

RESPONSE TO THE BCP COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

1. INTRODUCTION

- 1.1 The purpose of this report is to agree the Council's response to Bournemouth, Christchurch and Poole (BCP) Council's Local Plan Issues and Option Consultation, closing on 25 March 2022.

2. BACKGROUND

- 2.1 Bournemouth, Christchurch, and Poole (BCP) Council are consulting on their emerging Local Plan, which will cover the period up to 2038. They have published an 'Issues and Options' document that has been prepared as a consultation document explaining the key issues for the Local Plan and either recommends the approach BCP Council consider they should take or sets out options to address the issue.
- 2.2 The overall housing numbers BCP will need to meet through the Local Plan have yet to be finalised with two options proposed:
- Look to meet the number of homes identified as needed through the government's standard housing method of a minimum of 2,667 homes a year, or 42,672 homes to 2038
 - Alternatively, identify a lower locally derived housing need figure that deviates from the government's standard methodology but still reflects our aspirations for growth. Initial findings indicate this would be a minimum of 1,600 homes a year or 25,600 homes to 2038
- 2.3 In respect of potential allocations for housing and other uses, the consultation is seeking views on all sites that have been promoted for possible development – BCP Council do not identify any preferred options in the document.
- 2.2 BCP Council ran an initial public consultation on the key issues for the Local Plan to address and a call for development sites in 2019, with the information used to develop this Issues and Options document. Prior to this, a similar 'Options' consultation was undertaken by CBC suggesting sites, for which this Council responded to in August 2018.

3. ISSUES FOR NEW FOREST DISTRICT COUNCIL

Housing Site Options

- 3.1 From the sites that have been promoted to BCP Council, there are three that immediately border NFDC. All three sites are within the designated South East Dorset Green Belt. Comments on the sites are set out below.

Site reference 07_01: Land at Higher Clockhouse Farm, Burley Road (Bransgore) – estimated capacity promoted c.300 dwellings.

- 3.2 The site adjoining the settlement of Bransgore was previously identified as a possible development site in the public consultation undertaken by the former Christchurch Borough Council in 2018. At the time of this consultation NFDC raised concerns about

the possible allocation of this site due to the impact on the Green Belt and on the settlement of Bransgore.

- 3.3 This Council continues to have serious concerns about the potential impact of a significant extension to the village, across the county boundary into Dorset. It questions the appropriateness of addressing the housing needs of the major conurbation of BCP by a significant extension to a small Hampshire / New Forest village with limited infrastructure to support further growth. There are concerns about the poor relationship between the identified land and the village and poor connections between a development in this location and the village. This site is not an obvious 'rounding-off' of the settlement but would be a 'finger' of urbanisation extending westward from the village into the green belt and encroaching on open countryside.
- 3.4 The site's impact on the Green Belt is highlighted in the Strategic Green Belt Assessment Stage 1 Study (December 2020) prepared by LUC for BCP Council, which scores the eastern area as 'relatively strong' for Purpose 3 (Assist in safeguarding the countryside from encroachment), and the western area as 'strong'. In addition the Stage 2 Harm Assessment Report prepared by LUC, is rated as 'moderate' for the eastern area and as 'moderate-high' for the western area.
- 3.5 Should this site be considered further there are a number of significant issues which will need to be satisfactorily addressed and resolved if feasible. These relate to flooding, the sewage system, highway and other supporting infrastructure, connectivity to the village, and mitigation of impacts on the New Forest and River Avon nature conservation sites (notably recreation and air quality impacts, but also phosphates from urban run-off – please see further comments below).

Site reference 16_02: Coda Music Centre, Walkford – estimated capacity promoted c.29 dwellings / Site reference 16_03: Chewton Glen Farm, Walkford – estimated capacity promoted c.85 dwellings

- 3.6 The land promoted for development at Chewton Glen Farm and the adjacent Coda Music Centre is part of a very narrow green gap between the settlements of Walkford/Highcliffe and New Milton. There are concerns that the erosion of this gap, by taking it out of the Green Belt and allowing it to be developed will reduce the separation of these settlements. It is also considered to be contrary to Green Belt purpose set out in the NPPF (Paragraph 138) of preventing neighbouring towns merging into one another.
- 3.7 Should any of these three sites progress to the draft plan, BCP Council will need to demonstrate how they have worked with adjacent planning authorities on cross-boundary issues under the 'duty to cooperate'. It is strongly encouraged that BCP Council engage with this Council regarding the cross-boundary issues and concerns arising from their consideration of these sites.

Mitigation measures to address impact of development on the New Forest designated sites

- 3.8 The BCP Habitats Regulations Assessment (HRA) Stage 1 Screening Report undertaken by WSP identifies the potential for adverse impacts from public access / recreation impacts on the New Forest SPA/SAC/Ramsar, and an issue that will need to be scoped-in to the HRA of BCP's Local Plan. However, the consultation document has not addressed this as an issue and consequently the Plan consultation is silent on appropriate mitigation measures.
- 3.9 Best available evidence from the recent Footprint Ecology Research Reports confirms that development in and around the New Forest is likely (alone and in combination) to

result in increased recreational visits to the designated sites; and there is evidence that increased recreation is impacting on the integrity of the designated sites. Much of the BCP Local Plan area falls within the 13.8km 'zone of influence' where appropriate mitigation measures need to be put in place. The position of Natural England is that these Reports represent the best available evidence to inform decisions as 'competent authorities' and therefore should be reflected in the emerging Local Plan and BCP Council's duties as competent authority under the Habitat Regulations.

Air Quality

- 3.10 The BCP Habitats Regulations Assessment (HRA) Stage 1 Screening Report identifies air pollution impacts on the New Forest SPA/SAC/Ramsar as an issue that will need to be scoped-in to the HRA of the Local Plan.
- 3.11 For its Local Plan Examination, New Forest District Council worked closely with the New Forest National Park Authority and Natural England in order to prepare a traffic-based air quality assessment produced by Air Quality Consultants (AQC). A second stage of screening was undertaken by BSG Ecology to determine whether potential effects on European sites need to be investigated further. This concluded that although the impact from the residential development proposed in the Local Plan was minimal, in combination with modelled background / through-traffic growth harmful effects from air pollution on designated sites could not be ruled out. Therefore, further air quality and habitat monitoring should be undertaken to establish whether any harmful impact were occurring. The Mitigation Strategy, produced by consultants Ecological Planning & Research Ltd (EPR), proposed that a monitoring regime be established in order to monitor the air quality levels at selected sites.
- 3.12 New Forest District Council and the New Forest National Park Authority have now commissioned and commenced operation of the necessary Air Quality monitoring work in order to follow through on the recommendations made in the above Reports.
- 3.13 Given the above and the conclusions of the BCP HRA Stage 1 Screening Report, BCP Council should consider preparing a similar air quality evidence base in order to inform and support its new Local Plan. This Council would welcome future joint working on this matter.

Nutrient Neutrality – River Avon

- 3.14 Phosphates from urban run-off is an issue that has been identified effecting the integrity of the River Avon SAC and will need to be fully assessed through the HRA/AA. Where potential adverse effects cannot be ruled out from any proposals then this will need to be addressed in the emerging draft BCP Local Plan.
- 3.15 Given that water quality and the mitigation of nutrient enrichment on the River Avon is an important cross-boundary issue affecting all local authorities within its catchment, it is highlighted to BCP Council that cross boundary working is now underway developing an appropriate mitigation strategy.

Transport Infrastructure

- 3.16 The intention of BCP Council is noted to progress work around strategic transport schemes, including enhancements to walking and cycling routes and other improvements to transport connections. This Council would welcome further engagement with BCP where such proposals adjoin or relate to NFDC's Plan Area.

4. FINANCIAL IMPLICATIONS

4.1 There are none.

5. CRIME & DISORDER IMPLICATIONS

5.1 There are none.

6. ENVIRONMENTAL IMPLICATIONS

6.1 Environmental implications include; the potential environmental impact of the plan on the internationally designated New Forest sites (SPA and SAC and Ramsar sites) and the Avon Valley (SPA and SAC and Ramsar sites).

7. EQUALITY & DIVERSITY IMPLICATIONS

7.1 There are none.

8. RECOMMENDATIONS

8.1 It is recommended that New Forest District Council respond the consultation to inform BCP Council of the following:

- i. There are concerns regarding the three sites adjoining the boundary of the District
- ii. To highlight the wider cross boundary issues of
 - o Mitigation measures to address impact of development on the New Forest designated sites
 - o Air Quality
 - o Nutrient Neutrality – River Avon
 - o Transport Infrastructure
- iii. NFDC would welcome the opportunity to work with BCP Council to address the cross-boundary issues and the matters raised above in progressing the BCP Local Plan

9. PORTFOLIO HOLDER ENDORSEMENT

I have agreed to the recommendation of this report.

Sign: Diane Andrews Date: 17 March 2022

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Background Papers:

Published documents