Rowdown Cottage
Off Rolleston Road
Blackfield
Southampton, Hants
SO45 1XG

Habitat Mitigation Strategy and related matters
Frank Tillyer
Statement: FT5
Representation 215

January 2014

New Forest District Council
Local Plan Part 2 – Sites and Development Management - Public Examination

ID/16 - Inspector’s preliminary questions for clarification (Nov 2013) Note 7 dated 26 November 2013

ID/17 – Inspector’s Guidance Note for the Further Hearings

ID/18 – Inspector’s pre-hearing and other questions (Dec 2013)

NFDC51 – NFDC Response to Inspector’s Note 7 (ID/16) dated 29 November 2013

NFDC52 – Erratum to NFDC47 and S12: Habitat Regulations Assessment of Local Plan Part 2, and BP40 Draft Sustainability Appraisal dated 29 November 2013

This statement is prepared by Frank Tillyer in response to the above documents ID/16, ID/17, ID/18, NFDC51 and NFDC52. The Inspector’s relevant questions and comments are in bold text for ease of reference. The Council’s and my responses follow on.

ID/16

1.2 Representations (Reps 215 Mr Tillyer and 226 Mr Penny) indicate that there is (and was previously) a factual error in relation to HYD2 Land off Cabot Drive in Table 3.2 on p28. The table indicates that this site is within 400m of the Solent and Southampton Water SPA/Ramsar. This would appear to be incorrect, but the site would appear to be within 400m of the New Forest SPA/SAC/Ramsar. Is this correct?

NFDC51

1.2 Council’s response: “Representations received from Mr. Tillyer (215) and Mr. Penny (226) have drawn attention to an editing error that has remained unnoticed in tables 3.2 and 3.3 of the various HRA documents from an early stage in the HRA work, including the screening statement (BP41), as well as the HRA of the Submitted Plan (S12) and the revised HRA published in October 2013 (NFDC47).”

Cont.....
However, the Council can give the Inspector firm assurances that while the tables erroneously referred to the ‘Solent and Southampton Water SPA/Ramsar’, all assessment working regarding the HYD2 Cabot Drive site has been in relation to the New Forest SPA/SAC/Ramsar site. This is evidenced by the fact that in table 3.2 the ‘Relevant criteria’ score is 9, and not 8, which it would have been in relation to the Solent and Southampton SPA/Ramsar site. The ‘9’ score relates to the whole of the Cabot Drive site, and the site was given a score of ‘9’ because a very small part of the site, in the southwest corner, lies within 400 metres of the New Forest SPA/SAC/Ramsar site (see map below). As discussed below, in hindsight, at Submission stage this scoring should have been revised in HRA table 3.2 to ‘8’, to take account of the policy wording that has included in the submitted Plan (policy HYD2) to ensure that the part of the site developed for housing was over 400m from the New Forest SPA/SAC/RAMSAR site. This correction is now included in the erratum referred to below.

ID/17

7. I raised some preliminary questions with the Council in my Note 7 (now ID/16). These are matters not directly related to the proposed Modifications. The Council’s response is in NFDC51 and NFDC52. The latter shows corrections to various errors in the Habitat Regulations Assessment (S12) submitted with the plan in 2012, in the Revised HRA (NFDC47) and in Appendix A of the updated IDP (NFDC48). To avoid further confusion in relation to the assessment of the allocated site HYD2, I note that in the Draft Sustainability Appraisal (BP40), the site being appraised was the northern half of the land now allocated as HYD2. This northern part of the allocated site is not within 400m of the New Forest SPA/SAC/SSSI. Policy HYD2 requires the residential development to be the northern part of the site. I have no further questions on the matters raised in my Note 7 (other than in relation to the Mitigation Strategy which is the focus of most of my pre-hearing questions).

My response

1. 2 I refer to the Council’s response in paragraph 1.2 above and I quote: “However, the Council can give the Inspector firm assurances that while the tables erroneously referred to the ‘Solent and Southampton Water SPA/Ramsar’, all assessment working regarding the HYD2 Cabot Drive site has been in relation to the New Forest SPA/SAC/Ramsar site”.

Cont.....
January 2014

Frank Tillyer
Statement: FT5
Representation 215

1.2.1 The Council can give the Inspector firm assurances. What assurances? This is only "hearsay". We only have the Council’s word. The Inspector has stated that any work needs to be evidence led. Will the Council produce all the assessment work evidence referred to, and where that evidence can be found regarding the HYD2 Cabot Drive site, given the factual errors already identified?

1.2.2 I formally request the Council to produce the evidence for the Inspector and the oral hearing(s) participants to evaluate, no later than 12.00 noon on Tuesday 14 January 2014.

1.2.3 The Council also state: “The ’9’ score relates to the whole of the Cabot Drive site”. I agree.

ID/17

7. Please refer to the comment made by the Inspector, and I quote: "I note that in the Draft Sustainability Appraisal (BP40), the site being appraised was the northern half of the land now allocated as HYD2”. I agree.

My response

1.2.4 However, upon further investigation I have revealed another factual error, which strengthens my serious concerns, therefore, they need to be addressed by the Inspector and the Council, to make the plan sound.

1.2.5 The Inspector has requested specific cross-referencing to any relevant material already submitted is helpful, therefore please turn to my representation 215MM page 10, BP40 site reference HYT-BU-22 ID: HYD3 and then Appendix 1 page 160. Focus on the proposed site boundary area of land.

1.2.6 Also turn to page 11, the actual proposed submitted Sustainability Appraisal Document S11 BP46 site reference HYD2 ID: HYT-BU-22 and then Appendix 1 page 175. Focus on the proposed site boundary area of land.

1.2.7 Now turn to Document S2 – Sites and Development Management DPD Consultation Document pages 104 and 105 (my statement pages 10 and 11) and map HYD3: Land off Cabot Drive.

1.2.8 Compare the site maps shown in documents BP40 and S11 (BP46) against S2 site map, the Council have a complete match.

Cont.....
1.2.9 However, when you compare the HYD2 site maps shown in documents BP40 and S11 (BP46), against the document S1 site map, in the Proposed Submission Document (now the Local Plan Part 2) page 91 (my statement page 12), and document NFDC51 page 2 (my statement page 15), the Council have an incomplete match, because the whole original proposed site has nearly doubled in size, since document S2, to include land to the south west, which is nearer to the New Forest SPA/SAC/Ramsar site.

1.2.10 There appears to be no revised or amended Sustainability Appraisal Assessment having been done by the Council or the Land Use Consultants, to support the HYD2 additional land proposed in the site allocation, because I believe, the Council were and are, fully aware that this site, is now within 400m of the New SPA/SAC/Ramsar site, and that a full Appropriate Assessment would have to be carried out, before HYD2 could be proposed in the submitted plan for residential development.

1.2.11 For clarification, at an early stage of the plan preparation, any site put forward for consideration by the Council for allocation, a Sustainability Appraisal was conducted on the whole of every site being proposed.

1.2.12 Refer to documents BP40 and S11 (BP46), and the proposed BLA2 site, two separate Sustainability Appraisals were carried out – BLAK-01A and BLAK-01D (my statement pages 17 to 20), on an area of land, where the site boundaries were proposed by the Council Officers themselves, which overlapped, but have two different assessment summaries. This procedure should have been applied to the HYD2 site.

1.2.13 The Council could have amended the site boundary for HYD2, in the Sustainability Appraisal Assessment, as the Council have done for other proposed sites, e.g. document S11a (SA) NFDC Proposed Changes, change no. 4.2, Policy Map MoS1, together with the revised Sustainability Appraisal, by reducing the size of the site. This change has now been withdrawn.

1.2.14 Also, document NFDC2 – NFDC Proposed Changes Schedule dated August 2012, change no. 3.10 Policy Map TOT12 Revise site boundary by reducing the size of the site.

1.2.15 From the evidence so far referred to in this statement, it has to be another deliberate factual error, by the Council, to increase the size of the HYD2 site to nearly double, without a revised Sustainability Appraisal, which would bring the site within 400m of New Forest SPA/SAC/Ramsar site criteria. This has gone unnoticed since January 2012, which is over two years ago, by suitably qualified and experienced Council Officers, and by Land Use Consultants, who must have checked the documents before they were submitted, in order to propose allocating the HYD2 site.

Cont.....
1.2.16 In conclusion on this particular matter, the whole plan is unsound, because in documents BP40 and S11 (BP46), the site maps regarding HYD2, DO NOT MATCH the actual site area of land, now being proposed in document S1, the submitted Local Plan Part 2, and NFDC51 – NFDC Response to Inspector’s Note 7 (ID/16). This has to be procedurally flawed and if left uncorrected, would become the subject of a legal challenge at a later date.

NFDC51

1.3 The Council is issuing an erratum to documents S12 and NFDC47 to correct these editing errors. (The erratum will be document NFDC52, as attached). The only revision to the assessment that is needed is to reduce the relevant criteria score in table 3.2 down from ‘9’ to ‘8’ to take account of detailed policy wording for the HYD2 site. Other corrections are to correct editing errors.

My response

1.3 This is incorrect. The relevant criteria score should remain at ‘9’ for the following reasons:

1.3.1 Refer to paragraphs 1.2 and 1.2.3 above, where the Council stated that: “all assessment working regarding the HYD2 Cabot Drive site has been in relation to the New Forest SPA/SAC/Ramsar site”, and “the ‘9’ score relates to the whole of the Cabot Drive site”. Therefore, the Council accepts the whole site comes within 400m of the New Forest SPA/SAC/Ramsar site, irrespective of where the proposed development will be located.

NFDC51

1.4 Throughout the preparation of the Plan, the Council has had appropriate regard to the fact that a very small part of the HYD2 lies within 400 metres of the boundary of the New Forest SPA/SAC/Ramsar site. The map below illustrates how little of the site is within 400m of the New Forest SPA/SAC/Ramsar site. The Council has had particular regard to this fact in considering how this site could be development appropriately. Accordingly, policy HYD2 specifically states that residential development on the site be located in the northern part of the site. This is to ensure that the housing on the site is located more than 400 metres away from the New Forest SPA/SAC/Ramsar site.

My response

1.4.1 Please refer to: “Throughout the preparation of the Plan, the Council has had appropriate regard to the fact that a very small part of the HYD2 lies within 400 metres of the boundary of the New Forest SPA/SAC/Ramsar site”, and “particular regard”.

Cont.....
1.4.2 Throughout the preparation of the Plan (this is from August 2010 to November 2013, well over 3 years), and "appropriate and particular regard".

1.4.3 Again, where is the evidence? This is "meaningless". We only have the Council’s word. Please produce the evidence as requested in paragraph 1.2.2 above.

NFDC51

1.5 The Inspector refers to differences between the draft Sustainability Appraisal (BP40) and the submitted Plan Sustainability Appraisal (S11) for the assessment of the Cabot Drive site. There was an error in the draft SA (BP40), as it incorrectly stated the site was within 400m of the New Forest SPA/SAC/Ramsar site. This was corrected in the SA for the Submitted Plan. (An erratum to BP40 is included in NFDC52).

My response

1.5.1 I totally disagree with paragraph 1.5 for the following reason:

1.5.2 Please refer to paragraph 1.3.1 above, and in particular: “all assessment working regarding the HYD2 Cabot Drive site has been in relation to the New Forest SPA/SAC/Ramsar site”, and “the '9' score relates to the whole of the Cabot Drive site”. This is correct.

NFDC51

1.6 On the Inspector’s final point relating to this matter, the Council confirms that none of the above affects the mitigations requirements set out in the SPD.

My response

1.6.1 In the absence of the evidence referred to in paragraphs 1.2 and 1.3.1 above, the mitigation requirements will affect the HYD2 site, particularly if the proposed HYD7 SANGS site is not justified, or made available and deliverable during the plan period.
<table>
<thead>
<tr>
<th>Document</th>
<th>Table/Para. Page no.</th>
<th>My recommendation</th>
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<tbody>
<tr>
<td>S12 Submitted HRA</td>
<td>HYD2 entry in Table 3.2 page 25</td>
<td>My recommendation for Withdraw because the text: “part of the site” do not feature in any of Natural England’s criteria or advice, in relation to this Local Plan. It is the whole site.</td>
</tr>
<tr>
<td>S12 Submitted HRA</td>
<td>HYD2 entry in Table 3.2 page 25</td>
<td>Disagree.</td>
</tr>
<tr>
<td>S12 Submitted HRA</td>
<td>HYD2 entry in Table 3.3 page 40</td>
<td>Agree.</td>
</tr>
<tr>
<td>NFDC47 Revised HRA</td>
<td>HYD2 entry in Table 3.2 page 28 “part of the site”.</td>
<td>My recommendation for Withdraw because the text: “part of the site” do not feature in any of Natural England’s criteria or advice, in relation to this Local Plan. It is the whole site.</td>
</tr>
<tr>
<td>NFDC47 Revised HRA</td>
<td>HYD2 entry in Table 3.2 page 28 “Criteria score should be ‘8’”.</td>
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<tr>
<td>NFDC47 Revised HRA</td>
<td>HYD2 entry in Table 3.3 page 43</td>
<td></td>
</tr>
<tr>
<td>BP40 Draft SA</td>
<td>Appendix 2, page 182 Delete first bullet point which states: “The site is within 400m of the New Forest SPA/SAC/SSSI.”</td>
<td>Withdraw. This is factually correct, as referred to and evidenced in this statement. Cont.....</td>
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</tbody>
</table>
16. In relation to HYD7 (Land west of Lower Mullins Lane) the Council (NFDC50 paragraph 22) comment that its priority will be securing a public right of way across the land which is privately owned, whilst not closing the door on the implementation of the whole SANGS proposals in the longer term.

1. Given the high priority that needs to be given to the delivery of the SANGS, is the allocation of the privately owned part of HYD7 in the plan justified and effective?

2. Should the plan refer only to the access link in relation to this land, which the Council sees as a priority and may be more deliverable?

3. What are the prospects for delivery of that part of HYD7 owned by the Town Council, given that longstanding proposals for open space which have not been delivered? Council to respond to the possible difficulties for early implementation highlighted in rep 123 (e.g. paragraph 2.12).

(I do not regard the merits of residential development on any part of the land at Mullins Lane as a matter for discussion at these hearings. It is not a matter that arises directly from the Proposed Modifications/supporting evidence.)

My response

16. 1 Please refer to document NFDC16 – NFDC Proposed Changes Schedule Consolidated list, dated January 2013 page 21 changes 3.27 and 3.28.

3. 27 I quote: “Amend site area of HYD7 to exclude land shown in blue below (the map). The reason is: “Recognition that the proposal may not be fully deliverable in the plan period.”

3. 28 I quote: “Amend paragraph to read: 3. 126 The proposals to provide 2.3 (changed to) 0.93 hectares of informal public open space. The reason is: “Consequential change.”

16. 2 The site referred to in paragraph 16. 1 above, is now being proposed as part of the HYD7 site for SANGS. What has changed?

16. 3 The Guarantee Trust of Jersey have confirmed in their representation 123, that their land is not available for SANGS, therefore it is still not fully deliverable in the plan period.

Cont.....
16. 4 Will the Council explain to the Inspector and the oral hearing(s) participants, what *legal process* they intend to adopt, when implementing and securing a public right of way across the land, which is owned by the Guarantee Trust of Jersey. How is it going to happen?

16. 5 In conclusion, this is another example of the Council’s ability to amend the actual proposed site boundaries, but in the case of the HYD2 site, the Council did not want to amend the site map in document **S11 (BP46)** the submitted Sustainability Appraisal. The Council were and are fully aware, what the consequences would have been, that is, the *whole site* would be within 400m of the New Forest SPA/SAC/SSSI/Ramsar site, and a **full Appropriate Assessment** needed to be carried out, before HYD2 could be proposed in the submitted plan for residential development.
**HYD2: Land adjoining Frost Lane**

Land adjoining Frost Lane, as shown on Map HYD2, is identified as a possible site for residential development, to provide for local housing needs in accordance with Policies CS12 and CS15 of the Core Strategy. Subject to the outcome of a site-specific Flood Risk Assessment, it is estimated that the site could provide around 12 dwellings.

In addition to policy requirements in the Core Strategy and Development Management policies in Section 2 of this document, development on this site would be subject to:

- a site-specific Flood Risk Assessment to determine the developable area of the site;
- the retention of important trees and hedgerows on the boundaries of the site;
- public open space, including provision of natural play space for children located within the residential development; and
- provision of a pedestrian link from the development connecting with existing routes to Tate’s Copse and the recreation ground.

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**Map HYD 2: Land adjoining Frost Lane**

Possible housing sites within Hythe and Dibden

3.95 Land off Cabot Drive, Dibden was allocated for a new school in the Local Plan. However, it is understood that this is now unlikely to take place. While some of the site will be retained for Education Authority development, any surplus land on this site could be appropriate for residential development.
HYD 3: Land off Cabot Drive, Dibden

Land off Cabot Drive as shown on Map HYD3 is identified as a possible site for residential development.

In addition to policy requirements in the Core Strategy and Development Management policies in Section 2 of this document, development on this site would be subject to:
- provision of appropriate vehicular, pedestrian and cycle access from Cabot Drive; and
- landscaping of the boundaries of the site in order to screen development from existing housing.

Map HYD3: Land off Cabot Drive

Small scale residential developments in Hythe and Dibden

3.96 Small scale residential developments will continue to be permitted on appropriate sites within the existing built-up area. When considering such developments, particular regard will be had to Core Strategy Policy CS2 (Design Quality) and the need for new development to contribute positively to local distinctiveness.

Employment at Hythe and Dibden

3.97 The Core Strategy does not require any new employment allocations at Hythe and Dibden and no new sites are proposed. However, it is proposed to extend the area covered by an existing employment allocation in the Local Plan (Local Plan Policy HD-15) which has not yet been implemented. The proposed allocation is extended to cover land fronting Southampton Road. Should the existing uses become redundant (petrol filing station and car sales), land in this area offers a good opportunity for new employment development in the town.
Map HYD1: Land at Forest Lodge Farm

3.109 The development of this site will provide around 40-45 new homes. Its development will assist in addressing local housing needs and provide wider community benefits including additional formal public open space and allotments.

Housing sites within Hythe and Dibden

3.110 Within the existing built-up area land off Cabot Drive, Dibden is allocated for residential development. Small scale residential developments will continue to be permitted on appropriate sites within the defined built-up area (as defined on the Proposals Map).

**HYD 2: Land off Cabot Drive, Dibden**

Land off Cabot Drive is allocated for residential development, including affordable homes in accordance with Policy CS15(d), and education development. The site will be developed in accordance with the following site-specific criteria:
- residential development to be located in the northern part of the site;
- retention of existing trees and hedgerow across the site;
- provision of vehicular, pedestrian and cycle access from Cabot Drive;
- provision of a pedestrian and cycle route through the site linking the residential development to the footpath/cycleway alongside Applemore playing fields;
- provision of public open space in accordance with Core Strategy Policy CS7, to include natural play space for young children on the site.

Map HYD2: Land off Cabot Drive
3.111 The land off Cabot Drive has been safeguarded for education development. However, the whole site is no longer needed for this purpose.

New employment development at Hythe and Dibden

3.112 The Core Strategy makes no provision for new employment land allocations at Hythe and Dibden. However, a previous proposal for employment development on land adjoining Jones Lane is carried forward into this Plan in an amended form.

<table>
<thead>
<tr>
<th>HYD3: Land between Jones Lane and Southampton Road, Hythe</th>
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<tbody>
<tr>
<td>Land between Jones Lane and Southampton Road, Hythe is allocated for employment development.</td>
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</tbody>
</table>

Map HYD3: Land between Jones Lane and Southampton Road

3.113 In the event that the existing uses (petrol filling station and car sales) on this site cease, land in this area offers a good opportunity for new employment development, close to the town centre.

Hythe Centre and Dibden Local Centre

3.114 Hythe town centre is an important shopping and commercial centre. The Core Strategy sets the strategy for town centres in Policy CS20.

3.115 The Town Centre Boundaries, Primary Shopping Areas and Secondary Shopping Frontages are defined on the Proposals Map (Inset for Hythe). Development Management policies for town centres are set out in Section 2 of this Plan. Within the Primary Shopping Area Policy DM15 applies. Within the Secondary Shopping Frontages, Policy DM16 applies. Policy DM17 applies elsewhere within the town centre boundary.

3.116 Map HYD-TC1 illustrates the policy areas shown on the Proposals Map for Hythe town centre. This includes the town centre boundaries, together with the Town Centre Opportunity Sites identified in Policy HYD4.
NFDC Response to Inspector’s Note 7 (ID/16)

1. NFDC47 Habitats Regulations Assessment (HRA) of the Submission Document and Main Modifications

1.1 The Council confirms Table 3.2 is unchanged in its entirety from that previously submitted.

1.2 Representations received from Mr. Tillyer (215) and Mr. Penny (226) have drawn attention to an editing error that has remained unnoticed in tables 3.2 and 3.3 of the various HRA documents from an early stage in the HRA work, including the screening statement (BP41), as well as the HRA of the Submitted Plan (S12) and the revised HRA published in October 2013 (NFDC47). However, the Council can give the Inspector firm assurances that while the tables erroneously referred to the 'Solent and Southampton Water SPA/Ramsar', all assessment work regarding the HYD2 Cabot Drive site has been in relation to the New Forest SPA/SAC/Ramsar site. This is evidenced by the fact that in table 3.2 the 'Relevant criteria' score is 9, and not 8, which it would have been in relation to the Solent and Southampton Water SPA/Ramsar site. The '9' score relates to the whole of the Cabot Drive site, and the site was given a score of '9' because a very small part of the site, in the south west corner, lies within 400 metres of the New Forest SPA/SAC/Ramsar site (see map below). As discussed below, in hindsight, at Submission stage this scoring should have been revised in HRA table 3.2 to '8', to take account of the policy wording that has been included in the submitted Plan (policy HYD2) to ensure that the part of the site developed for housing was over 400m from the New Forest SPA/SAC/Ramsar site. This correction is now included in the erratum referred to below.

1.3 The Council is issuing an erratum to documents S12 and NFDC47 to correct these editing errors. (The erratum will be document NFDC52, as attached). The only revision to the assessment that is needed is to reduce the relevant criteria score in table 3.2 down from '9' to '8' to take account of detailed policy wording for the HYD2 site. Other corrections are to correct editing errors.

1.4 Throughout the preparation of the Plan, the Council has had appropriate regard to the fact that a very small part of the HYD2 lies within 400 metres of the boundary of the
New Forest SPA/SAC/Ramsar site. The map below illustrates how little of the site is within 400m of the New Forest SPA/SAC/Ramsar site. The Council has had particular regard to this fact in considering how this site could be developed appropriately. Accordingly, policy HYD2 specifically states that residential development on the site should be located in the northern part of the site. This is to ensure that the housing on the site is located more than 400 metres away from the New Forest SPA/SAC/Ramsar site.

1.5 The Inspector refers to differences between the draft Sustainability Appraisal (BP40) and the submitted Plan Sustainability Appraisal (S11) for the assessment of the Cabot Drive site. There was an error in the draft SA (BP40), as it incorrectly stated the site was within 400m of the New Forest SPA/SAC/Ramsar site. This was corrected in the SA for the Submitted Plan. (An erratum to BP40 is included in NFDC52).

Map showing 400m distance from New Forest SPA/SAC/Ramsar site in the vicinity of the HYD2 site.

1.6 On the Inspector’s final point relating to this matter, the Council confirms that none of the above affects the mitigation requirements set out in the SPD.

2. MAR2 Land at Park’s Farm, Marchwood

2.1 The Council has granted temporary planning permission to enable Southampton Football Club to use the land at Park Farm Marchwood as part of its training facilities for a period of 5 years. This temporary use has been permitted on the understanding that it does not prejudice the implementation of emerging policy MAR2 during the plan period (i.e. before 2026). The five year permission expires in October 2018, leaving 7 years of the plan period for implementation of the housing allocation. This was acceptable to the Council.
<table>
<thead>
<tr>
<th>Document</th>
<th>Table/Para. Page no.</th>
<th>Correction</th>
<th>Comment</th>
</tr>
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<tbody>
<tr>
<td>S12 Submitted HRA</td>
<td>HYD2 entry in Table 3.2, 'Initial screening of plan policies' page 25</td>
<td>Comment column should read: Part of the site is within 400m of the New Forest SPA/SAC/Ramsar.</td>
<td>This is an editing error which gone unnoticed since the original HRA screening statement was prepared in 2010.</td>
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<tr>
<td>S12 Submitted HRA</td>
<td>HYD2 entry in Table 3.2, 'Initial screening of plan policies' page 25</td>
<td>Relevant criteria column should be scored '8'</td>
<td>The scoring takes account of wording in Policy HYD2 to limit residential development to the part of the site which is further than 400m from the New Forest SPA/SAC/Ramsar site.</td>
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<tr>
<td>S12 Submitted HRA</td>
<td>HYD2 entry in Table 3.3, 'Summary of Effects on European sites caused by the plan alone', page 40</td>
<td>Site(s) affected column should read: New Forest SPA/SAC/Ramsar</td>
<td>This is an editing error which gone unnoticed since the original HRA screening statement was prepared in 2010.</td>
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<tr>
<td>BP40 Draft SA</td>
<td>Appendix 2, page 182 HYD-BU-22</td>
<td>Delete first bullet point which stated: 'The site is within 400m of the New Forest SPA/SAC/SSSI.'</td>
<td>This is factually incorrect.</td>
</tr>
</tbody>
</table>
Address: Kings Copse Road, Blackfield
Parish: Fawley
Site Size (Ha): 2.2

Site Description:
The site is situated to the west of Blackfield and covers an area of 2.2 hectares. The site is agricultural grassland with boundary trees and hedgerows. It is in single ownership.

Assessment Summary:
This site could provide affordable housing to meet a local housing need. It is in a reasonably sustainable location, with good access to footpaths and cycleways, and adequate access to facilities, shops and services at Blackfield Local Centre and public transport connections. It has poor access to employment.
This site has the following issues:
* The site is within 400m of the New Forest SAC/SPA/SSSI and development of this site could cause harm to the SAC/SPA as a result of increased recreational activity. A full assessment of the impacts will be considered as part of the Habitat Regulations Assessment.
* The site is in close proximity to the New Forest National Park and development could have a negative impact on the setting of the National Park which would require mitigation. Further investigation may be required.
* The development of this site would result in the loss of land which is part of the backup grazing land resource for the New Forest.
* The development of this site would have a negative impact on the character of the countryside and on the locally important views from the Roman Road.
BLAK-01A | Land at Kings Copse Road (Last) (Not in DPD)

Address: Kings Copse Road, Blackfield

Parish: Fawley

Site Size (Ha) 2.2

Site Description
The site is situated to the west of Blackfield and covers an area of 2.2 hectares. The site is agricultural grassland with boundary trees and hedgerows. It is in single ownership.

Assessment Summary:
This site could provide affordable housing to meet a local housing need. It is in a reasonably sustainable location, with good access to footpaths and cycleways, and adequate access to facilities, shops and services at Blackfield Local Centre and public transport connections. It has poor access to employment.

This site has the following issues:
* The site is within 400m of the New Forest SAC/SPA/SSSI and development of this site could cause harm to the SAC/SPA as a result of increased recreational activity.
* The site is in close proximity to the New Forest National Park and development could have a negative impact on the setting of the National Park which would require mitigation.
* The development of this site would have a negative impact on the character of the countryside and on the locally important views from the Roman Road. Although it would be possible to provide a safe access to the site via Kings Copse Road, this would require the upgrading and adoption of a forest track which would also have a negative impact on the character of the area.
Address: Kings Copse Road, Blackfield
Parish: Fawley
Site Size (Ha): 1.8

Site Description:
The site is situated to the west of Blackfield and covers an area of 1.8 hectares. The site is agricultural grassland with boundary trees and hedgerows. It is in multiple ownerships.

Assessment Summary:
This site could provide affordable housing to meet a local housing need. It is in a reasonably sustainable location, with good access to footpaths and cycleways, and adequate access to facilities, shops and services at Blackfield Local Centre and public transport connections. It has poor access to employment.

This site is not considered to be suitable for allocation for development. The main reasons the site is not considered suitable are:
* part of the site is not available for development

The owners of part of the site have told the Council that they are not interested in promoting this site for residential development.

This site has the following additional issues:
* The site is within 400m of the New Forest SAC/SPA/SSSI and development of this site could cause harm to the SAC/SPA as a result of increased recreational activity. A full assessment of the impacts will be considered as part of the Habitat Regulations Assessment.
* The site is in close proximity to the New Forest National Park and development could have a negative impact on the setting of the National Park which would require mitigation. Further investigation may be required.
* The development of this site would result in the loss of land which is part of the backup grazing land resource for the New Forest.
* The development of this site would have a negative impact on the character of the countryside and on the locally important views from the Roman Road.
BLAK-01D | Land at Kings Copse Road (South) (Not in DPD)

Address: Kings Copse Road, Blackfield
Parish: Fawley
Site Size (Ha) 1.8

Site Description
The site is situated to the west of Blackfield and covers an area of 1.8 hectares. The site is agricultural grassland with boundary trees and hedgerows. It is in multiple ownerships.

Assessment Summary:
This site could provide affordable housing to meet a local housing need. It is in a reasonably sustainable location, with good access to footpaths and cycleways, and adequate access to facilities, shops and services at Blackfield Local Centre and public transport connections. It has poor access to employment.

This site is not considered to be suitable for allocation for development. The main reasons the site is not considered suitable are:
* part of the site is not available for development
* the owners of part of the site have told the Council that they are not interested in promoting this site for residential development.

This site has the following additional issues:
* The site is within 400m of the New Forest SAC/SPA/SSSI and development of this site could cause harm to the SAC/SPA as a result of increased recreational activity.
* The site is in close proximity to the New Forest National Park and development could have a negative impact on the setting of the National Park which would require mitigation.
* The development of this site would result in the loss of land which is part of the backup grazing land resource for the New Forest.
* The development of this site would have a negative impact on the character of the countryside and on the locally important views from the Roman Road. Although it would be possible to provide a safe access to the site via Kings Copse Road, this would require the upgrading and adoption of a forest track which would also have a negative impact on the character of the area.