

**Habitats Regulations Assessment
for Test Valley Revised Local
Plan DPD
2011 – 2029**

Regulation 19 – Pre Submission

Addendum to Main Report

June 2014

Introduction

The purpose of this addendum is to identify alterations to the Habitats Regulations Assessment (November 2013) for the Revised Local Plan. This accounts for the Schedule of Proposed Minor Changes (June 2014).

This document should be read in conjunction with the Habitat Regulations Assessment report (November 2013). Insertions are shown as underlined text, with deleted text shown as strikethrough. Chapter 5 is shown in its entirety given the number of changes proposed.

Table 3.5 and subsequent reference to housing requirement require updating to reflect the Submission version of the RLP.

Table 3.5 is replaced with the below:

	<u>Northern Test Valley</u>	<u>Southern Test Valley</u>
<u>Requirement</u>	<u>7092</u>	<u>3492</u>
<u>Completions</u>	<u>1263</u>	<u>472</u>
<u>Existing Commitments</u>	<u>3573</u>	<u>1296</u>
<u>SHLAA: Identified Capacity</u>	<u>1023</u>	<u>47</u>
<u>Unplanned Sites (2015/16 – 2028/29)</u>	<u>490</u>	<u>224</u>
<u>Residual Requirement</u>	<u>743</u>	<u>1453</u>
<u>Residual Requirement plus 10%</u>	<u>817</u>	<u>1598</u>

Paragraph 3.82

... The 'residual requirement' (plus the necessary 10% cushion) is thus the total requirement that the Council is seeking to allocate sites – a total of ~~2,347~~ 2415 across the Borough.

Paragraph 3.83

... and Northern Test Valley (the new neighbourhoods at Picket Piece (COM6) for an additional 400 dwellings and Picket Twenty (COM6A) for an additional 300 dwellings). ~~Thus the residual housing requirement in COM1 almost entirely accommodated by the allocations, with only 9 additional outstanding dwellings needed in Southern Test Valley over what is allocated.~~

Paragraph 3.92

Emer Bog is believed to draw visitors from a far smaller catchment than the New Forest and Solent designations. ~~However, there remains uncertainty over the distance that effects on this SAC can be ruled out (discussed in greater detail in Section 4 – Appropriate Assessment).~~

Paragraph 3.102

These policies ~~as set out in the Pre-Submission Plan~~ include an additional criterion specifically to address the issue of increased recreational pressure. These policies

require additional new informal recreational open space at a level of 8.0 hectares per 1000 new population specifically to avoid impacts to European sites. This is to be provided at the Luzborough Plantation, which currently has no permitted public access. The policies also require this new informal recreational space to be subject to an agreed long term management plan, which is being implemented at an early stage of any development to be delivered along with an agreed long term management plan prior to development commencing and be in place prior to occupation.

Chapter 5 – Composite Text

5 Recreational activity

5.1 Many people enjoy outdoor recreation and leisure activities and contact with wildlife and the natural environment. While such activities have been proven to have positive mental and physical health benefits for individuals and whole communities¹, and should be supported and facilitated, some recreational activities in certain natural environments can have adverse effects on biodiversity.

The effects of the plan

5.2 As identified in the work that supported the Screening stage of this assessment (see summary in Table 3.6), two distinct types of effect are associated with recreational visits to important biodiversity conservation sites:

A) *Deterioration of habitats* as a result of, for example, frequent trampling, horse riding, climbing etc. Deterioration becomes significant where it has an effect on changing the natural characteristics of the habitat (such as trampling of heathland resulting in loss of heather cover), to the extent that it undermines the conservation objectives. Recreation can also result in habitat deterioration where the level or type of activity compromises the effectiveness of any on-site conservation management measures.

This is of concern for Emer Bog SAC.

A) *Disturbance of species* from activities such as those above, plus, for example, angling, sailing, canoeing, shooting and a wide range of other outdoor recreational pursuits. Disturbance becomes significant where it affects the normal patterns of behaviour, life cycles and breeding success of species to the extent that the conservation objectives become undermined.

This is of concern for New Forest SPA / Ramsar site and Solent and Southampton Water SPA / Ramsar site.

5.3 Implementation of the plan will result in a net increase in the number of dwellings across Test Valley. This will result in more people visiting the

¹ Natural England (2010), '*Nature Nearby*' - Accessible Natural Greenspace Guidance.

countryside and coastal areas in and near Test Valley. The extent to which increases in recreational use of International sites would flow from the Plan is dependent upon a number of factors including:

- the distance of the development from the site or feature;
- the availability and accessibility of open space;
- socio-economic status of the household (especially car ownership);
- demography of the household (including children in the household).

The Borough Council's strategic approach to recreational pressure

5.4 The Council has worked hard to develop a strategy to address the issue of recreational pressure. There are two key elements of this, as follows: set out below.

5.4a In addition, following advice from Natural England, the Council has sought to recognise the need for ongoing monitoring in the supporting text to policy E5, with paragraph 7.36 being amended to note "This may include a range of mitigation and access management and monitoring measures..." and paragraph 7.37 being updated to state "Contributions will also be secured towards monitoring the effectiveness of mitigation measures".

Strategic alternative open space

5.5 There is no agreed standard of provision of alternative green spaces which would provide an alternative destination to the European sites affected by the Plan. However, attempts have been made at other ecologically sensitive areas which experience visitor pressures to quantify the amount of land needed to counteract this additional pressure. These can be drawn on to inform the approach to be taken:

- Thames Basin Heaths SPA

The approach to mitigation for this designation has been established for some years. As part of the Examination in Public for the South East Plan, there was specific consideration of the appropriate approach to mitigation for this designation², with a number of approaches being considered. The outcome recommendation of this report set out that suitable alternative natural green space should be provided at a scale of 8 hectares (ha) per 1,000 population as part of the mitigation package. This standard is now enshrined in the Thames Basin Heaths Special Protection Area Delivery Framework³.

² Report to the Panel for the Draft South East Plan Examination in Public on the Thames Basin Heaths Special Protection Area and Natural England's Draft Delivery Plan, P. Burley, 2007.

³ Thames Basin Heaths Special Protection Area Delivery Framework, Thames Basin Heaths Joint Strategic Partnership Board, 2009.

- Ashdown Forest SPA and SAC

A number of studies have been undertaken for this area looking at visitor use. It is understood that Natural England has advised local planning authorities that, based on the approach taken for the Thames Basin Heaths, alternative green space should be provided at a standard of 8ha per 1,000 increase in population⁴.

- Dorset Heaths SPA

A significant amount of work has been undertaken looking at recreational pressures on the Dorset Heaths SPA. A Development Plan Document setting out a joint approach to mitigation is being developed. Alternative green spaces are acknowledged form part of a package of mitigation measures; however a specific scale of provision does not appear to have been established.

5.5a NE has highlighted that work carried out for New Forest District Council (NFDC)⁵ may provide further justification for the 8ha/1000 standard. The NFDC assessment examined the possibility of basing alternative green space provision on figures derived from analysis of various existing provision mechanisms, namely:

- usage of nearby country parks;
- local standards for PPG17 open space; and
- the Thames Basin Heaths 8ha / 1,000 people standard.

5.5b Through the Examination of New Forest District Council's Local Plan Part 2, the Planning Inspector stated that the:

“Provision of new SANGS is to be at the rate 8ha per 1,000 people. This rate of provision was originally established in the mitigation strategy for the Thames Basin Heaths SPA some years ago and is now also applied elsewhere. There is no evidence to indicate that an alternative rate of provision would be more appropriate.”⁶

5.6 In light of the approach taken for other SPA designations, , including the New Forest, the Council proposes to adopt the **8ha per 1,000** population figure as the basis for the scale of mitigation for recreational use of International sites.

⁴ Habitats Regulations Assessment for the Mid Sussex District Plan, Urban Edge Environmental Consulting, 2013 (paragraph 6.3.8) (available:

http://www.midsussex.gov.uk/media/BP3_HRAMay13.pdf).

⁵Habitats Regulations Assessment of Submission Document and Main Modifications, revised September 2013 (available

[http://www.newforest.gov.uk/media/adobe/7/6/NFDC47_\(S12_update\)_revised_HRA_of_Submission_Document_and_Main_Modifications_Sept_2013_.pdf](http://www.newforest.gov.uk/media/adobe/7/6/NFDC47_(S12_update)_revised_HRA_of_Submission_Document_and_Main_Modifications_Sept_2013_.pdf)).

⁶ Report on the Examination into the Sites and Development Management Development Plan Document for New Forest District outside the National Park, Simon Emerson, 2014, paragraph 19 (available: http://www.newforest.gov.uk/media/adobe/0/b/New_Forest_DPD_Report_Final.pdf).

This scale of provision could provide mitigation for more than one International site, as the mitigation provides an alternative recreation provision for residents rather than relating to an alternative to each International site.

- 5.7 ~~The Revised Local Plan includes proposals for additional residential development within Southern Test Valley – with a total figure of 3,492 dwellings in the Plan period. Some of this development has already been completed or permitted, resulting in 1,659 dwellings to be planned for. Natural England has indicated its preferred method of calculating population changes as a result of the plan comprises multiplying average occupancy rates by number of dwellings. The Council has used 2.4 persons per dwelling for the calculation of public open space provision when the mix of a development is unknown. The 2011 Census data gives a figure of 2.37 persons per dwelling. The Census figure has been used for the purposes of this document.~~
- 5.8 ~~In respect of Southern Test Valley, an estimate of the land required for mitigation (as alternative green space) has been calculated on the basis of 8ha per 1,000 population based on the development proposed within the Revised Local Plan. This is in addition to the provisions secured in relation to public open space (including parks and gardens and informal recreation areas. Delivery of the two major allocation sites in Southern Test Valley (through COM3 and COM4, totalling 1,600 homes, or 3,792 people) would release the 46.2ha Luzborough Plantation for public access. Luzborough Plantation is within the same landownership as the COM3 and COM4 allocations. At the 8ha/1000 rate, this would provide alternative green space for up to 5,775 new residents. The release of this site would thus provide alternative recreational space for a further 1,983 people at the 8ha / 1000 rate (837 new homes) in addition to the Whitenap and Hoe Lane allocations.~~
- 5.9 ~~2011 Census data gives a figure of 2.37 persons per dwelling. A figure of 2.4 persons per new dwelling has been used to calculate the likely increase in population resulting from the Plan. For Southern Test Valley, this gives a figure of (1,659 dwellings x 2.4 persons per dwelling) = 3,982 people. Applying the standard of 8ha per 1,000 population would generate a need for approximately 32ha of alternative green space. This further capacity could provide for some of the housing flowing from implementation of COM1 outside the allocated sites that the Luzborough Plantation is tied to. Further consideration is given to mitigation requirements in relation to each designation below.~~
- 5.10 ~~The majority of this population increase would be associated with two main allocations, namely Whitenap in Romsey (for 1,300 dwellings) and Hoe Lane in North Baddesley (for 300 dwellings). These allocations would therefore require the provision of approximately 30.7ha of alternative green space (based on the same calculations).~~
- 5.11 ~~The landowner for these two sites also controls land adjoining the two allocations, which includes the Luzborough Plantation (46.2ha in size). Subject to Luzborough Plantation being able to meet the *quality* requirements of alternative green spaces (see below, in relation to specific International sites), it would have the capacity to provide the *scale* of mitigation required for~~

~~all of Southern Test Valley. The principle of public access to the woodland has been agreed with the landowner.~~

- 5.12 ~~The Plan needs to be considered as a whole as well as through its separate elements. As set out in the Plan, Policy COM1 supporting text now includes specific reference for sites to be considered in the context of International sites, while Policies COM3 and 4 include a specific requirement for these sites to be supported by additional provision for new areas of strategic areas of informal recreational space in a semi-natural setting, to be located at Luzborough Plantation.~~
- 5.13 This alternative green space needs to be a long term provision, and Natural England has informally advised the Council that this could be considered as being a period of 125 years. The Plan reflects this, requiring long term management of the site to be secured before development can commence.

New research into visitor use of Test Valley's open spaces

- 5.14 ~~In conjunction with the development of the approach for the identified strategic alternative green space, the Council has embarked on a programme of research to better understand how residents of Test Valley use larger semi-natural areas of open space for informal recreational purposes. In conjunction with the development of the approach for the identified strategic alternative green space, the Council embarked on a programme of research to better understand how residents of Test Valley use larger semi-natural areas of open space for informal recreational purposes.~~
- 5.15 ~~This work will identify the proportions and types of households that currently access large areas of semi-natural open space for recreational purposes, the activities they do there and the features that particularly attract them to the sites they use. This work⁷ identified the proportions and types of households that currently access large areas of semi-natural open space for recreational purposes, the activities they do there and the features that particularly attract them to the sites they use.~~
- 5.16 ~~This work will have a range of outcomes. It will help identify the visitor catchments of areas of open space – particularly those that have limited current research related to them, it will identify what Test Valley residents use such spaces for, and what attracts them to such spaces. This work has helped clarify the visitor catchments of areas of open space (particularly those that have limited current research related to them), it identifies what Test Valley residents use such spaces for, and what attracts them to such spaces.~~
- 5.17 ~~This information will allow the Council, when considering planning applications flowing from Policies COM1, COM3 and COM4, to be able to understand: • If people from the new developments are likely to visit nearby International sites; and, • If any alternative recreational green space is appropriate in terms of its location, size and qualities to counteract any additional pressure. This information will allow the Council to better design the detail of new alternative~~

⁷ Open Spaces Residents Survey 2013-14 For Test Valley Borough Council, Qa Research, 2014.

open spaces provided to counteract visitor pressure on international sites – and indeed any other open space.

- 5.18 ~~This work is not yet complete; the evidence-gathering element has started and is expected to finish in early 2014. This will be followed by necessary analysis and reporting.~~

Conclusion

- 5.19 To provide a strategic solution to recreational pressure from the two key allocations in Southern Test Valley (COM3 and COM4), a large, strategic area (46.2ha) of new alternative green space will be provided through these policies.
- 5.20 In addition, a detailed study of residents' use of such spaces ~~is currently being carried out~~ has been completed. This will inform the detail of the strategic alternative recreational sites ~~where currently established quality criteria are less robust with respect to certain designations and also provide information where other alternative sites or similar counteracting measures are needed for sites outside the allocations – for example those flowing from COM1~~ including key criteria to encourage use of such spaces.

Emer Bog

- 5.20a In comments made in relation to a recent planning application⁸, Natural England has discussed the evidence relating to recreational impacts to Emer Bog. Their stated opinion is that (our emphasis) “*there is no such body of evidence to confirm that impacts are currently occurring, or are likely to occur in the future.*”⁹
- 5.20b The Borough Council has taken this opinion into account and believes that a conclusion of no likely significant effect on Emer Bog SAC from an increase in recreation use is justified. Nevertheless, given that the Wildlife Trust remain concerned over this issue, and that future evidence may alter Natural England’s opinion, the Council has explored this further, as set out below.
- 5.21 A visitor survey carried out by Ecological Planning and Research (EPR) to support the recent appeal at a proposed residential development at Nutburn Road, North Baddesley¹⁰ conducted interviews with visitors at the access points to the SAC. The survey identified that just over half of visitors to Emer Bog arrived by foot (58%), and these visitors travelled on average 560m to reach the site. Overall, including people arriving by car, average distance travelled to reach the site was 1.6 km.
- 5.22 This *suggests* that the SAC has a small catchment area for visitor origination points, used mainly by visitors within easy walking distance, with most visitors originating from North Baddesley and Romsey. The SAC has very few

⁸ 13/00727/OUTS – Baddesley Close, North Baddesley – application for 37 dwellings – this site is relatively close to Emer Bog SAC.

⁹ Email dated 14th June 2014, from Sarah Armstrong-Stacey, Natural England

¹⁰ 10/00494/OUTS – Land at Nutburn Road, North Baddesley

parking spaces, comprising only four spaces near the Wildlife Trust's main access to the north of the site and a small number of informal verge spaces along this road. All these are well-used and these are believed to act as a control on the number of vehicles that can park at any one time. However, the presence of these parking spaces means that a proportion of visits are likely to come from further than easy walking distance.

- 5.23 The survey also identified that much of the dog-walking activity occurred on the open access land, that 97% of dog walkers (who themselves make up 87% of visitors) let their dogs off the lead and that 39% of dogs stray off the paths.
- 5.24 ~~However, as this is a fairly small scale study over a short time period it is difficult to draw robust conclusions from this at this time. The current programme of research will provide a great deal more clarity. The more detailed study carried out by Qa Research has identified that 75% of visitors come from within 2.32 miles (approximately 3.7km) of the SAC. The 75% of visitors level is an established level of use used in other studies of visitor access patterns on European sites (including Thames Basin Heaths SPA and the Solent SPAs). This confirms that although there is a difference between findings of the two studies in terms of the distance people travel to the site, the SAC does have a small catchment area for origination of visitors when compared to other designated sites.~~
- 5.24a The Qa study found that 50% arrived on foot, and 55% by car / van¹¹ compared to 58% by foot and 40% by car in the previous study – these figures are broadly similar. The surveys also identified that much of the dog-walking activity occurred on the open access land, although there were significant differences in the findings of the two studies. Although the EPR study identified that 87% people accessing the site were dog-walkers, the Qa study found that dog walking was the main reason for visiting for only 47% of visitors (although it should be acknowledged that people who's main reason for visiting may not be dog walking may still take a dog).
- 5.25 **COM1** (Housing Provision) may result in development within the 3.7km SAC visitor catchment, but the level cannot be gauged. This policy does however contain a requirement that proposals flowing from its implementation are assessed against impacts on International sites. ~~However, the lack of understanding at this stage regarding the use of the SAC means that a complete assessment is not possible. Therefore, without the on-going research into residents' use of informal open spaces, effects on the SAC from implementation of COM1 could not be ruled out. Based on the two studies that have examined visitor use at this site, it is considered likely that residents of new dwellings within this relatively small catchment would be likely to visit the SAC.~~
- 5.26 **COM3** ~~is outside the 1.6km potential visitor catchment identified from the EPR study (undertaken for the application at Nutburn Road). However, as~~

¹¹ Note: Residents were able to identify more than one mode of travel to the designation, therefore percentages will add up to more than 100%.

discussed, this has not been robustly tested. This policy does however require the development to provide recreational access to substantial areas of semi-natural space at both Beggarspath Wood and Luzborough Plantation. **COM3** and **COM4** are both within the area identified in the Qa research where it is considered that 75% of visitors would originate. However, following the Regulation 18 version, additional policy wording has been added to **COM3** and **COM4** “8.0 Ha per 1,000 population of ... to be provided to mitigate the impact of the development on sites of European importance”. Development at these sites would secure provision of alternative recreational green space at Luzborough Plantation.

- 5.27 ~~COM4~~ is close to the SAC and visits to Emer Bog from Hoe Lane cannot be ruled out. However it should also be recognised that Hoe Lane is closer to Luzborough Plantation than Emer Bog.
- 5.28 Based on the standard of 8ha of alternative green space per 1,000 new population, the alternative green space at Luzborough Plantation ~~and Beggarspath Wood~~ is considered of sufficient *scale* to meet the requirements for **COM3** and **COM4**.
- 5.29 ~~However,~~ Emer Bog (and the surrounding landscape of the wider Baddesley Common) provides for the most part a far more open landscape, of a very different character to the more closed woodland of Luzborough Plantation ~~or Beggarspath Wood~~. ~~It may be the case that this is not a constraint to these sites being used as suitable alternatives to Emer Bog. However this cannot be concluded at present.~~ However, the Qa research identifies that the primary reasons for people visiting the SAC are because it is good for walking, can be used by dogs and has public footpaths. Only a very small proportion visited specifically for the bog habitats and that it is a protected area. It is therefore likely that the alternative provisions for recreational green space associated with COM3 and COM4 would meet the quality requirements. In addition, Luzborough Plantation would be closer to the proposed developments than Emer Bog for new residents.
- 5.29a The Luzborough Plantation – to be delivered with the Whitenap and Hoe Lane allocations (COM3 and COM4) – will accommodate the remainder of the additional population in Southern Test Valley (delivered through policy COM1) when accounting for the available ‘spare’ capacity (see paragraph 5.8). The Park Farm, Stoneham site (see paragraph 5.36), which would provide a further approximately 50 dwellings (approximately 119 residents) is outside the likely SAC visitor catchment.
- 5.30 ~~However,~~ †The Plan contains a policy dedicated to consideration of biodiversity (Policy E5). This states that:
- “Development that is likely to result in a significant effect either alone or in combination on an international or European nature conservation designation, or a site proposed for such designation, will need to satisfy the requirements of the Habitats Regulations.”*

5.31 There is therefore some level of assurance that any development proposals flowing from COM1, ~~COM3 and COM4~~ would still need to go through this process, and if these proposals did not include measures to avoid any identified adverse effects on the SAC then permission could not be granted and be in accordance with the plan. However, while guidance from Natural England identifies that it can be appropriate to introduce such a ‘blanket’ policy to address certain elements of uncertainty related to how the plan would be implemented, it also states that policies introduced to remove uncertainty need to be targeted specifically to deal with the issue that is causing the uncertainty. Thus the supporting text to COM1 additionally states (following the Regulation 18 consultation):

“Any site coming forward that is not an allocation will need to be considered against all relevant policies within the Local Plan and other legislation including that affecting International ecological designations”.

5.32 ~~Following the Regulation 18 version, additional policy wording has been added to COM3 and COM4,~~

~~“8.0ha per 1,000 population of land to be provided to mitigate the impact of the development on sites of European importance.”~~

~~while the supporting text to COM1 additionally states (following the Regulation 18 consultation):~~

~~“Any site coming forward that is not an allocation will need to be considered against all relevant policies within the Local Plan and other legislation including that affecting International ecological designations”.~~

5.33 This demonstrates that the Plan includes sufficient text in either the Policies themselves, or their supporting text, that would ensure that measures to counteract potential adverse impacts will be provided.

5.34 The strategic approach the Council is taking with respect to provision of new alternative open space as well as responding to the ~~on-going~~ recent research to support this and other similar measures will ensure that developments flowing from these policies can and will only be assessed against up to date and appropriate information relating to these issues. Developments flowing from COM1, COM3 and COM4 can therefore only be supported by the Plan where these demonstrate that such projects would not ~~cause an increase in recreational use of the SAC (thus not~~ result in an adversely effect on the SAC).

5.35 It is therefore concluded that Policies COM1, COM3 and COM4 **would not** ~~result in increased recreational use of the SAC~~ an adverse effect on the SAC in terms of recreational disturbance.

5.36 **COM5** (Residential Development at Park Farm, Stoneham) is approximately 5.5km away from the SAC. It is concluded therefore that this policy **would not** ~~result in increased recreational use of the SAC~~ an adverse effect on the SAC in terms of recreational disturbance.

New Forest SPA / Ramsar

- 5.37 The most recent comprehensive visitor survey of the New Forest National Park was undertaken in 2005 for the then Countryside Agency (now part of Natural England) by Tourism South East (TSE) Research Services. The survey, known as the PROGRESS survey estimated that some 13.345 million visits are made to the New Forest each year. It should be noted that only 2.6% of the PROGRESS report sample were classed as Test Valley residents. Of these the total number of visitors to the New Forest, 35% (4.671 million) were local day visits, originating from within the National Park itself and from within an area of 8km around the park. A further 25% (3.336 million) were from non-local day visits. Of these non-local day visits, 52% (0.902 million) were from within Hampshire.
- 5.38 As noted above, Test Valley residents made up 2.6% of all the visits to the New Forest each year i.e. 346,970 visits per year. A visitor profile for Test Valley residents was constructed based on this figure and on detailed analysis of the questionnaire surveys completed by Test Valley residents as part of the TSE survey. This visitor profile is shown in Table 5.1 below:

Visitor Group Type	Percentage of All Visits by Test Valley Residents	Total Visits per Annum
Staying Tourists	1.31	4,545
Local Day Visitors from within 8km)	43.8	151,972
Non-local Day Visitors	54.89	190,451
TOTAL	100	346,970

Table 5.1 – Profile of Visits to the New Forest from Test Valley Residents

- 5.39 In 2006 (the nearest date to the PROGRESS study for which an estimate is available), the population of Test Valley was projected to be 112,285¹². Using the profile in Table 5.1 it can thus be estimated that on average, there were 3.1 visits per annum to the New Forest for every person in the Borough. ~~Population projections for Test Valley up to 2029 is for an increase of approximately 23,000, which would be accommodated by the housing to be delivered through the implementation of the Plan.~~
- 5.40 It can be estimated using ~~these figures than~~ the expected population growth in Test Valley that an additional 71,300 visits each year (approximately 195 per day) to the New Forest could potentially be generated by the growth of the Test Valley population in the plan period, if avoidance measures are not implemented.

¹² <http://www3.hants.gov.uk/factsandfigures/population-statistics/pop-estimates/long-term-proj.htm>

- 5.40a Natural England's preferred approach to estimating population increase is to assess this using the average occupancy rates of the proposed additional dwellings. The housing figure¹³ for northern Test Valley is 2,330 and for southern Test Valley is 1,869. These figures provide a total population increase for the Borough of 9,952. Using the profile of visits in Table 5.1 (i.e. 3.1 visits per person per year) this gives a figure of 30,851 additional visits per year to the New Forest.
- 5.40b A further alternative assessment of visits to the New Forest can be obtained from examining the findings of the recent research carried out for Test Valley Borough Council¹⁴. This identified that 72% of existing residents of Southern Test Valley visited the nearest areas of the New Forest within the previous 12 months, while 37% of existing residents of Northern Test Valley visited during the same period. The Qa research also identified the frequency of visits from the various areas in Test Valley. Using these figures suggests that the population increase could result in approximately 80,540 additional visits per year to the New Forest.
- 5.41 **COM3** and **COM4** are the two larger allocations in Southern Test Valley, and include specific policy wording requiring provision of alternative green space at Luzborough Plantation to support any new housing development.
- 5.42 The issues resulting in the need for mitigation from recreational use of Thames Basin Heath are similar to the New Forest and the scale of mitigation has been scrutinised at a public inquiry for this designation. Large areas of the New Forest visited by the public comprise open heathland and the characteristics of the visits made are similar. The key difference is that the New Forest is a national park and a major tourist destination in its own right. It attracts attracting a wider range of visitors including those from Test Valley who go specifically for the reasons identified above (note that mitigation for use of the National Park by tourists would not be within the remit of Test Valley to provide mitigation for).
- 5.43 The Thames Basin Heaths SPA is designated for some of the same species as the New Forest; also Ashdown Forest SPA has a number of similarities to the New Forest, in terms of its history, the access available and its nature conservation value.
- 5.44 The Green Dimensions study (2009) commissioned by the Council reviewed the existing evidence regarding why people visit the New Forest. This review has informed what key attributes alternative green spaces would need to have to provide an attractive alternative. It would be unreasonable to try to replicate all of the attributes of the New Forest which has its own unique history and character which has resulted in it being designated as a national park. The key attributes identified were as follows, together with comments in relation to Luzborough Plantation:

¹³ These figures are calculated based on the residual housing requirement plus 10%, unplanned sites and SHLAA - identified capacity (see Table 3.5).

¹⁴ Open Spaces Residents Survey 2013-14 For Test Valley Borough Council, Qa Research, March 2014

A) Landscape and Views:

Luzborough Plantation would provide a similar experience for those who enjoy visiting woods and forests which have a mix of landscapes. The woodland habitat at the site is similar in character to many areas of the New Forest that currently receive high visitor levels. Existing rides and clearings also provide a degree of openness, while there are opportunities to create additional open areas as part of future management.

B) Quiet and Not Over Crowded:

Parts of the woodland are subject to some background noise linked to traffic. However, for most of the areas traffic noise and other sources are largely absent. The woodland parcel is sufficiently large to be able to create a perception of not being over crowded for much of the year.

C) Good for walking / dog walking / cycling:

Walking and dog walking accounted for a significant proportion of the reasons for visiting the New Forest, particularly amongst the local day visitors. There is an existing network of tracks and rides within the woodland, a number of which are of a robust construction designed to accommodate forestry operations. There is potential to create a network of routes in terms of distance/time for different users, reflecting the average duration of visits to the New Forest.

D) Diversity of Wildlife and Natural Interest:

Experiencing a diversity of wildlife is one of the attributes as to why people visit the New Forest. Any alternative green space provision is unlikely to be able to match the ecological diversity of the New Forest; however, the Luzborough Plantation contains a range of wildlife habitats. Part of the woodland is designated to be of local importance for nature conservation. The long term management of the woodlands should provide an opportunity to retain and possibly enhance the diversity of wildlife.

For most visitors the specific ecological characteristics of the area will not be how they would necessarily judge the wildlife interest and enjoyment. The casual visitor is more likely to appreciate and enjoy a variety of habitat types and the sights, sounds and colours and scents of nature. This therefore supports the conclusion that this parcel of woodland is a feasibility alternative to the New Forest in ambience.

E) Woodlands are accessible:

Luzborough Plantation is in close proximity to the two major allocations proposed within Southern Test Valley, whilst being adjacent to the settlements of Romsey and North Baddesley. There would be scope to improve access to the woodland via non-car modes of travel, including the enhancement of existing routes.

- 5.45 In light of the comments above, Luzborough Plantation has the capability to meet those attributes identified as being the key features that attract people to the New Forest.
- 5.46 Given that the alternative green space to be provided via Policies COM3 and COM4 is of a scale and quality that is considered to attract users who would otherwise visit the New Forest, it can be concluded that Policies COM3 and COM4 **would not** result in an increased recreational use of the New Forest SPA / Ramsar site.
- 5.47 ~~COM1 (Housing Provision) may contribute to additional visitors to the New Forest. However, because most of the housing requirements are to be provided by allocations supported by policies that require provision of alternative green space, it is not considered that COM1 would result in significant numbers of additional visitors to the New Forest. Additionally, Policy COM1 now includes specific recognition that any such site coming forward would need to be considered against impacts on International sites. This policy hook is reiterated in the policy wording for E5 (Biodiversity), which states ‘Development that is likely to have a significant effect, either alone or in combination, on an international or European nature conservation designation...will need to satisfy the requirements of the Habitats Regulations.’~~ Additional housing outside the allocation sites would flow from implementation of COM1. Some of this may be provided for through ‘spare’ capacity at Luzborough Plantation, as has been discussed above. However, to accommodate those additional dwellings coming forward, a different provision will need to be made or a different approach taken. The Council has commenced work with neighbouring authorities, Natural England and other partners on preparing an approach for mitigating the recreation pressures on the New Forest designations. This will see to ensure that appropriate mitigation, which may comprise alternative green space, is brought forward in advance of the unallocated sites being occupied. This is highlighted through additional text, supporting policy E5 which states:

“The Council has commenced work with neighbouring authorities and statutory bodies on preparing a long term approach for mitigating the recreational pressures on the New Forest ecological designations.”

- 5.47a Additionally, Policy COM1 now includes specific recognition that any such site coming forward would need to be considered against impacts on International sites. This policy hook is reiterated in the policy wording for E5 (Biodiversity), which states:

“Development that is likely to have a significant effect, either alone or in combination, on an international or European nature conservation designation...will need to satisfy the requirements of the Habitats Regulations.”

- 5.48 ~~Furthermore, in contrast with the Solent designations, it has been established that there is certainty over the quality criteria of any strategic open space flowing from implementation of this policy.~~

- 5.49 Taking account of the spare capacity available from Luzborough Plantation, the work that is underway with partners and the attraction of the New Forest as a tourist destination, it is therefore considered that policy COM1 **would not** result in increased recreational use of the New Forest.
- 5.50 **COM5** is a small part of a much larger development area (Land South of Chestnut Avenue) for approximately 1,100 dwellings that is proposed by Eastleigh Borough Council in their Local Plan. The larger development proposals include all the necessary infrastructure and associated features to make the development sustainable. As identified in the policy supporting text, the Councils are working together to ensure delivery is properly phased and that development flowing from COM5 is brought forward in line with the Eastleigh development.
- 5.51 It is therefore concluded that COM5 **would not** result in an increased recreational use of the New Forest SPA / Ramsar site.

Solent and Southampton Water SPA / Ramsar

- 5.52 Almost all the estuaries in the SPA / Ramsar site are used extensively for a wide range of leisure and recreational activities, particularly water-based recreation. The Ramsar information sheet for the Solent and Southampton Water Ramsar site, lists the following as current recreation and tourism activities on the coast:
- A) *Land-based recreation:*** Walking including dog-walking is popular along large stretches of the coast and estuaries. The presence of country parks, NNR and LNRs on the coast also attract large numbers of people to certain locations.
- Bait-digging and collection of shellfish occurs in a number of locations. Birdwatching is also a popular activity with a number of favoured locations with easy access. Some golf courses are also present.
- B) *Water-based recreation:*** The Solent is an internationally important centre for yachting, dinghy sailing and power-boating and nationally important for canoeing, and water-skiing. A small amount of hovercraft racing sometimes occurs.
- C) *Wildfowling and egg collection:*** Private, syndicate and club wildfowling operate on the marshes. Small-scale egg-collecting also occurs. Bait-digging and angling also occur.
- D) *Air-based recreation:*** There is a proposed microlighting centre within the area.
- 5.53 Additionally, the high degree of recreation in the Solent is accompanied by a high degree of supporting developments such as marinas, boatyards, clubs and holiday centres.
- 5.54 The Solent Disturbance and Mitigation Project (SDMP) was established through the Solent Forum to seek to assess what the potential effects of

population growth and increased recreational visits may be on the SPA and what could potentially be done to avoid or mitigate such effects. The project studied the actual observed effects of recreational disturbance on the Solent coast and assessed the current visitor patterns to the coast. From this work, it is hoped to model potential future scenarios based, for example, on population change and climate change and the effects of potential mitigation measures, although the results do not specifically include consideration of the visitor patterns of Test Valley residents as they were not specifically included in the survey work.

5.55 The SDMP postal survey of households – which unfortunately did not include residents in Test Valley – identified that of the households which visited a coastal section by car, 90% lived within 29km of their visited coastal section, 75% lived within 18km and 50% lived within 9.5km of their visited coastal section. As 52% of all visits to the coast are known to be made by private vehicle, it is therefore possible to estimate from these figures that:

- 26% of all visits to the coast by private vehicle come from within 9.5km
- 13% come from within 18km
- 13% come from 29km or further
- Approximately 20% of those visiting within the last year up to the survey point owned a dog, and 25% of questionnaire respondents identified that dog-walking was the reason for the visit.

5.56 Figure 5.1 shows that households living more than 10km road distance away from a section, on average, make fewer than one visit per household per year to that section by car (and none on foot), with an annual rate of 0.853 and 0.339 for households in the 10-15km and 15-20km bands respectively. This further demonstrates that any new residential development in Test Valley this general distance from the coast is likely to generate few regular visits to the coast.

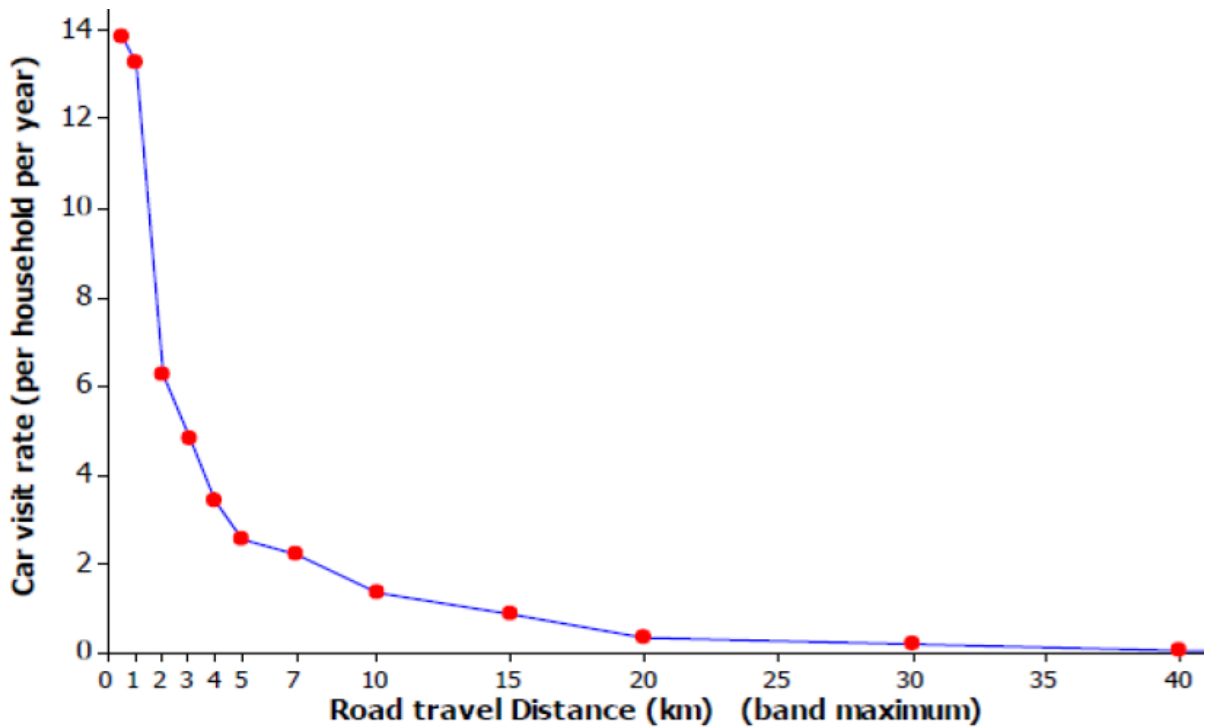
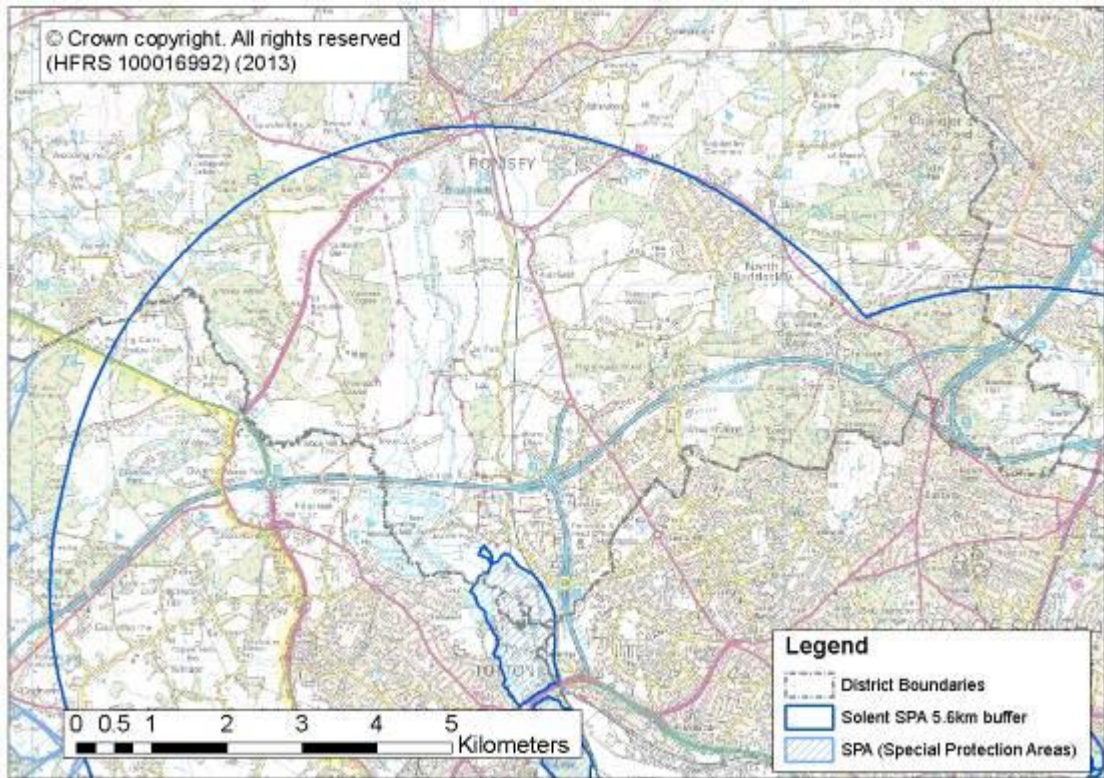


Figure 5.1: Overall car visit rates (per household per year) in relation to distance band (maxima) from the coast.¹⁵

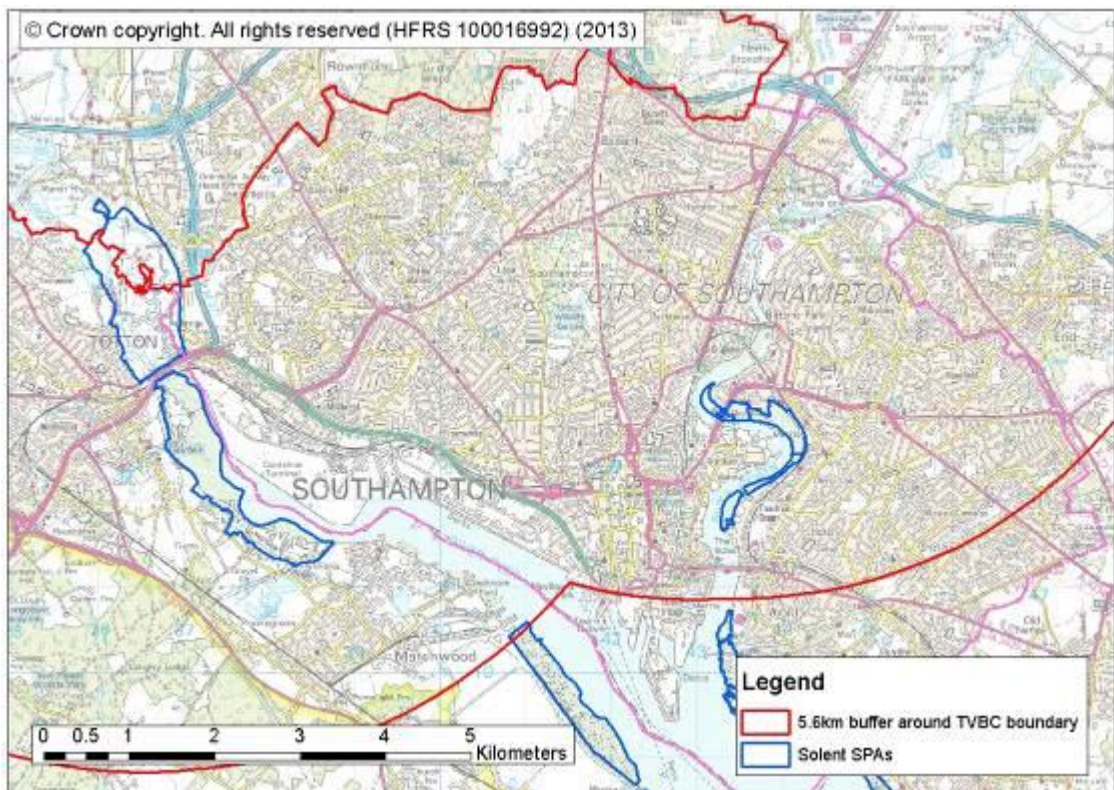
- 5.57 A key outcome of the SDMP is the establishment of a zone extending for 5.6km around the Solent designations (see Map 5.2, below). The research identifies that 75% of visitors to the Solent designations originate from within this zone. Consequently, Natural England¹⁶ has identified that all developments that result in a net increase in residential development within this area should be considered to have a likely significant effect on the designations when considered in combination with other plans or projects that would deliver in increased residential development.
- 5.58 Map 5.3 below shows the areas of the Solent designations within 5.6km of Test Valley. This shows that very small areas of the designations would be considered likely to receive any more than the approximately 2.5 visits per household per year identified as flowing from 5.6km or further in Figure 5.1. The map also shows that the intervening areas between Test Valley and the coast are largely highly urbanised, with the exception of the Lower Test (the only coastal SPA / Ramsar section within Test Valley).

¹⁵ Footprint Ecology and Bournemouth University (September 2011), The Solent Disturbance and Mitigation Project Phase II – Results of the Solent household survey.

¹⁶ Natural England (May 2013), Planning Applications Affecting Solent SPAs (SPA), letter to PUSH Planning Officers Group, dated 31st May 2013

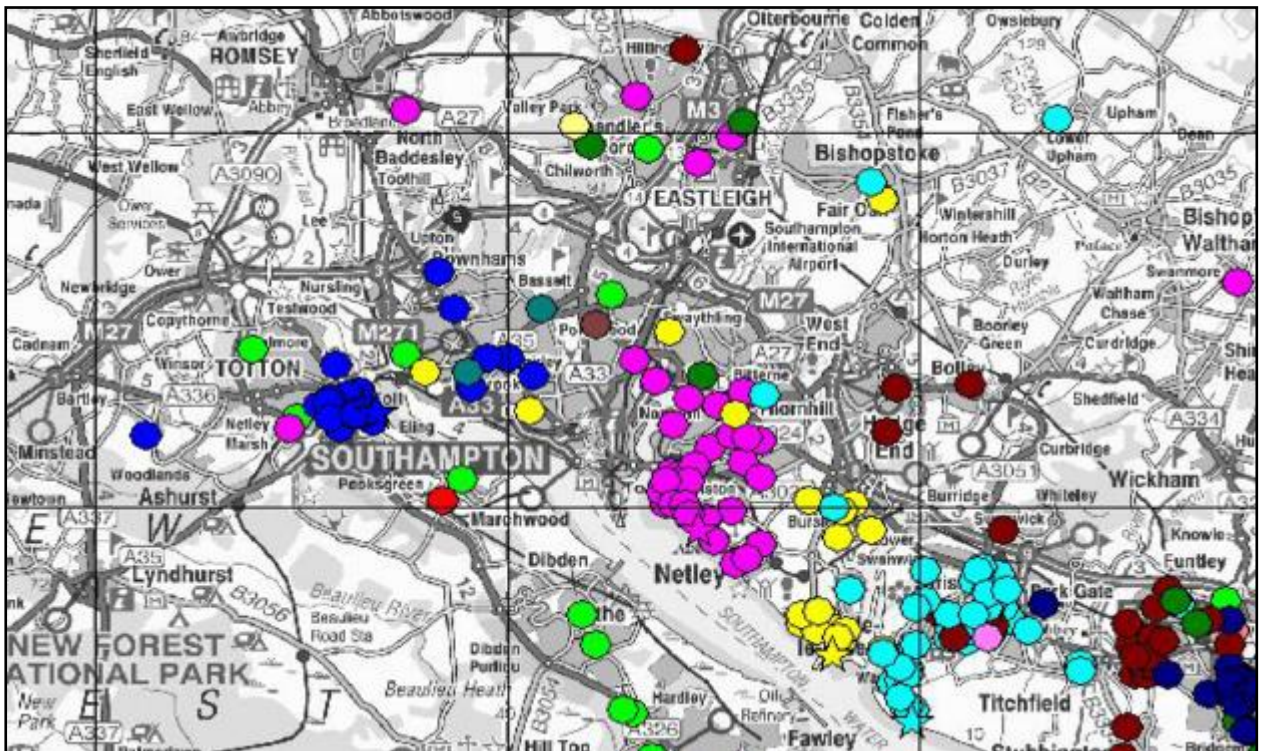


Map 5.2 – Areas of Test Valley within 5.6km of Solent International designations (Solent and Southampton Water SPA and Ramsar site)



Map 5.3 – Solent International sites (partial or whole) within 5.6km of Test Valley

- 5.59 In addition to the postal survey of households, the SDMP carried out questionnaire surveys of visitors at a number of sites across the Solent designations. Map 5.4 (below) demonstrates that nearly all the visitors recorded to the three nearest sections of coast within 10km of the Borough boundary came from outside Test Valley. This clearly shows that the majority of visitors to the coast would appear to visit the nearest point, hence the clustering of coloured circles near the stars of corresponding colour.
- 5.60 Of the extremely small number of respondents who lived in Test Valley (one in Romsey, one in Rownhams and two in Valley Park), only two (blue and dark pink circles) visited parts of the coast relatively close to their homes. The two visitors from Valley Park went further afield, to Alverbank (Gosport) and West Itchenor (Chichester).



Map 5.4 – origin postcodes for visitors to Solent sites from SDMP household survey (stars identify survey locations, circles represent corresponding origin postcodes)¹⁷

- 5.61 Of the 1,322 people interviewed during the study, only 4 (only **0.3%** of the total) came from Test Valley. This does not demonstrate that people from Test Valley do not or would not visit the Solent, nor does it demonstrate that any increase in housing in Test Valley as a result of implementation of the Plan would not result in an increase in the level of visitors to the coast. However it does clearly demonstrate in visual and quantitative terms quite how small the contribution Test Valley residents make to overall visitor pressure to the coast.

¹⁷ Fearnley, H., Clarke, R. T. & Liley, D. (2010) The Solent Disturbance & Mitigation Project. Phase II - On-site visitor survey results from the Solent region.

- 5.62 Policies **COM3** and **COM4** include provision of large areas of semi-natural open space available for extensive recreational activity in an informal natural setting. In terms of the *scale* or *quantity* of the alternative green space, these areas (Luzborough Plantation from both COM3 and 4 and in addition, for COM3, Beggarspath Wood) are considered acceptable in that they can comfortably deliver 8ha per 1,000 new residents.
- 5.63 In terms of *quality*, clearly these alternative recreational areas do not provide the same environment as the coast. It is not possible to re-create the coast within Test Valley. Therefore, those visitors that specifically visit the Solent designations for activities linked to the coastal location – for example sea views, coastal wildlife and, beach walks will not be diverted from this by newly-accessible, high-quality woodland.
- 5.64 However, it should be recognised that a significant proportion of coastal visitors are not visiting the coast because of its coastal location. Rather, their primary purpose is to simply walk the dog or go for a general walk. For example, in the SDMP postal survey, 25% of people who visited the coast in the preceding year identified that dog-walking was the reason for the visit. Therefore it may well be the case that the new open space is sufficient to attract those people from new developments who do not specifically require a coastal location to carry out their desired activity on any given day,
- 5.65 Furthermore, in addition to new residents from Whitenap or Hoe Lane, it should be recognised that there may be people who currently reside close to the Luzborough Plantation who currently visit the coast on occasion and who may be attracted more often to the new alternatives.
- 5.66 Regarding **COM1**, given the lack of location and scale criteria for this policy, and the complexities of applying a wide-ranging study like the SDMP to a small and discrete area (and one that was not included in part of the study), it is not possible to take the development of any firm figures for an increase in visitors to the coast as a direct result of the Plan any further than the broad indications described above. COM1 is nevertheless considered to contribute to additional visitors to the SPA / Ramsar site.
- 5.67 The issues of quality and likely diversion from existing habits are not fully understood at present. The differences between coastal areas and the more heathland-type habitats where qualitative requirements of alternative open spaces are more readily understood mean that it is not possible at this stage to conclude that the provision of the alternative open spaces at these sites will avoid effects on the Solent and Southampton Water SPA and Ramsar site. Therefore, without the on-going research into residents' use of informal open spaces, effects on the SPA / Ramsar site from implementation of COM1, COM3 and COM4 could not be ruled out.
- 5.68 ~~In contrast with the New Forest designations, it has not been established that there is certainty over the quality criteria of any alternative open space proposals to support residential development flowing from implementation of this policy.~~

5.69 While the ~~on-going~~ recent research into Test Valley residents use of open spaces for recreation will provide a ~~great deal of~~ relevant information to clarify this issue, effects on the SPA / Ramsar from implementation of COM1 cannot be ruled out ~~at this stage in the absence of this research.~~

5.70 However, the Plan contains a policy dedicated to consideration of biodiversity (Policy E5). This states that:

“Development that is likely to result in a significant effect either alone or in combination on an international or European nature conservation designation, or a site proposed for such designation, will need to satisfy the requirements of the Habitats Regulations.”

5.71 There is therefore some level of assurance that any development proposals flowing from COM1, COM3 and COM4 would still need to go through this process, and if these proposals did not include measures to avoid adverse effects on the SPA / Ramsar then permission could not be granted and be in accordance with the plan. However, while guidance from Natural England identifies that it can be appropriate to introduce such a ‘blanket’ policy to address certain elements of uncertainty related to how the plan would be implemented, it also states that policies introduced to remove uncertainty need to be targeted specifically to deal with the issue that is causing the uncertainty.

5.72 Following the Regulation 18 version, additional policy wording has been added to COM3 and COM4,

“8.0ha per 1000 population of land to be provided to mitigate the impact of the development on sites of European importance.”

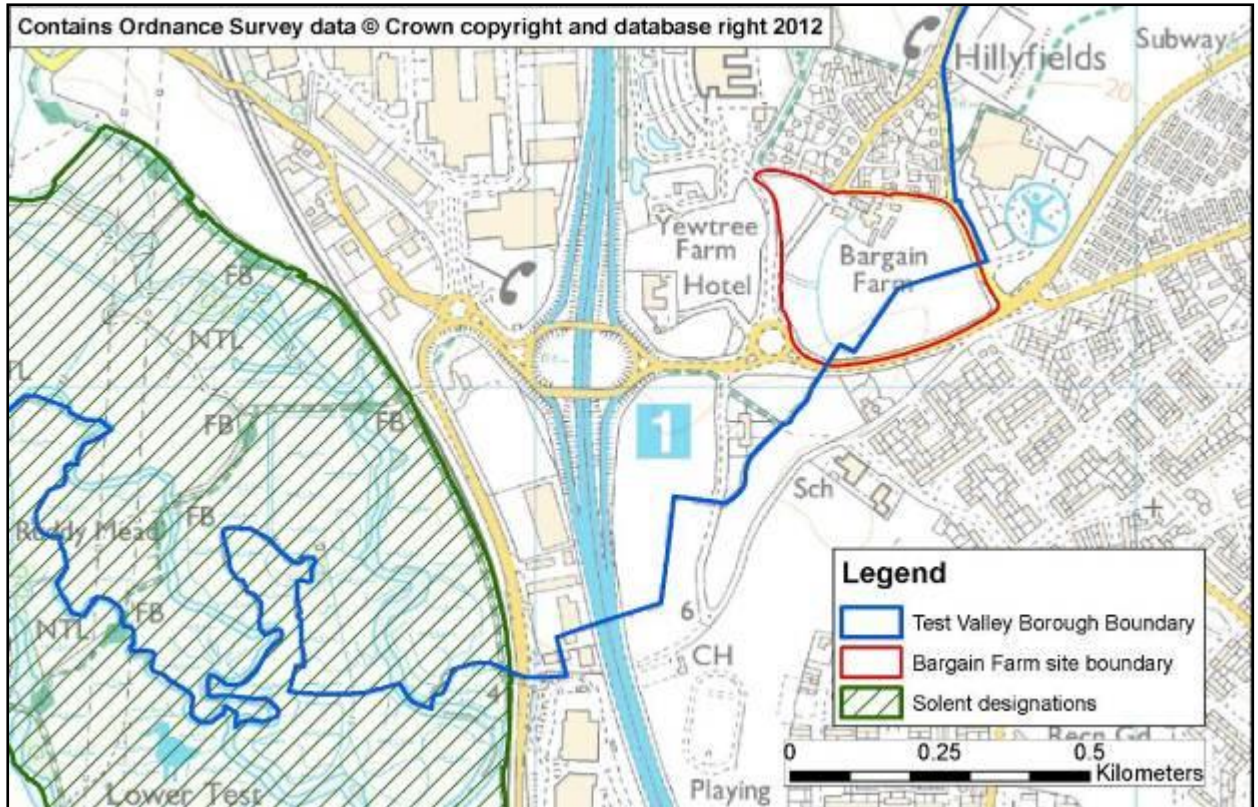
while the supporting text to COM1 additionally states (following the Regulation 18 consultation):

“Any site coming forward that is not an allocation will need to be considered against all relevant policies within the Local Plan and other legislation including that affecting International ecological designations”.

5.72a Paragraph 7.38 of the Revised Local Plan DPD sets out that the Council has been working with a range of partners as part of the Solent Disturbance and Mitigation Project (SDMP), which has been set up to assess the likely impact from existing and future recreation pressure on the Solent designations. As a result of this work, contributions to an agreed mitigation package will be sought from all new dwellings development contributing to recreational pressure on the Solent International sites within 5.6km of the Solent International sites. This approach has been agreed by the Council’s Cabinet¹⁸. This demonstrates that the Plan includes sufficient text in either the Policies themselves, or their supporting text, that would ensure that measures to counteract potential adverse impacts will be provided.

¹⁸ <http://www.testvalley.gov.uk/resident/planningandbuildingcontrol/guidance/solent-southampton-water-special-protection-area/>

- 5.73 This demonstrates that the Plan includes sufficient text in either the Policies themselves, or their supporting text, that would ensure that measures to counteract potential adverse impacts will be provided.
- 5.74 The strategic approach the Council is taking with respect to provision of new alternative open space as well as responding to the ~~on-going~~ recent research to support this and other similar measures will ensure that developments flowing from these policies can and will only be assessed against up to date and appropriate information relating to these issues. Developments flowing from COM1, COM3 and COM4 can therefore only be supported by the Plan where these demonstrate that such projects would not cause an increase in recreational use of the SPA / Ramsar (thus not adversely the designated site).
- 5.75 It is therefore concluded that Policies COM1, COM3 and COM4 **would not result in increased recreational use of the SAC.**
- 5.76 **COM5** is a small part of a much larger development area (Land South of Chestnut Avenue) for approximately 1,100 dwellings that is proposed by Eastleigh Borough Council in their Local Plan. The larger development proposals include all the necessary infrastructure and associated features to make the development sustainable. As identified in the policy supporting text, the Councils are working together to ensure delivery is properly phased and that development flowing from COM5 is brought forward in line with the Eastleigh development.
- 5.77 It is therefore concluded that COM5 **would not** result in an increased recreational use of the Solent and Southampton Water SPA / Ramsar site.
- 5.78 Policy **T3** (Park and Ride at Nursling) was also screened in as having a likely significant effect specifically on the Solent and Southampton Water SPA / Ramsar site. This is because it provides a large car park in close proximity to the Lower Test Marshes area of the SPA / Ramsar and it was considered that there may be potential for people to use the Park and Ride car park to visit the SPA / Ramsar.
- 5.79 Map 5.5 (below) shows that people walking to the SPA from the Park and Ride facility would need to walk nearly 1km along a busy spur road and across a busy motorway junction that has no footway. It is also likely that the Park and Ride car park would require payment. It is therefore considered that these factors (distance, lack of safe walkway and cost) would preclude the car park from being used by potential visitors to the SPA at this point. It is therefore concluded that T3 **would not** result in an increased recreational use of the Solent and Southampton Water SPA / Ramsar site.



Map 5.5 – Bargain Farm (Policy T3) in relation to Solent and Southampton Water SPA

5.80 It is therefore concluded that it is not necessary to further consider the implications of the Plan on the conservation objectives of the Solent and Southampton Water SPA / Ramsar site sites with respect to recreational disturbance arising from COM1, COM3 and COM4.

Conclusions

5.81 There are elements of uncertainty that prevent a more robust assessment of the effects of the plan on Emer Bog SAC and Solent and Southampton Water SPA and Ramsar site. Ways of addressing uncertainty are discussed in more detail in Chapter 2 (paragraphs 2.10 to 2.22). With respect to recreational impacts on these specific sites:

A) Scientific Uncertainty

5.82 ~~It is proposed to reduce t~~The level of scientific uncertainty has been reduced through completing the planned research into how Test Valley residents use semi-natural open space. A higher level of certainty over the likely impacts and the qualities required of strategic open space to be provided to address potential increase in visitor use of International sites has now been provided to provide certainty over the qualities required of strategic open space to be provided to address potential rises in visitor use of affected International sites. With respect to Emer Bog, the Council is ~~also~~ remains committed to working with the Wildlife Trust and Natural England and ~~responding to the findings of the research the Council is undertaking.~~

B) Implementation Uncertainty

- 5.83 In response to the uncertainty over the implementation of the policy and the lack of, and emerging, evidence base at this stage, the wording to policies COM1, COM3 and COM4 have been amended to specifically address these issues. This demonstrates that regardless of how these policies could be implemented, it can be reasonably concluded that developments that could adversely affect an International site would not draw support from this policy.

C) Planning Hierarchy

- 5.84 It is also appropriate to consider deferring assessments of projects flowing from COM1, COM3 and COM4 to a lower tier at planning application stage. It is however only acceptable to defer down to a lower tier assessment if the following conditions are met:

- *Where the higher tier plan cannot reasonably assess the effects in any meaningful way.*
 - As discussed, it is not possible to reasonably assess the effects of the policy due to the large areas of scientific and implementation uncertainty.
- *Where the lower-tier plan can identify more precisely the nature, scale or location of development, and thus its potential effects.*
 - HRA of a proposal at a lower level is able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of the International sites.
- *Where the HRA of the plan or project at the lower tier is required as a matter of law and policy*
 - As discussed, there is a policy requirement under E5, as well as new text in COM1, COM3 and COM4 specifically relating to addressing potential impacts on International sites from these policies. Thus there is a requirement to undertake HRA as a matter of policy, as well as clearly a matter of national and international law.

- 5.85 In conclusion, due to the necessary text having been added to the relevant policies, and the on-going research into visitor use of open spaces such as Emer Bog and the nearby coastal areas to enable the Council to consider the development proposals at planning application stage as required by the policies, it is considered that implementation of policies COM1, COM3, COM4 and COM5, and hence the Test Valley Revised Local Plan DPD will not adversely affect the integrity of Emer Bog SAC, or the Solent and Southampton Water SPA / Ramsar site.