

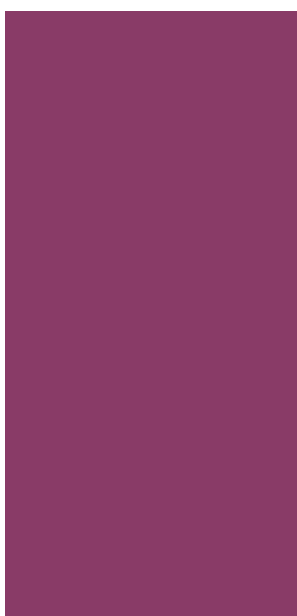


NHS PROPERTY SERVICES LTD

Ashurst Hospital, Lyndhurst Road, Ashurst

New Forest National Park Local Plan 2016-2036

Local Plan Hearing Statement (March 2019)



Introduction

1. This Hearing Statement has been prepared by WYG on behalf of NHS Property Services (NHSPS). It relates to the Ashurst Hospital site and its potential allocation for development.
2. The site's potential for development was the subject of discussion during the Local Plan hearing sessions which closed in November 2018. Subsequently, the Inspectors wrote to the National Park Authority (NPA) requesting that it gave further consideration to the opportunity to deliver residential development at the Ashurst Hospital site.
3. The NPA has now put forward a potential main modification to the Local Plan which would allocate the site for development. This Hearing Statement responds specifically to the proposed main modification.

Site Description

4. The Ashurst Hospital site covers an area of c 2.8ha (see Figure 1 below) and is located off Lyndhurst Road.



Figure 1: Site location plan showing hospital boundary in red, birthing centre (blue hatched area), the Victorian chapel and former workhouse buildings

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5. The site is previously developed land located in the south western part of Ashurst. Ashurst is one of the four 'defined villages' within the National Park and has a range of local services including schools, a railway station and local shops. The site benefits from a sustainable location with direct access to local services and amenities on the edge of the existing 'defined village' of Ashurst.
 6. The hospital site includes:
 - the modern birthing centre (towards west);
 - the former workhouse buildings (centrally on site);
 - former Education Centre and Mortuary (towards east)
 - chapel (towards north);
 - car parking (towards south); and
 - the grounds of the former workhouse.
 7. The site is bound by car parking and commercial premises to the north, with residential properties beyond. To the west is an SSSI designation and the railway line.
 8. The site lies adjacent to (but not within) the New Forest Special Protection Area and protected habitats to the east and south.

Background to this Hearing Statement

Post-November 2018 Hearing Matters

9. The hearings into the New Forest National Park Local Plan closed on 15 November 2018. The Inspectors subsequently wrote to the NPA on 29 November 2018 (see letter at **Appendix A**) stating, inter alia that:

"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.

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.

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.

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.

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.

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.

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. In light of this correspondence, NHSPS and its advisors were invited to a meeting with both the NPA and representatives of Natural England which took place on 13 December 2018. In advance of the meeting (see email correspondence at **Appendix B**), NHSPS provided the NPA with the following technical reports, which was also shared with Natural England:

- Desktop Archaeological Assessment
- Heritage Assessment
- Ecological Appraisal – including:
 - Badger Report
 - Bat Report
 - GCN Report
 - Reptile Report

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- Breeding Birds Report
 - Tree Survey Plan
 - Phase 1 Ground Condition Assessment

11. It was confirmed in writing by NHSPS that whilst the Heritage Assessment discussed the merits and effects of demolition of the chapel such demolition is not being proposed.
12. It was agreed at the meeting that NHSPS would provide an updated sketch layout plan that would form the basis of the further HRA work that was required. This sketch plan would, inter alia, show a much-reduced development footprint when compared with the plan tabled during the November 2018 hearing session and would provide a substantial buffer between the potential development area and the designations adjoining the site, along with a strengthened boundary.
13. It was also noted that the designated land to the south of the hospital site is currently accessible from the hospital site, and the existing parking area includes no restrictions or boundary treatment preventing access to the south. A proposal that provided a buffer and strengthened the southern boundary to the SPA would, therefore, be beneficial in terms of some existing urban edge effects.
14. On 16 December 2018 the NPA provided NHSPS with a draft policy wording for the site's allocation (see **Appendix C**). The draft policy stated:

Policy XX - Land at Ashurst Hospital

Land at Ashurst Hospital is allocated for a mixed-use development comprising:

- *Retained and extended healthcare provision in the western part of the site (focused on the Snowden Building) – illustrated in blue on the map below; and*
- *Around 30 residential units on the remaining previously developed part of the site.*

Detailed proposals for the site that meet the following site-specific requirements will be permitted:

- (a) The site must be redeveloped in a comprehensive manner and detailed proposals will need to ensure the retained healthcare uses on the site can operate efficiently;*
- (b) Built development will be confined to the previously developed land at the north of the site to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats.*

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- (c) The Victorian Chapel will be retained as part of the redevelopment. A detailed heritage assessment and structural survey will be required to justify the loss of the former workhouse buildings;*
- (d) Redevelopment proposals must retain the protected trees on the site;*
- (e) Proposals for C3 residential use must provide on-site affordable housing for local people in housing need as close to the Authority's target of 50% affordable housing as is viable. Viability will be demonstrated through an open book approach;*
- (f) Proposals for C2 use must be accompanied by a legal agreement requiring the occupancy to be limited to those with a local connection;*
- (g) All of the dwellings on site will be limited to a maximum total internal floor area of 100 square metres; and*
- (h) Development proposals must incorporate measures to mitigate potential significant urban edge impacts on adjacent protected habitats. The existing southern boundary between the site and the adjacent protected habitats should be retained and strengthened with the planting of native species. A detailed application for the site will be subject to a full appropriate assessment.*

15. NHSPS provided the NPA with some comments on the draft wording on 18 December 2018 and the NPA further responded on 19 December 2018 (the correspondence is contained at **Appendices D & E** respectively).
16. On 21 December 2018, and as had been agreed at the meeting with the NPA and Natural England on 13 December 2018, NHSPS submitted to the NPA a revised sketch option indicating the quantum of development that could reasonably be achieved on the site given the findings of the various technical work undertaken.
17. As noted above, the sketch option issued to the NPA indicated a much-reduced area of development from that previously tabled at the November 2018 hearing session. It showed an indicative scheme of 33 residential units with built form restricted to the previously developed part of the site and a substantial landscape buffer between the development and the site boundary to the south. This plan is contained at **Appendix F**.
18. The NPA responded in an email of 28 December 2018 (see **Appendix G**) acknowledging receipt of the revised plan and confirming that its consultants were working on the HRA of the draft policy.

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19. On 7 January 2019 NHSPS emailed the NPA confirming the current position regarding both site access and the 'reverser clause'. This correspondence is contained at **Appendix H**.
 20. On 9 January the NPA provided a copy of both its formal response to the Inspectors' letter of 29 November 2018 and the HRA addendum (January 2019) that its consultants had prepared in connection with the draft policy wording.
 21. At this point, it became apparent, notwithstanding what had been agreed with the NPA regarding a revised sketch option, that its consultants had used the sketch layout provided in November 2018 rather than the scheme for a reduced scale of development issued in December following the meeting on 13 December 2018. The NPA had confirmed receipt of this revised sketch layout on 28 December 2018.
 22. It is not at all clear to NHSPS why the HRA addendum refers solely to the initial sketch layout without any reference to the reduced scale of development being indicated, along with its substantial buffer. The sketch plan was provided in sufficient time for it to be duly considered. However, instead the HRA addendum includes only the much larger form of development and references potential impacts of such scale of development.
 23. In light of this oversight, NHSPS commissioned its own HRA report which specifically looks at a scale and form of development along the lines of the sketch layout submitted to the NPA on 21 December 2018. This HRA report is included at **Appendix I**.
 24. On 23 January 2019 a six-week formal consultation commenced on the proposed additional site allocation and the draft policy wording. The draft policy wording is contained at **Appendix J**.

Inspectors' Questions

1) Are the specific types of uses proposed for the site appropriate and justified?

25. NHSPS does not seek to dispute that the specific uses proposed for the site in the draft policy are not appropriate for the site. They clearly are. However, it does wholeheartedly dispute that they are the only appropriate uses for the site.
26. It appears clear to NHSPS that an appropriately scaled and designed form of Class C3 residential development is entirely appropriate in principle. Such a scheme could be along the lines of the sketch option provided to the NPA on 21 December 2018.

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27. The HRA report prepared on the basis of this sketch layout indicates that a development of about 30 residential units (Class C3) can be delivered at the site without giving rise to any adverse effects, given the existing lawful use of the site and subject to detailed design considerations, such as the substantial buffer indicated to the south.
 28. It is also pertinent to note that Use Class C3 allows for certain types of small-scale residential care facilities, which are currently ruled out under the current draft policy wording. Furthermore, there is some ambiguity by what is meant by '*30 residential units (Use Class C2...*' given that the term 'residential unit' would normally be taken to apply to Class C3 uses.
 29. Even when dealing with Class C2 uses the policy needs to be more flexible. There is no apparent reason why a care home within Class C2 would not be acceptable on the site, whether on its own or as part of a mixed-use development.
 30. The draft policy refers only to 'around 30 residential units' within Class C2, whereas there would be the capacity to accommodate a care home on the site of greater than 30 bed spaces in an acceptable manner.

2) What contribution would the allocation make to the provision of housing within the National Park? Are needs for Class C2 use and extra care use included in the Objectively Assessed Need for housing identified in the 2017 study and how would such provision contribute towards meeting the housing requirement?

31. The submission Local Plan clearly states the objectively assessed housing need in the New Forest National Park is 63 dwellings per annum, equating to 1,260 dwellings over the Plan Period. It is stated that this figure is robust and the best available information on the 'policy off' housing needs arising within the National Park.
32. National Planning Practice Guidance states that: "*The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) may need to be assessed...*" and "*The assessment can also set out the level of need for residential institutions (Use Class C2).*" (Paragraph: 017 Reference ID: 2a-017-20190220)
33. It seems clear from the OAN Final Report (October 2017) that the housing need figure for the Local Plan has been reached without including any assessment or evidence relating to the need for Class C2 residential care uses or extra care housing. Rather, it is an assessment only of the need for Class C3 residential units.

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34. If Class C2 uses are to be included in the supply and deemed to contribute to meeting OAN then it is only right that the need for such uses should be clearly included as part of the overall housing requirement and assessed as such. There is no corresponding evidence or calculation of the need for such uses in the OAN and, therefore, such uses cannot be considered to contribute to meeting the OAN.
35. In short, Class C2 uses should not be included as contributing to the OAN as there is no corresponding assessment of the need for such uses in the OAN. Therefore, the allocation as drafted would not contribute to meeting the OAN for housing.
36. Policy SP19 sets out the planned level of new housing for the Plan Period and proposes a figure of 800 dwellings, some 460 below the figure referred to above. Notwithstanding the unique characteristics of the National Park, the shortfall in proposed housing provision is far too great, particularly when the Ashurst Hospital site could help address this shortfall.
37. In light of the acknowledged shortfall, every avenue should be explored to deliver additional Class C3 housing at the Ashurst Hospital site and NHSPS is concerned that proper consideration has not been given to the suitability of the site to deliver much needed homes, in particular in light of the HRA addendum not referring to the latest sketch proposals for the site and how the NPA is proposing to deal with the former Lyndhurst Park Hotel site (see below).
38. In the above context, Class C3 residential units should be the clear priority for this site and it seems somewhat incomprehensible that the position of the NPA is that not a single Class C3 dwelling would be appropriate here whereas about 50 Class C3 dwellings are being supported through the Lyndhurst Park Hotel allocation.

3) Should the policy allow for Class C3 residential use? Is the distinction between this site and the former Lyndhurst Park Hotel in terms of C3 use appropriate and justified?

39. It is clear to NHSPS that the policy should allow for Class C3 residential use and that the current drafting, which does not allow for even one dwelling, is unreasonable based on the robust suite of technical evidence made available and given the allocation at Lyndhurst Park Hotel for about 50 residential units.
40. Whilst it is acknowledged that the two sites are not identical in their characteristics and context, they are sufficiently similar to be of the view that the policy stance being taken in each case by the NPA is unreasonable and unjustified.
41. Both the NPA (in its letter of 9 January 2019) and its consultants in the HRA addendum make reference to the existing lawful uses of the two sites and use them to seek to justify, at least in part, the respective draft policies for the two sites.

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42. For example, the NPA letter states at 2.2 on page 3 that: *"The existing healthcare use of the Ashurst Hospital site is unlikely to give rise to urban edge effects such as cat predation and garden waste tipping. Its allocation for residential use would therefore be much more likely to result in an increase in such effects."*
43. This may or may not be true. However, what is abundantly clear is that this statement would apply equally to the former Lyndhurst Park Hotel site. Hotel uses do not generate urban edge effects such as cat predation or garden waste tipping either.
44. Both during the November hearing session and in subsequent correspondence the NPA appears to have confused itself relating to existing lawful uses and proposed uses. It is the proposed use of Class C3 residential units that would potentially generate the urban edge effects that would need mitigating. The starting point must be that for both sites the existing lawful uses do not generate such effects – i.e. that the baseline for assessment in each case is the same and that no material distinction between the sites can be drawn based on the existing lawful use.
45. In light of this, the conclusion that one site is suitable for about 50 dwellings and the other for none whatsoever seems perverse. It is also noted again that the HRA addendum referred to an out of date sketch layout which indicated a far greater extent of development than the subsequent plan provided to the NPA, which shows development focussed on the existing developed part of the site.
46. The NHSPS commissioned HRA report based on the latest sketch proposals is contained at **Appendix I**. Section 3.8 (pages 16-19) addresses in detail the potential effects of development of about 30 residential units at the site and summarises the proposed mitigation that is likely to be required. This section of the report provides a direct comparison with the NPA commissioned HRA addendum report.
47. The NHSPS commissioned HRA Report shows that, subject to suitable mitigation, the Ashurst Hospital site can accommodate a development of about 30 residential units without urban edge effects resulting in adverse effects on the integrity of any European Site, either alone or in combination with other plans and projects.
48. In essence, the potential urban edge effects resulting from either site would not be dissimilar (and certainly not 'significantly different') if developed for Class C3 residential units. The NPA accepts that the likely effects can be appropriately mitigated in the case of about 50 residential units at the former Lyndhurst Park Hotel. However, despite the similarities in the two sites, the NPA is seemingly of the view that not even the potential effects of just one Class C3 dwelling at the Ashurst Hospital site can be appropriately mitigated.

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49. These disparate conclusions are just not borne out by the evidence and the NHSPS commissioned HRA Report confirms that development for about 30 residential units at the Ashurst Hospital site can be suitably accommodated subject to the identified mitigation.

4) What are the potential adverse impacts of development on the site and how would these be mitigated?

50. The NHSPS commissioned HRA report based on the latest sketch proposals is contained at **Appendix I**. In terms of this specific question, the attention of the Inspectors is again drawn to Section 3.8 (pages 16-19) of the report which addresses in detail the potential effects of development of about 30 residential units at the site and summarises the proposed mitigation that is likely to be required.
51. Notwithstanding what had been agreed with the NPA in December 2018 regarding the submission of a revised sketch option, its consultants have used the sketch layout provided in November 2018 rather than the scheme for a reduced scale of development issued following the meeting on 13 December 2018.
52. As noted earlier, it is not at all clear why the HRA addendum refers solely to the initial sketch layout without any reference to the reduced scale of development being indicated, along with its substantial landscape buffer. The sketch plan was provided in sufficient time for it to be considered and assessed. However, instead the HRA addendum includes only the much larger form of development and references potential impacts of such scale of development.
53. For this reason, NHSPS commissioned its own HRA report to specifically assess a scale and form of development based on the sketch layout submitted to the NPA on 21 December 2018. The Inspectors are respectfully requested to give considerable weight to the conclusions of the NHSPS commissioned HRA Report.

5) Are the policy requirements appropriate and justified?

54. In terms of detailed policy requirements, NHSPS considers the following amendments need to be incorporated:
- In light of the foregoing analysis, the policy should provide for about 30 residential units within Class C3.
 - The policy needs to also allow for potential residential care home use (Class C2), by including express reference to such use, and not just to 'extra care use'.
 - Mixed use development of Class C3 and Class C2 uses needs to be provided for.

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- In terms of criterion (b), the policy should allow for some development beyond the confines of the previously developed land if, and only if, it is demonstrated through a detailed proposal for the site that gains resulting from the proposals would outweigh any incursion beyond the previously developed land.
 - In terms of criterion (c), it is contended that the second sentence relating to the workhouse buildings should be deleted. A Heritage Statement has already been prepared and made available to the NPA and comments made by officers during the meeting held on 13 December 2018 indicate that the buildings had been subject to much unsympathetic alteration over the years. The original building has been heavily truncated and altered, both externally and internally. As confirmed by the Heritage Statement, the following factors, in particular, have seriously diminished its significance:
 - Loss or concealment of the original grand façade of the showpiece entrance block
 - Much of the interior of the remaining part of the workhouse has been updated to accommodate the needs of the current hospital – only part of the top floor has been left un-modernised but even here original and historical features have been stripped out or blocked up.
 - The 20th century additions of a porch, external staircases and a gallery
 - Mixed re-fenestration which interrupts what, judging by other similar workhouse examples, would originally have been a fairly harmonious and balanced arrangement of sash and casement windows
 - The loss of much of the outer ring of ancillary buildings, which gave the final completed form of the workhouse its distinctive hexagonal shape.

It is also noted that although the former workhouse is mentioned in the Ashurst & Colville VDS it is not listed as a “an important historical building”. The late Victorian chapel is really the only part of the former workhouse building complex which has retained its original external character and appearance, although its original interior has been now largely concealed or stripped away by the insertion of a modern office. The chapel, which occupies a prominent position at the entrance to the Ashurst Centre, is to be retained as previously confirmed by NHSPS.

- In terms of criterion (f), and as was discussed at the earlier local plan hearing sessions in connection with other sites, this criteria (if, indeed, it is to be included at all given the general

policy requirement contained elsewhere) must provide for a potential scenario where local need is fully met but there remains unfilled space within the development which should be allowed to be occupied by others

55. Based on the above, the following revised policy wording is proposed (along with any consequential amendments to the supporting text):

Land at Ashurst Hospital is allocated for mixed-use development comprising:

- ***Retained (and potentially extended) healthcare provision in the western part of the site (focused on the Snowden Building) – illustrated in blue on the map below; and***
- ***Residential dwellings (Class C3) and/or extra care housing/residential care home (Class C2) on the remaining previously developed part of the site.***

Should the non-healthcare part of the site be developed solely for residential dwellings (Class C3) the quantum of development should be about 30 dwellings. Should a mixed Class C3/Class C2 development be proposed it will be expected that proposed dwelling numbers will be reduced accordingly relative to the amount of Class C2 development being proposed and bearing in mind the site-specific requirements below.

Detailed proposals for the site that meet the following site-specific requirements will be permitted:

- (a) The site must be redeveloped in a comprehensive manner and detailed proposals for residential development will need to ensure the retained healthcare use on the site can operate efficiently;***
- (b) Built development should be focussed on the previously developed land to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats. Some development beyond the confines of the previously developed land may be acceptable if it is demonstrated through a detailed proposal for the site that the benefits of the scheme (including biodiversity gains) would outweigh any incursion beyond previously developed land;***
- (c) The Victorian Chapel will be retained as part of the redevelopment;***
- (d) Redevelopment proposals must retain the protected trees on the site;***

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- (e) Proposals for Class C3 residential use must provide on-site affordable housing for local people in housing need as close to the Authority's target of 50% affordable housing as is viable. Viability will be demonstrated through an open book approach;*
 - (f) Proposals for Class C2 Use (i.e. where no affordable housing for local people would be provided) must be accompanied by a legal agreement giving priority to those with a local connection;*
 - (g) All of the dwellings on site will be limited to a maximum total internal floor area of 100 square metres;*
 - (h) Development proposals must incorporate measures to mitigate potential significant urban edge impacts on adjacent protected habitats. The existing southern boundary between the site and the adjacent protected habitats should be retained and strengthened. Proposals should seek to enhance both its role in buffering the designated sites and supporting species of principal importance for biodiversity; and*
 - (i) Development proposals must provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.*

6) In overall terms should the site be allocated for development? What are the benefits? Alternatively, should it be included within the settlement boundary for Ashurst?

- 56. NHSPS strongly contends that the Ashurst Hospital site should be allocated for residential development for about 30 dwellings, with an element of retained healthcare in the western part of the site. The allocation should also provide for potential Class C2 uses.
- 57. The site constitutes previously developed land in a sustainable location with direct access to local services. It is located immediately adjacent to the existing built up area of Ashurst.
- 58. The site is suitable, available and achievable for redevelopment within the Plan period, and the significant body of technical work undertaken to date (and made available to the NPA) demonstrates that the site is both deliverable and suitable for residential development.
- 59. The NPA should plan positively for development and a specific site allocation would achieve this. The NPA has accepted with other brownfield sites that it is preferable in planning terms to expressly allocate a site and provide some clear parameters as to what is an acceptable form of development based on the robust body of technical evidence that exists.

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60. Without a site allocation for the Ashurst Hospital site which includes provision for Class C3 dwellings the Plan cannot be considered 'positively prepared', or consistent with national policy. This is on the basis that the NPA is showing a shortfall of 460 dwellings over the Plan Period and is not allocating a deliverable site that is previously developed land in a sustainable location with development potential for much needed housing.

Overall Conclusions

61. Our overall conclusions in respect of the Ashurst Hospital Site and the proposed draft policy allocation are as follows:
- It is clear that an appropriately scaled and designed form of Class C3 residential development is entirely appropriate for the site, along the lines of the sketch option provided to the NPA on 21 December 2018 (but not used by its consultants in preparing their HRA addendum).
 - The NHSPS commissioned HRA Report shows that, subject to suitable mitigation, the Ashurst Hospital site can accommodate a development of about 30 residential units without urban edge effects resulting in adverse effects on the integrity of any European Site, either alone or in combination with other plans and projects.
 - Class C2 uses should not be included as contributing to the OAN as there is no corresponding assessment of the need for such uses in the OAN. Therefore, the allocation as drafted would not contribute to meeting the OAN for housing.
 - It is clear that the policy should allow for Class C3 residential use and that the current drafting, which does not allow for even one dwelling, is unreasonable based on the robust suite of technical evidence made available and given the allocation at Lyndhurst Park Hotel for about 50 residential units. Whilst it is acknowledged that the two sites are not identical, they are sufficiently similar to be of the view that the policy stance being taken in each case by the NPA is unreasonable and unjustified. The sites are certainly not '*significantly different in terms of urban edge effects.*' (Inspectors' letter of 29 November 2018)
 - The Ashurst Hospital site is suitable, available and achievable for redevelopment within the Plan period, and the significant body of technical work undertaken to date (and made available to the NPA) demonstrates that the site is both deliverable and suitable for residential development.
 - The NPA should plan positively for development and a specific site allocation would achieve this, rather than an amendment to the settlement boundary. The NPA has accepted with other brownfield sites that it is preferable in planning terms to expressly allocate a site and provide some clear

parameters as to what is an acceptable form of development based on the body of technical evidence that exists.

- Without a site allocation for the Ashurst Hospital site which includes provision for Class C3 dwellings the Plan cannot be considered 'positively prepared', or consistent with national policy.
- Modifications to the draft policy are necessary in order for the policies of the Plan to fully meet the tests of soundness.

Appendix A – Letter from Inspectors to NPA, dated 29 November 2018



David Illsley
Policy Manager
New Forest National Park Authority

Our Ref:

PINS/B1740/429/9

Date:

29 November 2018

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

Appendix B – NHSPS email to NPA, dated 7 December 2018

From:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
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Attachments:

00576 Ashurst Hospital DBA v.1 red.pdf; 2017 12 15- Ashurst Centre Heritage Assessment -.pdf; A105557 New Forest Ashurst Centre_FINAL_MERGED-compressed.pdf; A105557_ Badger Report_FINAL.pdf; A105557-1 Bat Report_FINAL-watermark.pdf; A105557-1 New Forest Ashurst Centre GCN Report_FINAL.pdf; A105557-1 New Forest Ashurst Centre Reptile Report.pdf; BBreport_final-.pdf; NHSPS - Tree Survey Plan (21112017).pdf; Phase 1 Ground Condition Assessment - (November 2017)-pages-1-24.pdf

Commercial in Confidence

Dear David,

Further to your email below, and the enclosed letter.

We are happy to share with you technical surveys requested to facilitate discussion on the site. These are however 'client-facing' documents, and should therefore be treated as 'Commercial in Confidence' and not for wider circulation or publication without our express consent. You will find attached the following;

- Desktop Archaeological Assessment
- Heritage Assessment
- Ecological Appraisal – including:
 - Badger Report
 - Bat Report
 - GCN Report
 - Reptile Report
 - Breeding Birds Report
- Tree Survey Plan
- Phase 1 Ground Condition Assessment

I can confirm in the first instance that we are happy for you to share the Ecological information with John Stobart (Natural England) in advance of next week's meeting to facilitate discussion.

Just a note on the Heritage Assessment, this is an early baseline survey and does include general discussion on the effects of demolition on the Chapel, however as we have previously confirmed we are proposing retention and conversion of the Chapel to an alternative use.

Finally thanks for confirming contact details for the Forestry Commission. We will be engaging with them separately on this site.

Look forward to meeting with you on Thursday, if there is anything further you need in the mean time please let myself or Julian know.

Kind Regards

Mark

Mark Adams | Senior Town Planner (MRTPI)

Appendix C – NPA Draft Policy Wording, dated 16 December 2018

New Forest National Park Local Plan 2016 – 2036

Proposed additional text on the Ashurst Hospital site

1. The Ashurst Hospital site comprises previously developed land with access to a range of local services, including the train station and local shops. The site immediately adjoins the existing Defined Village boundary of Ashurst and is located within Flood Zone 1 for fluvial flooding.
2. Health Commissioners have confirmed that much of the existing accommodation at Ashurst Hospital is of poor quality and there is an opportunity to make a more efficient use of the site. Large parts of the site have been declared surplus to the operational healthcare requirements of the NHS and are vacant. The more modern Snowden Building at the west of the site currently contains the Birthing Centre and is to be retained. It is likely that this building will need to be extended to accommodate the future healthcare services that will continue to be delivered from the Ashurst Hospital site and policy XX supports this.
3. Policy XX allocates the site for a mix of residential and retained healthcare provision. It is considered that the surplus part of this previously developed site can deliver around 30 residential units - although the exact number will depend on the final form of residential development, which will in turn be guided by the need to avoid impacts on the adjacent protected habitats. Viability modelling for the Local Plan indicates that the redevelopment of the Ashurst Hospital site (including site clearance costs) is unlikely to achieve the 50% affordable housing policy target.
4. The site allocation policy highlights the natural and built environment constraints and opportunities on the Ashurst Hospital site. The site lies adjacent to the New Forest SSSI, SAC, SPA and Ramsar sites and the Habitats Regulations Assessment for the Local Plan identifies the potential for a range of possible effects from development on these protected sites, including recreation pressure, urban edge effects and the loss or damage to off-site supporting habitats.
5. Policy XX therefore requires development to be confined to the previously developed land to the north of the site and the strengthening of the planted boundary to the adjacent Natura 2000 site designations. Mitigation measures for potential urban edge effects could include the use of legal covenants and arrangements for grounds maintenance. The requirement to ensure no adverse impact on the adjacent national and internationally protected habitats will also influence the form of residential development on site.
6. Elements of the existing built development on the site date back to the 1830s. The former historic workhouse building is considered to be a non-designated heritage asset due to its 19th Century origins and the degree to which the building has survived to a large extent. The Victorian Chapel on the site was constructed sometime between 1869 and 1896 and the exterior remains in good condition. The former workhouse building and Victorian Chapel have heritage significance and Policy XX confirms the Chapel will be retained as part of the redevelopment of the site. The policy requires a detailed heritage assessment to be undertaken to justify proposals that would result in the loss of the former workhouse building.

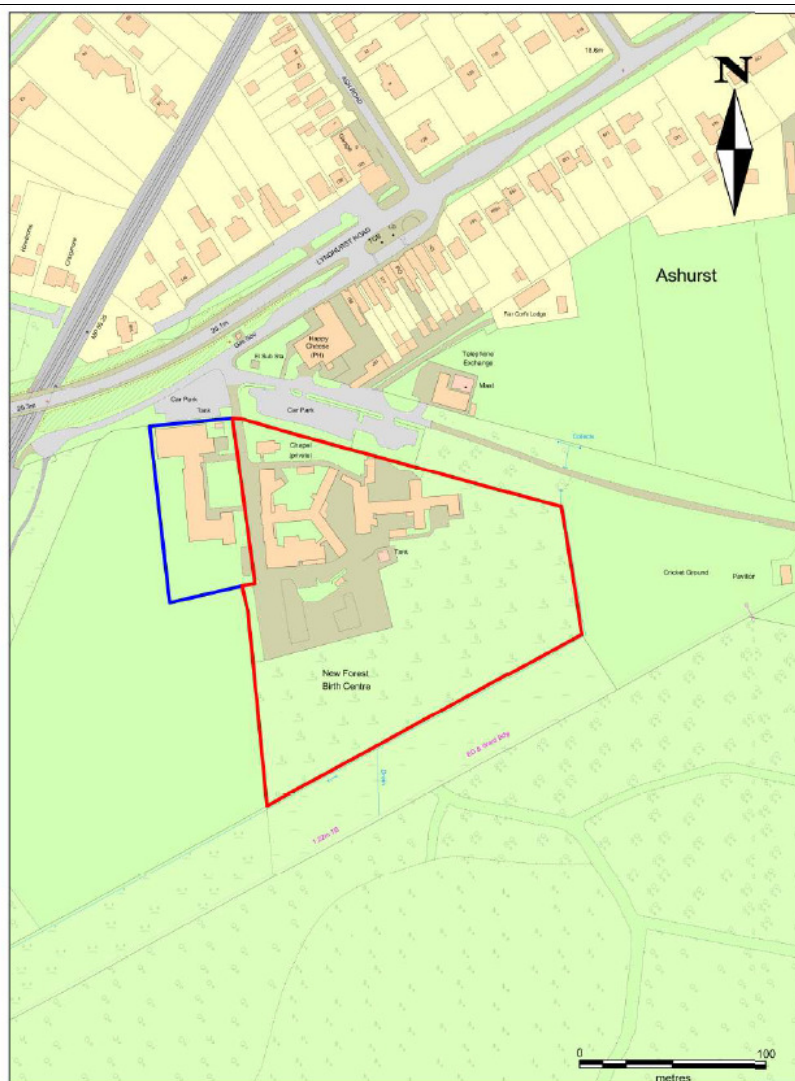
Policy XX - Land at Ashurst Hospital

Land at Ashurst Hospital is allocated for a mixed-use development comprising:

- Retained and extended healthcare provision in the western part of the site (focused on the Snowden Building) – illustrated in blue on the map below; and
- Around 30 residential units on the remaining previously developed part of the site.

Detailed proposals for the site that meet the following site-specific requirements will be permitted:

- (a) The site must be redeveloped in a comprehensive manner and detailed proposals will need to ensure the retained healthcare uses on the site can operate efficiently;
- (b) Built development will be confined to the previously developed land at the north of the site to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats.
- (c) The Victorian Chapel will be retained as part of the redevelopment. A detailed heritage assessment and structural survey will be required to justify the loss of the former workhouse buildings;
- (d) Redevelopment proposals must retain the protected trees on the site;
- (e) Proposals for C3 residential use must provide on-site affordable housing for local people in housing need as close to the Authority's target of 50% affordable housing as is viable. Viability will be demonstrated through an open book approach;
- (f) Proposals for C2 use must be accompanied by a legal agreement requiring the occupancy to be limited to those with a local connection;
- (g) All of the dwellings on site will be limited to a maximum total internal floor area of 100 square metres; and
- (h) Development proposals must incorporate measures to mitigate potential significant urban edge impacts on adjacent protected habitats. The existing southern boundary between the site and the adjacent protected habitats should be retained and strengthened with the planting of native species. A detailed application for the site will be subject to a full appropriate assessment.



Appendix D – NHSPS email to NPA, dated 18 December 2018

From:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject:

RE: Draft Local Plan policy - Ashurst Hospital

Attachments:

Ashurst Hospital - draft policy wording - NHSPS comments 18.12.18.docx

Dear David,

Thank you again for your time last week. It was a constructive meeting and NHS Property Services remains committed to working with the NPA with a view to bringing forward an appropriate form of development on the surplus land at Ashurst Hospital.

We have reviewed your draft wording and attach a track-changes version with some proposed amendments that we would respectfully ask you to consider. We also provide some commentary on the proposed changes as follows:

- Para 5/Policy Criteria (b): It was discussed at the meeting that there might be a case to allow some limited incursion beyond the existing previously developed land if, and only if, there were significant benefits accruing from the proposals that outweighed any limited harm. This may well be a difficult case to make but the policy wording should at least allow for a case to be advanced, which it currently does not. The proposed wording provides this flexibility whilst still protecting the NPA's position.
- Para 6/Policy Criteria (c): We are surprised that the draft wording indicates that the workhouse should be considered as a non-designated heritage asset with some express policy protection. If we recall correctly, there was even reference by yourself at the meeting that the building had been 'NHS-ified' through alterations, both internal and the likes of added weather boarding. The original building has been heavily truncated and altered, both externally and internally. The following factors, in particular, have seriously diminished its significance:
 - Loss or concealment of the original grand façade of the showpiece entrance block
 - Much of the interior of the remaining part of the workhouse has been updated to accommodate the needs of the current hospital – only part of the top floor has been left un-modernised but even here original and historical features have been stripped out or blocked up.
 - The 20th century additions of a porch, external staircases and a gallery
 - Mixed re-fenestration which interrupts what, judging by other similar workhouse examples, would originally have been a fairly harmonious and balanced arrangement of sash and casement windows
 - The loss of much of the outer ring of ancillary buildings, which gave the final completed form of the workhouse its distinctive hexagonal shape.

It is also noted that although the former workhouse is mentioned in the Ashurst & Colville VDS it is not listed as a "an important historical building". The late Victorian chapel is really the only part of the former workhouse building complex which has retained its original external character and appearance, although its original interior has been now largely concealed or stripped away by the insertion of a modern office. The chapel, which occupies a prominent position at the entrance to the Ashurst Centre, is to be retained as previously confirmed.

- Policy wording first bullet: Whilst an extension to the retained hospital remains quite likely it is not guaranteed and healthcare provision could just be retained within the existing building. The policy wording should reflect this potential scenario.
- Policy Criteria (f): As was discussed at the examination in connection with other sites, this criteria (if, indeed, to be included at all given the general policy requirement elsewhere) must provide for a potential scenario

where local need is fully met but there remains unfilled space within the development which should be allowed to be occupied by others.

In light of the above, we hope that you can agree to the proposed changes which will enable NHS Property Services to fully support the NPA when consulting in due course on its proposed main modifications.

We look forward to hearing from you.

Regards

Julian

Julian Bolitho MRTPI
Director - Planning

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From:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Subject: Draft Local Plan policy - Ashurst Hospital [Filed 16 Dec 2018 21:22]

Dear All,

Following our meeting on Thursday 13 December, please find attached a draft allocation policy for the Ashurst Hospital site. This draft wording is based on the matters discussed at our meeting last week, as well as the evidence we have on the site from the studies commissioned by the National Park Authority (covering viability and a Strategic Flood Risk Assessment); and those commissioned by the NHS (including a heritage assessment and various ecological assessments). We have also had regard to the approach taken in the other proposed housing site allocations in the Authority's draft Local Plan in preparing the attached wording.

As discussed last week, we are keen to respond to our Local Plan Inspectors early in the new year and will also need to run the draft policy through the Habitats Regulation Assessment process. **Could I therefore request your responses to the attached draft policy wording by 5pm on Tuesday 18 December.** We will also be sharing the draft policy wording with the Authority's specialist officers for archaeology, ecology and arboriculture at a meeting tomorrow.

I look forward to hearing back from you by the end of Tuesday 18 December and in the meantime please get back to me with any queries.

Regards

David Illsley
Policy Manager
Tel: 01590 646672



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Lymington Town Hall
Avenue Road
Lymington
SO41 9ZG

Switchboard: 01590 646600

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New Forest National Park Local Plan 2016 – 2036

Proposed additional text on the Ashurst Hospital site

1. The Ashurst Hospital site comprises previously developed land with access to a range of local services, including the train station and local shops. The site immediately adjoins the existing Defined Village boundary of Ashurst and is located within Flood Zone 1 for fluvial flooding.
2. Health Commissioners have confirmed that much of the existing accommodation at Ashurst Hospital is of poor quality and there is an opportunity to make a more efficient use of the site. Large parts of the site have been declared surplus to the operational healthcare requirements of the NHS and are vacant. The more modern Snowden Building at the west of the site currently contains the Birthing Centre and is to be retained. It is likely that this building will need to be extended to accommodate the future healthcare services that will continue to be delivered from the Ashurst Hospital site and policy XX supports this.
3. Policy XX allocates the site for a mix of residential and retained healthcare provision. It is considered that the surplus part of this previously developed site can deliver around 30 residential units - although the exact number will depend on the final form of residential development, which will in turn be guided by the need to avoid impacts on the adjacent protected habitats. Viability modelling for the Local Plan indicates that the redevelopment of the Ashurst Hospital site (including site clearance costs) is unlikely to achieve the 50% affordable housing policy target.
4. The site allocation policy highlights the natural and built environment constraints and opportunities on the Ashurst Hospital site. The site lies adjacent to the New Forest SSSI, SAC, SPA and Ramsar sites and the Habitats Regulations Assessment for the Local Plan identifies the potential for a range of possible effects from development on these protected sites, including recreation pressure, urban edge effects and the loss or damage to off-site supporting habitats.
5. Policy XX therefore requires development to be primarily confined to the previously developed land to the north of the site and the strengthening of the planted boundary to the adjacent Natura 2000 site designations. Some limited development beyond the previously developed portion might be acceptable but only where it has been shown that the benefits being delivered by the development warrant such an approach. Mitigation measures for potential urban edge effects could include the use of legal covenants and arrangements for grounds maintenance. The requirement to ensure no adverse impact on the adjacent national and internationally protected habitats will also influence the form of residential development on site.
6. Elements of the existing built development on the site date back to the 1830s. The former historic workhouse building is considered to be a non-designated heritage asset due to its 19th Century origins and the degree to which the building has survived to a large extent, albeit subject to some inappropriate alteration. The Victorian Chapel on the site was constructed sometime between 1869 and 1896 and the exterior remains in good condition. The former workhouse building and Victorian Chapel have heritage significance and Policy XX confirms the Chapel will

be retained as part of the redevelopment of the site. ~~The policy requires a detailed heritage assessment to be undertaken to justify proposals that would result in the loss of the former workhouse building.~~

6.

Policy XX - Land at Ashurst Hospital

Land at Ashurst Hospital is allocated for a mixed-use development comprising:

- Retained (and potentially extended) healthcare provision in the western part of the site (focused on the Snowden Building) – illustrated in blue on the map below; and
- Around 30 residential units focussed on the remaining previously developed part of the site.

Detailed proposals for the site that meet the following site-specific requirements will be permitted:

- (a) The site must be redeveloped in a comprehensive manner and detailed proposals for residential development will need to ensure the retained healthcare uses on the site can operate efficiently;
- (b) Built development will be primarily confined to the previously developed land at the north of the site to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats. Some limited development beyond the previously developed portion might be acceptable but only where it has been shown that the benefits being delivered by the development warrant such an approach.
- (c) The Victorian Chapel will be retained as part of the redevelopment. ~~A detailed heritage assessment and structural survey will be required to justify the loss of the former workhouse buildings;~~
- (d) Redevelopment proposals must retain the protected trees on the site;
- (e) Proposals for C3 residential use must provide on-site affordable housing for local people in housing need as close to the Authority's target of 50% affordable housing as is viable. Viability will be demonstrated through an open book approach;
- (f) Proposals for C2 use must be accompanied by a legal agreement requiring the occupancy to be limited to those with a local connection unless it can be demonstrated that there is insufficient local demand;
- (g) All of the dwellings on site will be limited to a maximum total internal floor area of 100 square metres; and
- (h) Development proposals must incorporate measures to mitigate potential significant urban edge impacts on adjacent protected habitats. The existing southern boundary between the site and the adjacent protected habitats should be retained and strengthened with the planting of native species. A detailed application for the site will be subject to a full appropriate assessment.

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Appendix E – NPA email to NHSPS, dated 19 December 2018

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Draft Local Plan policy - Ashurst Hospital

Julian,

Thank you for your email and for responding within the timescale requested.

We have considered the points raised in your email and the proposed amendments submitted on behalf of NHS Property Services. The two main areas of proposed revisions (recognising that there are others) relate to:

- (i) the extent of redevelopment and the potential for this to extend beyond the previously developed part of the site; and
- (ii) the approach to the built heritage on the site.

In terms of point (i), we are clear that redevelopment should be restricted to the previously developed part of the site and not extend closer to the internationally protected New Forest habitats - a position supported by Natural England at our meeting on 13 December. We are therefore not minded to amend paragraph 5 and criteria (b). In relation to the built heritage of the site, our specialist building conservation and archaeology officers have reviewed the information submitted and we have concluded that there are buildings on the site that constitute non-designated heritage assets. The draft policy wording requires further information to justify the demolition of the former workhouse building and we consider this to be consistent with national policy in Chapter 16 of the NPPF (2018). We are similarly therefore not minded to amend paragraph 6 and criteria (c). In terms of other points, we are content with the suggested re-wording of the first bullet point of the policy.

I can confirm that we have now sent the draft policy wording to Land Use Consultants (LUC) to undertake the Habitats Regulations Assessment / appropriate assessment of the draft allocation. As highlighted in paragraph 10 of the Inspectors' recent letter, for a positive allocation to be taken forward further work on the HRA/appropriate assessment is key. We will share with you the revised policy wording early in the new year once it has been assessed through the HRA process.

We are aiming to respond formally to our Inspectors by Wednesday 9 January 2019 and alongside the draft policy wording we intend to submit further supporting information. As part of this we would like to provide further clarification over the access to the existing site over Forestry Commission land; and the legal position regarding the historical 'reverser clause'. Both of these matters were discussed at our meeting on 13 December and we would welcome further information/clarification on these points from the NHS to support our response to the Inspectors and to demonstrate that the site is deliverable.

Regards

David Illsley
Policy Manager
Tel: 01590 646672

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Draft Local Plan policy - Ashurst Hospital

Dear David,

Thank you again for your time last week. It was a constructive meeting and NHS Property Services remains committed to working with the NPA with a view to bringing forward an appropriate form of development on the surplus land at Ashurst Hospital.

We have reviewed your draft wording and attach a track-changes version with some proposed amendments that we would respectfully ask you to consider. We also provide some commentary on the proposed changes as follows:

- Para 5/Policy Criteria (b): It was discussed at the meeting that there might be a case to allow some limited incursion beyond the existing previously developed land if, and only if, there were significant benefits accruing from the proposals that outweighed any limited harm. This may well be a difficult case to make but the policy wording should at least allow for a case to be advanced, which it currently does not. The proposed wording provides this flexibility whilst still protecting the NPA's position.
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 - Mixed re-fenestration which interrupts what, judging by other similar workhouse examples, would originally have been a fairly harmonious and balanced arrangement of sash and casement windows
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It is also noted that although the former workhouse is mentioned in the Ashurst & Colville VDS it is not listed as a "an important historical building". The late Victorian chapel is really the only part of the former workhouse building complex which has retained its original external character and appearance, although its original interior has been now largely concealed or stripped away by the insertion of a modern office. The chapel, which occupies a prominent position at the entrance to the Ashurst Centre, is to be retained as previously confirmed.

- Policy wording first bullet: Whilst an extension to the retained hospital remains quite likely it is not guaranteed and healthcare provision could just be retained within the existing building. The policy wording should reflect this potential scenario.
- Policy Criteria (f): As was discussed at the examination in connection with other sites, this criteria (if, indeed, to be included at all given the general policy requirement elsewhere) must provide for a potential scenario where local need is fully met but there remains unfilled space within the development which should be allowed to be occupied by others.

In light of the above, we hope that you can agree to the proposed changes which will enable NHS Property Services to fully support the NPA when consulting in due course on its proposed main modifications.

We look forward to hearing from you.

Regards

Julian

Julian Bolitho MRTPI
Director - Planning

WYG

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From: David Illsley [REDACTED]

Subject: Draft Local Plan policy - Ashurst Hospital [Filed 16 Dec 2018 21:22]

Dear All,

Following our meeting on Thursday 13 December, please find attached a draft allocation policy for the Ashurst Hospital site. This draft wording is based on the matters discussed at our meeting last week, as well as the evidence we have on the site from the studies commissioned by the National Park Authority (covering viability and a Strategic Flood Risk Assessment); and those commissioned by the NHS (including a heritage assessment and various ecological assessments). We have also had regard to the approach taken in the other proposed housing site allocations in the Authority's draft Local Plan in preparing the attached wording.

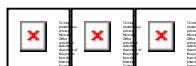
As discussed last week, we are keen to respond to our Local Plan Inspectors early in the new year and will also need to run the draft policy through the Habitats Regulation Assessment process. **Could I therefore request your responses to the attached draft policy wording by 5pm on Tuesday 18 December.** We will also be sharing the draft policy wording with the Authority's specialist officers for archaeology, ecology and arboriculture at a meeting tomorrow.

I look forward to hearing back from you by the end of Tuesday 18 December and in the meantime please get back to me with any queries.

Regards

David Illsley
Policy Manager
Tel: 01590 646672

Connect with us on:



Appendix F – NHSPS email to NPA, dated 21 December 2018

From:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
38113 Option 2 -Residential_CONFIDENTIAL.pdf

Attachments:

David,

Thank you for the prompt response to our email.

When we met we also indicated that we would prepare some sketch options that would assist in confirming the quantum of development that could reasonably be achieved on the site. This work has commenced but is not yet complete. However, the attached first sketch (provided in commercial confidence, as with the previously provided information) confirms that the quantum of development being indicated in the draft policy wording is appropriate for this site. Other options currently being worked on will include the potential to replace some of the residential units with a care home.

The attached sketch is also relevant to our comments in our previous email relating to some potential limited encroachment beyond the existing previously developed part of the site. I am conscious that we may not have been wholly clear what we had in mind.

The sketch scheme does not involve the development of any residential units on land beyond that which is previously developed land. However, a very small part of the overall scheme in the south east corner, beyond the previously developed part of the site, is indicated as landscaping and green space.

Our proposed policy amendment was to facilitate a scheme where potentially the red line area extends slightly beyond the previously developed land but that no new buildings are developed in this area. Rather, it could, for example, provide landscaping associated with the development. Could you confirm that such an approach could be acceptable in principle? Obviously final scheme details will dictate whether a proposal is actually acceptable or not to the Authority. Assuming that you are in agreement, we could consider a slight revision to the draft policy that deals with this point.

I look forward to hearing from you.

Regards

Julian

Julian Bolitho MRTPI
Director - Planning

WYG

90 Victoria Street, Bristol, BS1 6DP

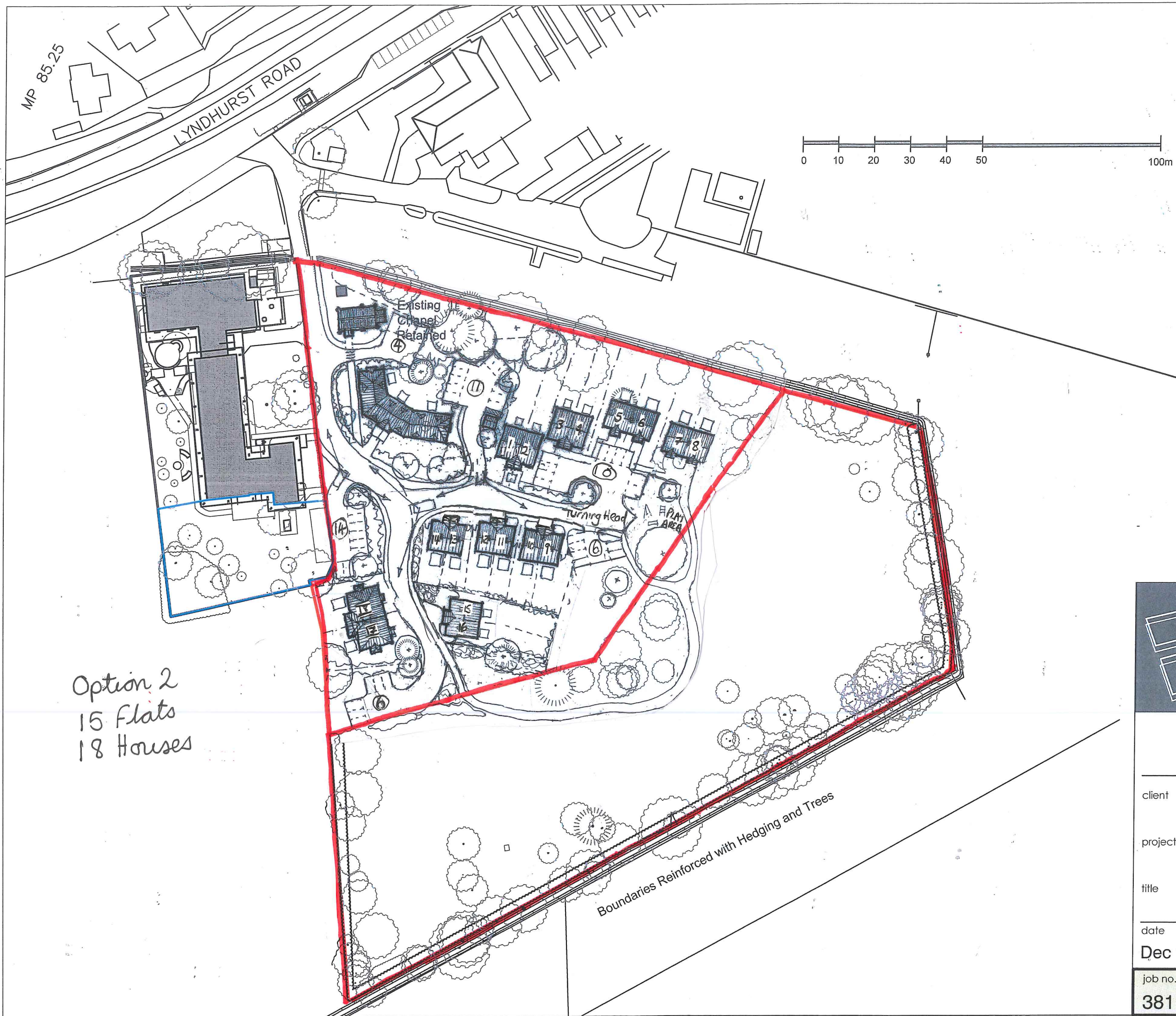
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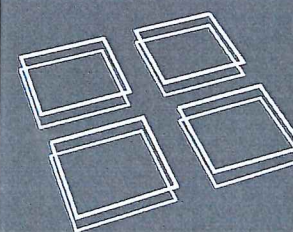
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Option 2
15 Flats
18 Houses

PRELIMINARY



studio four
architects ltd

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01962 820255
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client NHS Property Services Ltd

project Ashurst Hospital Surplus Land

title Site Plan - Option 2

date scale paper drawn checked

Dec 18 1:1000 A3 - -

job no. dwg no. revision

38113 SK03 -

file 38113 Site Plan

Appendix G – NPA email to NHSPS, dated 28 December 2018

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Draft Local Plan policy - Ashurst Hospital

Julian,

Thank you for your email and the indicative sketch layout.

In terms of your query regarding potential limited encroachment beyond the previously developed land, criterion (b) in the draft policy states that, "*...built development will be confined to the previously developed land to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats...*" (my emphasis). Therefore the draft policy does not preclude landscaping and greenspace provision within the green buffer and therefore I would suggest that the scenario outlined in your email is already adequately covered by the draft site allocation policy wording.

I was also keen to update you on the timetable moving forward. We are due to be responding to our Local Plan Inspectors by Wednesday 9 January 2019 and our consultants are currently working on the HRA of the draft policy. As we discussed at our meeting on 13 December (and in other related emails), we are very keen to provide an update to the Inspectors on: (i) the legal reverser clause; and (ii) the access to the site over third party (Forestry Commission) land. Both of these matters are relevant in demonstrating the deliverability of the site. Could I therefore request an update from the NHS on these matters by Monday 7 January to enable us to provide some wording in our letter to the Local Plan Inspectors?

Regards

David Illsley
Policy Manager
Tel: 01590 646672

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Draft Local Plan policy - Ashurst Hospital

David,

Thank you for the prompt response to our email.

When we met we also indicated that we would prepare some sketch options that would assist in confirming the quantum of development that could reasonably be achieved on the site. This work has commenced but is not yet complete. However, the attached first sketch (provided in commercial confidence, as with the previously provided information) confirms that the quantum of development being indicated in the draft policy wording is appropriate for this site. Other options currently being worked on will include the potential to replace some of the residential units with a care home.

The attached sketch is also relevant to our comments in our previous email relating to some potential limited encroachment beyond the existing previously developed part of the site. I am conscious that we may not have been wholly clear what we had in mind.

The sketch scheme does not involve the development of any residential units on land beyond that which is previously developed land. However, a very small part of the overall scheme in the south east corner, beyond the previously developed part of the site, is indicated as landscaping and green space.

Our proposed policy amendment was to facilitate a scheme where potentially the red line area extends slightly beyond the previously developed land but that no new buildings are developed in this area. Rather, it could, for example, provide landscaping associated with the development. Could you confirm that such an approach could be acceptable in principle? Obviously final scheme details will dictate whether a proposal is actually acceptable or not to the Authority. Assuming that you are in agreement, we could consider a slight revision to the draft policy that deals with this point.

I look forward to hearing from you.

Regards

Julian

Julian Bolitho MRTPI
Director - Planning

WYG

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Appendix H – NHSPS email to NPA, dated 7 January 2019

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Draft Local Plan policy - Ashurst Hospital

Dear David,

Hope you are well, and had a good Christmas break / new year.

Further to your email below, I have provided an update on the two matters referenced below.

- **Reverser Clause** - Our in house legal team have carried out a legal review of the registered title and pre-registration deeds for Ashurst Centre, Lyndhurst Road, Ashurst, SO40 7AR. They are of the opinion that there is no current or ongoing 'reverser clause' relating to the property in favour of the Crown Estate from the documentation available to them, and therefore concur with the Crown Estate that it does not have a proprietary interest in the property. Therefore, this is not a constraint that would prevent development of the surplus land, or its progression as a site allocation.
- **Access** – NHSPS has arranged a meeting with Paul Grugeon at the Forestry Commission for w/c 7th January to discuss the site's future development. As set out in your letter dated 8th December 2018, the Forestry Commission has already confirmed that future access to new residential development on the surplus land can be provided for through updating the existing Licence arrangement, particularly as health uses will be retained on part of the site. Therefore, this is again not a constraint that would prevent development of the surplus land, or its progression as a site allocation.

I would be grateful if you could keep us informed as this progresses. Happy to discuss further as required.

Kind Regards

Mark

Mark Adams | Senior Town Planner (MRTPI)

NHS Property Services Ltd
99 Gresham Street, London EC2V 7NG

E: mark.adams@property.nhs.uk
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Subject: RE: Draft Local Plan policy - Ashurst Hospital

Julian,

Thank you for your email and the indicative sketch layout.

In terms of your query regarding potential limited encroachment beyond the previously developed land, criterion (b) in the draft policy states that, "*...built development will be confined to the previously developed land to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats...*" (my emphasis). Therefore the draft policy does not preclude landscaping and greenspace provision within the green buffer and therefore I would suggest that the scenario outlined in your email is already adequately covered by the draft site allocation policy wording.

I was also keen to update you on the timetable moving forward. We are due to be responding to our Local Plan Inspectors by Wednesday 9 January 2019 and our consultants are currently working on the HRA of the draft policy. As we discussed at our meeting on 13 December (and in other related emails), we are very keen to provide an update to the Inspectors on: (i) the legal reverser clause; and (ii) the access to the site over third party (Forestry Commission) land. Both of these matters are relevant in demonstrating the deliverability of the site. Could I therefore request an update from the NHS on these matters by Monday 7 January to enable us to provide some wording in our letter to the Local Plan Inspectors?

Regards

David Illsley
Policy Manager
Tel: 01590 646672

Appendix I – NHSPS commissioned HRA report based on c. 30 unit housing scheme



Ashurst Centre, New Forest

Report to Inform Habitats Regulations Assessment Stage 2

NHS Property Services

February 2019

The Pavilion, 1st Floor, Botleigh Grange Office Campus, Hedge End, Southampton SO30 2AF



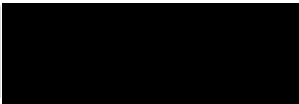
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Glossary

ACIEEM	Associate Member of Chartered Institute of Ecology & Environmental Management
ALSE	Assessment of Likely Significant Effects
CEMP	Construction Environment Management Plan
CEnv	Chartered Environmentalist
CIEEM	Chartered Institute of Ecology & Environmental Management
CIRIA	Construction Industry Research and Information Association
Habitats Regulations	Conservation of Habitats and Species Regulations 2018
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IROPI	Imperative Reasons of Overriding Public Interest
IWMS	Integrated Water Management Study
JNCC	Joint Nature Conservation Committee
MCIEEM	Member of Chartered Institute of Ecology & Environmental Management
Natura 2000 site	A European site designated for its nature conservation value
PPG	Pollution Prevention Guidelines
PUSH	Partnership for Urban South Hampshire
SAC	Special Area of Conservation
SPA	Special Protection Area
SPD	Supplementary Planning Document

1.0 Introduction

1.1 Background

WYG was commissioned by NHS Property Services to prepare a report to inform Stage 2: Appropriate Assessment of a Habitats Regulations Assessment (HRA) to help support the allocation of the Ashurst Centre Site within the New Forest National Park Local Plan 2016-2036.

The HRA seeks to provide information to help determine whether redevelopment of the Ashurst Centre site could result in Likely Significant Effects (LSE) on qualifying features of any European site, and ultimately affect site integrity. This report follows on from the Stage 1: Screening Report (WYG, 2018), and publication of an addendum to the Habitats Regulations Assessment of the New Forest National Park Local Plan 2016-2036 (Land Use Consultants (LUC), 2018) relating to the potential allocation of the Ashurst Hospital site (LUC, 2019).

The sites where LSE were identified as requiring Appropriate Assessment in the Stage 1: Screening report are listed below, with their qualifying features given in Appendix A:

- New Forest Ramsar (adjacent to eastern and southern boundary of the site);
- New Forest SAC (adjacent to eastern and southern boundary of the site);
- New Forest SPA (adjacent to eastern and southern boundary of the site);
- Solent Maritime SAC (3.2km northeast);
- Solent and Southampton Water Ramsar (3.2km northeast); and
- Solent and Southampton Water SPA (3.2km northeast).

This report has been prepared by WYG Principal Ecologist Jonathan Jackson MCIEEM.

1.2 Site Location

The Ashurst Centre is also known as the New Forest Birthing Centre and is located off Lyndhurst Road in Ashurst, Hampshire, centred at Ordnance Survey National Grid Reference SU 33667 10242. The area with the potential to be redeveloped is shown on Figure 1, and is hereafter referred to as the 'site'.

The Birthing Centre comprises a complex of several building (some of which are not currently occupied) alongside associated landscaping and hardstanding. The Centre and associated buildings are confined to the north western section of the site. The predominant habitat in the remainder of the site is tussocky neutral semi-improved grassland surrounded by lines of trees, tall ruderal vegetation and scrub. The grassland is punctuated by stands of dense scrub and scattered trees with a large expanse of tall ruderal vegetation encompassing the area in the south west. Felling of scattered trees has occurred within the grassland creating areas of tree stumps and woodchip.

1.3 Development Proposals

The proposed allocation will comprise the demolition of existing buildings and construction of new buildings to provide 33 residential units in the form of 18 houses and 15 flats within the 'new built environment' shown on Figure 1. The area to the south of the new built environment would be

retained and would be managed for the purposes of supporting biodiversity. In this report this area is called the 'enhanced greenspace'. This area currently supports shrub, rank grassland and rush pasture (WYG, 2017). The management prescription for this site is to be determined, but may include the creation of drier areas of heath, ponds and areas of gorse rich scrub.

It should be noted that the HRA Addendum for the Ashurst project (LUC, 2019) referred to throughout this report, was based on the masterplan shown in Appendix B, and was not therefore based on the up-to-date iteration shown in Appendix C. The HRA Addendum therefore did not include any assessment of the impact of the inclusion of greenspace and had the boundary of the new built environment tight against the boundary of the New Forest. Where this has the potential to alter the LUCs conclusions, it is highlighted in this report.

1.4 Requirements for the HRA

The requirement for an HRA is established through Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora, hereby referred to as the 'Habitats Directive', in Articles 6(3) and 6(4). The Habitats Directive is transposed into national legislation by the Conservation of Habitats and Species Regulations 2018. These are hereafter referred to as the 'Habitats Regulations'.

Under Regulation 63, any project which is likely to have a significant effect on a European site (either alone or in-combination with other projects) and is not directly connected with, or necessary for the management of the site, must be subject to an HRA to determine the implications for the site in view of its conservation objectives. This is determined during the Stage 1: Screening Assessment of an HRA (see below).

Under Regulation 63, a Stage 2: Appropriate Assessment then needs to be carried out in respect of any plan or project which:

- either alone or in combination with other plans or projects would be likely to have a significant effect on a site designated within the European network; and
- is not directly connected with the management of the site for nature conservation.

The term European site is defined fully in Regulation 8 of the Habitats Regulations and include:

- Special Areas of Conservation (SACs);
- candidate and proposed SACs;
- Special Protection Areas (SPAs);
- potential SPAs;
- proposed Wetlands of International Importance designated or proposed for their wetland features under the auspices of the Convention of Wetlands of International Importance (commonly referred to as 'Ramsar sites'); and
- sites identified for Natura 2000 compensatory measures.

The final two categories are afforded the same level of protection as SACs and SPAs as a matter of Government policy, and the assessment provisions of the Habitats Regulations are applied to them (Natural England, 2017).

1.5 Requirement for Stage 2 assessment at Ashurst

This report assesses both the pathways to LSE identified in the Stage 1: Screening Report, and those from the Local Plan HRA Addendum. These are presented in Table 1 and show that eight pathways have been identified. This report does not repeat the reasons for screening out sites or pathways to LSE previously identified in the Stage 1 Screening Report.

Table 1 Pathways assessed in this report

Pathway assessed (using merged terminology where appropriate)	Stage 1 Screening		Local Plan HRA Addendum	
	New Forest Ramsar, SAC and SPA	Solent and Southampton Water Ramsar and SPA	New Forest Ramsar, SAC and SPA	Solent and Southampton Water Ramsar and SPA
Public access / disturbance / Recreation pressure	Yes	Yes	Yes	Yes
Hydrological changes / Changes in water quantity and quality	Yes	-	Yes	-
Invasive species	Yes	-	-	-
Air pollution / Changes in air quality	Yes	-	Yes	-
Changes in species distribution via habitat loss / Loss or damage to offsite supporting habitat	Yes	-	Yes	-
Direct loss or physical damage to European sites	-	Yes	-	Yes
Vehicles / Traffic collision risk	Yes	-	Yes	-
Urban edge effects	-	-	Yes	-

1.6 Consultation

A meeting was held on 13 December 2018 to discuss the development proposals and potential inclusion within the local plan. In attendance were:

- New Forest Policy Manager – David Ilsley
- Natural England Planning and Conservation Senior Advisor – John Stobart
- WYG Director of Planning – Julian Bolitho
- WYG Principal Ecologist – Jonathan Jackson
- WYG Project Ecologist – Ben Cooke

Key point and outcomes from the meeting are presented in Table 2.

Table 2 Key outcomes of consultation meeting relating to ecology

Key point	Issue	Outcome
The results from ecological baseline	WYG intended to base the HRA on the results from surveys which do not include any evidence use of use by Dartford warbler, nightjar or woodlark. This was not accepted by Natural England who consider all adjacent habitat to be supporting habitat.	Any assessments made will consider the enhanced greenspace to the south of the existing buildings as habitats of value to SPA birds.
The location of the boundary of the built area	It was considered by Natural England that it would be inappropriate for the boundary of the new built environment area to be adjacent to the New Forest due to the increased risk of any deleterious impacts being significant.	The boundary of the new built environment was moved to be within the boundary of existing buildings and hardstanding only, as far as possible.
The appropriateness of the development	It was agreed by Natural England that some redevelopment of this site could be achieved without affecting the integrity of European Sites.	The potential for redevelopment was established.

2.0 Assessment Methodology

2.1 Assessment Guidance

The Habitats Directive and Regulations do not specify how assessment should be undertaken. In undertaking this HRA, the process we have adopted is that recommended in official EC guidance (EC, 2001).

- **Stage 1: Screening** – the process which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant. This is also known as an 'assessment of likely significant effects (ALSE)';
- **Stage 2: Appropriate assessment** – the consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in-combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts (in accordance with guidance following the recent decision by the Court of Justice of the European Union (CJEU) *People Over Wind and Sweetman v Coillte Teoranta* (C-323/17) regarding application of embedded mitigation at Stage 1 or Stage 2 of an HRA (Freeths, 2018);
- **Stage 3: Assessment of alternative solutions** – the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site; and
- **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain** – an assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Over-riding Public Interest (IROPI), it is deemed that the project or plan should proceed (it is important to note that this guidance does not deal with the assessment of IROPI).

It is Stage 2: Appropriate Assessment that is the focus of this report.

3.0 Stage 2: Appropriate Assessment

The following sections present an assessment of the pathways listed in Table 1 based on the adjusted outline plan for the site given in Appendix C and Figure 1, and taking into account potential avoidance or mitigation measures which could be included within a site allocation policy or development framework plan.

3.1 Public access / Disturbance / Recreation pressure

3.1.1 Pathway description

There is the potential for areas outside of the boundary of the site to be affected by an increase in usage for the purposes of recreation. There is access into adjacent habitats into the cricket ground and Churchplace Inclosure to the east.

Disturbance of qualifying features of the New Forest SPA could include affecting nesting bird behaviour at the nest, foraging or predator avoidance. Walking dogs within habitats used by mobile qualifying species can also have the impact of increasing predator numbers. For example, corvids that can rob bird nests also feed on dog faeces and litter that has not been disposed of, meaning that they may be attracted to the area.

For the Solent and Southampton Water Ramsar and SPA, any increase in the number of residential units within 5.6km of the site has been identified as being likely to result in increased visitor usage. This is following the outcomes of visitor surveys used to inform the Solent Recreation Mitigation Strategy (Bird Aware Solent, 2017). This has the potential to result in flushing of wading birds either when foraging or roosting. This can have an energetic cost on birds and could therefore affect populations sizes and distribution, and therefore the conservation objectives of these sites.

3.1.2 Proposed mitigation

New Forest SPA

In the Stage 1: Screening Report (WYG, 2018), a description was provided of New Forest District Council's approach to mitigating the threat of recreation pressure from residential development. This was to prepare and adopt a Supplementary Planning Document (SPD) (New Forest District Council, 2014a). However, the SPD was not used in the preparation of the Local Plan HRA Addendum for the Ashurst site (LUC, 2019) as a means to describe mitigation. Instead the Local Plan HRA Addendum references The New Forest National Park Draft Habitat Mitigation Scheme 2018 (New Forest National Park, 2018). It is therefore the measures in The New Forest National Park Draft Habitat Mitigation Scheme that are now referred to in this report.

The New Forest National Park Draft Habitat Mitigation Scheme is focussed on alleviating the potential alone and in combination effects of recreation pressure on New Forest SAC, SPA and Ramsar site. The key elements of the revised scheme are:

- access management within the New Forest European designations;
- alternative recreation sites and routes outside the designated sites;
- education, awareness and promotion;
- monitoring and research; and

- in-perpetuity funding.

Elements of these measures could be included within conditions of allocation (or planning consent) to the extent that the impact of recreational pressure could be reduced. The potential application of these measures to the Ashurst site is described in greater detail in Table 3.

Table 3 Potential outline measures in The New Forest National Park Draft Habitat Mitigation Scheme

Measure	Description	Likely application at Ashurst
Access management within the New Forest European designations	The southern boundary of the site and the southern boundary of the new built environment will both be made impassable by pedestrians to prevent informal paths forming through to the Forest. This could be achieved using fencing or planting.	Yes
Education, awareness and promotion	Within the new built environment, there is the potential for interpretive signage within the new estate to educate users of the New Forest about the species it supports. It may also be possible for new residents to receive home owner packs.	Yes
Monitoring and research	The management plan for the enhanced greenspace described in Section 3.5 will include monitoring to determine the quality of habitats for the ecological features it is intended to support. This could be provided to the New Forest District Council and used to supplement the information they use to inform management of adjacent habitats.	Yes
Alternative recreation sites and routes outside the designated sites	There is the potential for a proportion of the enhanced greenspace to the south of the developed areas to be managed for the benefit of new residents and their recreation. However, this would clash with the intended use of the area for the benefit of biodiversity including those for which the New Forest is designated (see Section 3.5). This is therefore considered to be inappropriate and public access to this area would not be provided.	No
In-perpetuity funding	No funding is proposed, other than to provided funds for management and monitoring of the enhanced greenspace to the south of the developed area.	No

Solent and Southampton Water Ramsar and SPA

Regarding the Solent and Southampton Water Ramsar and SPA, a per-unit financial contribution will be made in accordance with the Solent Recreation Mitigation Strategy (Bird Aware Solent, 2017) in order to mitigate for potential alone and in-combination recreational impacts upon the species they support.



3.1.3 Assessment

This assessment identifies that there are measures which could be employed to minimise the level of recreational pressure on The New Forest from having new properties in close proximity to its boundary. It is also relevant that the Local Plan HRA Addendum (LUC, 2019) concludes that:

"However, the additional recreation pressure on this adjacent area of New Forest SAC and SPA from the scale of development proposed by the draft Ashurst Hospital allocation, alone or in combination with any windfall development, is judged unlikely to be sufficient to have an adverse effect on site integrity, particularly as a proportion of the incremental recreation activity by new residents is likely to involve travel by car and be spread over a wide area."

This conclusion is supported by this assessment, and combined with the measures to minimise the impacts that could occur for the New Forest and the Solent coast European sites, **public access / disturbance would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

3.2 Hydrological changes / Changes in water quantity and quality

3.2.1 Pathway description

During construction there is the potential for localised pollution events via run-off into neighbouring habitats that are part of the New Forest SAC, SPA and Ramsar. This could be via contaminated surface water run-off containing silt and / or other pollutants caused by inappropriate storage of fuel, or protection during refuelling operations. This would be short term but does have the potential to results in LSE.

During operation there is also the potential for increased volumes of treated wastewater, overloading of combined sewer networks during storm events and contaminated surface runoff from urban surface and road. The addendum to the Habitats Regulations Assessment of the New Forest National Park Local Plan 2016-2036 (LUC, 2018) found that the scale of this development was too small to effect integrity alone, but could contribute to in-combination effects on Solent and Southampton Water European Sites.

The addendum to the Habitats Regulations Assessment of the New Forest National Park Local Plan 2016-2036 (LUC, 2018) goes on to conclude that operational water quality and quantity changes do not have the potential to affect integrity. This is based on the findings of the Integrated Water Management Study (IWMS) commissioned by the Partnership for Urban South Hampshire (PUSH) (Amec Foster Wheeler Environment & Infrastructure UK Limited, 2018). This study secures the commitment to Policy DP8 to formulate a strategic solution to preventing deleterious impacts from nitrogen inputs from 20,000 homes in the PUSH region. These development proposals would contribute a negligible amount to these values, if included, and therefore the pathway is not taken further in the assessment.

3.2.2 Proposed mitigation

The control of environmental changes during construction are commonly controlled by the implementation of measures contained within a Construction Environment Management Plan (CEMP).

A CEMP will be prepared for this project and will detail how best practise and standard industry behaviours will be adhered to during construction works.

The CEMP will describe how hydrological changes from run-off and pollution will be preventable. This will include principles taken from the Pollution Prevention Guidelines (PPGs) available from The National Archives such as *PPG 1 – Understanding your environmental responsibilities*, *PPG 5 – Works and maintenance in or near water* and *PPG 21 – Incident response planning* (The National Archives, 2014). Whilst these guidance documents have been withdrawn, they are still considered to contain useful information in the absence of published replacements. The measures relating to hydrological changes in the CEMP will include measures such as:

- Appropriate storage of fuels and chemicals on site;
- An emergency incident plan;
- Method statements for refuelling operations;
- Control of run-off via silt fencing; and
- Appropriate storage of friable materials.

During operation, a drainage strategy would need to be implemented that would demonstrate how changes in surface water would be managed in perpetuity. This may include the use of methods outlined in The Sustainable Urban Drainage System (SuDS) Manual (Construction Industry Research and Information Association (CIRIA), 2015).

3.2.3 Assessment

With the application of the measures described above, **hydrological changes / Changes in water quantity and quality would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

3.3 Invasive species

3.3.1 Pathway description

This pathway relates to the introduction or spread of invasive plant species. Aspects of this pathway relating to animals are not considered to be applicable to this development proposal and are not discussed further. For the purposes of this HRA, invasive species are those listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (GB non-native species secretariat, 2018) e.g. giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, Japanese knotweed *Fallopia japonica*, some rhododendron species and wall cotoneaster *Cotoneaster horizontalis*.

The potential for this pathway to result in LSE is assessed as being limited to the construction phase. This is based on surveys not having ever found invasive species of plant on the site (WYG, 2017) and on the assumption that the development proposals would not include the planting of any invasive plant species within the operational scheme design. There is therefore no potential for spread from within the site to adjacent protected habitats in the SAC, SPA and Ramsar during the operational phase.

During the construction phase of developments, there is the potential for viable propagules of invasive species of plant to be accidentally imported in material imported onto the site, or on plant machinery e.g. in excavator tracks. Invasive species can then become established and could spread

into neighbouring habitats. Based on the geography of this site and proximity to designated habitats, this does have the potential to result in LSE. Whilst this has been reduced by the increased distance (approximately 60m) between the boundary of construction works and the New Forest, vehicles from site could potentially still drive on roads adjacent to protected habitats and introduce invasive species in the manner described above.

The potential for invasive species to become introduced to the New Forest SAC was also established as part of the draft site allocation HRA (LUC, 2019). However, this was in the context of being an 'urban edge' effect relating to increased instances of fly-tipping during occupation. As such, this has been considered separately in Section 3.8.

3.3.2 Proposed mitigation

To protect against invasive species being introduced to a site during construction, the CEMP will include a section on biosecurity. This would detail measures that could be used to reduce the risk of introduction to negligible levels. These could include, but would not be limited to:

- Monitoring of the site;
- Display of interpretation boards in site offices regarding invasive species;
- Wheel washing facilities when entering and exiting sites; and
- Checking origins of all imported materials.

3.3.3 ALSE

With the application of the measures described above, **invasive species would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

3.4 Air pollution / Changes in air quality

3.4.1 Pathway description

During construction activity, there is the potential for releases of fugitive dust to result in deleterious impacts on plant growth in habitats up to 50m from the source. This distance is based on guidance from the Institute of Air Quality Management (IAQM) (2014). Whilst the site is small in the context of the wider New Forest, the potential for LSE is considered to exist and avoidance / mitigation would be required. This pathway is therefore considered to require Appropriate Assessment at Stage 2.

During operation there are no potential sources of fugitive dust and so this pathway is assessed as not having the potential to result in LSE.

Air quality changes can occur as a result of deposition of nitrogen and acid in the form of oxides of nitrogen and sulphur respectively. These gases are principally released by exhausts from internal combustion engines. During construction, workers vehicles, plant machinery and generators are all potential sources of exhaust gases. During operation / occupation of a site, it is principally vehicles belonging to workers or residents that cause acid and nitrogen deposition.

The deposition of nitrogen and acid during operation identified above was also identified in the Local Plan HRA Addendum (LUC, 2019) as a potential pathway to LSE. However, the pathway was not

screened in as having the potential to result in LSE. It therefore follows that because there would be a negligible contribution from this small scale development to the quantity of housing assessed in the Local Plan HRA, effects would also not have the potential to result in LSE.

Based on these conclusions, LSE via nitrogen and acid deposition during operation have not been taken forward to Appropriate Assessment.

3.4.2 Proposed mitigation

During construction, measures to control releases of fugitive dust will be incorporated within a CEMP. These will include but would not be limited to:

- Damping of haul routes;
- Use of dust suppression devices on cutting machinery;
- Covering of friable materials; and
- Seeding of topsoil bunds where storage is required for medium to long-term periods.

3.4.3 ALSE

With the application of the measures described above, **Air pollution / Changes in air quality would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

3.5 Changes in species distribution via loss or damage to offsite supporting habitat

3.5.1 Pathway description

The potential for the habitats within the site to support qualifying species was identified during the Ecological Appraisal (WYG, 2017). This was followed up with four breeding bird surveys that were completed between April and June 2018 (WYG, 2018c). These did not record any qualifying species of the New Forest SPA. While no nocturnal species were completed for nightjar, the potential for the site to support nightjar was considered to be negligible due to the suboptimal habitats present. However, the enhanced greenspace is adjacent to the SPA and it is considered extremely unlikely that SPA qualifying species never visit this area, and is impossible to prove. Therefore, as a minimum it is considered that the site is likely to support invertebrates that could potentially be preyed upon by SPA qualifying birds. Therefore if enhanced greenspace is lost, there is the potential for fewer prey items to be in the adjacent habitats of the SPA. Consequently birds for which it is designated will use it less.

3.5.2 Proposed mitigation

The proposed avoidance will be to restrict the new built environment to the curtilage of existing buildings and hardstanding as show in Appendix C and Figure 1, which retains a buffer of approximately 60m. It is also proposed that the retained habitats within the enhanced greenspace are enhanced for SPA birds. This would provide a buffer for SPA birds between the boundary of the New Forest and the development proposals.

Within the boundary of the new built environment, enhanced greenspace could be included with the intention of attracting invertebrate prey for the benefit of all bird species that feed on the group, including Dartford warbler, nightjar and woodlark.

The enhanced greenspace between the development and the New Forest SA would be managed in such a way to encourage occupation by invertebrate prey and by qualifying species. The details of this are yet to be determined but this would aim to expand the foraging range of Dartford warbler, nightjar and woodlark. This would include habitat creation of heath, gorse-rich scrub and areas of shorter turf. This may necessitate the drainage and creation of ponds within the habitat area, that would improve habitat heterogeneity overall within the 400m zone of influence of the edge effect pathway.

3.5.3 ALSE

It is therefore intended that habitat creation and management occurs for the benefit of foraging birds, including Dartford warbler, nightjar and woodlark. The management would also benefit foraging outside of the boundary of this area by creating a sink from which prey species e.g. moths might disperse. This would be supported by including a planting scheme of value to invertebrate within the development proposals themselves.

With the application of the measures described above, **Changes in species distribution via loss or damage to offsite supporting habitat would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

3.6 Direct loss or physical damage to European sites

3.6.1 Pathway description

The potential for there to be direct loss or physical damage to European sites was identified in both the Stage 1 Screening report and the Local Plan HRA Addendum. However, this was based on the plan shown in Appendix B, whereby the boundary of the new built environment was adjacent to the New Forest.

Based on the revised layout, shown in Appendix C and Figure 1, there is now a complete lack of overlap between the developed area of the site and any European site. Therefore, adverse effects on integrity due to direct loss or physical damage to European sites from development of the Ashurst Hospital site can be ruled out, both alone and in combination with other plans and projects.

3.6.2 Proposed mitigation

The mitigation would be by avoidance, as secured within the site allocation policy.

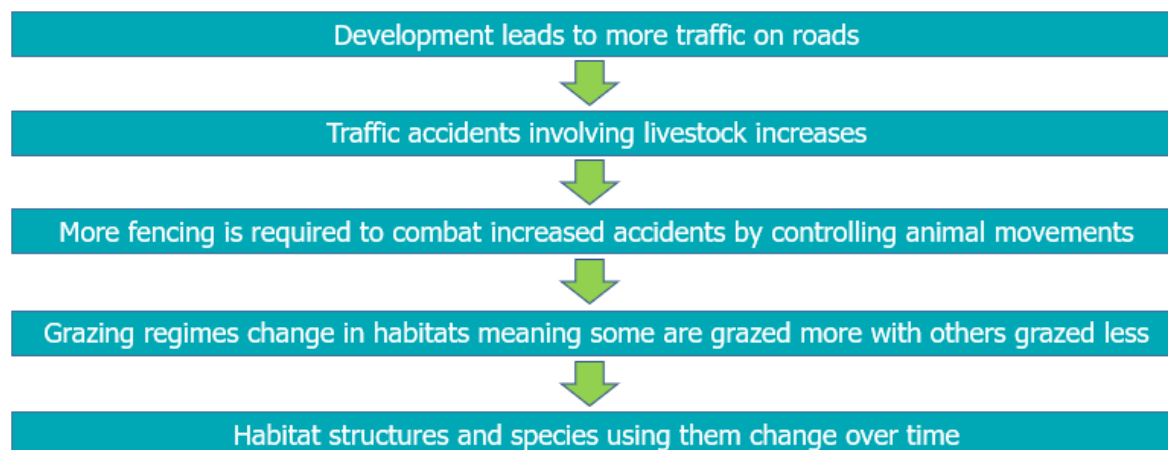
3.6.3 ALSE

With the application of the measures described above, **Direct loss or physical damage to European sites would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

3.7 Vehicles / Traffic collision risk

3.7.1 Pathway description

The potential for there to be direct loss or physical damage to European sites was identified in the Local Plan HRA Addendum only. This report suggests that a pathway exists whereby increased traffic movements arising from development could indirectly affect habitats within the New Forest, as shown in the schematic below:



The pathway therefore ultimately relates to grazing which is identified in *The New Forest SAC – Standard Data Form* (JNCC, 2015). Furthermore the impact of deer (and associated grazing) is described in *The New Forest SPA – Site Improvement Plan* (JNCC, 2014).

Whilst this was identified in the Local Plan HRA Addendum, the same document goes on to conclude that the scale of development envisaged by the draft allocation policy for the Ashurst Hospital site is judged to be negligible in relation to the total amount of housing development reflected in the Local Plan.

3.7.2 Proposed mitigation

There is no mitigation proposed as Vehicles / Traffic collision risk is not predicted to result in LSE.

3.7.3 ALSE

Vehicles / Traffic collision risk would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.

3.8 Urban edge effects

The potential for Urban edge effects to result in LSE and affect the integrity of the New Forest SAC, SPA and Ramsar was not identified as part of the Stage 1 Screening. However, LUC use this term to apply to two effect pathways in their draft HRA of the Ashurst site:

- Increased fly-tipping – particularly risk of introduction of invasive alien species from garden waste (particularly relevant to New Forest SAC); and
- Cat predation – hunting by domestic cats (particularly relevant to the qualifying bird species of New Forest SPA that nest on or close to the ground such as Dartford warbler, nightjar and woodlark).

These effects are discussed separately in the following sections.

It should be noted that the Local Plan HRA (LUC, 2018), urban edge effects on windfall developments within 400m of the New Forest were screened out, on the basis that they are not clustered. The windfall allocation comprises of 400 dwellings, with developments ranging in size up to 30 houses. Whilst it is therefore possible to argue that urban edge effects for the Ashurst site could be screened out, these pathways have been considered in this assessment on a precautionary basis.

3.8.1 Increased fly tipping

The Local Plan HRA Addendum for the Ashurst site was based on a masterplan with property boundaries immediately adjacent to sensitive habitats of the New Forest (see Appendix B). The masterplan on which this assessment is made, is based on the curtilage of new buildings being largely limited to areas that are already built on (see Appendix C and Figure 1). There would therefore be an intervening enhanced greenspace buffer zone of approximately 60m between the boundary of the development and the New Forest. This would therefore prevent green waste potentially containing viable propagules of invasive plants from being easily dumped into SAC habitats. This would also prevent spreading Schedule 9 plants from accidentally escaping and colonising e.g. variegated yellow archangel *Lamium galeobdolon subsp. Argentatum*, which commonly spread along road verges from gardens.

The presence of buffer zones separating potential development sites from sensitive habitats is also identified in the HRA Addendum for the Ashurst project (LUC, 2019). This is regarding the Lyndhurst Park Hotel site, where the presence of short horse / pony grazed lawns, car parks, a cricket pitch, cricket pavilion, graveyard and the famous 'Bolton's Bench', are considered to act as buffers from the impacts of urban edge effects. This is used by LUC to conclude that the susceptibility the New Forest SAC and SPA to urban edge effects is reduced. This same approach and conclusion is drawn in this assessment for the Ashurst Hospital site.

The alternative pathway for invasive species to take hold would be via deliberate fly-tipping from people transporting waste. This could be via the use of informal paths leading from properties into the New Forest, or by car. The former is not considered likely as access from gardens into the managed green space will not be provided. It is also proposed that the southern boundary between the enhanced greenspace and the New Forest would be strengthened to make it impassable for pedestrians. The latter therefore remains, but is not site specific as it applied to all potential properties allowable under the Local Plan allocations. On this basis, the Ashurst site would not differ from what has been allocated under the Lyndhurst Park Hotel Site, whereby any increase in the number of properties has the potential to result in increased instances of fly-tipping. It is therefore concluded that the HRA mitigation measures for the Lyndhurst Park Hotel Site would also be applicable e.g. arrangements for ground maintenance, whereby no effect on integrity is predicted, and this potential pathway to LSE is not discussed further.

3.8.2 Cat predation

There exists the potential for cats belonging to new homeowners to find and predate on the nests of qualifying species of the New Forest SPA as these are ground nesting. While predation of these birds when foraging is a possibility, the likelihood of Dartford warbler, nightjar and woodlark being caught and killed is remote. This is based on their relative rarity compared to common and garden species. As described in the Habitats Regulations Assessment of New Forest National Park Local Plan 2016-2036 (LUC, 2018), this pathway has been identified as having the potential to result in LSE where there is any new residential development within 400m of the New Forest. This distance was informed by work underpinning The Dorset Heathlands Planning Framework 2015-2020: Supplementary Planning Document (SPD) (Borough of Poole *et al.*, 2015). Natural England agreed with the assessment of 400m in the Dorset Heathlands SPD, and approved its use for the New Forest Local Plan at a New Forest HRA stakeholder meeting on 9 August 2016.

The Dorset Heathlands SPD prohibits all building of new residential property within 400m of the heathland. This is not considered appropriate for the New Forest as it is less fragmented and is more than three-times the size. This means that the edge to area ratio is much lower and therefore urban edge effects would be likely to be much less pronounced. This means that a total ban on new property would not be proportionate to the risks of impacts on integrity, and therefore while pathways such as cat predation exist, they may be mitigated.

Aerial imagery shows that 29.07ha of the SPA is within 400m of the boundary of the site, as shown in Appendix C and Figure 1. Currently none of this habitat has the potential to support ground nesting birds (WYG, 2017), including those for which the New Forest SPA is designated. However, as is highlighted in the HRA Addendum for the Ashurst project (LUC, 2019), when the plantation woodland to the south of the site is cropped it would create 3.97ha of optimal nesting habitat for woodlark for five years and nightjar for 15 years. This limits the potential window for predation within the lifespan of the occupational phase of the development. In this area it is estimated that no more than one pair of any of the three qualifying species could be supported by an area this size, further reducing the significance of any predation events.

There is also the potential for cat predation to result in a reduction in range of qualifying species, when habitats are in suitable condition. However, in the context of the whole New Forest where the total area of suitable habitat at any one time is influenced by so many factors, e.g. grazing patterns, numbers of grazers, burning, scraping, woodland thinning etc.. Therefore the area affected by possible predation arising from this proposed development would be immeasurably small, and would not have the potential to affect integrity.

3.8.3 Proposed mitigation

The outline measures to mitigate for the effects of cat predation are provided below.

- The boundary of the new built environment has been moved away from the boundary of the SPA by 60m. This will reduce cat predation events as the cats will have to travel further to reach SPA habitats.
- It is also likely that a proportion of the new housing will need to be affordable and would be managed by a housing association. In this scenario, it would be possible to enforce legal covenants preventing cat ownership. These properties could also be positioned towards the



southern boundary of the development, again increasing the distance that cats would need to travel to reach habitats within the SPA. Such covenants have been included within Policy SP23 for the Lyndhurst Hotel Site.

- A proportion of the buildings on the site might be brought for C3 use as care homes. In this scenario, pet ownership would be prevented and no predation by cats in the SPA could therefore occur.
- Within the development, the southern boundary would also be strengthened to prevent informal pathways into the New Forest from forming. Whilst this would not prevent cats from climbing barriers such as garden fences, it would ensure that access was not made easier.

3.8.4 Assessment

It is considered that there is no potential for increased rates of fly-tipping as a result of the development proposals.

The Appropriate Assessment finds the pathways for LSE exists where there is the potential for the nests of Dartford warbler, nightjar and woodlark to be predated. However, there is currently no habitat with the potential to support such nests within 400m of the development proposals. This is likely to change in the future, when the 3.97ha of plantation is cropped, leaving habitats that could be used by all three species, but only for a limited time window. In the context of the numbers of pairs of each species this area could support (a maximum of one), predation from this newly expanded range would not have the potential to affect the integrity of the SPA.

It is proposed that the development proposals are compliant with the National Planning Policy Framework (Ministry of Housing Communities and Local Government, 2018). This requires new development to deliver net gain for biodiversity. For these development proposals, the boundary has been moved to retain the enhanced greenspace to the south.

When considered together, **urban edge effects would not be expected to result in adverse effects on the integrity of any European site, either alone or in combination with other plans and projects.**

4.0 Summary

This assessment finds that there are no pathways to LSE that are assessed as having the potential to affect integrity of European sites should this site be allocated. This is on the basis that the allocation proceeds according to the boundary of the new built environment shown in Appendix C and Figure 1. This is with the application of mitigation, as summarised in Table 34.

Table 4 Summary of Stage 2 Appropriate Assessment

Effect pathway	Phase	Mitigation	ALSE
Public access / disturbance / Recreation pressure	Occupation	Strengthening of boundary fencing. Interpretive signage. Monitoring and research.	No adverse effects on integrity predicted.
Hydrological changes / Changes in water quantity and quantity	Construction	Measures secured in a CEMP.	No adverse effects on integrity predicted.
Invasive species	Construction	Measures secured in a CEMP.	No adverse effects on integrity predicted.
Air pollution / Changes in air quality	Construction	Measures secured in a CEMP.	No adverse effects on integrity predicted.
Changes in species distribution via habitat loss / Loss or damage to offsite supporting habitat	Construction and Occupation	The boundary of the new built environment has been moved to only include the curtilage of existing buildings and hardstanding.	No adverse effects on integrity predicted.
Direct loss or physical damage to European sites	Construction and Occupation	The boundary of the new built environment has been moved to only include the curtilage of existing buildings and hardstanding.	No adverse effects on integrity predicted.
Urban edge effects	Occupation	The boundary of the new built environment has been moved to only include the curtilage of existing buildings and hardstanding. Covenant preventing cat ownership in affordable housing stock. Use of some buildings for C3. Strengthening of boundary fencing. Interpretive signage. Enhanced greenspace.	No adverse effects on integrity predicted.

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Figures



Appendix A: Qualifying features of European sites for which LSE were identified

New Forest Ramsar

There are three Ramsar criteria for which the Dorset Heathlands Ramsar is designated (JNCC, 1993).

Ramsar criterion 1

Valley mires and wet heaths are found throughout the site and are of outstanding scientific interest. The mires and heaths are within catchments whose uncultivated and undeveloped state buffer the mires against adverse ecological change. This is the largest concentration of intact valley mires of their type in Britain.

Ramsar criterion 2

The site supports a diverse assemblage of wetland plants and animals including several nationally rare species. Seven species of nationally rare plant are found on the site, as are at least 65 British Red Data Book species of invertebrate.

Ramsar criterion 3

The mire habitats are of high ecological quality and diversity and have undisturbed transition zones. The invertebrate fauna of the site is important due to the concentration of rare and scarce wetland species. The whole site complex, with its examples of semi-natural habitats is essential to the genetic and ecological diversity of southern England.

The New Forest SAC Qualifying Features

There are 11 Annex I habitats present that are a primary reason for selection of this site (JNCC, 2015):

- **3110** Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae);
- **3130** Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea;
- **4010** Northern Atlantic wet heaths with *Erica tetralix*;
- **4030** European dry heaths;
- **6410** Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae);
- **7150** Depressions on peat substrates of the Rhynchosporion;
- **9120** Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion);
- **9130** Asperulo-Fagetum beech forests;
- **9190** Old acidophilous oak woods with *Quercus robur* on sandy plains;
- **91D0** Bog woodland; and
- **91E0** Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae).

There are two Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site (JNCC, undated):

- **7140** Transition mires and quaking bogs
- **7230** Alkaline fens

There are two Annex II species that are primary reasons for selection of this site (JNCC, 2015):

- **1044** Southern damselfly (*Coenagrion mercurial*); and
- **1083** Stag beetle (*Lucanus cervus*).

There is one Annex II species present as a qualifying feature, but not a primary reason for site selection (JNCC, undated):

- **1166** Great crested newt (GCN) (*Triturus cristatus*)

The New Forest SPA

There are four Annex I species present during the breeding season that are qualifying species for selection of this site (JNCC, 2001):

- Dartford warbler, 538 pairs representing at least 33.6% of the breeding population in Great Britain;
- Honey buzzard (*Pernis apivorus*), two pairs representing at least 10.0% of the breeding population in Great Britain;
- Nightjar, 300 pairs representing at least 8.8% of the breeding population in Great Britain; and
- Woodlark, 184 pairs representing at least 12.3% of the breeding population in Great Britain (Count as at 1997).

There is one Annex I species present during the over-wintering season that is a qualifying species for selection of this site (JNCC, 2001):

- Hen harrier, 15 individuals representing at least 2.0% of the wintering population in Great Britain.

Solent and Southampton Water Ramsar Criteria

The Ramsar Criteria for the Solent and Southampton Water Ramsar are provided below and are available from the JNCC (1998).

Ramsar Criterion 1

The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.

Ramsar Criterion 2

The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site.

Ramsar Criterion 5

Assemblages of international importance:

- Species with peak counts in winter: 51343 waterfowl (5 year peak mean 1998/99-2002/2003).

Ramsar Criterion 6

Species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

- Species with peak counts in spring/autumn:
 - Ringed plover, Europe/Northwest Africa, 397 individuals, representing an average of 1.2% of the GB population (5 year peak mean 1998/9-2002/3).
- Species with peak counts in winter:
 - Dark-bellied brent goose, 6456 individuals, representing an average of 3% of the population (5 year peak mean 1998/9-2002/3);
 - Eurasian teal, NW Europe, 5514 individuals, representing an average of 1.3% of the population (5 year peak mean 1998/9-2002/3); and
- Black-tailed godwit, Iceland/W Europe, 1240 individuals, representing an average of 3.5% of the population (5 year peak mean 1998/9-2002/3).

Solent and Southampton Water SPA Qualifying Features

The qualifying features are provided below, as provided by the Joint Nature Conservation Committee (JNCC) (JNCC, 2001b).

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

- During the breeding season;
 - Common tern (*Sterna hirundo*), 267 pairs representing at least 2.2% of the breeding population in Great Britain (5 year peak mean, 1993-1997);
 - Little tern (*Sterna albifrons*), 49 pairs representing at least 2.0% of the breeding population in Great Britain (5 year peak mean, 1993-1997);
 - Mediterranean gull (*Larus melanocephalus*), 2 pairs representing at least 20.0% of the breeding population in Great Britain (5 year peak mean, 1994-1998);
 - Roseate tern (*Sterna dougallii*), 2 pairs representing at least 3.3% of the breeding population in Great Britain (5 year peak mean, 1993-1997); and
 - Sandwich tern (*Sterna sandvicensis*), 231 pairs representing at least 1.7% of the breeding population in Great Britain (5 year peak mean, 1993-1997).

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

- Over winter;
 - Black-tailed godwit (*Limosa limosa islandica*), 1,125 individuals representing at least 1.6% of the wintering Iceland - breeding population (5 year peak mean, 1992/3-1996/7);
 - Dark-bellied brent goose (*Branta bernicla bernicla*), 7,506 individuals representing at least 2.5% of the wintering Western Siberia/Western Europe population (5 year peak mean, 1992/3-1996/7);



- Ringed plover (*Charadrius hiaticula*), 552 individuals representing at least 1.1% of the wintering Europe/Northern Africa - wintering population (5 year peak mean, 1992/3-1996/7); and
- Teal (*Anas crecca*), 4,400 individuals representing at least 1.1% of the wintering Northwestern Europe population (5 year peak mean, 1992/3-1996/7).

The area also qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl:

Over winter, the area regularly supports 53,948 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: gadwall (*Anas strepera*), teal, ringed plover, black-tailed godwit, little grebe (*Tachybaptus ruficollis*), great crested grebe (*Podiceps cristatus*), cormorant (*Phalacrocorax carbo*), dark-bellied brent goose, wigeon (*Anas penelope*), redshank (*Tringa tetanus*), pintail (*Anas acuta*), shoveler (*Anas clypeata*), red-breasted merganser (*Mergus serrator*), grey plover (*Pluvialis squatarola*), lapwing (*Vanellus vanellus*), dunlin (*Calidris alpina alpina*), curlew (*Numenius arquata*) and shelduck (*Tadorna tadorna*).



Appendix B: Indicative site layout used to inform the Local Plan HRA Addendum

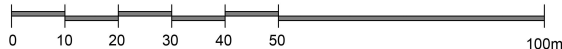


New Forest
Birth Centre

future parking
future building
expansion

shelter/deliveries

60-BED
CARE UNIT



Circa 60 Bed Care Unit
9 Flats
23 Houses



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architects ltd

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01962 820255
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client NHS Property Services

project Ashurst Hospital
Development of surplus land

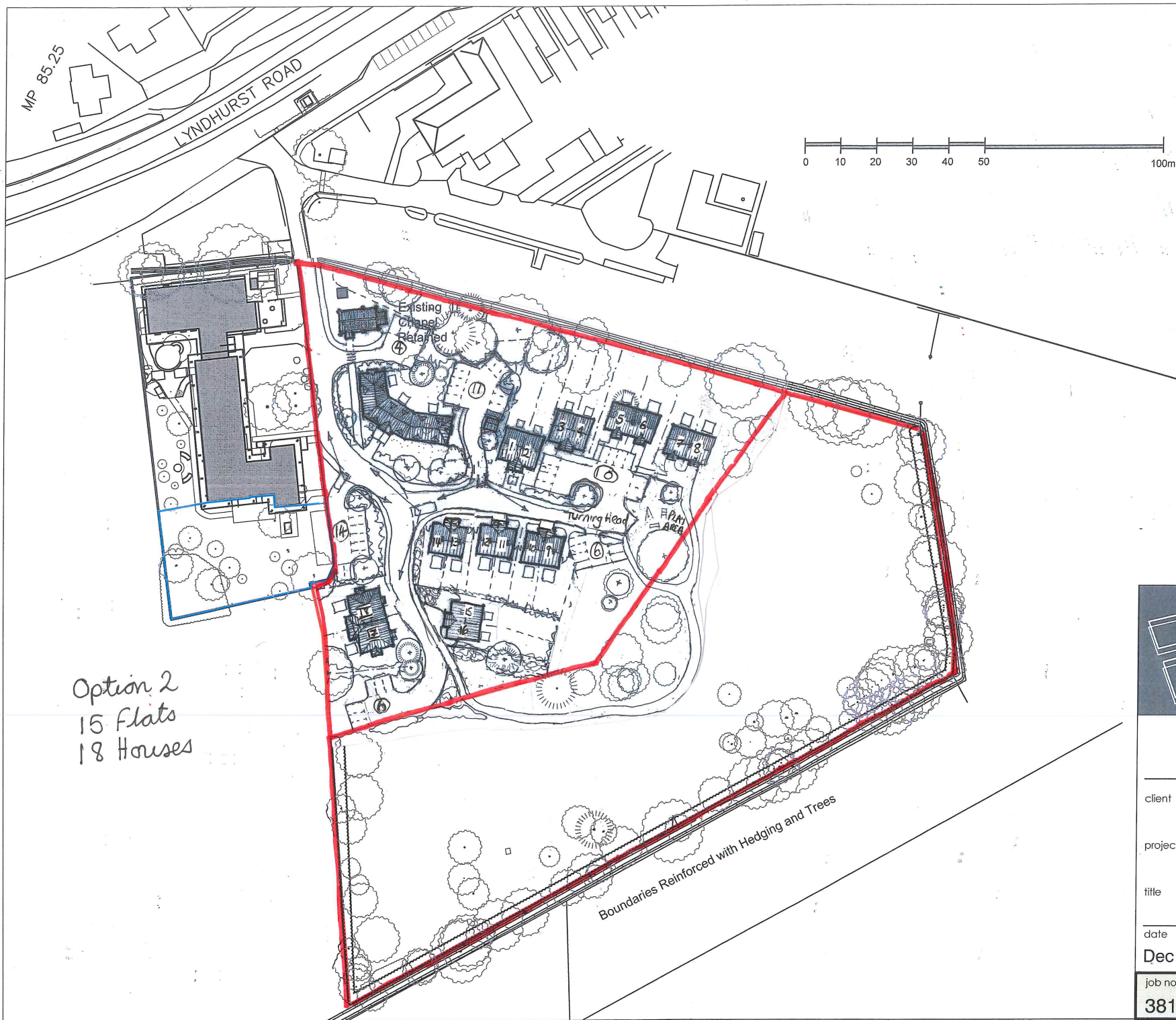
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date	scale	paper	drawn	checked
Nov 18	1:500	A1	RN	MB

job no.	dwg no.	revision
38113	04	-

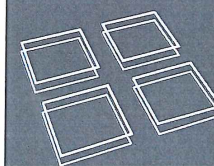


Appendix C: Indicative site layout used to inform this HRA



Option 2
15 Flats
18 Houses

by checked
PRELIMINARY



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project Ashurst Hospital Surplus Land

title Site Plan - Option 2

date	scale	paper	drawn	checked
Dec 18	1:1000	A3	-	-

job no.	dwg no.	revision
38113	SK03	-

file 38113 Site Plan

Appendix J – Draft site allocation



New Forest National Park Submission Draft Local Plan 2016 – 2036

Proposed additional site allocation – Ashurst Hospital

January 2019

Proposed Ashurst Hospital Site Allocation Policy

1. The Ashurst Hospital site comprises previously developed land with access to a range of local services, including the train station and local shops. The site immediately adjoins the existing Defined Village boundary of Ashurst and is located within Flood Zone 1 for fluvial flooding.
2. Health Commissioners have confirmed that much of the existing accommodation at Ashurst Hospital is no longer fit for purpose and there is an opportunity to make a more efficient use of the site. Large parts of the site have been declared surplus to the operational healthcare requirements of the NHS and are vacant. The more modern Snowden Building at the west of the site currently contains the Birthing Centre and is to be retained. It is likely that this building will need to be extended to accommodate the future healthcare services that will continue to be delivered from the Ashurst Hospital site and policy XX supports this.
3. Policy XX allocates the site for a mix of residential (C2 Use or extra care) and retained healthcare provision. It is considered that the surplus part of this previously developed site can deliver around 30 units - although the exact number will depend on the final form of residential development, which will in turn be guided by the need to avoid impacts on the adjacent protected habitats. Viability modelling for the Local Plan indicates that the redevelopment of the Ashurst Hospital site (including site clearance costs) is unlikely to achieve the 50% affordable housing policy target.
4. The site allocation policy highlights the natural and built environment constraints and opportunities on the Ashurst Hospital site. The site lies adjacent to the New Forest SSSI, SAC, SPA and Ramsar sites and the Habitats Regulations Assessment for the Local Plan identifies the potential for a range of possible effects from development on these protected sites, including recreation pressure, urban edge effects including cat predation and the loss or damage to off-site supporting habitats.
5. Policy XX therefore requires development to be confined to the previously developed land to the north of the site and the strengthening of the planted boundary to the adjacent Natura 2000 site designations. Mitigation measures for potential urban edge effects could include the use of legal covenants (e.g. preventing cat or dog ownership) and arrangements for grounds maintenance. The requirement to ensure no adverse impact on the adjacent national and internationally protected habitats will also influence the form of the C2 or extra care residential development on site.
6. Elements of the existing built development on the site date back to the 1830s. The former historic workhouse building is considered to be a non-designated heritage asset due to its 19th Century origins and the degree to which the building has survived to a large extent. The Victorian Chapel on the site was constructed sometime between 1869 and 1896 and the exterior remains in good condition. The former workhouse building and Victorian Chapel have heritage significance and Policy XX confirms the Chapel will be retained as part of the redevelopment of the site. The policy requires a detailed heritage assessment to be undertaken to justify proposals that would result in the loss of the former workhouse building.

Policy XX - Land at Ashurst Hospital

Land at Ashurst Hospital is allocated for a mixed-use development comprising:

- Retained (and potentially extended) healthcare provision in the western part of the site (focused on the Snowden Building) – illustrated in blue on the map below; and
- Around 30 residential units (Use Class C2 or extra care use) on the remaining previously developed part of the site.

Detailed proposals for the site that meet the following site-specific requirements will be permitted:

- (a) The site must be redeveloped in a comprehensive manner and detailed proposals for residential development will need to ensure the retained healthcare uses on the site can operate efficiently;
- (b) Built development will be confined to the previously developed land to ensure the existing green buffer remains to the south of the site and the New Forest's protected habitats.
- (c) The Victorian Chapel will be retained as part of the redevelopment. A detailed heritage assessment and structural survey will be required to justify the loss of the former workhouse buildings;
- (d) Redevelopment proposals must retain the protected trees on the site;
- (e) Proposals for extra care use (that is not C2 Use) must provide on-site affordable housing for local people in housing need as close to the Authority's target of 50% affordable housing as is viable. Viability will be demonstrated through an open book approach;
- (f) Proposals for C2 Use must be accompanied by a legal agreement requiring the occupancy to be limited to those with a local connection;
- (g) All of the dwellings on site will be limited to a maximum total internal floor area of 100 square metres;
- (h) Development proposals must incorporate measures to mitigate potential significant urban edge impacts on adjacent protected habitats. The existing southern boundary between the site and the adjacent protected habitats should be retained and strengthened with the planting of native species. Proposals should seek to enhance both its role in buffering the designated sites and supporting species of principal importance for biodiversity. A detailed application for the site will be subject to a full appropriate assessment; and
- (i) Development proposals must provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

