

**SOUTH WEST ENGLAND REGIONAL SPATIAL STRATEGY**

**Examination in Public**

**MATTER 4/7 – BOURNEMOUTH AND POOLE**  
**HMA SUB-REGIONAL STRATEGY**

**WRITTEN STATEMENT BY THE**  
**NEW FOREST NATIONAL PARK AUTHORITY**

**Respondent No. 3009**

(Hot-seating with the South East of England Regional Assembly)



## **Executive Summary**

Proposals in the South East Dorset sub-region must have regard to the statutory purposes of the New Forest National Park<sup>1</sup>. The development proposed within South East Dorset, including the expansion of Bournemouth Airport and the urban extension north of Christchurch, must be fully justified in terms of their impacts on the special qualities and protected habitats of the New Forest National Park

It is also essential that the impacts of development in the sub-region on the adjacent protected habitats of the New Forest and the Solent are fully assessed. The Authority broadly supports the proposals for green infrastructure provision within policy G11, and believes that a network of natural greenspaces should be developed through Local Development Documents to mitigate the effects of increased development on the protected habitats that characterised the sub-region.

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<sup>1</sup> The statutory purposes of the New Forest National Park, as set out in Section 61 of the 1995 Environment Act are to:

- conserve and enhance the natural beauty, wildlife and cultural heritage of the Park; and
- promote opportunities for the understanding and enjoyment of the Park's special qualities by the public

## Introduction

1. In designating the New Forest National Park in March 2005, the Minister for Rural Affairs and Local Environmental Quality emphasised the legal obligation on all relevant bodies to have regard to the two statutory purposes of the National Park<sup>2</sup>. This is commonly known as the Section 62 duty because it was inserted by that section of the 1995 Environment Act. The duty should ensure that relevant authorities take account of National Park purposes when coming to decisions or carrying out activities relating to or affecting land within National Parks.
2. It is therefore clear that proposals in South East Dorset must have regard to the statutory purposes of the New Forest National Park. This is broadly reflected in paragraph 7.2.7 of the draft Regional Spatial Strategy which states that, “...*development in the South West region adjoining the [New Forest National] Park should not prejudice the achievement of the Park’s purposes, as set out in Policy ENV3.*” Although the National Park Authority would prefer this wording to be included in policy ENV3 to give it greater prominence, its inclusion as supporting text at least recognises the issue.
  - (a) **Is the RSS sufficiently clear about the spatial outcomes it is seeking in Bournemouth and Poole in terms of their present and future regional and sub-regional roles and their relationship with other parts of the HMA?**
3. The New Forest National Park Authority has no comments to make on this issue.
  - (b) **Has the scale of greenfield development been adequately justified against the likely level of housing requirements and in particular the urban renewal opportunities in the main urban areas?**
4. The New Forest National Park Authority does not consider the proposed urban extension development of about 600 homes at Roeshot Hill, Christchurch to have been adequately justified in terms of its location in relation to the National Park, or the size of the development. The proposed areas of greenfield development in the sub-region should be focussed away from protected areas.
5. The South West Regional Assembly and Christchurch Borough Council are required to ‘have regard’ to the statutory purposes of the New Forest National Park in making decisions. The National Park Authority has significant concerns over the impacts of development in this location on the A35 and the A31 cross-Forest routes, the visual impact

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<sup>2</sup> *Guidance to the New Forest National Park Authority, on behalf of the Secretary of State, on how the Authority will be expected to take into account the special features of the New Forest*  
- Minister of State for Rural Affairs and Local Environmental Quality, March 2005

of development of this scale when viewed from the National Park, and the potential for increased recreational pressure on protected habitats. This Authority will continue to promote the understanding and enjoyment of the National Park, but this does not equate to meeting the day-to-day recreational needs of adjacent residential development.

6. In accordance with views of the South East England Regional Assembly, the National Park Authority (along with other relevant authorities in the South East region) should be involved in work in relation to this area of search. If development is to proceed in this area, it is essential that it is planned with suitable public transport and cycle links into Christchurch centre; and is self-contained in terms of the appropriate provision of accessible natural greenspace and recreational facilities. The sub-regional strategy should avoid creating additional population and traffic pressures on the sensitive environments of the New Forest.

**(c) Has sufficient consideration been given to the impact of lead in times for all or any of the development areas on the required annual output for the HMA?**

7. The New Forest National Park Authority has no comments to make on this issue.

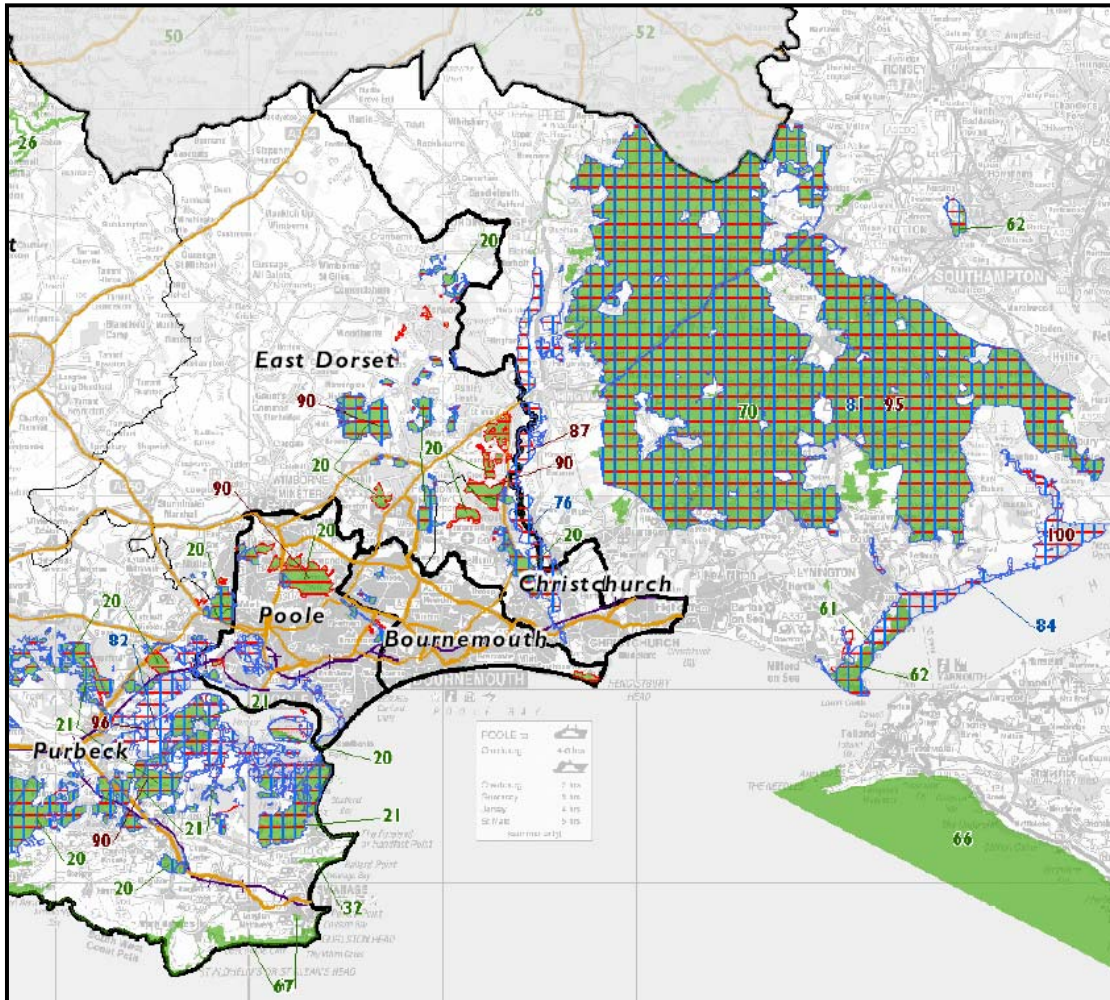
**(d) Have environmental limits arising from matters such as flood risk and the protection of environmental assets been adequately taken into account and in particular do the proposals reflect the need to avoid any impact on the integrity of important nature conservation areas around the conurbation?**

8. The New Forest National Park Authority does not consider that the proposals completely reflect the need to avoid *any* impact on the integrity of important nature conservation objectives around the conurbation. Specifically, there is a need to consider “in-combination” impacts on sites either side of the regional boundary through specific guidance on the impacts on Natura 2000 sites. The Dorset Heaths, the Avon Valley and the New Forest have been highlighted in the Appropriate Assessment of the South East Plan (October 2006) as being susceptible to ‘in-combination’ impacts from proposals in the South West and these cross-regional impacts must be considered.

9. The Appropriate Assessment of the South West Plan (February 2007) identifies potential impacts on the New Forest SAC, SPA and Ramsar sites from growth in the South East Dorset sub-region (policies SR26 – 30), airport expansion at Bournemouth Airport (policy TR9), and through the development of Poole and Bournemouth as tourism destinations (policies TO1, 3). Policy TR9, for example, supports the expansion of Bournemouth Airport despite the conclusions of the Appropriate Assessment and the Strategic Sustainability Appraisal regarding the impact on greenhouse gas emissions and local air quality

impacts. Consequently, this Authority does not consider that the proposals totally reflect the need to avoid any impacts on site integrity.

10. The Authority endorses the recommendations in Appropriate Assessment that the specific requirements that apply to Natura 2000 sites should be more explicitly stated<sup>3</sup>. The Authority considers the policy to be particularly relevant in South East Dorset, where a sub-regional policy reference should be made to the integrity of adjoining habitats that may be affected by development. PPS9 supports this, stating that that Regional Spatial Strategies should address regional, sub-regional and cross-boundary issues in relation to habitats and species through criteria based policies (paragraph 3). This should ensure proposals in the South West take full account of the protected habitats (including the New Forest SAC, SPA and Ramsar site, and the Solent Maritime SAC) that lie adjacent to the region (see below).



*Habitats Regulations Assessment of the draft RSS for the South West, Final Report, Feb. 2007 - Appendix A4: Natura 2000 sites in Bournemouth, Poole and Dorset*

<sup>3</sup> Habitats Regulations Assessment of the draft Regional Spatial Strategy for the South West – Final Report, February 2007, paragraph 5.12

- (e) **Have infrastructure considerations been adequately taken into account?**  
and
- (f) **Do the proposals adequately reflect the need to reduce the need to travel, support the use of public transport and minimise congestion?**
11. The National Park Authority remains concerned that the proposals for the sub-region will not reduce the need to travel. In particular, the Authority believes there to be a need to consider the phasing of development in South East Dorset and South Hampshire. The Authority endorses the statement by the South East England Regional Assembly (373) that there is a need to guard against increased pressure on the roads through the New Forest National Park (including any proposals to upgrade the A31 from Ringwood across the New Forest) from development in the South East Dorset sub-region.
12. The Authority also believes that the employment allocation and airport expansion at Bournemouth Airport will have significant transport implications. The cumulative impact of the employment proposals and the airport expansion must be considered in terms of impacts on the local road network, and also the inter-regional routes such as the A35 and A31. The airport site is relatively remote from public transport links and this issue must be addressed as a priority if development is not to significantly increase congestion in the area.
13. Full regard should also be given to the conclusions of the Strategic Sustainability Appraisal (March 2006) regarding airport expansion. Paragraph 11.20 of the Appraisal concludes that, "*The RSS should explicitly resist airport expansion, because it would undermine all the efforts within other sections of the RSS to reduce green house gas emissions.*" This conclusion echoes recent concerns in the Stern Review on the Economics of Climate Change<sup>4</sup> regarding the long term sustainability of air travel.
14. Rather than preventing 'leakage' to the airports in the South East, airport expansion at Bournemouth will be in addition to expansion in the South East. Expansion at Bournemouth is likely to affect the tranquillity of the New Forest National Park through increased over-flying at low levels, and increased traffic using the cross-Forest roads to access the site. Airport expansion is also likely to conflict in local air quality terms with the conservation of both internationally important wildlife sites and those in the New Forest National Park<sup>5</sup>. Policy TR9 and supporting paragraph 5.4.12 should therefore be amended to take account of the conclusions of the Strategic Sustainability Appraisal that the Regional Spatial Strategy should explicitly resist airport expansion.

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<sup>4</sup> *Stern Review on the Economics of Climate Change*, October 2006

<sup>5</sup> Habitats Regulations Assessment of the draft RSS for the South West – Final Report, February 2007

**(g) Are the proposed modifications to the Green Belt adequately justified?**

15. As outlined above, the Authority has concerns regarding the proposed employment development at Bournemouth Airport and considers that the greenbelt designation for the remainder of the airport site should be retained to ensure that the scale, design and siting of future development respects the purposes of the designation. The National Park Authority's comments regarding the proposed modifications to the greenbelt boundary north of Christchurch are set out in sub-matter (b).

**(h) Does the draft RSS set out adequate guidance on the provision of Green Infrastructure?**

16. The National Park Authority broadly supports the approach to green infrastructure provision within policy GI1 of the draft Regional Spatial Strategy. Within South East Dorset, the Authority commends the work undertaken to produce the *Dorset Heathlands Interim Planning Framework (2007)*, the nature conservation contributions sought through this, and the commitment to produce a joint Heathland Development Plan Document. With pressures on protected habitats within and adjoining the region likely to increase, green infrastructure provision can play an important role in the mitigation of impacts. Potential alternative sites in the sub-region should be identified at a strategic level and a network of sites then developed through the Local Development Documents.
17. The evidence gathered to support the Appropriate Assessment of development plans and projects in South East Dorset (January 2007) tentatively suggests that visitor levels to protected heathlands may increase by 13% as a result of new development. Paragraph 5.3.5 of the report states that suitable alternative natural greenspace sites designed to attract people away from protected areas must:
- be reasonably large (circa 40ha as an indicative minimum);
  - have good convenient access, including parking;
  - include semi-natural habitats, ideally with some tree cover.
18. The provision of these sites is beyond the scope of the usual PPG17 provision for open space and recreation facilities that local planning authorities can seek through individual applications. Paragraph B29 in Circular 05/2005 (*Planning Obligations*) identifies pooled contributions towards major infrastructure in growth areas as something that it may be appropriate to refer to in the Regional Spatial Strategy. The National Park Authority supports the proposed nature conservation contributions in South East Dorset for implementing the provision of alternative greenspace provision and considers the principle of such contributions should be supported in the Regional Spatial Strategy.

## **Conclusions**

- **The National Park Authority would welcome the inclusion of reference to the New Forest National Park and the duty placed on relevant authorities by Section 62 of the 1995 Environment Act in policy ENV1 and the South East Dorset section of the Strategy.**
- **The Authority does not consider the proposed urban extension development of about 600 homes at Roeshot Hill, Christchurch to have been adequately justified in relation to impacts on the New Forest National Park. Further work should focus on the transport, recreation and visual impacts of development.**
- **The specific requirements that apply to Natura 2000 sites should be more explicitly stated in the Strategy, including reference to the impacts on adjacent sites. This issue is particularly pertinent for South East Dorset given its proximity to the protected habitats of the New Forest and the Solent.**
- **Consideration must be given to the phasing of the residential development in South East Dorset and employment development in South Hampshire, including the potential increase in commuting across the New Forest.**
- **Policy TR9 and paragraph 5.4.12 should be re-worded in accordance with the findings of the Strategic Sustainability Appraisal. Expansion at Bournemouth Airport is very difficult to reconcile with the surrounding nature conservation designations.**
- **A network of suitable alternative natural greenspace sites should be identified at a strategic level and then developed through the Local Development Documents. Pooled contributions should be collected to deliver sub-regional greenspaces.**