

## RESPONSE TO SOUTHAMPTON CITY COUNCIL LOCAL PLAN 'CITY VISION' CONSULTATION (10 FEBRUARY – 19 APRIL 2020)

### 1. INTRODUCTION

- 1.1 The purpose of this report is to agree the Council's response to the Southampton City Council consultation regarding its emerging Local Plan closing on 19<sup>th</sup> April 2020.

### 2. BACKGROUND

- 2.1 Southampton City Council (SCC) is consulting on the vision for its next Local Plan. This represents the start of the plan preparation process, and its objective is to conduct initial consultation to understand what people and businesses in the city need. Two technical reports have been published alongside the consultation, consisting of a Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA).

### 3. PROPOSED RESPONSE

- 3.1 The SCC plan area immediately adjoins the New Forest District and there are issues that have direct implications that could affect the New Forest area and district, described briefly below.
- 3.2 **Housing Need:** It is assumed that the final housing requirement figure will have regard to the work of the Partnership for South Hampshire (PfSH), who are working towards a Statement of Common Ground on future sub regional growth and any unmet housing need that may need to be addressed arising from that process. As noted in a recent PfSH Joint Committee report (and including the New Forest National Park position) there is a shortfall relative to the standard methodology currently around 8,640 homes 2016-2036, of which around 7,100 homes are within the New Forest District Council (NFDC) Local Plan area. This shortfall will need to be considered by PfSH authorities both collectively and in individual Local Plans. NFDC also draws SCCs attention to the MHCLG 'Planning for the Future' paper which gives emphasis to greater building within and near urban areas.
- 3.3 **Impacts on New Forest SPA:** Both the SA report and HRA acknowledge the need for recreational mitigation for Natura 2000 sites outside of the Southampton city boundaries. The Local Plan review must address the recreational impacts that residential development in Southampton has on the New Forest SPA/SAC and how this can be appropriately mitigated to avoid adverse impacts on the European Designations. Southampton City Council should address this issue and adopt an effective approach to mitigation of recreational impacts on the New Forest beyond the current Solent-focussed mitigation work. The current SA and HRA documentation is inadequate regarding these issues and does not reflect the available evidence base. The Local Plan must provide clarity on these points, including how the planned residential development will proceed so that it is in accordance with the Conservation of Habitats and Species Regulations 2017.
- 3.4 See Appendix 1 for the proposed response in full.

## **5. ENVIRONMENTAL IMPLICATIONS**

- 5.1 Without effective mitigation measures in place there will be potential adverse environmental impacts of the Southampton Local Plan, on the internationally designated sites (New Forest SPA / SAC / Ramsar sites, and Solent and Southampton Water European sites).

## **6. FINANCIAL, EQUALITY & DIVERSITY and CRIME & DISORDER IMPLICATIONS**

- 6.1 None

## **7. RECOMMENDATIONS**

- 7.1 To agree the consultation response attached as Appendix 1.

## **8. PORTFOLIO HOLDER DECISION**

**Signed: CLLR E J HERON**

**Date: 17 March 2020**

### **For further information contact:**

Andrew Herring  
Planning Policy Officer  
E-mail: [andrew.herring@nfdc.gov.uk](mailto:andrew.herring@nfdc.gov.uk)  
Tel: 023 8028 5588

### **Background Papers:**

Published documents<sup>1</sup>

**Date on which notice given of this decision – 17 March 2020**

**Last date for call in – 24 March 2020**

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<sup>1</sup> <https://www.southampton.gov.uk/planning/planning-policy/emerging-plans/cityvision/haveyoursay.aspx>

## APPENDIX 1

### Response of New Forest District Council to the Southampton Local Plan (City Vision)

#### Housing Provision

It is assumed that the final housing requirement figure will have regard to the work of the Partnership for South Hampshire (PfSH), who are working towards a Statement of Common Ground on future sub regional growth and any unmet housing need that may need to be addressed arising from that process.

In this respect the Main Modifications consultation on the emerging NFDC Local Plan 2016-2036 Part 1: Planning Strategy has recently concluded. In planning for a Modified target of 521 dwellings per annum, this Council has already sought to maximise the extent to which housing provision can be made in this district without causing significant adverse environmental impacts. As noted in a recent PfSH Joint Committee report (and including the New Forest National Park position) there is a shortfall relative to the standard methodology currently around 8,640 homes 2016-2036, of which around 7,100 homes are within the New Forest District Local Plan area. This shortfall will need to be considered by PfSH authorities both collectively and in individual Local Plans. NFDC also draws SCCs attention to the MHCLG 'Planning for the Future' paper which gives emphasis to greater building within and near urban areas.

#### Habitats Regulations and mitigation

Development in the city has the potential to adversely affect the integrity of sites of European and national nature conservation value within and beyond the city's boundaries. In paragraphs 3.11.1 and 4.4 (and Appendix 3, page 19) the SA only refers to recreational disturbance to Solent European sites. Likewise in paragraph 6.4.1 adverse impacts are only mentioned in broad terms. The Habitats Regulations Assessment (baseline evidence review) goes further (in paragraph 6.2.4, section 7.4 and 11.1.2) by confirming that development in Southampton could also contribute to recreational disturbance within the New Forest SPA.

The Sustainability Appraisal (SA) Scoping Report lacks a more explicit acknowledgement that development in Southampton will require mitigation of recreational impacts on the New Forest SPA / SAC European designations. Southampton City Council should address this issue and adopt an effective approach to mitigation of recreational impacts on the New Forest beyond the current Solent-focussed mitigation work. The current Sustainability Appraisal and Habitats Regulations documentation is inadequate regarding these issues and does not reflect the available evidence base. The Local Plan must provide clarity on these points, including how the planned residential development will proceed so that it is in accordance with the Conservation of Habitats and Species Regulations 2017.

Future iterations of the SA and HRA must address how development in Southampton will mitigate recreational impacts on the New Forest European Designations.

More generally please see the following [linked information](#) for Habitat Regulations Assessment purposes. It documents findings from the Footprint Ecology New Forest Visitor Surveys work, which confirms that visitor catchments to the New Forest European Nature Conservation Sites extend to Southampton and far beyond. This new technical work confirms and in fact strengthens the findings of previous studies. It was made available for the Eastleigh Local Plan examination hearings.

An appropriate mitigation strategy to address recreational impacts needs to be developed. NFDC notes that Eastleigh Borough Council is producing a mitigation strategy as part of its

Local Plan Review, and it follows that SCC must too, given that its residents are far closer to the New Forest plan area. We recommend that Natural England be specifically consulted on this matter and would welcome a wider strategic discussion to ensure a consistent and proportionate mitigation approach is put in place.