

**Christchurch and East Dorset Core Strategy**  
**Hearing Statement from the New Forest National Park Authority**

*Matter and Issue 4 - Strategic Allocations – Christchurch Urban Extension*

*Question 5*

- *Deliverability: Has the SANG Strategy been agreed with all stakeholders, including adjacent authorities?*
- *Has any potential conflict with proposed mineral extraction been addressed / resolved?*

**1. Introduction**

1.1 As set out in our representations on the Pre-Submission Core Strategy DPD (letter dated 25 June 2012), the Authority broadly supports the principles behind the proposed habitat mitigation measures to be delivered as part of the proposed Christchurch Urban Extension. This includes the provision of a significant area of SANG to relieve recreational pressures on the protected Natura 2000 habitats in the Dorset Heathlands and the New Forest. The Authority notes that the number of dwellings proposed in the urban extension has increased from 600 in the draft Regional Spatial Strategy for the South West, up to 950 dwellings in the Submission draft Core Strategy DPD (an increase of around 60%). As the number of dwellings in the proposed urban extension has increased, so has the importance of the infrastructure required to support it. The Christchurch Urban Extension is the largest development proposed in the DPD and the provision of infrastructure – including green infrastructure - is an essential requisite for the development.

**2. Has the SANG Strategy been agreed with all stakeholders?**

2.1 In response to the query raised by the Inspector, **the Authority is of the view that the SANG Strategy has not been agreed by all stakeholders.** We have repeatedly raised concerns at the lack of publicly available details on the

proposed SANG, how it will be delivered, and its effectiveness in attractive residents away from designated sites given the minerals developments proposed in the area north of the railway line. The Authority therefore does not believe that this element of the Christchurch Urban Extension proposal is currently 'effective' when considered against the soundness criteria set out in paragraph 182 of the NPPF.

- 2.2 The Submission draft Core Strategy DPD referred to a SANG Strategy (2012) which it was stated was available online. However, despite several requests for the document at the time the Authority was preparing its consultation response in summer 2012 it was not made available, The Authority (and potentially others) therefore had difficulty in responding in any detail on the proposed SANG at the time of the consultation on the draft DPD.
- 2.3 Given that a significant area of the proposed SANG is located on land within the National Park (and therefore under Authority's planning jurisdiction), it would have been expedient for the National Park Authority to have been involved in the Christchurch Urban Extension Advisory Group established in 2008. This group was set up to engage "*...those bodies directly affected by the proposed urban extension and those involved in its sustainable delivery*" – paragraph 3.4.2, 'Duty to Cooperate' paper. However, despite the fact that the proposed eastern SANG falls entirely within the National Park, the Authority has not been involved in this group in any capacity. Similarly the Authority was not one of the stakeholders involved in the 'North Christchurch Urban Extension Masterplan Report'.
- 2.4 Given the lack of information available at the time of the consultation on the Submission draft DPD, the Authority felt it necessary to raise concerns about the deliverability of the SANG, its effectiveness in reducing pressures on the New Forest Natura 2000 sites (located less than 5km of the development site) and its compatibility with the large scale gravel extraction proposed north of the railway line (in both Hampshire and Dorset).

2.5 The only meaningful opportunity the Authority has had to input into the emerging SANG Strategy in any detail was following a meeting with Jackson Planning (representing the Meyrick Estate) in late October 2012. The Authority was invited to make comments on the draft SANG Strategy and did so on 4 December 2012. These comments are summarised below and the Authority's full comments on the draft SANG Strategy are available if required:

- Concerns over whether the proposed SANG would achieve its objectives while the proposed periods of large scale minerals extraction were taking place on immediately adjacent land. The Authority also raised concerns over public safety generally across the whole of the mineral site, given that public access would take place in close proximity to heavy machinery, the processing plant site and associated silt beds.
- It appeared from reading the draft Strategy that the proposed minerals extraction at Roeshot Hill would take place after the SANG had been implemented. Given this sequencing of events, the Authority questioned whether the requirements of SANG provision to provide an attractive area for people to use could actually be met.
- Concerns that the proposed link between the central and eastern SANGs would be shared by recreation users and the mineral haul route.

2.6 Given these significant concerns, the Authority was not in the position to endorse the draft SANG Strategy and stated this to Jackson Planning (representing the landowner) in December 2012. These concerns remain outstanding and have not been addressed. It is understood that similar reservations were raised by Natural England and New Forest District Council and to our knowledge a final version of the SANG Strategy has yet to be presented by endorsement by key partners. Until a clear SANG Strategy is in place setting out how the essential infrastructure required to support the development can be delivered to ensure impacts on the internationally protected habitats in both the Dorset Heathlands and the New Forest will be mitigated, the Authority is not in the position to support the DPD.

3. **Has any potential conflict with proposed mineral extraction been addressed / resolved?**

3.1 As set out above in paragraph 2.5 of this hearing statement, **the Authority continues to have significant concerns regarding the potential conflicts between the provision of an attractive area of natural greenspace to serve the 950 dwelling urban extension, and the proposals for major minerals extraction on land north of the railway line in both Hampshire and Dorset. These conflicts have not, in our opinion, been satisfactorily resolved to date** and this element of the Plan is not 'effective' or 'justified' when considered against the soundness criteria outlined in the NPPF.

3.2 As outlined in paragraph 2.5 of this statement, there is a range of potential conflicts between the two land uses including public safety issues to do with the heavy machinery associated with minerals extraction and the proposals for the mineral haul route to cross through the areas proposed as SANGs. Policy ME3 in the *Schedule of Proposed Changes to the Core Strategy Pre-Submission Document* (November 2012) states that SANGs (i) must be designed so that visitors are not deterred by safety concerns; (ii) have largely unrestricted access with plenty of space provided where dogs can exercise freely off the lead; and (iii) they must be perceived as natural spaces without intrusive artificial structure. In the Authority's view, the proposed SANG areas, and their proximity to active minerals extraction sites, means these guidelines cannot be met. As well as the safety concerns that will necessitate restricted access, a large bund is proposed to screen the minerals haul route and this unnatural feature would take up a significant area of the potential SANG and is hardly compatible with the requirement for a natural greenspace.

3.3 87 hectares of land to the north of the railway is allocated for the extraction of 3 million tonnes of sharp sand and gravel in the Hampshire Minerals & Waste Plan – see map in Annex A to this paper (with the proposed minerals extraction site highlighted in red). The Inspector's Report into the Hampshire Minerals & Waste Plan was received by the Hampshire minerals and waste planning authorities in May 2013. In his Report, the Inspector concluded that

the Hampshire authorities have fulfilled the duty to cooperate with regard to the Plan and he found the allocation of the Roeshot Hill site to be sound. The Hampshire minerals and waste planning authorities are due to have all formally adopted the Plan by October 2013. The minerals and waste plan in Dorset is less advanced, but also proposes minerals extraction on land north of the railway line.

3.4 With the land in Hampshire to be allocated for minerals extraction in the statutory 'development plan' for the area imminently (and similar proposals emerging in Dorset), the Authority would suggest there are two potential options for resolving the outstanding conflicts between extraction and SANG provision.

- (i) a more acceptable sequencing would be for the minerals extraction to take place first. The site could then be restored post mineral extraction to provide a useable area of SANG to serve the proposed Christchurch Urban Extension.
- (ii) If this is not an option, much greater certainty is required over the delivery of the SANG and it's compatibility with the minerals extraction. The current draft SANG Strategy does not do this and the draft DPD itself has little detail on the sequencing of development. An alternative may be for a site development brief for the urban extension to be prepared setting out more details on how the phasing of development will take place to ensure all of the elements are delivered.

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*Question 9*

*Transportation: has the impact of increased traffic on the roads in the adjacent National Park been taken into account?*

- 4.1. In the Authority's representations on the Submission draft Core Strategy, we echoed the comments of New Forest District Council in calling for the transport impacts of the urban extension (and other large developments in the Plan area) on the New Forest road network to be properly assessed and that development north of Christchurch should not be progressed if these impacts were shown to be unacceptable. The Authority raised particular concerns about impacts on the A35 from Christchurch to Lyndhurst (an Air Quality Management Area within the National Park).
- 4.2 Christchurch Borough Council and East Dorset District Councils have a statutory duty under Section 62(2) of the Environment Act 1995 to have regard to the two statutory National Park purposes when considering proposals for development which might affect a National Park, including where the development may be located outside the Park. This duty recognises that the delivery of the two Park purposes does not fall solely on the National Park Authority. At the time of responding to the Submission draft Core Strategy DPD, it appeared that the background work on transport impacts had focused purely on impacts within South East Dorset. Given that the county boundary between Dorset and Hampshire forms the eastern boundary of the combined Plan area, the Authority and New Forest District Council both called for further work to be carried out to assess cross-boundary impacts as this did not appear to have been considered.
- 4.3 In August 2013, Dorset County Council circulated a preliminary assessment into the likely impacts on the New Forest roads arising from development in Christchurch (including the employment growth proposed at the airport and the Christchurch Urban Extension). Following discussions with Hampshire

County Council (as the statutory highways authority for this area of the National Park), the Authority can now confirm that although this additional information addresses some of the highway issues raised, there remain some outstanding concerns that have yet to be fully allayed (including a commitment to cross-boundary working). It is anticipated that the Authority will be able to give a verbal update on this at the relevant hearing sessions in September 2013 following further discussions between Dorset County Council and Hampshire County Council as the relevant highways authorities over the next month.

**Annex A – Roeshot Hill minerals extraction site allocation, Hampshire Minerals & Waste Plan, 2013**

