New Forest District Council’s Local Plan Review 2016-2036

LUC response to Terence O’Rourke’s review of Green Belt sites to the south of Ringwood

1.1 In July 2016 Pennyfarthing commissioned Terence O’Rourke Ltd to review LUC’s New Forest District Green Belt Study¹, specifically the assessment of Green Belt land south of Ringwood, referred to as ‘South Ringwood’.

1.2 The Green Belt parcels in question are inner Green Belt parcel RI07 and outer Green Belt parcel RI13.

1.3 Terence O’Rourke’s review is in the context of Pennyfarthing’s proposed development site to potentially support 750 homes considered in the public consultation on New Forest District Council’s Local Plan Review 2016-2036 Part One: Planning Strategy Initial Proposals. The southern part of the site identified within the Local Plan Review is within the control of Pennyfarthing.

1.4 Terence O’Rourke contend that LUC’s application of the methodology for assessing purposes 3 and 4² of the Green Belt was flawed when applied to inner Green Belt parcel RI07 and outer Green Belt parcel RI13. They also query LUC’s assessment of Green Belt boundary strength for both of these parcels.

1.5 This document outlines these concerns and provides LUC’s initial response.

Comments on Terence O’Rourke’s assessment of Green Belt parcels

Differing judgements on purpose 3

1.6 The Terence O’Rourke scores for purpose 3 differ from LUC’s for both RI07 and RI13. LUC rated these parcels as making a ‘Strong’ contribution to purpose 3 whereas Terence O’Rourke rated these parcels as making a ‘Moderate’ contribution to purpose 3.

Urbanising influences

1.7 The differences in these scores stems, in part, from what is considered to be an ‘urbanising influence’ on a given parcel, which is a key factor that informs whether a parcel has a stronger relationship with the countryside or the urban area.

1.8 With regard to RI07, Terence O’Rourke disagree with our assessment that RI07 lacks urbanising development (para 3.3 of Terence O’Rourke Green Belt Study). They contend that the residential development to the west of the parcel represents urbanising development. In response, we consider that this residential development is not significant enough to constitute urbanising development.

1.9 Terence O’Rourke also dispute LUC’s statement that development to the west of RI07 is strongly separated from the parcel by Christchurch Road and the raised bank along the boundary (para 3.5). This is due to the fact three residential dwellings lie to the east of Christchurch Road, immediately adjacent to the parcel boundary in the north-western corner. However, we suggest these dwellings do not constitute enough development to significantly weaken the contribution of the parcel to safeguarding the countryside from encroachment. Furthermore, in our opinion the

¹ New Forest District Green Belt Study (2016) http://www.newforest.gov.uk/CHttpHandler.ashx?id=32070&p=0
² Purpose 3 – to assist in safeguarding the countryside from encroachment; Purpose 4 – to preserve the setting and special character of historic towns
change in elevation (2m or more) between the parcel and adjacent development helps to create a
distinction between the two – hence the 'Strong' rating.

1.10 Terence O'Rourke, in relation to the previous point, are of the opinion that the presence of sheds,
other structures and the storage of vehicles such as tractors, caravans and vans creates a
cluttered urbanising influence within the parcel (para 3.5). However, it is our view that temporary
structures and storage uses do not necessarily constitute urbanising development and are
commonplace in the countryside. They may detract from landscape character and quality but
should not influence the assessment of Green Belt contribution.

1.11 With regard to both RI07 and RI13, Terence O'Rourke disagree with our assessment that the
football pitches, buildings and allotments do not constitute significant urbanising features (paras
3.6 and 4.5). They make the point that the football ground also contains a parking area and that
the buildings include a clubhouse, rifle range and spectator stand. Additionally, the floodlighting
illuminates the area at night and can be seen from surrounding roads. However, such land uses,
although commonly associated with the urban edge, don't necessarily detract from openness. In
this case they are surrounded on all sides by open fields and therefore retain a strong relationship
with the countryside and are not, in this context, significant urbanising elements. We also
contend that the built footprint of the football club is very small in the context of RI13 as a whole.
Furthermore, rifle ranges are not typically considered an urban land use. With regard to the
floodlights, we agree that the lighting may have an impact on landscape character and could be
considered to blur the distinction between settlement and countryside, however in this location
and surrounded by open land, we feel that its impact is not significant.

1.12 With regard to RI13, Terence O'Rourke state that LUC's study fails to mention the significant area
of football fields and allotments within the assessment table (para 4.5). These should perhaps
have been noted, but the assessment table is considering RI13 as a whole, which is mostly
agricultural land.

1.13 In general, Terence O'Rourke believe there are inconsistencies within the Green Belt Study in
relation to how allotments and sports pitches are assessed. They cite several examples:

- They disagree with LUC's description of the recreational amenity use and proximity of
  urbanising influences in parcel NM19 as limiting the contribution to countryside encroachment
  (para 4.6). In response, we argue that the context here is different; NM19 is contained on 3
  sides by the urban edge so there is less sense of a relationship with the wider countryside.

- Terence O'Rourke also disagree with our assessment that the sports fields associated with the
  school in parcel NM13 are distinguishable from the wider countryside (para 4.6). However,
  we would suggest that this is a more contained location, both by the urban area and by
  wooded margins that create some separation from the wider countryside. The parcel is still
  rated 'Relatively strong' for purpose 3.

- Lastly, in parcel LY06 the allotments are described by us as having a functional use and this
  use increases its association with the built-up area (para 4.6). Although Terence O'Rourke
  disagree with this, it is our view that there is a closer relationship between the allotments and
  urban edge at LY06 than is the case for South Ringwood. Allotments are not inherently
  urbanising – they occur in rural locations too.

Visual connection with the urban edge

1.14 Terence O'Rourke state that LUC fail to acknowledge the visual interrelationship between parcel
RI07 and the urban edge (para 3.4), and suggest that RI07 cannot be considered open
countryside due to the influence of urban development along Christchurch Road (para 3.6).
However, it is our view that proximity to, and visibility of, an urban edge is not in itself reason to
say that land cannot be considered to constitute countryside, and to make a strong contribution to
preventing encroachment. In terms of landscape character and quality this location might not
rate particularly strongly but, as mentioned in para 2.13 of Terence O'Rourke's assessment,
factors such as this should not influence the assessment of Green Belt contribution. There would
need to be a stronger relationship with the urban edge, or some degree of separation from the
wider countryside for RI07 to be considered to make a moderate or weaker contribution to
purpose 3, and this is not the case.
1.15 Terence O'Rourke compare the assessment of RI08 to RI07 (para 3.4), the latter of which scored more strongly. They contend that both parcels are largely undeveloped and share a visual relationship with the urban edge. As such, RI07 should be given a lower score with regard to purpose 3. However, as mentioned previously, visibility of an urban edge isn't considered a major factor in the assessment of Green Belt land. The reason why RI08 scored moderately when parcel RI07 scored strongly is the extent to which RI08 is contained by development, with a prominent industrial area to its north. The 'horsiculture' land use of RI08 was not significant to the rating given.

**Distinguishing between inner/outer parcels**

1.16 With regard to RI13, Terence O'Rourke raise the point that the descriptive text on RI13 concentrates on the 'outer' part of the parcel and does not include any description of the 'inner' parcels and their influence (para 4.3). However, the methodology used in our Green Belt Study involved the definition of 'outer' parcels in cases where land adjacent to a settlement – the 'inner' parcel – was rated moderate or weaker. An outer parcel was defined and assessed cumulatively alongside the associated inner parcel. As such, we felt that there was no need to repeat the assessment already carried out for the inner parcel, so the focus in our commentary was on how inclusion of the outer part of the parcel affects the contribution of the enlarged area.

1.17 We do not describe the parcel boundaries of the combination of parcels under the heading 'Parcel boundaries' because as noted above, there is no need to repeat the inner parcel assessments. The nature of separation/connection between the inner and outer parcel areas is what influences the rating of the area as a whole.

1.18 The assessment of contribution to each purpose considers the outer parcel area in combination with the relevant inner parcel(s), in this instance RI08 and RI12. We have already established that the inner part makes no more than a moderate contribution to any purpose, so we are now considering whether, in combination with the outer parcel area, the contribution is any stronger. For RI13 we believe that the outer area does make a stronger contribution to purpose 3. We do agree with Terence O'Rourke in that the description here should refer to the inner areas as having a stronger relationship with the settlement; however the judgement is still valid because the outer area has a weaker relationship with the settlement. The level of contribution of a parcel as a whole equates to the highest level of contribution associated with either the inner or outer area.

1.19 With regard to the sentence “See RI07, RI08, RI12, RI09 and RI10 for description of settlement-edge parcels” under the heading 'Development/land use' which Terence O'Rourke refer to in para 4.3, RI09 and RI10 were excluded from the RI13 parcel area because they do not lie between the defined outer area and the inset settlement edge – but it was felt that their proximity warranted mention.

1.20 Terence O'Rourke make the point that there is no discussion on how the combined parcel relates to the settlement of Ringwood, under the heading 'Relationship between settlement and countryside' (para 4.3). Instead, LUC focus on parcel RI07, which does not form part of the outer parcel. However, RI07 is adjacent to the countryside such that, in combination with the RI13 outer area, constitutes an area of similar farmland that relates more strongly to the countryside than the town. It was therefore necessary to mention RI07.

1.21 Terence O'Rourke conclude that RI13 should be sub-divided into two parts: the western part (RI13 part A) should be rated as a 'Moderate' contribution; and the eastern part (RI13 part B) should be rated as 'Relatively strong' contribution (para 4.8). On reflection we accept that a 'Strong' rating was perhaps too high for the western part, but feel it was correct to judge that extending RI08/RI12 to include the area to the south would constitute a greater degree of encroachment. A 'Relatively strong' rating would therefore be more appropriate.

**Differing judgements on purpose 4**

1.22 LUC rated RI07 and RI13 as making a 'Moderate' contribution to purpose 4. However, Terence O'Rourke concluded that RI13 should be sub-divided into two parts. They rated the western part of RI13 (part A) as making a 'Relatively weak' contribution to purpose 4 and the eastern part of RI13 (part B) as making a 'Moderate' contribution to purpose 4.
**Inner Green Belt parcel RI07**

1.23 LUC’s assessment of RI07 states that development would not detract significantly from the special character of the town. Terence O’Rourke therefore question why the parcel scored ‘Moderate’ rather than ‘Relatively weak’ (para 3.8 to 3.13). This is just a question of judgement: RI07 was on the lower side of ‘Moderate’ in our view, so not far off being ‘relatively weak’.

**Outer Green Belt parcel RI13**

1.24 With regard to RI13, LUC stated that “The open agricultural fields play a role in the setting of Ringwood and its relationship with the National Park”. Terence O’Rourke consider that this is unjustifiable given that LUC assessed RI08 and RI12, constituent parts of RI13 as ‘Relatively weak’ (para 4.9). Our view is that the openness of the area is important in being able to appreciate the transition to the National Park landscape; the fact that RI08 and RI12 were only considered to make a ‘Relatively weak’ contribution doesn’t mean that inclusion of the area to the south shouldn’t tip this into a ‘Moderate’ rating.

**Green Belt boundary strength**

1.25 Terence O’Rourke query LUC’s assessment of Green Belt boundary strength for both RI07 and RI13.

**Inner Green Belt parcel RI07**

1.26 Terence O’Rourke disagree with LUC’s view that there are no other boundaries within parcel RI07 that would provide an equally strong Green Belt boundary. They feel that Long Lane would provide an equally strong Green Belt boundary (para 3.15). However, it is LUC’s view that Long Lane lacks the landform change that distinguishes the parcel and adjacent countryside from Christchurch Road.

**Outer Green Belt parcel RI13**

1.27 Terence O’Rourke agree with LUC’s statement that Crow Lane and Green Lane would form a strong Green Belt boundary because it corresponds to the boundary along which they have subdivided parcel RI13 (para 4.12). However, our comments on Green Belt boundaries relate to the clarity of boundary that would be created, not to a wider consideration of potential impact on the contribution of adjacent land to Green Belt purposes. Crow Lane and Green Lane were not recommended by LUC for revised boundaries as the scope of our study did not extend to recommendations for Green Belt release and consequent boundary changes.

**LUC**

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