PLANNING & TRANSPORTATION PORTFOLIO HOLDER

RESPONSE TO SOUTHAMPTON LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

1. PURPOSE OF REPORT

1.1 To agree the Council's response to Southampton Local Plan review Issues and Options consultation closing 16 October 2015.

2. BACKGROUND

- 2.1 Southampton City Council has commenced a Citywide Local Plan review to update all the site allocations, designations and development management policies for the city. An Issues and Options consultation is underway seeking views on key issues and their proposed approach. The Southampton Local Plan review identifies five key areas to be addressed.
 - A strong economy and vibrant city
 - Revitalising and strengthening our town and district centres
 - Meeting the housing, education and health needs of a growing population
 - Providing an efficient transport and infrastructure network
 - Protecting and enhancing our city's unique environment
 - Potential sites for development

3. PROPOSED RESPONSE

- 3.1 For the most part the approach outlined is appropriate, addressing matters that are rightfully for Southampton to decide upon. However there are two main areas with wider implications that could adversely affect the New Forest area and district, described briefly below. These are the focus of the proposed response attached as Appendix 1.
- 3.2 **Policy aspirations for waterfront sites**: any proposals that could reduce or fetter current port operations within Southampton to the point that replacement facilities port would be required elsewhere should be subject to a thorough consideration of their wider and cross boundary implications in particular in relation to the Habitats Regulations, both in terms of the Solent/Southampton Water SPA and New Forest SPA/SAC.
- 3.3 **Mitigation of impacts on the New Forest SPA and SAC**: the Local Plan review should address the recreational impacts that residential development in Southampton will have on the New Forest SPA/SAC and how this can be appropriately mitigated to avoid adverse impacts on the European Designations. Southampton CC should work with others to provide a coordinated approach to mitigation of recreational impacts, building on and going beyond the current Solent-focussed mitigation work.

5. ENVIRONMENTAL IMPLICATIONS

5.1 The potential environmental impact of the Citywide Local Plan, especially on the New Forest SPA and SAC, could be reduced through better coordinated avoidance and mitigation measures if the points made in NFDC's proposed response are addressed.

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

6.1 None

7. RECOMMENDATIONS

7.1 To agree the consultation response attached as Appendix 1.

Portfolio Holder's endorsement: I agree the recommendation

SIGNED:

Date:	CLLR E J HERON	7 October 2015
Date Notice of Decision given:		7 October 2015
Last Day for call-in:		14 October 2015

For further information contact:

Background Papers:

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¹ Southampton Issues and Options Consultation Paper (July 2015) https://www.southampton.gov.uk/Images/Issues-and-Options-Consultation-Paper_tcm63-373889.pdf

Appendix 1

Southampton Local Plan review Issues and Options consultation: Response by New Forest District Council

Q1: Suggested approaches for city centre retail/leisure/offices and (Q10 and para 40) city centre housing

1. The approach to maintain and build on existing commercial agglomerations in the city centre area is reasonable and sensible, subject to managing the boundary with and consequences for port operations on current port operational land as discussed below.

Q37, Q42: Key sites, do we agree with the types of development suggested?

- 2. The Port of Southampton Master Plan 2009-2030 contains bullish forecasts of future freight volumes and port use, which are in need of independent updating. If trade volumes grow as forecast (para 25) appropriate planning policy controls will continue to be necessary to continue to manage potential commercial pressure on port land for higher value, urbanising land uses.
- 3. Both our councils are aware of the port operator's interest in and longer term aspirations for land at Dibden Bay. Mindful that such development was rejected by the Secretary of State in 2004 it is inappropriate in a consultation document (para 29) to describe Dibden Bay as a location for port expansion when it has no formal planning status for such use.
- 4. This statement forms a misleading backdrop to aspirational policy options or choices presented in the consultation that may not be realistic alternatives because they are undeliverable. For example, relocation of bad neighbour uses to port operational land from wharves (such as but not limited to Itchen Riverside key sites 3, 8, 9). The same point may also apply to civic centre uses (city centre sites 2, 4 and the 'major development zone (para 103)).
- 5. In considering and presenting reasonable alternative options for sites we also suggest taking into account the findings of 'Maritime Futures: Solent Waterfront Sites, Final Report' (Solent LEP, September 2015). For example, this report identifies sites within the consultation including Divers Wharf, Saxon Wharf, Shamrock Quay, Supermarine Wharf, and Centenary Quay as tier 1 (highest) priority for maritime use.
- 6. It should also be acknowledged in both plan-making process and subsequent policy that any proposals that could reduce or fetter current port operations within Southampton to the point that replacement facilities port would be required elsewhere would require a thorough consideration of their wider and cross boundary implications in particular in relation to the Habitats Regulations, both in terms of the Solent/Southampton Water SPA and New Forest SPA/SAC.

Q.4: Approach to considering the loss of some employment land

7. We agree with the general approach proposed, to protect and intensify use of industrial land and make releases where there is no prospect for industrial use.

8. We suggest that this principle is equally appropriate for warehousing and storage land that supports port activities directly and indirectly, as based on ongoing and increasing wharf related warehousing and storage activity in our district there would appear strong ongoing demand. Where such land is considered for other uses, assessment should extend to wider environmental and habitats implications of displacement, to be weighed in the balance with local regeneration benefits.

Q.20: Open Space & Q.34: Biodiversity – are there other options to consider?

- 9. We note and agree with the statement at para 91: 'the natural environment is an absolute; it is not something that can be left until later to be addressed as a debt. It is necessary and important for designated sites, priority habitats and protected species to continue to be conserved'.
- 10. Para 54 notes the proximity to Southampton of the New Forest National Park as an open space/recreational asset. Para 92 identifies recreational opportunities are a known issue in relation to previous Habitats Regulations assessments. Para 93 suggests various management and mitigation options we agree are likely to be necessary, but in our view those stated may not be sufficient.
- 11. Work is currently underway coordinated by PUSH on a Solent Recreation Mitigation Strategy for the impacts of development on the Solent/Southampton Water SPA, building on the interim measures. You will likely be aware of that the NFDC Local Plan Part 2 is accompanied by a Mitigation Strategy SPD following the intervention of Natural England through the hearings stages, within which New Forest mitigation measures and costs are significantly more onerous than those (interim) for the Solent/Southampton Water SPA.
- 12. For the south-western parts of Hampshire including the city of Southampton, impacts on the New Forest also require consideration. The local plan review should consider the recreational impacts development in Southampton will have on the New Forest and how this can be appropriately mitigated to avoid adverse impacts on the European Designations.
- 13. What is significantly lacking in the Issues and Option document is a more explicit acknowledgement that development in Southampton is likely to require mitigation of recreational impacts on the New Forest European Designations.
- 14. An appropriate mitigation strategy to address recreational impacts needs to be developed in partnership with neighbouring authorities and other relevant bodies to ensure a coordinated approach.