

Application No: 16/00846/FULL Full Application

Site: Land Of Roeshot (rear Of Cat And Fiddle "Pick Your Own" farm), Hampshire

Proposal: Change of Use of land to use as informal open air recreation space including (but not limited to) use as suitable alternative greenspace (SANG); creation of pond; boardwalk; drainage; fencing; gates; information board; benches.

Applicant: Mr G W Meyrick, Christchurch Environmental Management Ltd

Case Officer: Deborah Slade

Parish: BRANSGORE

1. REASON FOR COMMITTEE CONSIDERATION

Previous Committee consideration.

2. DEVELOPMENT PLAN DESIGNATION

Site of Special Scientific Interest

3. PRINCIPAL DEVELOPMENT PLAN POLICIES

DP1 General Development Principles
CP1 Nature Conservation Sites of International Importance
CP2 The Natural Environment
DP3 Open Space

4. SUPPLEMENTARY PLANNING GUIDANCE

Development Standards SPD

5. NATIONAL PLANNING POLICY FRAMEWORK

Sec 1 - Building a strong, competitive economy
Sec 3 - Supporting a prosperous rural economy
Sec 6 - Delivering a wide choice of high quality homes
Sec 8 - Promoting healthy communities
Sec 11 - Conserving and enhancing the natural environment
Sec 12 - Conserving and enhancing the historic environment
Sec 13 - Facilitating the sustainable use of minerals

6. MEMBER COMMENTS

None received

7. PARISH COUNCIL COMMENTS

Bransgore Parish Council: No comments.

8. CONSULTEES

- 8.1 Ecologist: Objection. There is no information within the application to demonstrate how impacts upon the adjacent Burton Common SSSI and the New Forest SPA will be avoided. The SANG strategy and management plan have not been provided. There is no method of securing off-site mitigation or compensation for impacts upon on-site habitats e.g. for lapwings and skylark.
- 8.2 Landscape Officer: There is concern that the proposal erodes the rural character of the landscape by the introduction of structures and non-native planting. It is not clear how the intended heathland restoration can be achieved, nor how the landscape will be managed in the longer term.
- 8.3 New Forest District Council - Development Control: No objection to the proposal. NFDC have granted permission for the Central SANG, subject to conditions and informatives.
- 8.4 Dorset County Council - Minerals and Waste: No comments.
- 8.5 Natural England: No objection subject to conditions.
- 8.6 Hampshire County Council - Minerals and Waste: No comments.
- 8.7 Christchurch Borough Council (Planning), Civic Offices: No objections. The SANG is now directly linked to the Christchurch Urban Extension housing allocation. Christchurch Borough Council is in negotiations with the applicant about how to secure the proposal as part of a S106 agreement.
- 8.8 East Dorset Planning, Council Offices: No comments.
- 8.9 HCC Access Development Officer (Planning): No comments.
- 8.10 Environmental Protection (NFDC): No comments.
- 8.11 RSPB South East Regional Office: No comments.
- 8.12 Hampshire and Isle of Wight Wildlife Trust: No comments.
- 8.13 Hampshire County Council Flood and Water Management: No comments.
- 8.14 Archaeologist: No objection subject to condition.

9. REPRESENTATIONS

- 9.1 No representations received.

10. RELEVANT HISTORY

- 10.1 Change of use of land to use as informal open air recreation space including (but not limited to) use as suitable alternative greenspace (SANG) (16/00281) withdrawn on 28 July 2016
- 10.2 Construction of internal access road to the existing access to the A35 to serve the proposed Roeshot Quarry (16/00277) approved 31 August 2016

11. ASSESSMENT

- 11.1 This is the second application the Authority has received for the change of use of land within the New Forest National Park to informal open space to meet the needs arising from development outside the National Park. An earlier application for this same proposal was withdrawn last year. The site comprises an area of agricultural land of 7 hectares within the National Park. Part of the site was a former gravel pit. To the west of the site is a footpath and the boundary with New Forest District Council. Almost immediately to the north is Burton Common SSSI, just beyond a proposed haulage road for the 87 hectare minerals extraction site at Roeshot allocated within the adopted Hampshire Minerals & Waste Plan (2013). To the south is a 'pick your own' farm, which also lies within the National Park, and beyond it, the A35. To the east is further agricultural land. The site forms part of the Hinton Admiral Estate.
- 11.2 The proposal is to change the use of the land from agriculture to an area of informal open air recreation space, including its use as an area of Suitable Alternative Natural Greenspace (a 'SANG'). The application is submitted on the basis of providing alternative recreational space for the residents of the allocated Christchurch Urban Extension. This aim is to encourage recreation and dog walks in a more robust area than sensitive areas such as the Dorset Heathlands, Burton Common SSSI and New Forest SPA areas within the National Park. This application forms one of three linked planning applications, and this would be the 'eastern SANG' which would be linked to two other SANG areas within NFDC and Christchurch Borough via a 'green corridor'. New Forest District Council granted planning permission for the change of use of agricultural land within the district to use as natural green space in June 2016 subject to conditions, and Christchurch Borough Council are working on the terms of a S106 agreement which would link their SANG to the housing allocation.

11.3 In principle there is no objection to providing informal recreation space in appropriate areas of the National Park to offset pressures on more sensitive sites and such an approach is supported within the Core Strategy (Policy CP3). The area of land proposed currently has limited public access through the footpath network from the A35 towards Waterditch and Neacroft. Apart from the A35, the area is tranquil and not a part of the National Park which is widely used for recreation by visitors, although it is used locally by residents of the area. There are sensitive habitats adjacent to the site in the form of the Burton Common SSSI and therefore the Authority has to consider the potential impact of the proposal upon this nationally designated site of ecological importance, in accordance with Policy CP2 of the Core Strategy and Section 11 of the National Planning Policy Framework, as well as potential impact on the landscape character of the National Park.

11.4 Planning applications to change the use of land to recreational open space/ SANG use are more common in other parts of the country, outside nationally designated landscapes such as the New Forest National Park. Natural England's 'Guidelines on the Creation of SANGs' (2008) sets out a range of **essential** characteristics for a successful SANG, including (but not limited to):

- SANGs must be designed so that visitors are not deterred by safety concerns;
- SANGs must be perceived as natural spaces without intrusive artificial structures;
- SANGS must be free from unpleasant visual, auditory or olfactory intrusions; and
- Access within the SANG must be largely unrestricted.

These criteria are particularly relevant in considering this proposed change of use, which would be located immediately adjacent to a large scale minerals extraction site (with its associated haulage route, bunding and crushing plant). It is important to note that these are general guidelines and do not reflect the specific considerations that must be applied when assessing a proposed change of use of a large area of land within a nationally protected landscape.

11.5 The proposed SANG site has the potential to alleviate some recreational pressures on the adjacent 40-hectare Burton Common SSSI and the internationally protected habitats in the National Park. However, to determine this the Authority requires full details on the scheme to assess whether the proposals would fulfil their intended purpose. The assessment of this proposal in the National Park must also consider the immediate proximity of the designated SSSI at Burton Common, which is classified as being in 'unfavourable-recovering' condition by Natural England. Changing the use of adjacent land to recreational space has the

potential to compound recreational impacts upon the SSSI and therefore detailed consideration of the proposal and its likely impacts upon adjacent ecology are required.

- 11.6 Natural England raise no objection to the application, having had sight of a draft Roeshot and Burton SANG Delivery strategy document dated November 2016, which has not been seen by officers of the National Park Authority and has not been submitted as part of this planning application, despite being requested. There is therefore concern that it has not been demonstrated that the proposal would not place additional pressures upon Burton Common SSSI, and it is not clear how it would deflect pressures from the New Forest SPA. The Applicant contends that the National Park Authority should add a planning condition to any consent granted which requires the submission of a SANG delivery strategy. However officers are strongly of the view that the principle of how the SANG will function should be considered at this stage rather than left to condition, as there is no certainty that such a condition could be met. Without clear details on the delivery of the SANG it is not possible at this stage to conclude that it would be effective in avoiding impacts on the adjacent SSSI. No mitigation is proposed and capable of being secured as part of this application that would avoid potential impacts upon the adjacent SSSI.
- 11.7 There is also concern about Natural England's view that "*other aspects of the SANG security and maintenance will be resolved as part of applications where neighbouring authorities are taking a lead in determining applications*". This suggests that the National Park Authority would have little say in how the SANG is managed or its ultimate character and appearance. Whilst this may be acceptable to Natural England, it is the duty of the National Park Authority to ensure that any development meets with the two purposes of the National Park, i.e. to ensure that its natural beauty, wildlife and cultural heritage is conserved and enhanced, and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- 11.8 Officers are concerned that the SANG may not be fit for purpose, taking into account the 2008 guidelines set out above. In addition, concerns are raised regarding the proposed character and appearance of the SANG as a development within a National Park as highlighted in the NPA Landscape Officer's comments. The Landscape character would be altered by provision of 'country park' infrastructure e.g. litter bins, interpretation boards, board walks, dog pond, benches, post and wire fencing, waymarkers and non-native/ ornamental species. Whilst it is intended that there would be some heathland restoration proposed, this is a complex undertaking and no details have been provided to demonstrate how this would be achieved or managed in the longer term. The Agent's view is that the overall masterplan is illustrative only and that any further gates, fences

and benches would not require further planning approval; that it should be accepted that the application may result in a landscape solution that is slightly different from what might normally be acceptable within the National Park. This raises serious concerns regarding the suitability of a standard SANG solution in a nationally protected landscape.

- 11.9 Whilst officers consider that it *would* be possible to design and manage a SANG at this site which does respect the landscape character and ecology of the area, achieving this would take careful design and planning, and there is concern that this has not been done; what is being proposed is a basic 'country park' format with no consideration to the longer term landscape establishment or management, nor to habitats already at the site e.g. lapwing and skylark. Again it is material that the Authority has not had sight of the SANG delivery strategy, and of some concern that Natural England are suggesting that the future landscape of the National Park should be shaped by the decisions of neighbouring authorities.
- 11.10 As there are still uncertainties about the potential for the land to fulfil its intended SANG function, the Authority has considered the option of amending the description of the development to just grant planning permission for the change of use of the land to informal recreation space. However, it is still not possible to do this at the present time because the potential recreational impacts upon protected species and the SSSI, as well as the landscape character of the National Park, have still not been satisfactorily resolved.
- 11.11 At this juncture it is therefore recommended that planning permission is refused as there are a number of significant matters that have not been satisfactorily resolved. It remains unclear:
- how the SANG area could fulfil its intended legal function given the potential conflicts caused by the proximity of the large scale minerals allocation;
 - how the SANG would be established and managed, particularly without causing impacts upon existing habitats and the suburbanisation of the landscape. This concern is exacerbated by the lack of a final SANG delivery strategy; and
 - how the SANG area (where public access would be encouraged) would relate and interact with the adjacent SSSI.
- 11.12 This is unlikely to be the last application received by the Authority for recreational / SANG use within the National Park and it is essential that sufficient information is provided at the planning application stage to enable a full assessment of the proposals.
- 11.13 Finally, it should be emphasised that officers remain willing to consider a revised application which adequately addresses the issues set out above. The Authority fully recognises the

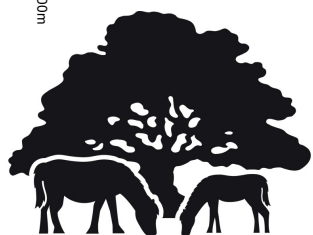
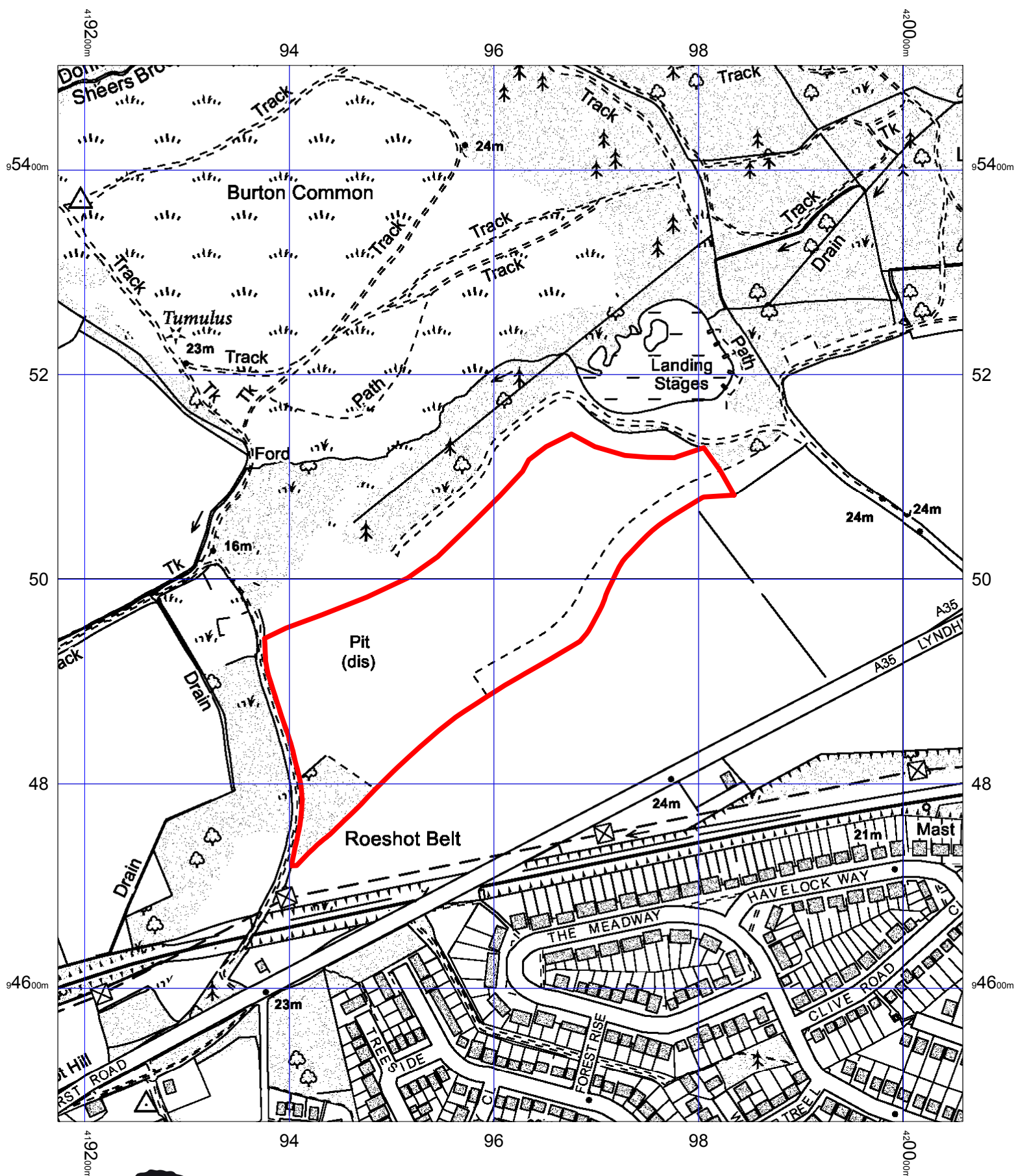
importance of the SANG to the allocated Christchurch Urban Extension and has consistently stated that a SANG in the National Park could work if carefully designed and managed to ensure there are no conflicts with the Statutory Park purposes. Unfortunately, having been withdrawn in summer 2016 this proposal has been re-submitted without any further engagement with officers and without details being available on how the SANG would be delivered and managed.

12. RECOMMENDATION

Refuse

Reason(s)

- 1 It has not been demonstrated that the proposal would uphold the ecological integrity of protected species populations, the adjacent SSSI (Burton Common), or the landscape character of the area. It is not clear that the proposal would divert impacts away from the New Forest SPA, given the distance from the development which it seeks to mitigate. As such the proposal is contrary to Policies DP1, CP2, CP8, CP3 and CP6 of the New Forest National Park Core Strategy and Development Management Policies (DPD) (December 2010).



NEW FOREST
NATIONAL PARK

New Forest National Park Authority
Lymington Town Hall, Avenue Road,
Lymington, SO41 9ZG

Tel: 01590 646600 Fax: 01590 646666

Date: 03/01/2017

Ref: 16/00846

Scale: 1:5000

© Crown copyright and database rights 2017 Ordnance Survey 1000114703

