Dear Mr Illsley,

Examination of the New Forest National Park Local Plan

1. We have now had the opportunity to consider the additional information provided since the close of the hearings on 15 November 2018.

2. We have concluded that the Authority has complied with the duty to co-operate in the preparation of the Local Plan.

3. In terms of soundness, one of the key issues is the provision that the Local Plan makes for housing. The Authority’s position is that the Local Plan is unable to provide for the Objectively Assessed Need (OAN) in full, given the particular constraints that apply. It is our understanding however that the Authority accepts that within the limitations of these constraints, it is appropriate to seek to provide for as much of the OAN as possible and indeed this is what it has sought to do in preparing the Local Plan.

4. Given this particular context, before we are able to proceed further with the examination, we will need to be assured that the potential supply of suitable housing land has been fully and appropriately assessed.

5. Paragraph 7.20 of the submitted Local Plan appears to recognise the potential for some residential use on the Ashurst Hospital site. Evidence put to the examination indicates that significant parts of the site will be available for redevelopment during the plan period and that concerns over access arrangements can be resolved.

6. It would seem that the key issue is the effect on the adjacent New Forest Special Protection Area (SPA). In considering this matter, we have taken account of the fact that the Ashurst Hospital site is previously developed and the nature of existing and lawful uses on the site. We have also taken into account that it adjoins the currently defined settlement boundary of Ashurst and is well related to local services and facilities. Of particular significance is that the submitted Local Plan proposes to allocate the site of the Former Lyndhurst Park Hotel, Lyndhurst for residential use (Policy SP23) despite it being adjacent to the SPA.
7. It is our understanding that the concern over the proximity of new residential development to the SPA (within 400m) relates primarily to urban edge effects (such as cat predation or fly-tipping) given that recreational use impacts can be mitigated. We note that Policy SP23 includes a criterion requiring measures to mitigate potential significant urban edge impacts.

8. It is not sufficiently clear, on the basis of evidence currently before us, that the situation with the Ashurst Hospital site would be significantly different to the Lyndhurst Park Hotel site in terms of the increase in urban edge effects given the existing/lawful use.

9. We would therefore like the Authority to give further consideration to the opportunity for residential development on the Ashurst Hospital site and the potential for the Local Plan to allocate the site or extend the settlement boundary to allow development to come forward as a windfall.

10. Clearly, for these options to be pursued there would be a need for additional work to be undertaken, not least in terms of HRA/Appropriate Assessment and liaison with Natural England. We would appreciate your views as to the work required and the timescale involved.

11. If it is the Authority’s view that the situation with the Former Lyndhurst Park Hotel and Ashurst Hospital sites is significantly different in terms of urban edge effects, we would be grateful if you would set this out in detail.

12. We appreciate that in itself and on the basis of indicative dwelling numbers discussed at the hearing, the Ashurst Hospital site would not increase housing provision up to the OAN. However, as set out above, we will need to be satisfied that the potential supply of suitable housing land has been maximised before proceeding further with the examination. In the interests of clarity, we can also confirm that it is only the Ashurst Hospital site that we consider may have potential to be identified as additional land suitable for residential development, having been provided with information on other sites assessed through the SHLAA and the reasons for their rejection.

13. We look forward to your response on this matter.

Yours sincerely

Kevin Ward and Caroline Mulloy
INSPECTORS