

**Application: P\_OUT\_2023\_01166**

**Location:** Land to the South of Ringwood Road, Alderholt

**Description:** Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health facilities; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, and new roads, access arrangements and associated infrastructure (Outline Application with all matters reserved apart from access off Hillbury Road)  
<https://planning.dorsetcouncil.gov.uk/plandisp.aspx?recno=394829>

.....  
**Response of the East Dorset Environment Partnership (EDEP)**

**Thank you for the opportunity to comment on this application to which EDEP objects strongly.** As detailed below, it does not comply with national or local plan policy and is unsustainable.

- .....
1. Principle of development
  2. Issues not yet addressed
  3. Hydrology and soils
  4. Biodiversity
    - 4.1 Hedgerows
    - 4.2 Bats
    - 4.3 Birds
    - 4.4 Amphibians and Reptiles
    - 4.5 Invertebrates
    - 4.6 Invasive species
  5. SANGs
  6. Conclusions
- .....

**1. Principle of development**

To put this application into context, the total of 1700 homes is more than the combined total allocations for Core Strategy New Neighbourhoods at Wimborne (Cuthbury, Cranborne Road and South of Leigh Road) and West Parley (Land East and West of New Road).

Being located outside of the Green Belt, Alderholt has become a target for inappropriate development. The development would be outside of the policy envelope as defined in **Saved Policy A1** of the **East Dorset Local Plan, 2002**. A Neighbourhood Plan for Alderholt is being prepared and will provide informed data on what is realistically achievable and sustainable. It must be taken into consideration in any assessment of housing and infrastructure needs for the settlement.

The Dorset Local Plan Review Options consultation, 2021, was poorly received and is currently being redrafted based on updated evidence. That evidence has not been used to inform this application.

The 2021 consultation proposed two options for Alderholt. Option 1 was for additional housing up to 300 in the plan period intended to meet primarily local needs. At the time,

much reliance had been placed on wishful thinking that it might be possible to reinstate the former railway line as a trailway, even though the land is in multiple private ownership. Option 2 was for a greatly expanded settlement but openly acknowledged *concerns about the sustainability of Alderholt as a location for significant growth and whether it would constitute sustainable development. This is primarily due to the lack of opportunities for travel by alternatives to the private car and the lack of employment opportunities in the immediate area. Significant growth would need to ensure that the new settlement would be self-contained to reduce the need for car-based trips.* This option received widespread criticism not only from Dorset based communities and organisations but also from Hampshire County Council and those within the New Forest area including Fordingbridge and NFDC that would suffer the damaging consequences of additional traffic (including HGVs) and demand for all services. The Consultation recognised (18.3.5) that many of the roads in the surrounding area are of a rural nature and any significant development would need to improve access to the settlement including links to nearby towns. It suggested that anything of this scale would need to be strategic in nature and work with the neighbouring LPA. **There is no evidence of this in the application documents.** Para 18.4.6 of the Local Plan consultation states, *If the significant expansion was to be proposed, the council would need to be convinced that the quantum of development was deliverable in order to create a self-contained settlement, with appropriate levels of community infrastructure and employment to create a sustainable town.* **This application does not do this and is not proposing to deliver a sustainable settlement.**

It does not comply with the following **Christchurch and East Dorset Local Plan Part 1: Core Strategy 2014** policies:

**KS1:** it has not demonstrated that the economic, social and environmental conditions in the area would be improved: the evidence presented indicates the opposite.

**KS2:** identifies Alderholt as a Rural Services Centre; the proposed scale of development would overwhelm community, leisure and retail facilities not only within Alderholt but also in Fordingbridge.

**KS4:** the current plan covers the period to 2028. Any changes to housing provision and its location will be allocated in the emerging county wide Local Plan.

**KS5:** the employment allocation would add to traffic problems in the area (particularly HGVs) with few jobs created.

**KS9, KS11:** Alderholt does not have access to prime transport corridors. Alderholt Parish Council's response to the application (and that of Cranborne and Edmondsham Parish Council) highlights some of the worst problems with the narrow country lanes that link it to employment and shopping centres and to the strategic transport network. The suggested local widening of roads is totally unrealistic because of topography and land ownership, historic buildings (Cranborne and Fordingbridge) and bridges (Harbridge and Fordingbridge): many of the narrow points include irreplaceable ancient boundary banks and species rich hedgerows. It is not just a question of giving way to an oncoming wide vehicle: it can mean several vehicles having to back up. Noise levels from HGVs in Fordingbridge are barely tolerable now. There has been no consideration of the impact on cyclists of additional

vehicular traffic and vice versa: frequently they are responsible for holding up vehicles along these routes when overtaking is not possible. With the changes made to the Highway Code on 29 January 2022, they have every right to assume priority and must not be put at risk.

In addition to the parish councils' informed comments on traffic and the unsustainability of the location, we wish to highlight the need to consider also the frequent surface flooding of roads in the area and the problems being experienced with climate change and increased duration and severity of heavy rain. Batterley Drove is subject to frequent surface flooding so that vehicles are confined to the centre of the road, having to use it as a single lane. Other serious and frequent surface flooding occurs closer to Verwood and along the B3078, both immediately west of Alderholt and on the outskirts of Fordingbridge where flooding requires cars to cross to the wrong side of the road on a blind bend. Roads become impassable in small saloon cars with little ground clearance. Problems due to both this and to narrow road widths preventing two HGVs passing each other have not been considered adequately. Hampshire Highways Authority have direct control over the sections of roads within their county. In their response to the HMWP Partial Update 2023, Dorset Council commented on their sections of the C102 and the notorious Bakers Hanging Junction. Although this is a key part of the route from Alderholt to the west, the problems at this junction are dismissed by the applicant: *No mitigation is proposed separate to any mitigation being undertaken for highway capacity.* Nonetheless para 7.82 says this is the most likely route for construction traffic.

**We object strongly to detailed consideration of this serious issue being deferred to a later stage in the planning process.** It is fundamental to the whole proposal with serious implications particularly as the application is for **full planning consent for the access off Hillbury Road.**

**ME1:** the proposals would destroy an existing coherent ecological network. The applicants have ignored the existence of habitats immediately to the east ie the other side of Hillbury Road, presumably because the land is in Hampshire [Section 4 below]. The summary of biodiversity issues in the ES Main Text gives a very different impression to the evidence presented in the ecological reports and omits important relevant information.

**ME2:** While it is intended to phase the delivery of the SANG compartments in line with phasing of development, any prior mineral extraction would affect noise and dust levels and potentially drainage and habitats. We question the suitability of the eastern SANG and its compliance with policy guidance. It would be bisected by a major road (even though the applicants intend eventually to partially block off a section of Ringwood Road) and would provide a circular walking route that is only half the required length. It is adjacent to the proposed employment area (an industrial site) and, if the mineral allocation at Midgham Farm is included in the Hampshire Minerals and Waste Plan Partial Update, would be directly opposite a large minerals site that would be worked for c.16 years. This is discussed in more detail in Section 5 below.

Assessment of current recreational impact on Cranborne Common SSSI was restricted to three hot summer days in 2022. This is inadequate [Section 4 below].

**ME3:** soil carbon has not been addressed.

**ME7:** the LLFA has asked for further groundwater monitoring which they estimate will take at least a year. If prior extraction of minerals were to proceed and the voids filled with unwanted clay as is proposed, this would affect infiltration, groundwater, run-off and retained natural habitats. This in turn would affect SUDs design (ME6). There is no discussion of the possible need to import material or if it is intended to restore excavated land to a lower level and the ecological and landscape implications of doing this [Section 3 below].

**HE2:** it has not demonstrated how more than doubling the size of the village in such a prominent position is compatible with or improves its surroundings.

**HE3:** similarly it does not seek to protect or enhance the landscape character of the area as evidenced by responses from the CC & WW AONB and New Forest National Park.

**LN3:** Of particular concern is the very real risk that viability assessment of the proposal will result in failure to deliver adequate affordable housing. This has been a real problem in Alderholt for many years with allocations being reduced to zero on some sites. Policy requires up to 50%; we suggest that 50% should be mandatory here. Viability should be established by the District Valuer prior to granting any outline consent and be a legally binding commitment. Endless whittling away to reduce this figure because of “unforeseen circumstances” should be precluded in conditions. The circumstances should be identified **now** as part of the outline application.

**LN6:** we question whether adequate consideration has been given to this policy and the suitability of the location for an 80 bed care home so close to the employment allocation and a new busy roundabout (that will be used by construction vehicles for the whole development) and is directly opposite a potential Hampshire minerals site. There is no discussion of staffing, their transport needs, medical and other services.

.....

## **2. Issues not yet addressed**

The applicants have given no indication of timescale. Full planning consent for the construction of a new access off Hillbury Road that may never be used cannot be condoned: it would be unsustainable.

Despite the far reaching consequences of a development of this size the applicants intend to leave much critical technical assessment until a far later stage in the planning process. EDEP considers this is totally unacceptable.

Up-to-date evidence on the 5 year housing land supply is required. The 2021- 2022 Dorset Council report clearly identifies that shortfalls have been due very largely to the requirement for nutrient neutrality. The recently introduced mechanism for offsetting has altered this situation considerably as has completion of other large scale housing developments that have delivered higher housing numbers than anticipated in Core Strategy.

In addition and notwithstanding any housing land supply considerations, it is essential that any site must be deliverable. This is defined in NPPF Annex 2 as:

*To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

There are numerous unresolved issues with the application that must be addressed before compliance (or otherwise) with the NPPF deliverability requirements can be determined. They include:

- Groundwater monitoring and the impact of prior mineral extraction on hydrology
- Extent and quality of the safeguarded minerals (sand and gravel)
- Land restoration proposals including changes to landform, soil composition, depth and characteristics
- The impact of prior extraction of minerals on biodiversity
- The impact of prior extraction of minerals on Alderholt's residents
- Nutrient budget calculation for the R Avon catchment must be agreed by NE
- Roads. Planning statement para 5.18 proposes leaving a review of road widening need until the detailed design. Access problems are acknowledged in the Application form which records "Uncertain about Alderholt's accessibility".
- Public transport
- Realistic viability assessment once all the above are taken into consideration
- Current visitor use of Cranborne Common, impact of additional visitors to other designated heathland sites including displacement to the New Forest both during and post development.

ES Technical Appendix 9.1 Annex 3 warns of the limitations of the survey work that has been carried out. The report is a PEA only: ABR advise that reported data are valid for just 18 months. The bird survey has already passed this period and the others will do so later this year (2023). Furthermore the PEA has not assessed the impact of the proposals on the wider landscape including that immediately adjacent to the proposed development to the east of Hillbury Road. Para 3.72 states, *For a Reserved Matters application, update surveys will be required to determine any mitigation requirements with regards to any protected species which are highly mobile*. This has implications for the site layout.

#### Solar farms and Sleepbrook Farm

The applicants refer to a consented 13.2ha solar farm (in addition to the existing 12.7ha one at Cross Roads Plantation. However, the planning consent granted on 21.9.2015 for that at Warren Farm Park may have lapsed as work should have started within 3 years of the permission. The application documents indicate installation of a third one that would effectively separate the SANG from Cranborne Common.

- There has been no assessment of the impact of this on **nightjar**: it would include foraging areas mapped in the 2021 Bird Survey report.
- There is no discussion of what is to become of Sleepbrook Farm, the associated buildings and track from Hillbury Road to the site boundary on the west.
- Is the track to be retained for construction and maintenance of the proposed solar farm? Underground routing of cables and other infrastructure that may affect drainage and biodiversity should be taken into consideration at this stage.
- Two planning applications for Sleepbrook Farm for glamping units and an associated 1.2ha SANG that includes 145m of new hedgerow (60% hawthorn, 30% blackthorn and 10% dog rose) plus native tree planting are under consideration.

Cumulative impact

The ES has considered only some of the consented planning applications in the area. They have omitted all the consented and proposed minerals and waste developments (Hampshire MPA) including those that are currently under consideration as part of the Hampshire Minerals and Waste Plan Partial Update consultation (2023) particularly adjacent land the other side of Hillbury Road.

Others omitted are:

- P/FUL/2022/03125 Phase 3 Potterswood Verwood for 38 dwellings (approved).
- Two applications for Sleepbrook Farm (see above) that is within this application site. The claim that the land at Alderholt Meadows is in the ownership of the applicant is inconsistent with the ownership claim on the applications for Sleepbrook Farm.
- Biodiversity of land N of Ringwood Road (approved PA3/19/2077).
- Forest Design Plans for Ringwood North and Somerley.

.....

**3. Hydrology and soils**

The Flood Risk Assessment, 4.6.2, identifies that *the Site is situated above a Secondary A aquifer. The superficial deposits are classified as a Secondary A aquifer. The groundwater vulnerability for The Site is medium to high.* 4.6.3 states that *the groundwater levels beneath The Site are currently unknown and are subject to confirmation from further winter groundwater monitoring prior to the detailed design stage.* EDEP considers this approach is unacceptable.

We note that the LLFA has advised groundwater monitoring should be over a period of 1 year and must be provided prior to the detailed design stage. Given the uncertainty of our weather patterns at present and changes to the intensity, duration and times of storm and heavy rainfall events we suggest that even this may not be adequate to predict drainage requirements with any certainty. See Table 1 below for monthly rainfall data for 2018-2023. The results of the groundwater monitoring may well influence both the viability of prior mineral extraction and ecological impact of the proposals on the R. Avon catchment.

**Table 1: Rainfall data (mm)**

	2018	2019	2020	2021	2022	2023
J	76.4	40.7	109.0	94.4	31.6	114.2
F	42.4	55.5	130.6	75.6	70.0	12.2

M	148.3	80.0	54.6	37.0	54.0	122.6
A	75.4	54.0	51.8	12.8	26.8	65.6
M	39.6	37.0	0.2	106.4	57.0	
J	0.4	74.4	59.6	83.8	48.2	
J	27.2	34.4	29.8	104.8	0.0	
A	64.0	43.4	103.4	21.2	15.4	
S	42.8	125.0	36.0	41.8	67.8	
O	44.8	135.6	170.8	141.6	82.6	
N	124.0	113.8	65.2	5.6	204.4	
D	139.4	144.4	140.4	84.0	110.6	
<b>Total</b>	<b>824.7</b>	<b>938.2</b>	<b>950.8</b>	<b>809.0</b>	<b>768.0</b>	

The Main ES Report (11.25) summarises soil conditions stating, *the Landis Soilscales Map, shows ground conditions at The Site to be mostly “Naturally wet very acid sandy and loamy soils” with a high water table, but to the east it has areas of “Slightly acid loamy and clayey soils with impeded drainage” and “Freely draining very acid sandy and loamy soils”.*

Further comment relating to habitats that might be supported places even less reliance on identifying soil types saying they are *likely to be ...*. Paras.11.69-11.70 highlight that existing field drains will be destroyed and that construction activities will cause soil compaction with localised surface water flooding that would be managed through a site-wide surface water drainage strategy. There is no discussion of the impact of this on soil structure and health and the species that would be supported in retained and recreated habitats. Experience elsewhere has demonstrated that on sensitive soils, soil structure adjacent to swales can be irreversibly damaged through compaction when they are being excavated: ruderals then dominate locally.

The range of soil types and drainage characteristics indicate very clearly that the site cannot be treated as a single uniform entity. If development were to proceed piecemeal as indicated then mineral extraction and construction would impact on undeveloped areas. The proposed phasing and associated risks must be identified clearly at the outline application stage to avoid risk of unforeseen damaging consequences. Proposals should include soil baseline data and intended restoration soil profile and composition. The extent of the potential for damage should be included in calculations for mitigation and enhancement (BNG).

The ES Non-technical summary states that no investigative work has been carried out to determine extent or quality of the sand and gravel in this Minerals Safeguarding Area. Instead it suggests that a *separate planning application and ES would likely be submitted should mineral extraction be necessary following any grant of outline planning permission for the Proposed Development*. Para 1.14 discusses some of the pros and cons of prior mineral extraction. Despite the applicants’ clear intention to use on-site minerals (including a public presentation at Cranborne on 18th April 2023) we have found no reference within the FRA to the suggested prior mineral extraction nor any information on how this might affect the drainage strategy including the Secondary A aquifer and ground water, or hydrological links to designated sites. The potential for disruption of hydrological links to environmentally sensitive areas, including designated sites, would need detailed investigation. Infiltration will clearly be dependent on the evidence supplied in response to the LLFA’s request and on whether or not there is prior mineral extraction. This in turn will affect the nutrient budget calculation that is required for the R. Avon Catchment and will affect viability.

We have found no discussion or calculations to show the impact of filling with clay and top soil the voids that would be left by sand and gravel extraction (Planning Statement 5.6.4). Government guidance states explicitly that *Responsibility for the restoration and aftercare of mineral sites, including financial responsibility, lies with the minerals operator and, in the case of default, with the landowner.* Given the poor drainage characteristics, it is essential that developers are required also to comply with *The Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings* (2021). Supplementary Note 3 of this guidance discusses the huge problems of attempting to restore compacted soils and highlights that prevention is crucial.

In their responses to this application, local residents who face the issues daily have commented on the problems with groundwater and surface drainage. The map submitted with P/FUL/2023/00672 shows how extensive drains are across the site: one property in Ringwood Road opposite the present recreation ground is named “Marsh Lands”. The clay soils of the area and excessive groundwater in the east of the site are well known and observation on 29.12.22 indicated how extensive the problem is with standing water in fields on both sides of Ringwood Road and Hillbury Road.



**Fig. 1 Looking east from Hillbury Road 29.12.22**



**Fig. 2 Looking west from Hillbury Road towards Alderholt Recreation Ground 29.12.22  
Swans were grazing beyond the standing water.**



Dorset Council has attempted to improve surface flooding at the junction of Harbridge Drove and Ringwood Road but there is simply nowhere for the water to go.

The Environment Agency's response to the HMWP Partial Update consultation (2023) confirmed that adjacent sites at Cobley Wood and Midgham Farm *are in a sensitive hydrological/hydrogeological setting due to being on (this same) Secondary A aquifer with potential hydraulic continuity with tributaries and the River Avon itself (designated as Ramsar, SAC, SPA and SSSI)*. They advised that any proposals for mineral development should therefore include appropriate investigation and assessment of risks to groundwater and surface water quality in line with Policy 8 (Water Resources) of the Hampshire Minerals and Waste Plan. Clearly the same considerations apply to the application site.

.....

#### **4. Biodiversity**

PLEASE NOTE: None of the reports we have examined has considered the impact of prior extraction of minerals.

The ABR Ecology Report (2022) Executive Summary summarises the habitat types, protected and BAP species found in their surveys.

ABR acknowledge (3.52) that the site visits provided just a 'snapshot' of the site and do not consider seasonal variation. The surveys can therefore only be regarded as indicative. This section of their report identifies the limitations of the surveys undertaken: these are significant as they could have far reaching consequences for a proposed development of this scale that would impede landscape scale habitat connectivity in addition to the other adverse impacts we have identified in our response.

Of particular concern are their admissions that

- Annex II bat species GHB is likely to have been under-recorded;
- badger setts may have been missed due to dense vegetation (though 2 clans were identified);
- some reptile mats were placed in shade, and
- surveying of ponds and ditches was carried out during drought conditions.

Although not mentioned in this report,

- the Bird Survey was carried out late in the season and admits to the likelihood of missing species such as woodlark and woodpecker; and
- the invertebrate survey was carried out when crops had been harvested and during a prolonged period of drought.

**None of these limitations is mentioned in the ES Main Report.**

#### **4.1 Hedgerows**

All but one of the twenty hedgerows on the site were identified as qualifying as species rich native hedgerows. The BNG report is confusing. Map 4 is entitled Proposed Habitats, Hedgerows and Ditches but no ditches are shown: the only hedgerow (barely visible) is a new one in the SW of the proposed east SANG. Map 5 (Hedge Loss and Gain) indicates considerable losses of native species rich hedgerows. The full list of hedgerows including

those that would be lost and the claimed eventual condition of those retained is in Table A3.4 of the BNG report.

Losses are particularly evident across and surrounding the northernmost Neighbourhood (D) where it is proposed to remove A7.3, A7.4, most of A8.2 and two sections of A12.1. The BNG report (Table A3.3) identifies that although they have suffered from nutrient enrichment A8.2 and A12.1 are still described as Moderate Condition. We advise that there should be a substantial buffer between the retained Important species rich native hedgerow A7.1 on the N boundary and the linear allotments

- to protect the native species rich hedgerow;
- to ensure no risk of fertilisers/pesticide drift (particularly as it shows signs of nutrient enrichment now); and
- to reduce competition for water.

Further allotments are shown in the SE corner of this Neighbourhood.

Both allotment areas will require fencing to exclude deer, rabbits and badgers, particularly the linear one because of its proximity to open countryside and known badger setts (two clans were identified) nearby. Rainwater harvesting should be considered.

If phasing follows the alphabetical sequence of the neighbourhoods it appears that the allotments would not be available until towards completion of the development as a whole. This should be clarified.

#### **4.2 Bats**

Species recorded in 2019 include *at least two rare Annex II bat species, Greater Horseshoe Bat and Barbastelle, as well as Long-eared Bat sp., Common, Soprano and Nathusius' Pipistrelle and Serotine, Noctule and Leisler's Bat.* The bat assemblage is identified as of Regional importance though both County and Regional Importance are stated for Greater Horseshoe Bat. This should be clarified.

ABR (2022) reconfirmed the presence of these species and their importance, also identifying roosts in three buildings:

- a maternity roost/hibernation roost for brown long-eared bats and a day roost for greater horseshoe bat in building 'B2';
- day roosts for brown long-eared and common pipistrelle bats in 'B5'; and
- a day roost for soprano and common pipistrelle bat in 'B14'.

The buildings would be demolished.

Although a *high number of trees on site possess Potential Roosting Features (PRFs) for bats* they advise that *full impacts on trees have not yet been established and therefore further surveys on these trees will be required at Reserved Matters stage.*

The Ecology Report (4.96) confirms that the change of land use from grazing/agricultural to residential will result in an increase in light spill, with potential for artificial lighting to disturb foraging and commuting bats: it explains the problems particularly with those bat species that are less tolerant of light and the simultaneous attraction of flying insects to artificial light, so reducing the available food supply to those species. The Report recommends a lighting strategy and mitigation will be detailed in the LEMP for the site,

which will then be refined at Reserved Matters stage. This will need to follow the updated BCT guidelines (2023).

ABR recommends that ***Site design should ensure that connectivity across and around the site is maintained so that foraging or commuting bats are able to cross the site.*** 'Dark corridors' must be maintained in the areas of identified peak activity and in areas of woodland or scrub planting where no lighting is permitted would provide suitable foraging and commuting routes for bats. This is important as ***greater horseshoe bats will not cross gaps of greater than 15 metres*** although open fields are crossed after dusk on dark nights (Jones & Billington, 1999; Ransom, 1. *Horseshoe bats are intolerant to light* (Stone et al., 2009) and commuting corridors for greater horseshoes need to be maintained to ensure connectivity to foraging areas.

The advised maximum 15m does not appear to have been taken forward to the mapped development proposals and only some selected hedgerows that have been identified as important for bats are to be retained as *10m wide Dark corridors with 6m wide grassland buffer for bats and other nocturnal wildlife.*

Survey for **PA3/16/1446/OUT** (former Hawthorn's nursery site, Ringwood Road) identified Annex II species Greater Horseshoe and Barbastelle plus Common and Soprano Pipistrelle, Serotine, Noctule, *Nyctalus* sp, *Myotis* sp. Planning conditions for this development required habitat enhancement to support these species: this also enables linkages to be retained to the ancient woodlands further to the east. Tree Preservation Order AL/59 covers five oaks and six linear groups of trees in this area.

However, the proposed N-S public footpath, LEAP and Alderholt Meadows Recreation Ground (identified in the Ecology Report as Parcel 10) together with any associated artificial lighting could compromise the outcome of the habitat enhancements of this site and destroy habitat connectivity. Any development should ensure that there is no adverse impact on the Annex II species in particular or to the commuting and foraging corridor links both to the east and to the areas in the west of the application site. We recommend that species rich native hedgerows surrounding A1, A2, A3, A5 on land to the east of Hillbury Road should be protected and enhanced. LCES report that a *greater horseshoe roost is present near Blashford.*

Given the far reaching nature of the proposals that would include separation of the former Hawthorns nursery site from other habitat and the loss of connectivity between areas where it has been shown these two Annex II species forage, we question the adequacy of both the survey and the suggested compensation and mitigation for loss of habitat connectivity. To comply with the NPPF 179 requirement to consider wider ecological networks, it would seem appropriate to extend survey across the Dorset/Hampshire country boundary that is Hillbury Road and to the identify commuting and foraging routes to the adjacent woodlands and species rich hedgerows that link to the belt of ancient woodland that includes Midgham Copse .

The Map of Ecological Enhancements (Landscape Strategy Plan) indicates a general intention to include integral bat boxes but there is no commitment to street trees to create additional corridors. We suggest that the siting of the bat boxes should be considered more carefully and not just built in simply to comply with a requirement.

### 4.3 Birds

Mapping in the Bird Report does not show

- the consented Solar Farm at Warren Farm Park;
- the location of the third solar farm in the west of the site that is being proposed as part of this development;
- application P/FUL/2023/00672 Sleepbrook Farm SANG; or
- associated application 3/22/1648/FUL for Glamping Units

Nor is there any mention of them or their impact on habitat and foraging.

Survey was carried out late in the year and the report acknowledges that it may have missed species such as woodlark and woodpecker.

Overall, the surveys recorded 58 species of birds, with 37 breeding species of which **Cuckoo, Greenfinch, Sparrow, Linnet, Skylark and Yellowhammer** are Red list species. **Nightjar** (Birds Directive Annex 1) were recorded foraging across the fields in the west of the site and breeding within heathland adjacent to the western boundary. **Barn owls**, listed as Schedule 1, were recorded roosting at Foxhill Farm in 2021. Overall, the assemblage of breeding birds is considered to be of local importance.

The report acknowledges (5.2) that **Linnet, yellowhammer and skylark** are arable red list BoCC species which will be negatively impacted by development of the site. It suggests that hay meadows should be provided as mitigation but only in the west of the site. However, mapping of skylark territories shows a large **skylark** territory on the east of the site includes land that the applicants have identified as Neighbourhood A. The “star” coincides with the proposed roundabout in Hillbury Road with housing and the employment land adjacent to it. A second skylark territory would be lost from this same plot, **A3**. This Neighbourhood (ie land between Hillbury Road and Ringwood Road) would also result in the loss of the (B4) **barn owl roost**. Development proposals for **A27** would result in loss of a further (third) skylark territory. There is no discussion of the risk of dogs (and people) disturbing any skylark nests within the SANG.

### Nightjars

Despite the surveying ecologist’s advice

*5.10 To ensure populations of nightjar can cross the scheme the development should include green corridors through the site, these should be unlit and not interrupted by buildings*

and

*5.11 The scheme will also need to retain foraging areas for nightjar, these are currently over the grasslands in the west of the site with birds also observed across the field to the north of the solar panels. Any loss in foraging habitat will require replacement within the scheme through the provision of heathland habitat or wildflower meadow,*

the proposals show development of Neighbourhoods C and D would preclude the occasional **nightjar** foraging observed in the bird survey and restrict it to areas to the west. This would be further restricted by the construction of the solar farms (one apparently lapsed planning consent, the other proposed by the applicants). Mapping has omitted the recorded **nightjar** activity at the pinch point between **A32** and **A37** where it is proposed to put an access gateway from “Neighbourhood D” (555 units, 17.39ha, 33dph) to create a circular dog

walking route. The SANG would be fully fenced here and owners commonly take their dogs out at night, off lead, on other fenced SANGs: a number of owners wear head torches and the dogs have reflective collars/coats.

The report recommends

- *The inclusion of heathland areas within the landscape plan within the 400 metre buffer with the adjacent heathland would provide additional habitat for heathland species such as nightjar, woodlark and Dartford warbler. These areas should be fenced with post and rail fencing with mesh to prevent access by dogs. The heathland areas should include short sward areas and patches of bare ground to provide optimum foraging for woodlark.* However this does not appear to have been taken forward by the applicants in other ES documents although the potential for establishing heathland/scrub/acid grassland within the solar farm is mentioned.
- *Planting gorse for Dartford Warbler.* It is extremely difficult to manage and prevent from spreading and would be totally unsuitable for any acid grassland planting within the solar farms. Gorse is already present in the west of the site. We recommend that any additional gorse should be omitted from planting schemes for this development.

Clearly the areas where **Nightjar** have been recorded are functionally linked to the heathland SPA (Cranborne Common). The proposals would lead to the loss of foraging area due to prior mineral extraction, development and significant disturbance of further areas through inclusion in what would be a heavily used SANG. **This is unacceptable.** There must also be full assessment of the impact on **Nightjars** of the construction of the proposed solar farm both alone and in combination with the housing development. As noted above (Section 2), current visitor use of Cranborne Common has not been assessed, neither has any potential change due to development.

Habitat connectivity Ringwood North and Somerley area of Ringwood Forest must be maintained. Forestry England's 2009 Design Concept shows the area to the south of Warren Park Farm as *Continuous cover mixed woodland sustained by thinning and natural regeneration to produce a permanent tree cover but at the same time providing a variety of different age and canopy heights.*

#### **4.4 Amphibians and Reptiles**

eDNA testing identified that four ponds W10, W13, W26 and W 28 supported Great Crested Newt (GCN) in their aquatic phase with a low population in one pond, W28. The first 3 of these ponds were recorded as supporting non-breeding population. Metapopulations of palmate, smooth newt, and frogs were also identified to be present on site.

ABR concluded that, *The proposed development holds potential to impact the on-site populations of GCN; most of the site is situated within an 'Amber Zone' for GCN, with other areas designated as 'Green Zones' (Natural England, 2022). Therefore, the Dorset District Level Licence (DLL) or a European Protected Species (EPS) licence must be sought and the scheme should accommodate new enhancement ponds and habitats for this species.*

Low populations of slow worm, grass snake and common lizard were found in the east side of the site (ie between Ringwood Road and Hillbury Road).

Excluding the far west, the remainder of the site supports overall ‘good populations’ of common lizard and slow worm, and a ‘low population’ of grass snake. These populations are considered to form a meta-population across the development site.

The far west supports an overall ‘exceptional population’ of common lizard, a ‘good population’ of slow worm, a ‘low population’ of grass snake and, in the heathland habitats, a population of smooth snakes was also identified. One adult common toad was also recorded in the southeast of the site.

ABR suggest that the area proposed for a solar farm should be subject to targeted habitat management such as new heathland/scrub and grass mosaic specifically to support smooth snake.

**We defer to ARC, NET and NE for comment on appropriate habitat management, licensing requirements and mitigation.**

#### **4.5 Invertebrates**

Little attention has been paid to invertebrates. The report acknowledges its limitations. The survey for the whole site was carried out over 2 days only (23 July and 31 August 2022) during a prolonged period of drought (see table 2 below). Consequently most native nectar resources would not have been obvious (species rich hedgerows are not mentioned), arable crops (along with associated arable “weeds”) would have been harvested and, as reported, ponds and ditches had dried out.

The significant number of bats (species and individuals), insectivorous bird species, reptiles and amphibians indicates that the site is of greater importance for invertebrates than this superficial walkover survey would suggest. It is lack of rain that caused the drought conditions (not just hot weather as claimed).

**Table 2: Rainfall data (mm)**

	2018	2019	2020	2021	2022	2023
J	76.4	40.7	109.0	94.4	31.6	114.2
F	42.4	55.5	130.6	75.6	70.0	12.2
M	148.3	80.0	54.6	37.0	54.0	122.6
A	75.4	54.0	51.8	12.8	26.8	65.6
M	39.6	37.0	0.2	106.4	57.0	
J	0.4	74.4	59.6	83.8	48.2	
J	27.2	34.4	29.8	104.8	0.0	
A	64.0	43.4	103.4	21.2	15.4	
S	42.8	125.0	36.0	41.8	67.8	
O	44.8	135.6	170.8	141.6	82.6	
N	124.0	113.8	65.2	5.6	204.4	
D	139.4	144.4	140.4	84.0	110.6	
<b>Total</b>	<b>824.7</b>	<b>938.2</b>	<b>950.8</b>	<b>809.0</b>	<b>768.0</b>	

We suggest that the invertebrate data are of limited value and resurvey is required.

#### 4.6 Invasive species

ABR identifies non-native invasive plant species listed in Schedule 9 of the WCA (1981) as including (but not limited to) three-cornered leek (*Allium triquetrum*), rhododendron (*Rhododendron ponticum*), Himalayan cotoneaster (*Cotoneaster simonsii*) and montbretia (*Crocsmia x Crocosmiiflora*) which must be removed and disposed of legally.

We welcome the advice given regarding using *measures to prevent the introduction of non-native plant species through garden waste or simply through dissemination of garden plants through soil/rhizomes and seeds and to prevent introduction of non-native fish and aquatic invertebrates would be required.* This was in relation to potential impact on the R Avon but applies equally to the watercourses and ponds in the application site. Invasive terrestrial plants and “garden thugs” are also a major threat to biodiversity. Frequently they are planted on new housing sites simply because they are cheap. ABR advise, *Effective garden waste collection protocols from homes on the development site will reduce the chance of invasive plants being introduced to the surrounding area. Additionally, information leaflets should be distributed to local residents informing them of these potential issues and how to prevent them from happening.* All landscaping schemes should ensure that planting complies with the NET/EDEP Guidance notes and does not put at risk our native biodiversity.

To ensure no harm to neighbouring agricultural land and to livestock, care should also be taken to remove “injurious weeds” ie those listed under the Weeds Act 1959:

- Common Ragwort (*Senecio jacobaea*)
- Spear Thistle (*Cirsium vulgare*)
- Creeping or Field Thistle (*Cirsium arvense*)
- Curled Dock (*Rumex crispus*)
- Broad-Leaved Dock (*Rumex obtusifolius*).

.....

#### 5. SANGs

Three SANG compartments are proposed:

Name	Area (ha)	Length of circular walk (km)
Harbridge Drove	9.0	1.2
Alderholt Common	22.4	2.3
Cross Roads Plantation	20.0	2.5

The applicants propose to deliver them in phases as with the development. No timescale has been identified.

##### Harbridge Drove

At 1.2km the circular walk at the SANG at Harbridge Drove is **only half** the required distance of 2.3-2.5km. Coupled with the outline description in the SANG Management Plan (2.31) ... *landscape proposals will be largely directed by its amenity function, and the objective of screening views of the proposed built form...*, this area clearly does not meet SANG requirements and should be identified as Public Open Space.

Although in time Ringwood Road would be reduced to a no-through road, it would remain as an access route for the car park here. It is adjacent to the proposed employment allocation and directly opposite a potential Mineral extraction site (Hampshire Minerals and Waste Plan Partial Update consultation, 2023). Noise and dust will be a problem. Effective noise and visual screening from a built environment will take many years particularly as ground conditions for tree growth are not good. The soil is poorly drained with a high clay content (see Figs 1 and 2 above). These issues further underline the area’s unsuitability as a SANG. The impact of additional disturbance within this part of Ringwood Forest and Home Wood SINC (Ringwood North and Somerley) should be assessed.

Alderholt Common and Cross Roads Plantation

Disturbance of foraging **nightjar** in the other two SANGs in the west has not been discussed.

Habitat Restoration

The SANG Management Plan (2.5) confirms that because of their nature and drainage characteristics, *the soils for the western part of residential development and western SANGs could support mixed dry and wet lowland heath communities. Similarly, those across the southern part of the western SANG and much of the eastern SANG ... could support lowland dry heath communities.* Para 2.23 states that *The adjacent Dorset Heaths is a key element of the Site’s ecological context.*

It is therefore of considerable concern that the recommendations in the Bird Report for heathland restoration have not been taken forward. Instead and despite the headline objectives in the SANG Management Plan, proposals for the SANG planting are the usual “woodland and wildflower meadows with scattered trees and scrub” with no consideration of what was here prior to cultivation, soil characteristics, habitat connectivity or ecotone from heathland to the proposed grassland.

Taking the land out of intensive agriculture presents a unique opportunity to restore significant areas of East Dorset’s priority habitat heathland and to follow at least in part the recommendations in the RSPB Heathland Extent and Potential mapping.

We object to the new woodland in the SW of the proposed SANG adjacent to the consented solar farm. Planning conditions here are for habitat restoration between the solar panels to acid grassland. This would be compromised by invasion of seedling trees. Similarly there should be a substantial buffer between Cranborne Common and the proposed Lowland Mixed deciduous woodland in the NE of the proposed SANG.

.....

**Conclusions**

As identified in Section 2 above, there are a number of issues that have not been addressed that are fundamental to this application and should not be deferred to a later stage in the planning process. Comparison with the Crossways development (as suggested by the applicants) is invalid: development there is in the adopted West Dorset, Weymouth & Portland Local Plan 2015 and there are good transport links.



These proposals for Alderholt are for a development that is excessive in scale, unsustainable and fails to comply with national and Local Plan policies. Notwithstanding our total objection to it, in the event that the LPA is minded to support the proposal we ask that our recommendations are taken into consideration.

Although citing one of the options in the 2021 Dorset Local Plan Options consultation, the application has ignored the fundamental requirement for any proposal for large scale development here to be strategic in nature and work with neighbouring authorities. This applies to all aspects of land use planning here including

- the cumulative impact of other development in the area, particularly minerals and the large number of housing developments in the “doughnut” around the New Forest, and
- the need for landscape scale habitat conservation and restoration.

The latter must include at least some heathland restoration and not continue the misguided generic approach to planting of green infrastructure and SANGs irrespective of soil type and the semi-natural habitats that were there prior to current land use.

**EDEP objects strongly to the application.**

12.5.23