Desmond Swayne**, Member of Parliament (New Forest West)
- **Beaulieu Parish Council**

## Annex B Review of Equality Impact Assessments

### Grading Framework:

<b>Satisfactory</b>	Adequate and evidence-based
<b>Weak</b>	Some consideration but limited evidence or depth.
<b>Materially problematic</b>	Significant gaps or reliance on assumptions; unlikely to demonstrate 'due regard' on its own
<b>Serious non-compliance risk</b>	On its face, does not evidence that 'due regard' has been exercised in a legally robust way

### National Parking Policy EqIA (February 2020)

Section	What is satisfactory	Main deficiencies	Grade
<b>1. Details of project</b>	Clearly sets out purpose and anticipated outcomes, explaining current financial pressures.	None	Satisfactory
<b>2. Evidence</b>	Broad impacts noted including the disproportionate impact on vulnerable minorities	No local specificity, but this is a national document.	Satisfactory
<b>3. Impacts</b>	Age and disability identified as protected characteristics that could be affected.	Focus is exclusively on how protected people can pay a charge. There is no acknowledgement that under s149 of the Equality Act the EqIA requires a much broader identification of the likely needs of such people and having due regard of how to remove or minimize disadvantage.	<b>Serious non-compliance risk</b>

<b>4. Meeting General Equality Duty</b>	Section was completed	Having not identified the likely broader needs of the protected people who might be affected, this section only focuses on how such disadvantaged people can pay.	<b>Serious non-compliance risk</b>
<b>5. Outcome</b>	Section was completed	The conclusion of “no major change” is clearly wrong, as the EqIA does not assess the broader needs and circumstances of affected protected people, but instead focuses narrowly on only payment mechanisms and in doing so materially understates the real impact of the proposal.	<b>Serious non-compliance risk</b>
<b>6. Monitoring</b>	Section was completed	A passive approach of logging queries—focused again narrowly on cashless payment—does not constitute effective monitoring, as it lacks defined metrics, fails to assess impacts on protected groups, and provides no assurance that the scheme will be adapted where adverse impacts arise, contrary to the requirements of section 149 of the Equality Act 2010.	<b>Serious non-compliance risk</b>

**Annex B (cont'd)**

**New Forest EqIA (27 Sept 2024)**

<b>Section</b>	<b>What is satisfactory</b>	<b>Main deficiencies</b>	<b>Grade</b>
<b>1. Details of project</b>	Section was completed	The assessment form clearly asks for indications of who is likely to be affected, and lists a number of examples, including older people, people with disabilities, etc. However this question was not answered and potentially affected groups have not been identified. Forestry England have again exclusively only referred to payment options that might be available to everyone. This response is in material non-compliance with s.149 Equality Act 2010.	<b>Serious non-compliance risk</b>
<b>2. Evidence</b>	Section was completed and NFDC high level economic profiling included, including identifying 6 neighbourhoods as being among the most deprived in England. Reflects and understanding that learning disability in the context of obtaining a driving licence is a factor to be considered.	The section requests available evidence about the needs of relevant groups. The form requires the person to refer to the GOV.UK EqIA site for the 'evidence list', and this requirement has not been followed with much of the narrative highlighting problems around payment, drawing on evidence for their Sence Valley site —some 165 miles north of the New Forest and statistics about mobile phone ownership. There is general statistics on visitor profile but with no relevance drawn to protected people.  Whilst consideration of learning disability in the context of driving licences may be relevant, the more	<b>Serious non-compliance risk</b>

		<p>major issues of disability have not been addressed, nor the more complete characteristics and needs around age.</p> <p>The section that requires gaps in evidence to be identified was left blank, whilst clearly there are significant gaps in evidence.</p> <p>The section requiring details of which groups have been consulted and the methods used has been signed off with “N/A”.</p> <p>This all gives rise to a concern that there is a fundamental misunderstanding of the requirements of the Equality Act 2010. In particular, this section does not properly collect evidence of relevant groups, and fails to identify and assess impacts on protected groups in the manner required under s149 of the Act.</p>	
<p><b>3. Impacts</b></p>	<p>The section has been completed and identifies Age and Disability as protected characteristics. It identifies impacts around mobile phone accessibility, signage (for people with a learning disability), coach and minibus arrangements.</p> <p>It identifies that there are people with</p>	<p><b>Age</b></p> <p>In relation to age, the assessment appears to focus narrowly on issues such as access to mobile phones and digital payment methods. It does not adequately consider the broader impacts on older people, including reduced mobility, reliance on informal support, fixed incomes, and the potential for increased time required to access and use the Forest, all of which are</p>	<p><b>Serious non-compliance risk</b></p>

	<p>protected characteristics of age, disability, reality and socio economic disadvantage who might be adversely affected In receiving less federal treatment or be subject to discrimination.</p>	<p>relevant to understanding the full effect of the proposal.</p> <p><b><u>Disability</u></b></p> <p>The assessment is incomplete it refers only to drivers with a learning disability and that signage including penalties to be clear and easy to understand by all.</p> <p>It does not address the complexities of disabled people (see examples of what should be covered in the main body of this letter). The only reference is around Blue Badge holders being able to park free elsewhere at local council and National Trust<sup>9</sup> car parks but stating the Forestry England “does not accept Blue Badges at Visitor Centrs and a EQIA is in place for this”. It defers consideration of Blue Badge provision in the New Forest.</p> <p>It infers that consideration will be given to people who are deaf, hard of hearing and/or with speech impairment, but this is not addressed in the subsequent EqlA dated 31 March 2026.</p> <p><b><u>Rurality</u></b></p> <p>The assessment states that the majority of those visiting car parks come from within NFDC postcodes and as such are not in heavily rural</p>	
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<sup>9</sup> NB: this indicates that these bodies appear to be complying with PSED responsibilities

		<p>locations. The evidence for this is unclear, as are the consequences or impacts of this statement.</p> <p><b><u>Socio-economic disadvantage</u></b></p> <p>The assessment relies on an assumption that, because the New Forest is one of England's least deprived areas, most users can afford parking charges, while acknowledging that such charges may deter visitors from lower socio-economic backgrounds, yet identifying no mitigations for such people. It further suggests costs will be "budgeted into a trip". This misdirects the purpose of the EqIA, as these considerations do not properly address the needs of people with socio-economic disadvantage. See examples of what might be covered in the main body of this letter.</p> <p><b><u>Proposed modifications</u></b></p> <p>The proposed modifications relate to the requirements of the scheme being well-publicised and promoted in order to reach as many different groups as possible through clear and easy to read signage etc. It refers to the annual membership scheme and refers to other payment and tariff arrangements. It fails to identify mitigation for</p>	
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		<p>the needs of the identified, affected groups.</p> <p>On this basis, we conclude that this section does not demonstrate compliance with the requirements of section 149 of the Equality Act 2010, and gives rise to a concern that its provisions have not been fully understood or properly applied.</p>	
<p><b>4. Meeting our General Equality Duty</b></p>	<p>Completed</p>	<p>Forestry England states that the policy eliminates discrimination by providing prior information in different formats, offering multiple payment methods, maintaining relatively low charging rates, and introducing a discounted membership scheme. It further notes that all visitors will be required to pay for parking, with payment methods available to all.</p> <p>In our view, this does not demonstrate compliance with the General Equality Duty. The measures described relate primarily to the mechanics of payment, rather than to the substantive impact of the policy on protected groups. The duty under s.149 of the Equality Act 2010 requires public bodies to have due regard to the need to “eliminate discrimination”, “advance equality of opportunity”, and “remove or minimise disadvantages”—not simply to ensure that</p>	<p><b>Serious non-compliance risk</b></p>

		<p>individuals are able to access and operate a charging system.</p> <p>In particular, the approach does not address whether requiring all users to pay, irrespective of their circumstances, may place certain groups—such as disabled people or those experiencing socio-economic disadvantage—at a disproportionate disadvantage. Nor does it demonstrate that Forestry England has considered how such impacts might be avoided, mitigated, or balanced through alternative approaches or concessionary arrangements.</p> <p>On this basis, we conclude that this section does not demonstrate compliance with the requirements of section 149 of the Equality Act 2010, and gives rise to a concern that its provisions have not been fully understood or properly applied.</p>	
<p><b>5. Outcome</b></p>	<p>Section is completed</p>	<p>The conclusion of “no major change” is fundamentally flawed and is not supported by the evidence presented. While the EqIA acknowledges a number of potential impacts and clear gaps in understanding, these are neither properly assessed nor informed by meaningful consultation with affected groups. The analysis focuses disproportionately on mechanisms by which</p>	<p><b>Serious non-compliance risk</b></p>

		<p>individuals might pay, rather than on the broader needs, barriers, and lived experiences of those affected, and therefore materially understates the impact of the proposal.</p> <p>In particular, the assessment does not demonstrate that relevant impacts on protected groups have been identified, analysed, or mitigated in accordance with the requirements of section 149 of the Equality Act 2010. On the face of the material provided, the conclusion reached does not follow from the evidence presented and does not provide a credible or lawful basis for determining that the proposal gives rise to no major change.</p> <p>On this basis, we conclude that this section does not demonstrate compliance with the requirements of section 149 of the Equality Act 2010, and gives rise to a concern that its provisions have not been fully understood or properly applied.</p>	
<p><b>6. Monitoring</b></p>	<p>Section is completed</p>	<p>Monitoring limited to logging queries—including those relating to mobile and portal-based payments—and considering additional payment methods.</p> <p>It falls materially short of a lawful approach, as it does not establish defined metrics, assess real-world impacts on protected groups, or commit to adapting the scheme where</p>	<p><b>Serious non-compliance risk</b></p>

		<p>adverse impacts are identified.</p> <p>On this basis, we conclude that this section does not demonstrate compliance with the requirements of section 149 of the Equality Act 2010, and gives rise to a concern that its provisions have not been fully understood or properly applied.</p>	
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**Annex B (cont'd)**

**Supplementary EqIA (31 March 2026)**

<b>Section</b>	<b>What is satisfactory</b>	<b>Main deficiencies</b>	<b>Grade</b>
<b>1. Background</b>	Makes a statement that due regard is given to how the introduction of car parking charging might affect people with protected characteristics. It states that stakeholder engagement has further informed the design of the scheme and the document details considerations and adjustments made to the design of the scheme to reflect the local needs of the New Forest.	It is not clear when this document was prepared, only when it was last updated.	Weak
<b>2. Evidence</b>	Section is completed	There's no material new evidence placed in this document	Weak
<b>3. Impacts</b>	Categories of people with protected characteristics have been set out covering age, disability, gender reassignment, marriage or civil partnership, race, religion, sex, sexual orientation, pregnancy and socio economic status.	When considering the impacts of the protective characteristic of age, the response in the document is exclusively about how people can pay their parking charges and does not consider steps involved in removing or minimising disadvantage.  On the protected characteristic of disability, the document states that levels of disability with the New Forest are considered to be in line with national averages and "as a result, our National Parking	<b>Serious non-compliance risk</b>

		<p>EqlA also applies in this local area”. It refers to ensuring the signage and tariff information is clear and easy to understand, and blue badge holders can park close to their destination, but there will be no concessionary parking charges. It therefore fails to have the necessary ‘due regard’ to the need of meeting the needs of protected disabled people as required by S149 (3)&amp;(4) Equality Act 2010.</p> <p>There is no new or substantive assessment of impacts on people experiencing socio-economic disadvantage, beyond a suggestion that car park charging may divert such users away from the sensitive New Forest Special Protection Area towards Suitable Alternative Natural Greenspaces (SANGs). It is unclear how such an approach aligns with Forestry England’s obligations under the Minister’s Mandate to provide access and recreation opportunities on Crown land. In practice, this appears to risk excluding those least able to afford access, thereby reducing—rather than promoting—equitable access to the New Forest. In these circumstances, the assessment does not demonstrate compliance with the requirements of s149 Equality Act 2010.</p>	
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<p><b>4 Listening to Feedback</b></p>	<p>Acknowledges issues that have been raised and where Forestry England has adapted its car parking scheme</p>	<p>On inspection of the 17 issues raised recorded by Forestry England, none relate to changes to the car parking scheme as a result of their obligations to have due regard particularly in taking steps to meet the needs of persons who share a relevant protected characteristic.</p> <p>The changes that have been included in this section are: payment arrangements, hours of opening, transferability of tickets, issues relating to commoning, verge protection, grace periods for youth groups and other sundry points.</p>	<p><b>Serious non-compliance risk</b></p>
<p><b>Meeting our General Equality Duty</b></p>	<p>This section was not included in this supplementary document.</p>	<p>Without this section being completed by Forestry England, it is difficult to understand the purpose of this supplementary paper.</p>	<p><b>Serious non-compliance risk</b></p>
<p><b>Outcome assessment</b></p>	<p>This section was not included in this supplementary document.</p>	<p>Without this section being completed by Forestry England, it is difficult to understand the purpose of this supplementary paper.</p>	<p><b>Serious non-compliance risk</b></p>
<p><b>Monitoring</b></p>	<p>This section was not included in this supplementary document.</p>	<p>Without this section being completed by Forestry England, it is difficult to understand the purpose of this supplementary paper.</p>	<p><b>Serious non-compliance risk</b></p>