Date: 06 March 2019

Our ref: 271366

Your ref: Proposed additional site allocation - Ashurst Hospital

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BY EMAIL ONLY



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Dear Chris

## New Forest National Park Submission draft Local Plan 2016 - 2036 Proposed additional site allocation

Thank you for your consultation on the above dated 23 January 2019 which was received by Natural England on 23 January 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England supports the Ashurst Hospital allocation policy and text as set out in this consultation and concurs with the findings of the Habitats Regulations Assessment Addendum (HRA) January 2019, completed on behalf of the New Forest National Park Authority by Land Use Consultants (LUC). In relation to your specific questions please find our comments below:

- Q1. Are the specific types of uses proposed for the site appropriate and justified? Natural England supports the conclusion with the HRA that adverse impacts on site integrity cannot be ruled out for general C3 residential development on this site and we support limitation of use to C2 residential or extra care use alongside the retained (and potentially extended) healthcare provision.
- Q3. Should the policy allow for Class 3 residential use? Is the distinction between this site and the Former Lyndhurst Park Hotel in terms of C3 use appropriate and justified? As mentioned above we support the conclusion of the HRA that adverse impacts on site integrity cannot be ruled out for general C3 residential development and the conclusions and evidence within the HRA that the Ashurst Hospital site is more susceptible to urban edge effects than the Lyndhurst Park Hotel site. Natural England concurs that limiting use of the site to C2 residential or extra care use reduces the severity of potential urban edge effects and enables provision of further mitigation measures to prevent adverse effects on integrity from an allocation at this site.
- <u>Q4.</u> What are the potential adverse impacts of development on the site and how would these be mitigated?

Natural England is satisfied that the relevant potential adverse impacts on the European sites from proposed development on the Ashurst Hospital site have been considered within the HRA. The main potential adverse impacts at this site are the loss of supporting SPA habitats that lie within the old grounds of the Hospital Site and the introduced urban edge effects that may, alone or in combination, have an adverse impact on the integrity of the European Sites. It is our advice that the restriction of new development to the previous

developed areas, the appropriate ongoing management of the site's retained habitats and the limitation to C2 residential or extra care use are fully justified restrictions, that are necessary to ensure an adverse effect on integrity of the European Sites is avoided.

## Q5. Are the policy requirements appropriate and justified?

In relation to ensuring adverse impacts on integrity of the European Sites is avoided Natural England believes the mitigation as highlighted above and set out in more detail within the HRA for the proposed allocation site are necessary and fully justified.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on

Yours sincerely

New Forest Team