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Christchurch Neighbourhood Plan HRA

Addendum to accompany the submission version of the Plan

Durwyn Liley & Emily Rush

FOOTPRINT ECOLOGY, FOREST OFFICE, BERE ROAD,
WAREHAM, DORSET BH20 7PA
WWW.FOOTPRINT-ECOLOGY.CO.UK
01929 552444

FOOTPRINT ECOLOGY

Footprint Ecology is a small, employee-owned, ecological consultancy with an ethical focus. Founded in 2004 and based in Purbeck, Dorset we are catalysts for change, collaborating with organisations that share our commitment to sustainability and social responsibility. We create practical solutions to complex ecological challenges across a diverse portfolio including nature conservation, outdoor recreation and associated strategic planning.

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1. Introduction

1.1 This document is a short addendum to the Habitat Regulations Assessment (HRA) report for the Christchurch Neighbourhood Plan ('the Plan'). A detailed HRA report was previously produced by Footprint Ecology (on behalf of Christchurch Town Council) to accompany the pre-submission draft ('Regulation 14') version of the Plan. Following consultation, the Plan has been revised ready for submission.

1.2 This addendum is therefore necessary to review the changes made to the Plan and check whether these alter or change the conclusions made in the previous HRA report. The addendum should therefore be read in conjunction with the submission HRA.

Overview of changes

1.3 All changes made to the Plan have been systematically checked and considered in light of the previous HRA report. The changes are mostly relatively small text changes that have no implications for the HRA or the conclusions made in the HRA report. The key change is the removal of Policy 7, Protected Habitats Sites, which is referenced a number of times within the HRA and considered as part of the appropriate assessment.

2. Policy 7: Protected Habitats Sites

2.1 Policy 7 stated that development will only be permitted where it would not lead to an adverse effect on integrity, either alone or in-combination with other plans or projects, on any European sites. It also set out mitigation requirements relating to the Dorset Heaths, New Forest and River Avon.

2.2 BCP Council in their consultation response, recommended deletion of the policy as:

2.3 *"elements of it largely repeat existing LP policies and regard must be had to not duplicating policy (see NPPF Section 3 para 16(f). Further, and notwithstanding this, the policy only picks up on specific elements in the SPD, which appear to be selectively chosen. When compared to the SPDs they are not wholly consistent with the measures recommended to be in place, set out in the adopted SPDs. As such, other factors, not covered, may be necessary to be demonstrated to ensure*

the development will not lead to adverse impacts on the integrity of national, European and internationally important sites. Again, these are matters for strategic policy and including these within the neighbourhood plan is inappropriate and will create ambiguity and uncertainty for decision makers. "

2.4 Natural England have advised that they view the comments made by BCP as appropriate and reflective of the Government's policy framework. Natural England's consultation response states that they are "*in agreement that the statutory duties on the authority duties under the NERC Act 2006, Habitats Regulations 2017 as amended etc as well as the legal requirements in the regulations and Government policy in the NPPF provide sufficient protection when the Council is determining applications which may have an adverse effect on the integrity, alone or in-combination, on habitats sites and internationally designated sites. Natural England would have no objection to the policy being deleted.*"

2.5 The HRA report refers to Policy 7 in a number of places to provide reassurance that development would not proceed unless adverse effects on site integrity were ruled out, alone or in-combination. The policy also provided details of strategic mitigation requirements that are relevant and as such was screened in for consideration within the appropriate assessment of the HRA.

2.6 It can be seen from the comments received from BCP and NE that the reassurance the policy provided on HRA matters can instead be found in strategic policy and the protection afforded by the legislation.

2.7 Neighbourhood plans form part of the development plan for a planning authority and must be in general conformity with the strategic policies of the development plan in force at the time. The relevant adopted plan in this case is the Christchurch and East Dorset Local Plan Core Strategy (adopted in 2014) and saved policies of the earlier Christchurch Borough Council Local Plan. While this is clearly dated, the text within the latest version of the Plan (at 4.23) still provides up to date details on the risks to European sites and mitigation strategies in place.

3. Conclusions

3.1 As such the changes made to Plan do not affect the overall HRA conclusions or undermine the HRA report produced for the Regulation 14 consultation.

The Christchurch Neighbourhood Plan (submission version) has therefore been subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017 as amended. The HRA can conclude that the Plan is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects, alone or in-combination, on European site integrity can be drawn.