

INDEPENDENT EXAMINATION OF THE ALDERHOLT NEIGHBOURHOOD PLAN

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

Nicky Ashton
Clerk to Alderholt Parish Council

Philip Reese
Senior Planning Policy Officer
Dorset Council

Via email

Examination Ref:02/AM/ANP

16 July 2024

Dear Mrs Ashton and Mr Reese

Having now had opportunity to review all the documentation submitted with the Alderholt Neighbourhood Plan (ANP) and conducted the site visit, I have a number of questions for Alderholt Parish Council (APC) and Dorset Council (DC) which seek clarification on some of the matters within the ANP.

In order to progress the examination, I would be grateful for responses to my questions to be provided by **Monday 29 July 2024**, if possible. All the points set out below flow from the requirement to satisfy the Basic Conditions.

Questions to Alderholt Parish Council and Dorset Council

Specific questions of clarification to each Council are listed below, but I would be happy to have comments from either Council about any of the questions asked.

The responses to the questions have been included within this letter – those from **Dorset Council** are in green font, those from *Alderholt Parish Council* are in purple italic font.

1. Date of submission to DC.

- a. **Question to APC.** Please could the date of the submission of the Alderholt Neighbourhood Plan (ANP) to DC be confirmed?

The Parish Council agreed the submission of the ANP at its meeting on 8 April 2024 – the bulk of the documents were submitted on 10 April, with the SEA and HRA submitted on 19 April. Dorset Council raised a query with regard to the HRA, and given the delayed start to the Regulation 16 consultation (due to the Council elections purdah period) the Parish Council took the opportunity to address these concerns, with an updated HRA and amended NP (approved by the PC under delegated arrangements) provided to Dorset Council on 13 May. Therefore we would be content for the Inspector to use the final date (13/05/24) as the official ‘submission date’ as that is when the full suite of documents that formed the Regulation 16 consultation had been received by Dorset Council.

2. Habitats Regulations Assessment (HRA) (2024)

- a. **Question to APC.** I note that in paragraph 7.5, the HRA concluded “policy wording recommendations were made to cover recreational pressure, noise and visual disturbance and loss of functionally linked habitat, air quality and water quality. As a result of the changes

made for the submission Neighbourhood Plan it can be concluded that a sufficient policy framework exists to ensure no adverse effect on integrity of any Habitats Sites either alone or in combination with other projects or plans". How were those changes incorporated into the ANP?

The Parish Council have sought to work in an iterative matter to deal with the possible issues identified through both the SEA and HRA work. As such drafts of the ANP were provided to AECOM (who undertook those assessments) prior to the Regulation 14 and submission stages, with the aim to incorporate any recommendations before commencing the consultation / submission.

At Regulation 14 the main changes to the Plan were:

- Inclusion of wording relating to the requirements of The Dorset Heathlands SPD (in Policy 7) and additional information in the supporting text in relation to the overwintering bird surveys*
- Inclusion of wording relating to the requirements of the Habitats Directive, and that developers must provide evidence that proposals will not result in adverse effects on site integrity of the Avon Valley SPA/ Ramsar (in Policy 7)*
- Inclusion of wording relating to the potential financial contribution to deliver the New Forest Recreation Management Strategy, or appropriate mitigation measures such as outlined in the New Forest National Park Revised Habitat Mitigation Scheme (in Policy 7)*
- Inclusion of wording relating to all developments needing to demonstrate nutrient neutrality for phosphorus in relation to the River Avon SAC (in Policy 7)*
- Inclusion of wording to the need for any applications for the provision of a recreational railway needing to be supported by a project-level HRA, demonstrating that the impacts of any potential increase in recreational footprint are adequately mitigated (in Policy 9)*

At Submission the main changes to the Plan were:

- Inclusion of wording related to the need for any new development to accord with the Dorset Heathland Air Quality Strategy (in Policy 7)*

b. Question to APC. I would be pleased to see a copy of the response from Natural England when consulted about the HRA.

These are appended at the end of this response – this is with reference to the Regulation 14 stage and then subsequent exchanges and discussions regarding the appropriate changes required to overcome the concerns raised.

3. Policy 7

- a. Question to APC and DC.** The ANP Appendix 2: Housing Target Paper indicates at paragraph A1.28 that the provisional housing target for Alderholt is 192 dwellings over the period of the Plan from 2022 to 2034. The implication from paragraph A1.19 of Appendix 2 is that 192 is made up of extant permissions (139) and a windfall allowance (53). The table at paragraph A1.23 lists the four extant permissions at April 2022: Alderholt Surplus Stores; Land north of Ringwood Rd; 29 Ringwood Road and 58 Ringwood Road making a total of 139 dwellings. Are the numbers still correct? Is the first paragraph of Policy 7 still able to be fulfilled? And, in particular, does DC agree with the second sentence of Policy 7?

There are two 192 figures. The 192 figure that is contained under the section on the emerging Local Plan (page 64-65 of the ANP) is, as explained, derived from the extant consents and a provisional windfall provision calculation at that time. This covers the proposed Local Plan period which was to run over a 17 year period (longer than the ANP) and equated to an annual average of 11.3 dwellings

(expressed as a minimum). Had we used that figure, the housing target we would have reached for the shorter plan period would have been lower at around 136 dwellings.

The 192 target adopted in the NP is based on a slightly higher level of growth (16 dwelling per annum over the 12 year period of the plan) which is derived from the higher end of the range looking at the various factors covered in the Housing Target paper. These factors included evidence on:

- historic growth rates (recently building rates have consistently been around 3 to 4 dwellings per annum)
- local need from Dorset Council’s Housing Register and previous surveys (possible need for 25 – 30 AH homes)
- the emerging Local Plan target (both in terms of the Neighbourhood Plan target in the appendices to the consultation draft, and a ‘policy-off’ pro-rata’d amount based on the comparative size of the ANP area (in terms of households) to Dorset) (11.3 – 15.4 dwellings per annum)
- the standard method (under the heading Latest Housing Needs Assessment by Dorset Council), updated by the more recent median house prices, median workplace-based earnings, looking at the East Dorset area (as opposed to Dorset-wide), again pro-rata’d on a household basis to the ANP area (16.1 dwellings per annum).

As a result of this analysis and Government’s guidance on boosting housing, it seemed sensible to look to deliver in the region of 192 homes, especially if this would help achieve 25 – 30 affordable homes.

Turning to supply, this is perhaps best explained in the emailed table clarification to Natural England that is contained at the end of this letter, updated to reflect the latest situation, and reproduced below in tabular form for ease. It is notable that the 192 target is not particularly reliant on windfall because of the 50-55 homes proposed through the NP allocations.

Site	Notes	Dwellings
Aldersholt Surplus Stores, Daggons Road	pp 3/11/0558/REM granted 24/03/2015, first homes constructed to ridge height early 2024	89 dwellings
Land north of Ringwood Road	pp 3/19/2077/RM granted 14/07/2023, groundworks commenced early 2024 0 includes demolition of dwelling (therefore net figure used)	44 dwellings (net)
29 Ringwood Road	pp 3/19/1135/FUL - completed 2022/23	1 dwelling
58 Ringwood Road	pp 3/19/2171/OUT and P/RES/2023/00142 pending for 4 dwellings – refused 19/04/24 based on lack of mitigation with regard to the European sites. These reasons for refusal may be overcome with a mitigation package.	0-4 dwellings
	Subtotal	134-138 dwellings
Aldersholt Nursery, East of Ringwood Road	NP Policy 12 for (about) 20 dwellings	20 dwellings
Paddock South of Daggons Road	NP Policy 13 for (about) 15 dwellings	15 dwellings
Land South of Blackwater Grove	NP Policy 14 for (about) 15 – 20 dwellings	15 – 20 dwellings
	Subtotal	50--55 dwellings
Windfall	Windfall (infill) development within the village envelope.	Unknown but assume 1-2 dwellings per annum

		<i>from 2026-2034 dwellings = 8 – 16 dwellings</i>
	Total	192 – 217 dwellings

On this basis the Parish Council considers that the first paragraph of Policy 7 is able to be fulfilled.

With regards to the table at para A1.23, Dorset Council note that the first 2 sites are under construction. 29 Ringwood Rd was completed in December 2022, therefore within your plan period. 58 Ringwood Rd has lapsed in April 2024 on account of the reserved matters being refused. Therefore, the identified supply in that table can be reduced by 4 units, reducing the net extant permissions from 138 to 134 dwellings.

The NP identifies 3 allocations for 20, 15 and 15-20 dwellings. Assuming the highest number for each of those gives a total of 55 dwellings.

This gives an identified supply of $134 + 55 = 189$ dwellings. This is only 3 short of the target of 192 dwellings over a 17 year period. As the village has a substantial village envelope, in which Policy 7 supports infill development, it is reasonable to assume that the difference can be made up by windfall sites during the plan period. Previous windfall completion rates can be referred to in order to support this assertion. For example, the average windfall completion rate between 2014 and 2020 was 3.8 dwellings per year. The main problem at the moment is the issue to nutrient neutrality in the Avon, but it is hoped that a workable solution will be found before long. It's a strategic issue that is beyond the scope of the NP to find a solution.

On this basis the first paragraph of Policy 7 can still be fulfilled despite permission for one site lapsing.

The second sentence of Policy 7 is slightly problematic if you read "identified supply" as not including a windfall allowance. This could be clarified by either suggesting that the reference to "identified supply" does include a windfall allowance, or suggesting that the first half of the sentence is deleted (due to it being unnecessary) so that the amended sentence reads "The release of unallocated greenfield sites for open market housing outside the village envelope should be resisted." That should be fairly uncontroversial given that it is essentially the current LP policy.

In response to Dorset Council's suggestion regarding the policy wording, the Parish Council's preference would be for the sentence to be amended to read: "Given this anticipated supply exceeds the housing need requirement, the release of unallocated greenfield sites for open market housing outside of the village envelope should be resisted." – this then links more clearly to the previous sentence that includes reference to the potential for further sensitive infill within the village envelope.

4. Policy 8

- a. **Question to APC.** Whereas I appreciate the desire to have a village "centre", is the application of Policy 8 to the extent of the "High Street" as defined on Map 10 of the ANP excessive, especially given the residential character of the majority of the "High Street", and should the "centre" be more focussed on the western section around the junction of Daggons Road/ Station Road with Ringwood Road as recognised in paragraph 4.2.4 of the Plan? If so, is the Parish Council able to suggest an alternative to the "High Street" as currently shown on Map 10?

The High Street area has been deliberately drawn to include the area shown because of both the existing, historic and potential future options for enhancing its performance.

At the present time there are a number of clusters of non-residential uses along or clearly visible from the High Street:

- Alderholt Motors, Daggons Road*
- Churchill Arms Public House, Daggons Road*
- Alderholt Village Hall, 1 Station Road*
- Co-op Store and Nearly New Beginnings, 1 Ringwood Road and 2a Station Road*
- Kalista Aesthetics, 60a Station Road*
- Alderholt Reading Room, 119 Station Road*
- Alderholt Chapel, Hillbury Road*
- Alderholt Vets Surgery, The Beeches, Fordingbridge Road*

Historically the NP Group are aware of many other businesses along this stretch of road (in the latter part of the c20), including:

- Alderholt Shopping Parade, including Hairdressers, Butchers, Post Office and Petrol Filling Station, Daggons Road (now Jubilee Court, adjoining Alderholt Motors) - <https://www.flickr.com/photos/131286969@N05/50486876863/in/photostream/>*
- S White, Horticultural & Newsagent, 1-3 Blackwater Grove*
- Adams Shoe shop/ cobbler, 2 Ringwood Road*
- Alderholt Surplus Stores, Daggons Road*
- Baileys Grocery Shop (including barbers and electrical appliances), corner of Park Lane / Station Road*
- Alderholt Pet Supplies, 84 Station Road (operated from a converted residential garage, and previously was used as a dental surgery)*
- Hall / chapel site (now 159 Station Road)*
- Bakery / stores / restaurant on Alderholt Corner (now Moonacre Cottage / Swallows Rest), Fordingbridge Road*
- The Salisbury Arms, in the grounds of Salisbury Arms Farm, Fordingbridge Road*

We have also considered whether sites could come forward, and looking at plot size and frontage, potential exists, but is not necessarily limited to:

- Paddock South of Daggons Road NP Policy 13 includes requirement for at least 0.2ha of employment land (falling within use Class E or similar).*
- Land adjoining the Co-op Store, 10 Station Road – this is large site of approximately 1,900sqm with 29m of road frontage*
- Land adjoining the Village Hall, 3 and 5 Station Road – whilst in two ownerships currently, this attached pair of properties sites within a large site of approximately 2,100sqm with 40m of road frontage*
- Land at 51 – 57 Station Road – within a single landownership parcel, currently laid out as two pairs of attached cottages, within a large site of approximately 2,500sqm with 63m of road frontage*
- Land at 58 Station Road – a corner plot with a relatively large area of approximately 900sqm with 55m of road frontage*
- Land parcel at 46 Station Road – a large property currently subdivided into flats, within a single landownership parcel, approximately 1,200sqm with 26m of road frontage*
- Land parcels at 62 – 66 Station Road – three separate land parcels with long rear gardens (No. 62 links back to the school site), which could come forward separately or as a single*

parcel through land assembly. Total area approximately 6,900sqm with 58m of road frontage

- 84 Station Road – no impediment to reopening
- Land parcel at 137 Station Road – property acquired by developer to provide access to land to the rear (in same ownership), with 29m of road frontage
- Land parcel at 92 Station Road – large but narrow site with significant depth, approximately 1,400sqm with 15m of road frontage
- Land parcels at 155 – 159 Station Road - three separate land parcels with lengthy frontage, which could some forward separately or as a single parcel through land assembly. Total area approximately 2,600sqm with 93m of road frontage.

These are marked on the map attached to the end of this report. This hopefully illustrates that there are several clusters along the B3078 which contain a mix of past and present uses (around the station, at Charing Cross (junction with Ringwood Road), around the Park Lane junction and at Pressey’s Corner). Whilst the entire length of the High Street includes stretches of currently residential properties, due to the reasonably generous plot sizes, it is possible that more sites could accommodate business uses – including through the re-purposing of outbuildings or parts of the property as well as redevelopment. It would be unfortunate to restrict the policy to the western end of the village should opportunities present themselves further to the east.

The Parish Council would therefore like to retain the length of the High Street as shown, but make clear in the supporting text (4.2.4) that the intent of the policy is one of encouragement, to support the increased sustainability of the village through allowing local businesses to establish a presence in the part of the village that will have the greatest passer-by trade, and potentially benefit from proximity to other businesses. However not all sites may be suitable – and having reflected on the policy and Dorset Council’s comments, the Parish Council would like to suggest the design requirements are only sought on larger sites of 0.2ha or more, and this could be clarified through an amendment to the policy – e.g.

“Where larger sites in excess of 0.2ha are proposed for re-development, their design should seek:...” (followed by the three bullet points).

5. Local Green Spaces

- a. **Question to APC.** Policy 16 lists 12 Local Green Spaces (LGS). Appendix 3 includes reasons for their designation. I would be grateful know whether there is any further evidence of how LGS 10, 11 and 12 are demonstrably special to the local community to justify their designation?

The Consultation Statement includes feedback from local residents in response to the question “Which of the following green spaces do you consider to be important?” (the survey form is on page 71, and graph showing the response is on page 7). This included both LGS10 and 11, and the results for these were:

	LGS10: Blackwater Grove field with pine trees		LGS11: Stroud Firs (frontage area adjoining Station Road)	
Very important	116	64%	117	62%
Reasonably important	42	23%	40	21%
Not important at all	8	4%	19	10%
Don't know that space	14	8%	13	7%

These ranked the third and fourth most important spaces (based on the number of respondents ticking “very important”) with only the recreation ground and school playing field considered more highly.

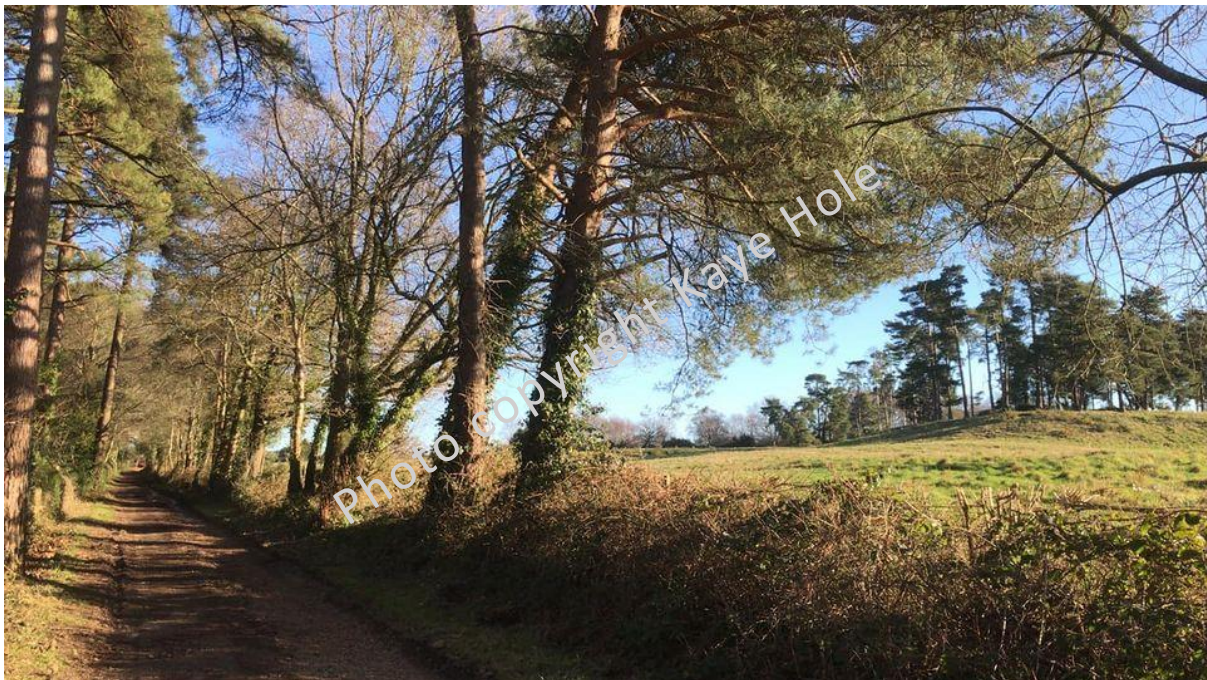
Whilst Bonfire Hill was not identified for consideration at the options consultation, it was mentioned several times in the response to that question and as such was considered further by the NP sub-committee, who took the decision to include the area in the Regulation 14 draft for the reasons given (with 86% of local residents supporting that Policy).

Turning to each of these in turn, and additional information on why they are important:

LGS10 - Blackwater Grove field

The site is the first real view across countryside when walking or riding along the popular public bridleway towards Cranborne Common. The views across this site (with the firs on the ridgeline) draw comments on local social media sites - as recently as this January someone posted a picture which received 105 thumbs up / hearts and comments included the following:

- Lovely picture, that track holds many childhood memories for me*
- My children enjoyed sledging down the little hill on the rare years we had snow deep enough*
- Hopefully it will stay like this and not be incorporated into the 10 year plan for housing suggested near Blackwater Grove*
- This is beautiful, it should be used as the Alderholt FB cover*
- You might see the fox if you are quiet. He likes to make an appearance*



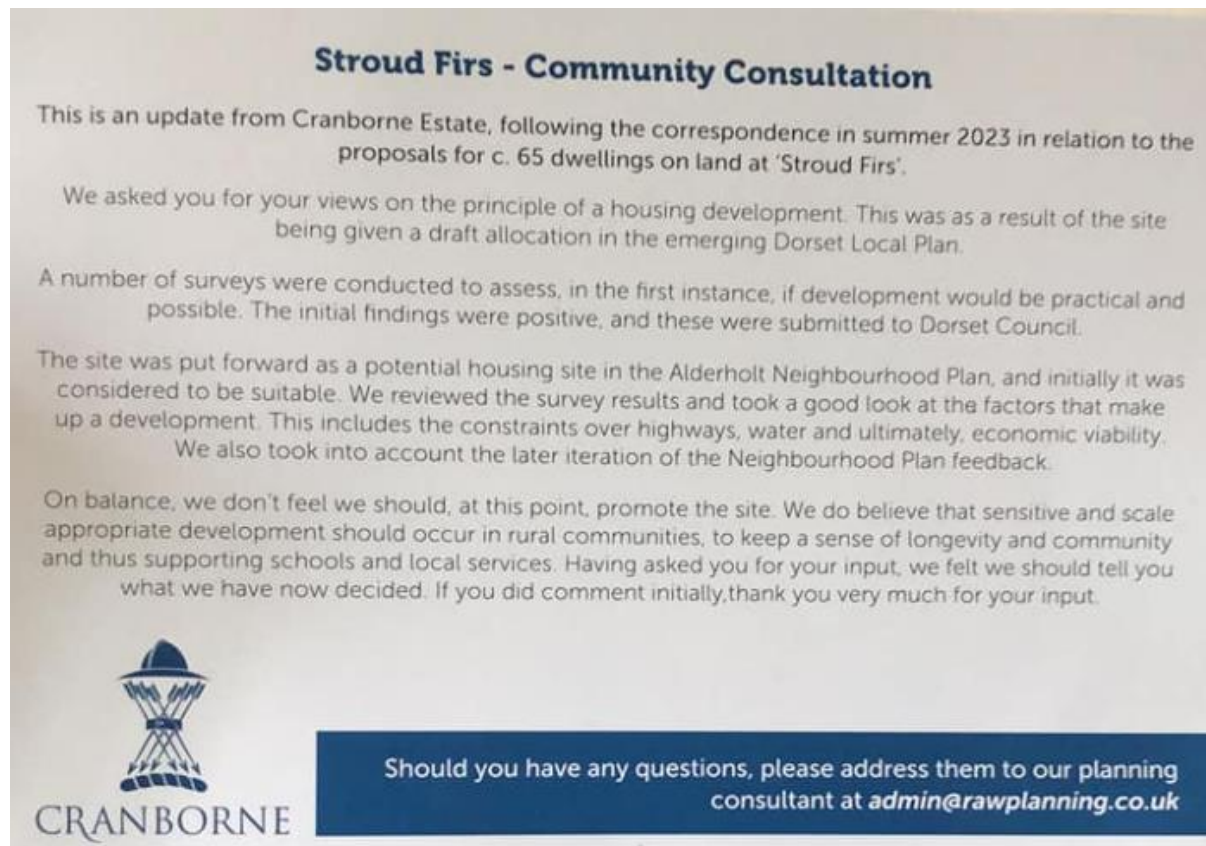
The proposal by Dorset Council to protect the fir trees (through the use of a Tree Preservation Order) was supported by the Parish Council at its planning meeting on 18 June 2024.

LGS11 – Strouds Firs

A prominent wooded area on the main thoroughfare (last cleared in the 1980s) that includes a range of informally used paths as well as public footpath along its eastern edge. Noted in the 2007 PPG17 Open space study as an important natural green space (see over).

It was also a particularly unpopular option for development (based on the feedback from the Options Consultation – please refer to the Consultation Statement page 6), with the main reasons for this (as surmised from the comments) relating to its wooded nature and as a habitat for local wildlife, with people noting that they had seen badgers, newts, deer, grass snakes, slow worms etc.

The Cranborne Estate have recently notified residents that they are no longer seeking to promote the wider site for development:



Stroud Firs - Community Consultation


This is an update from Cranborne Estate, following the correspondence in summer 2023 in relation to the proposals for c. 65 dwellings on land at 'Stroud Firs'.

We asked you for your views on the principle of a housing development. This was as a result of the site being given a draft allocation in the emerging Dorset Local Plan.

A number of surveys were conducted to assess, in the first instance, if development would be practical and possible. The initial findings were positive, and these were submitted to Dorset Council.

The site was put forward as a potential housing site in the Alderholt Neighbourhood Plan, and initially it was considered to be suitable. We reviewed the survey results and took a good look at the factors that make up a development. This includes the constraints over highways, water and ultimately, economic viability. We also took into account the later iteration of the Neighbourhood Plan feedback.

On balance, we don't feel we should, at this point, promote the site. We do believe that sensitive and scale appropriate development should occur in rural communities, to keep a sense of longevity and community and thus supporting schools and local services. Having asked you for your input, we felt we should tell you what we have now decided. If you did comment initially, thank you very much for your input.



CRANBORNE

Should you have any questions, please address them to our planning consultant at admin@rawplanning.co.uk

LGS12 – Bonfire Hill

The following is an extract from Chapter 14 of the East Dorset Local Plan, that confirms this site to be of local significance for nature.

- 14.17. Cranborne Common Site of Special Scientific Interest which is to the west and south west of the village comprises the most northerly heathland communities of Dorset. It is designated as an SSSI (Site of Special Scientific Interest) and is a proposed SPA (Special Protection Area) under the EC Birds Directive, and SAC (Special Area for Conservation) under the EC Habitats Directive, while parts are also proposed for designation under the Ramsar Convention for the protection of wetlands: these designations reflect its international importance. In addition there are substantial areas of lesser nature conservation importance around the village, particularly at Bonfire Hill and Strouds Firs. These have been designated as Sites of Importance for Nature Conservation.

In addition, the earlier 2007 PPG17 Open space study¹ goes on to note the importance of the areas for dog walkers.

2.2.4 Natural & Semi Natural Space and Green Corridors

Site	Quality
Bonfire Hill heathland	54.5 %
Strouds Firs	n/s
Wolvercroft Spinney	n/s
Woodland adjacent to Oak Road	n/s

Only one natural & semi natural space was assessed in Alderholt - the Bonfire Hill heathland – which is in need of higher management and maintenance. The site is an SNCI and has a public right of way; it is well used by dog walkers and should be in better condition.

Local Areas of Open Space in Alderholt

The most used areas of open space in Alderholt are Alderholt Recreation Ground and Bonfire Hill. People also often go outside the village to the Moors Valley Country Park, Cranborne Chase and to visit the beaches at Christchurch, Hengistbury and Boscombe. Other areas visited are likely to be on the New Forest/Fordingbridge area and also Mudeford Beach. The overwhelming reasons for visiting these areas are to go for a walk, visit areas of nature interest and value and to walk the dog.

Summary of Provision

Other than small areas of amenity open space and the allotments, there are four main open space sites in Alderholt:

- Bonfire Hill and Stroud's Firs – natural green space
- Alderholt Recreation Ground – the only (non-education) formal provision in the village with a play area, facilities for teenagers (basketball hoop and skate ramp), Alderholt Tennis Club (with 4 synthetic courts) and 1 senior football, 1 senior rugby and a cricket pitch with 3 wickets. These facilities are the home ground of Alderholt FC (2 Saturday sides); Alderholt RFC and Alderholt CC. No issues in respect of these clubs have been identified in the Study.
- St James First School which has a mini soccer pitch, grass field, small hall and a playground.

Whilst in 2016 the new owners fenced off the area (so that access was limited to the public footpaths), prior to that time villagers treated the land as an area of open space, widely used by dog walkers, and have a lot of memories relating to this. According to the sales particulars at that time, it was also the last remnant of Alderholt Heath, an area that formerly covered a total of 844 acres (1845 Tithe map).

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on both the Parish Council and Dorset Council websites.

Thank you in advance for your assistance.

Yours sincerely

Andy Mead

Examiner

¹ <https://www.dorsetcouncil.gov.uk/documents/35024/285921/EDDC+Alderholt+LNA.pdf/0a06c62d-825b-fecb-a7e8-11a682f826bc>

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BY EMAIL ONLY

Dear Nicky Ashton,

Planning consultation: Alderholt Neighbourhood Plan 2022 – 2034 Draft REG 14 Consultation

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

My apologies for not getting back to you earlier.

Summary

Natural England cannot advise that the Plan is compliant with the Habitats Regulation 2017.

- The Plan needs to consider the need for mitigation (SANG) in a way which takes into account the need to consider the c. 59 dwellings not counting windfall which may it is indicated may come forward in the plan period.
- The proposed Trailway extension to the west of Alderholt will have a likely significant effect on the habitats and Ramsar site at Cranborne Common and the map and supporting text need adjustment.

Housing needs

Natural England note that there is an approved but unimplemented SANG in Alderholt. Therefore at this time it is a concern that the number of other dwellings currently awaiting approval/implementation is in-combination likely to exceed the 50 unit threshold for which there is a requirement for SANG.

The Plan states there are consents for over 130 dwellings at this time including 89 at the surplus stores and 44 at the Hawthorns. It is understood that there are a significant number of small-scale applications in addition. It is proposed that over the plan period the existing applications including those as yet undetermined should not exceed a total of 192. In principle this level of development is agreed by Natural England, however whilst the two larger developments 44 and 89 are approved subject to providing mitigation there is likely to be a shortfall in mitigation provision over the plan period. This matter has been addressed in the Purbeck Local Plan with an agreed threshold to trigger the need for an assessment of risks to the habitats sites should be agreed.

Natural England advise that the plan group consult the Council forward planning offices about how best to address this matter.

Policy 5 : reference to provision of bird/bat/bee bricks/boxes is welcomed.

Policy 6 : the policy is welcomed by Natural England

Nutrient neutrality in the River Avon SAC: para 4.1.17 it is incorrect to say that excessive nutrient enrichment is due solely to sewage as the highest proportion comes from agricultural sources which act in-combination with nutrients from STWs. The text should be adjusted. Following the full enactment of the Levelling Up and Regeneration Act 2023 it is likely that the nutrient offsetting requirements will change as lower discharge levels at STWs are required.

Policy 9 : Natural England support the proposed recreational path/cycle link **east** from Alderholt towards Fordingbridge.

Natural England object to the proposed Trailway route to the **west** of Alderholt. The route passes through several parts of Cranborne Common SSSI, SPA, SAC and Ramsar. The plan presents no evidence or assessment which indicates how recreation related impacts can be avoided. The proposal is clearly contradictory to the mitigation measures set out in the Dorset Heathlands Planning Framework SPD 2020- 2025 for the avoidance of harm as it proposes a direct route into the designated sites from the settlement.

In the absence of any information to conclude otherwise Natural England advise that the Plan be amended to only show the link from Alderholt to Fordingbridge and indicate an intention to only explore further options westwards during the plan period. A similar adjustment needs to be made to Para 4.2.12 and Policy 13 in relation to the Trailway. The westwards extension should be considered as uncertain at this time.

Policy 11 : Natural England has no objection to the proposed village boundary extensions.

Policy 14 : This site is known to support at least two species of protected reptiles. The proposed mitigation project at this site is of a suitable scale for the number of dwellings indicated. The configuration of the area will need to be informed by an ecological survey. It is likely that the area supports breeding birds and may also be of importance for bats and SPA birds. The policy wording should be adjusted to accessible natural greenspace.

Policy 16 : Natural England support the allocation of the Important Local Green Spaces.

Policy 18 : Natural England note that some viewpoints are currently dependent on trees which are nearing the end of their lifespan eg VP1. It would seem appropriate for the Plan to indicate that some of these locations should be priority locations for tree enhancement/management eg through the oak tree project.

Biodiversity Net Gain

In the light of the now legal requirement for Biodiversity Net Gain it may be appropriate for the Plan to consider the identification of areas to which priority should be given for net gain. These may compliment Policy 16 and seek to direct gains to locations which benefit local people and biodiversity.

Ancient Woodland

The plan area is well resourced in coverage of Ancient Woodland, consideration should be given to the encouragement of the restoration of planted ancient woodland areas to native broadleaved cover as a contribution to both biodiversity restoration and positive climate change measures at a time of ecological emergency.

I trust these comments will assist the Neighbourhood Plan group and Dorset Council.

Yours sincerely

Nick Squirrell
Conservation and Planning Senior Advisor
Dorset Team
Wessex Area Team

Date: 25 March 2024
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BY EMAIL ONLY

Dear Jo,

Alderholt Neighbourhood Plan modifications

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for the information supplied and a helpful discussion on the issues with Mr Rendle.

I advise that the Plan Group consider adopting a policy which mirrors the latest Proposed Supplementary Main Modification SMM 43 to policy H8 (Purbeck Local Plan), specifically paragraph e.

The effect of this wording is to demonstrate that developments will be scrutinised under the Habitats Regulations 2017 as amended.

Following our discussion about the various current and proposed natural greenspace mitigation measures :

- Hawthorns (High Wood SANG)
- The Surplus Store, mitigation agreed including natural greenspace
- Policy 14, 2ha natural greenspace proposed

Natural England can advise that the number of dwellings the plan is making provision for is of a scale that an adapted wording of paragraph e) would be considered an appropriate approach given the current legal requirements as well as policy provision under the NPPF.

Subject to agreeing wording Natural England will be able to withdraw our objection to the draft ANP.

I await your consideration and proposed adjustment.

Yours sincerely

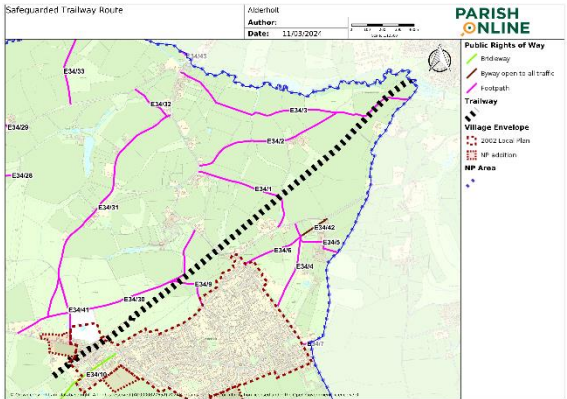
Nick Squirrell
Conservation and Planning Lead Advisor
Dorset Team
Wessex Area Team
Natural England

Email response from Parish Council’s Planning Consultant dated 26/03/24 contained the following information relating specifically to NE points and the proposed response:

Para / Policy	Matters raised (summarised)	NPG Response (<i>italics = change to NP</i>)
Policy 5	Reference to provision of bird/bat/bee bricks/boxes is welcomed	Support noted.
Policy 6	This policy is welcomed. In the light of the now legal requirement for Biodiversity Net Gain it may be appropriate for the Plan to consider the identification of areas to which priority should be given for net gain. The plan area is also well resourced in coverage of Ancient Woodland, and consideration should be given to the encouragement of the restoration of planted ancient woodland areas to native broadleaved cover as a contribution to both biodiversity restoration and positive climate change measures at a time of ecological emergency.	Support noted. The matter of off-site BNG will depend on the potential willingness of landowners to offer such opportunities, in the knowledge that this will require them to commit to management of that land in a certain way for at least 30 years. This will require further discussion / negotiation to clarify, and may be something that can be explored through the next view, with the supporting text simply noting this as an option at this point. <i>Include within supporting text reference to potential opportunities for off-site compensatory measures through the restoration of planted ancient woodland areas to native broadleaved cover.</i>
Para 4.1.17	It is incorrect to say that excessive nutrient enrichment is due solely to sewage as the highest proportion comes from agricultural sources which act in-combination with nutrients from STWs. The text should be adjusted. Following the full enactment of the Levelling Up and Regeneration Act 2023 it is likely that the nutrient offsetting requirements will change as lower discharge levels at STWs are required.	Noted. The text was no intended to imply that it was the sole reason, but rather a contributing factor to the harm – particularly given that the cumulative impact is considered to be significant. <i>Amend text by inserting “one of a number of factors” and reference LURA-based anticipated changes.</i>
Policy 7	The indicative housing target of 192 is in principle agreeable to Natural England, however whilst the two larger developments 44 and 89 are approved subject to providing mitigation, and provision of further heathland mitigation as part of Policy 14, there could still be a shortfall in mitigation provision over the plan period. Natural England advise that the plan group consult the Council forward planning officers about how best to address this matter	Following discussions with Natural England and Dorset Council, the level of development is clarified as up to 192 dwellings based on: Alderholt Surplus Stores, Daggons Road pp 3/11/0558/REM granted 24/03/2015 for 89 dwellings Land north of Ringwood Road pp 3/19/2077/RM granted 14/07/2023 for 44 dwellings (net) 58 Ringwood Road pp P/RES/2023/00142 pending for 4 dwellings Alderholt Nursery, East of Ringwood Road, NP Policy 12 for (about) 20 dwellings

Para / Policy	Matters raised (summarised)	NPG Response (<i>italics = change to NP</i>)
		<p>Paddock South of Daggons Road, NP Policy 13 for (about) 15 dwellings</p> <p>Land South of Blackwater Grove, NP Policy 14 for (about) 15 – 20 dwellings</p> <p>In addition, it is possible that additional dwellings may come forward through windfall (infill) development within the village envelope. Based on the 5 year average (2018-2023) this could be in the region of 5 dwellings per annum, or 30 dwellings for the period 2028 – 2034. These windfall sites would also require mitigation. At the current time, there is a single pending application for 1 dwelling on land at South Lodge, Daggons Road (P/FUL/2023/03371) – whilst this is outside of the village envelope, it could potentially be approved if mitigation can be secured prior to the Neighbourhood Plan coming into effect. There is also an application for up to 1,700 dwellings on land to the South of Ringwood Road which was refused planning permission in July 2023 (P/OUT/2023/01166). This decision has been appealed, but given the refusal and proposals within the plans to provide mitigation, this application has not been included in the above assessment. In terms of mitigation, the following projects are identified:</p> <p>HIP at Alderholt Surplus Stores, Daggons Road (planning application reference 3/11/0558/REM) - within the northern part of the site currently being developed</p> <p>High Wood SANG (planning application reference 3/20/1732/FUL), currently linked to delivery of Land north of Ringwood Road</p> <p>HIP on Land South of Blackwater Grove, 2ha site proposed as part of NP Policy 14.</p> <p>Whilst the above should be sufficient to mitigate the extant planning consents and site allocations, it is accepted that the mitigation measures need to come forward in a timely manner and may need to be revisited should the rate of past infill windfall development continue / increase further.</p> <p>Natural England have advised that adapted wording (using a similar approach to that agreed in the latest Proposed Supplementary Main Modification SMM 43 to policy H8(e)</p>

Para / Policy	Matters raised (summarised)	NPG Response (<i>italics = change to NP</i>)
		<p>(Purbeck Local Plan), would address this potential risk.</p> <p><i>Insert the following paragraph at the start of the HRA section of Policy 7:</i></p> <p><i>The impact of proposed development on the national site network (including European sites), alone or in combination with other existing and proposed development, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019 and/or any equivalent relevant legislation or regulations. Where there is a probability or risk of a significant effect, the proposed development will be subject of an appropriate assessment (taking into account the lifetime of the development). Development proposals should, therefore, be accompanied by information reasonably required to undertake an appropriate assessment, and demonstrate how the development will avoid or otherwise mitigate any adverse impact on the integrity of any relevant site(s) in the national site network. Delete reference to “a project level Habitats Regulations Assessment” in the next paragraph (to avoid duplication).</i></p> <p><i>Amend second bullet of 4.1.11 with the insertion of “including any planning applications where there is a net gain in homes”</i></p> <p><i>Amend supporting text (4.1.12) to read as follows:</i></p> <p><i>The following Heathland Infrastructure Projects are currently identified, and, together with Strategic Access, Management and Monitoring, are expected to be sufficient to mitigate the likely impact on the heathland area arising from the amount of housing development anticipated during the plan period:</i></p> <ul style="list-style-type: none"> <i>• HIP at Alderholt Surplus Stores, Daggons Road (planning application reference 3/11/0558/REM)</i> <i>• High Wood SANG (planning application reference 3/20/1732/FUL)</i> <i>• HIP on Land South of Blackwater Grove (Policy 14)</i> <p><i>This mitigation will need to be delivered in a timely fashion, and landowners are expected to</i></p>

Para / Policy	Matters raised (summarised)	NPG Response (<i>italics = change to NP</i>)
		<p><i>work together, potentially purchasing ‘credits’ from the respective HIP / SANG landowner to secure their delivery, or to agree suitable alternative provision with Natural England. Applicants should therefore assist Dorset Council with information regarding the contribution that their site will make towards the proportionate delivery of these mitigation projects.</i></p>
<p>Policy 9 Policy 13</p>	<p>Support the proposed recreational path/cycle link east from Alderholt towards Fordingbridge. Object to the proposed Trailway route to the west of Alderholt as the route passes through several parts of Cranborne Common SSSI, SPA, SAC and Ramsar. The plan presents no evidence or assessment which indicates how recreation related impacts can be avoided, despite proposing a direct route into the designated sites from the settlement. In the absence of any information to conclude otherwise the western link should not be proposed, although the Plan may still indicate an intention to explore further westwards options during the plan period. A similar adjustment needs to be made to Para 4.2.12 and Policy 13 in relation to the Trailway. The westwards extension should be considered as uncertain at this time.</p>	<p>Support of eastward link noted. Note concerns raised regarding the westward link, and whilst this was recognised in the draft Plan (4.1.24 and Policy 9), agree that these can be ‘downgraded’ for the part of the track extending beyond the western extent of the village to a feasibility project at this stage. <i>Amend second part of 4.1.24 to read: “The route going east from the village towards Fordingbridge provides the most potential benefit for local trips, and should therefore be prioritised in bringing forward this project. A westerly link towards Verwood, whilst desirable, could increase recreational pressures on Cranborne Common (an important part of the Dorset Heathlands), and Natural England have advised that further work is needed to show how such harm could be avoided. As such this west-bound route, beyond the village, is not shown, pending further feasibility work. ” Amend map as follows:</i></p>  <p><i>Amend second paragraph of Policy 9 to read: “Any proposals to extend the trailway west of Daggons Road will need to be supported by a project-level Habitats Regulations Assessment, demonstrating that the impacts of any potential increase in recreational footprint on</i></p>

Para / Policy	Matters raised (summarised)	NPG Response (<i>italics = change to NP</i>)
		<p><i>the Dorset Heathlands are adequately mitigated”</i></p> <p><i>Amend Trailway Project by the addition of: “This will include further feasibility work, particularly with regard to any westward extension towards Verwood, given the need to avoid harm to Dorset heathlands.”</i></p> <p><i>Amend Policy 13 to refer to “Future connections through land to the south to provide the potential for pedestrian / cycle links to the Trailway, if this is extended westwards from the village, should be included within the design of the layout.” And update the supporting text accordingly to reference that this route ‘may’ run to the south and is subject to further feasibility work.</i></p>
Policy 11	No objection.	Noted.
Policy 14	<p>This site is known to support at least two species of protected reptiles. The proposed mitigation project at this site is of a suitable scale for the number of dwellings indicated. The configuration of the area will need to be informed by an ecological survey. It is likely that the area supports breeding birds and may also be of importance for bats and SPA birds. The policy wording should be adjusted to accessible natural greenspace.</p>	<p>Noted – suggest amending text to reference these points.</p> <p><i>Add the following to the start of the supporting text on ecology “This site is known to support at least two species of protected reptiles. Any areas that support breeding birds may also be of importance for bats, and will need to be considered with reference to the Dorset heathlands (as one of the reasons for its significance related to breeding birds such as the European nightjar and Dartford warbler). ”</i></p>
Policy 16	Support the allocation of the Important Local Green Spaces.	Support noted.
Policy 18	<p>Some viewpoints are currently dependent on trees which are nearing the end of their lifespan eg V1. It would seem appropriate for the Plan to indicate that some of these locations should be priority locations for tree enhancement/management eg through the oak tree project.</p>	<p>Noted and agreed.</p> <p><i>Add additional paragraph in supporting text “Where trees are important landmarks within views, their retention and ongoing management is encouraged, and may form part of the Oak Tree Project.” Amend project to reference “and in locations where trees are important in local views”</i></p>

Date: 28 March 2024
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BY EMAIL ONLY

Dear Jo,

Alderholt Neighbourhood Plan modifications

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for the information supplied in your email dated 26 March 2024.

I can confirm that Natural England have **no objection** to the proposed Neighbourhood Plan modifications. It would be appropriate for a conclusion of no adverse effect on the integrity of the designated habitats and International sites to be reached.

Therefore the plan can be taken forward with the wording as set out in the modifications.

I trust this advice will be of assistance to you.

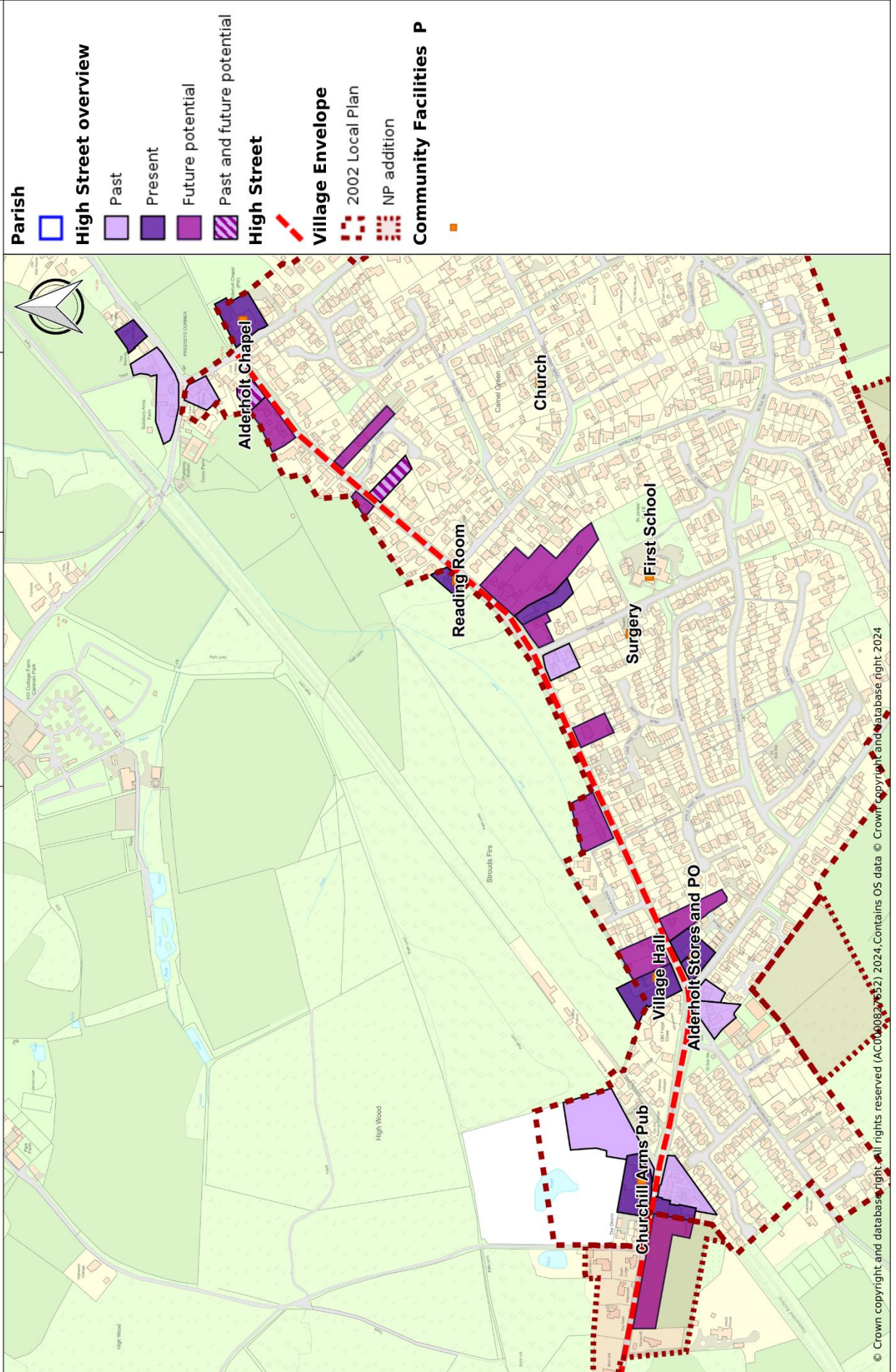
Yours sincerely

Nick Squirrell
Conservation and Planning Senior Advisor
Dorset Team
Wessex Area Team
Natural England

Alderholt

Author:

Date: 27/07/2024



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