

**Matters and Issues 3**

**4. Protection of designated habitats: Are all site allocations for residential development which are required to provide mitigation capable of providing SANG or alternative acceptable mitigation?**

**Part of Plan that is unsound: WMC3 & Map 8.3, WMC4, WMC5, WMC6, CM1, FWP3, FWP4, FWP6, FWP7, VTSW7, VTSW4**

**Soundness criterion that it fails:** Not consistent with NPPF109

**Why it fails - key parts of original representation**

**360302 - CSPA WMC3 & Map 8.3, WMC4, WMC5, WMC6, CM1, FWP3, FWP4, FWP6, FWP7, VTSW7**

**522117 - CSPA VTSW4**

<b>East Dorset Development site</b>	<b>Comments</b>
WMC3 Cuthbury	<b>FD5</b> indicates SANG has been identified but no further detail. No survey data. Potential for high water table/seasonal flooding in this area depending on location
WMC4 Stone Lane	<b>FD5</b> identifies potential risk to R Allen from <i>intrusive investigations to check for hotspots of pollution.</i> SANG not identified as at June 2013.
WMC5 Cranborne Road – Area to East	No survey data. Have expressed concerns to developers about layout.
WMC5 Cranborne Road – Area to West	No survey data. Concerned about damage to soil structure and impact on wet grassland habitat by machinery used to construct hard surfaced pathways and through additional pedestrian use. Much of land will be inaccessible when river is in flood.
WMC6 South of Leigh Road	No survey data
CM1 Lockyer’s School & North Corfe Mullen	No information on SANG availability
FWP 3,4,6 and 7	No survey data for development site or SANG. Potential for damage to soil structure on sites that are waterlogged for part of year. Flood risk for part of SANG for FWP7.
VTSW4	No survey data. Concerns about impact on R Crane SSSI and tributary and on SNCI woodland (Romford Bridge Copse).

	Wet grassland area of SANG adjacent to disused railway line may be unsuitable.
VTSW7 St Leonards Hospital	Only summary survey mapping of site has been made available. Proposals for development and mitigation will not be put into the public domain until 29 August.

Despite repeated assurances over several years that ecological surveys were being undertaken, (including at EDDC Full council Meeting March 2012) we have no evidence that work has been undertaken and no survey data for any of the proposed development sites or SANGs have been made available. **Thus it is impossible to answer the question and comment on the acceptability of mitigation.**

For all residential developments there is

- No survey data so no indication of what biodiversity will be lost and how biodiversity gain will be achieved
- No documented evidence of the effectiveness of SANGs. Although it has lessened them considerably, the SPD has not resolved the risks to heathland.

For residential developments where sites proposed for SANGs are waterlogged or flooded for part of the year, there is a risk of soil compaction and damage to soil structure with a knock on impact on biodiversity. These issues are discussed in response to **Matters and Issues 10.7 – SANG Guidelines**

It is understood that some land identified on the proposals maps as potential SANG will not be available.

#### **How it can be made sound**

Provide and review all ecological survey data, quantify risk and identify mitigation and how biodiversity gain will be achieved.

Ensure fall-back position for those sites that risk most adverse impact on heathlands if SANG and other Heathland SPD measures are inadequate.

#### **Modification sought**

Undertake partial review of Core Strategy as informed by monitoring and review of effectiveness of ME policies.

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**5. Do all site allocations satisfactorily address biodiversity?**

**Part of Plan that is unsound: WMC3 & Map 8.3, WMC4, WMC5, WMC6, CM1, FWP3, FWP4, FWP6, FWP7, FWP8, VTSW7, VTSW4, para 13.20** (applies to all site allocations) **CSPS Sustainability Report: WMC5 and VTSW4** SA criterion 3 Pollution

**Soundness criteria that it fails:** Does not comply with National Policy NPPF 109, 117, 125. No site allocation is consistent with NPPF109.

**Why it fails - key parts of original representation**

**360302 - CSPS WMC3 & Map 8.3, WMC4, WMC5 and appended Light Pollution document, WMC6, CM1, FWP3, FWP4, FWP6, FWP7, FWP8, VTSW7, para 13.20 and Soil Carbon document.**

**522117 - CSPS VTSW4**

Lack of survey precludes any consideration of biodiversity issues for any development site or SANG other than proximity to internationally designated heathland. The exception to this is the land originally proposed at NE Verwood where a recent planning application was supported by an Environmental Impact Assessment.

Lack of data has precluded consideration of priority habitats and species and the potential for enhancing biodiversity including habitat connectivity (as required by NPPF109 and 117).

Of particular concern are:

<b>East Dorset Development Site</b>	<b>Comments</b>
WMC2 Allendale Area	Light pollution risk to R Allen
WMC3 Cuthbury	Light pollution risk to R Stour
WMC4 Stone Lane	Light pollution risk to R Allen
WMC5 Cranborne Road	Boundary observations suggest at least moderately good biodiversity of grassland on part of site. Light pollution risk
FWP7 W of New Road, W Parley	Although we have seen no survey data, we are advised that survey here has been restricted to looking at what is evident while being heavily grazed by horses. Light pollution risk to R Stour
FWP8 Blunts Farm	We support the approach recommended by Natural England in FD5
VTSW4 NW Verwood	Risk of compromising veteran oaks, SNCI woodland, wet grassland, R Crane, nightjar and turtle dove territory. Significant light trespass with high impact on landscape and biodiversity.
VTSW6 Woolsbridge	Wildlife Strategy should include consideration of light pollution risk to Moors River, SSSI and SSSI

The only housing development where special mention is made of a requirement for SuDS is WMC5 despite the significant water attenuation volumes identified by BroadwayMalyan for

many of the development sites. Without attenuation there will be changes to biodiversity of adjacent land and downstream watercourses and habitats. The sites affected are discussed in detail under **Matters and Issues 10.7 SANG Guidelines**.

Ecosystem services including pollination and the critical role of soil ecosystems in maintaining and enhancing soil carbon have not been taken into consideration.

The impact of light pollution is of particular concern where development will impact on priority species and habitats and where the land is open in character so that light trespass affects the wider countryside (AGLVs and AONB). ETAG submitted a detailed review of impact of light pollution in response to the Options consultation: this was also appended to our response to CSPS WMC5. Detailed comments on each of the sites is given in Appendix 1 C of that document (using the site numbering assigned to the Options consultation). It was prepared in consultation with the Campaign for Dark Skies.

Policy only mentions light pollution in relation to impact on Landscape Quality (Policy HE3) and not its impact on biodiversity (NPPF125). Within the Core Strategy, light pollution only appears to have been taken into partial consideration for site WMC6 (lighting of pitches).

The CSPA Sustainability Report claims that any risk of light pollution for WMC5 is adequately covered by ME4 and HE3. We do not accept this. It acknowledges that VTSW4 will cause light pollution but has failed to address it. Photographs are appended.

We provided EDDC with the contact details of a lighting consultant recommended by the Campaign for Dark Skies in September 2012 but understand that no work has been undertaken on this critical aspect of deliverability of sites. (Nigel Pollard, NEP Lighting Consultancy, 6 Leopold Buildings, Bath, BA1 5NY tel: 01225 338937 fax: 01225 338937 e-mail: [nigelpollard@neplightingconsultancy.co.uk](mailto:nigelpollard@neplightingconsultancy.co.uk) ).

### **How it can be made sound**

Review all ecological survey data and identify what biodiversity gain will be achieved. Ensure fall-back position for those sites that risk most adverse impact on heathlands if SANG and Heathland SPD are inadequate. Any adjacent SSSI should be expanded and buffered substantially, re-creating areas of priority habitat: provision should be made for its long term management.

Although Policy ME6 requires new developments to result in no net increase of surface run-off, it is unclear if this policy includes SANGs and natural greenspace associated with the development. Special attention should be paid to the drainage requirements of all sites identified as having a water attenuation requirement to ensure deliverability.

Policy should clarify the importance of the impact of light pollution on biodiversity as well as landscape.

### **Modifications sought:**

- 1. Identify biodiversity gain that will be achieved.**
  - 2. Ensure fall-back position if heathland mitigation measures are inadequate.**
  - 3. Acknowledge risk to biodiversity due to light pollution from development on each of the sites identified by Campaign for Dark Skies and ensure mitigation is feasible for each one to ensure deliverability of development.**
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