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Date: 21/12/2022

Officer: Yvonne Wiacek

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Dear Ms Smith,

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017: EIA SCOPING OPINION

P/ESP/2022/07270: LAND AT ALDERHOLT, RINGWOOD ROAD, DORSET

Thank you for your letter requesting that the local planning authority adopts an Environmental Impact Assessment (EIA) Scoping Opinion for the proposed works at Land at Alderholt, Ringwood Road, Dorset (your ref: SRS/22-00541, dated 17th November 2022). The proposed development comprises the creation of a Garden Village of up to 1,700 dwellings, 10,000m² of employment space, a local centre, and green infrastructure which includes the provision of Suitable Alternative Natural Greenspace (SANG) and associated highway/drainage. The proposed development site is either side of the Ringwood Road to the south of Alderholt. An (EIA) Scoping Report (your ref: SRS/22-00541, dated 15th November 2022) was also submitted.

The statutory consultation bodies, which are Natural England, Historic England and the Environment Agency, were consulted in accordance with Regulation 15(4) of the EIA Regulations on 13th December 2022. The Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB) team, and the Flood Risk Management Team, Natural Environment Team, Senior Landscape Architect, Senior Architect at Dorset Council were also consulted. The consultation responses are appended to this EIA scoping opinion letter.

Dorset Council has adopted the EIA scoping opinion presented in this document.

The main purpose of this EIA scoping opinion is to state the information which should be provided in the Environmental Statement (ES).

In forming this EIA scoping opinion, Dorset Council have taken into account the representations made and the following information in accordance with Regulation 15(6) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations'):

- any information provided by the applicant about the proposed development;
- the specific characteristics of the development;
- the specific characteristics of development of the type concerned; and
- the environmental features likely to be significantly affected by the development.

Please note that this letter does not duplicate all of the detailed guidance provided but gives an overview of the key points which are raised.

Requirements of the Environmental Statement

The EIA regulations set out the statutory requirements which an Environmental Statement must meet in order to achieve legal compliance, including who should undertake an Environmental Statement and the information which an Environmental Statement must contain.

Regulation 18(5) states that in order to ensure the completeness and quality of the Environmental Statement, it must be prepared by competent experts and accompanied by a statement outlining the relevant expertise, or qualifications of such experts, to demonstrate that this is the case.

The Environmental Statement must contain the information specified in regulation 18(3) and must meet the requirements of regulation 18(4) of the EIA regulations.

Regulation 18(3) of the EIA regulations states that an environmental statement is a statement which includes at least:

- (a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;
- (b) a description of the likely significant effects of the proposed development on the environment;
- (c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- (e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and
- (f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

Regulation 18(3) of the EIA regulations states that an Environmental Statement must:

- (a) where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction);
- (b) include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment; and
- (c) be prepared, taking into account the results of any relevant UK environmental assessment, which are reasonably available to the person preparing the environmental statement, with a view to avoiding duplication of assessment.

The Environmental Statement must also include any additional information specified in Schedule 4 of the EIA Regulations which is relevant to the proposed development and environmental features likely to be significantly affected, including:

1. A description of the development, including in particular:

(a) a description of the location of the development;

(b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;

(c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;

(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:

(a) the construction and existence of the development, including, where relevant, demolition works;

(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;

- (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
- (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
- (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
- (g) the technologies and the substances used.

The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC and Directive 2009/147/EC.

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

9. A non-technical summary of the information provided under paragraphs 1 to 8.

10. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.

Summary of consultation responses

The EIA Scoping Report suggests which environmental topics will be included in the environmental statement, and which will not be included.

Dorset Council suggest that the following environmental topics should be included in the Environmental Statement as a minimum:

- Ecology;
- Historic Environment/Cultural heritage, including architectural and archaeological aspects;
- Landscape and Visual; and
- Flooding.

The following sections provide a summary of the advice relating to the scope of the EIA for each environmental topic to be included in the Environmental Statement.

Ecology

According to Natural England, the proposed development has the potential to affect the following European wildlife sites, which are defined as 'sensitive areas' according to Regulation 2(1) of the EIA Regulations:

- Dorset Heathlands European Sites (SAC, SPA and Ramsar);
- River Avon SAC;
- New Forest European Sites (SAC, SPA and Ramsar); and
- Solent Marine European Sites (SAC, SPA and Ramsar).

The Environmental Statement should thoroughly assess the potential for the proposal to affect European Sites, including any functionally linked land outside the designated site.

Natural England have identified the following possible impact pathways that should be assessed in the Environmental Statement:

- Recreational impacts on Dorset and New Forest Heathlands;
- Hydrological impacts on the River Avon including nutrient loads and water consumption within the catchment;
- Water quality impacts on the Solent Marine Sites through increased nutrient loads; and
- Air quality.

The proposed development also lies in close proximity to the following Sites of Special Scientific Interest (SSSI), which are also defined as 'sensitive areas':

- Cranborne Common SSSI;
- Verwood Heaths SSSI;
- Bugdens Copse and Meadows SSSI;
- Holt and West Moors Heaths SSSI;

- Eddlake Bog SSSI;
- Bousbury Wood SSSI;
- Moors River System SSSI;
- River Avon System SSSI; and
- Avon Valley (Bickton to Christchurch) SSSI.

The Environmental Statement should include a full assessment of the direct and indirect effects of the development upon the features of special interest within the SSSI, and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the SSSI.

Natural England advise that the Environmental Statement should also consider any impacts upon local wildlife and geological sites, including local nature reserves. The development site is within or may impact on the following Sites of Nature Conservation Interest (SNCI):

- Sleepbrook Farm SNCI immediately adjacent and to the west of the site; and
- Alderholt Heath SNCI approximately 110m to the north west of the site.

The development site lies in close proximity to ancient woodland. Natural England suggest that the Environmental Statement assesses the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate adverse impacts in addition to considering opportunities for enhancement of this habitat.

In addition to the assessment of impacts upon European, national and local wildlife sites, Natural England state that the Environmental Statement should:

- Assess the impact of all phases of the proposal on protected species;
- Assess the impact of the proposal on Priority Habitats and Species;
- Use an appropriate biodiversity metric (such as Biodiversity Metric 3.0) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain;
- Meet all the requirements of the Dorset Biodiversity Appraisal Protocol including the provision of a Dorset Council Natural Environment Team agreed Landscape and Ecological Management Plan (LEMP);
- Give consideration to the direct and indirect effects on the Area of Outstanding Natural Beauty (AONB) and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered;
- Include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies;

- Give consideration to potential impacts on access land, common land and public rights of way;
- Include the degree to which soils would be disturbed or damaged as part of the development and the extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted;
- Include the risks of air pollution and how these can be managed or reduced;
- Include any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels;
- Identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people; and
- Consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains.

The Environment Agency have requested that the Environmental Statement considers the impact of additional nutrients on the River Avon catchment due to increased foul drainage.

The Natural Environment Team at Dorset Council recommend that impacts on biodiversity are addressed by following the Dorset Biodiversity Appraisal Protocol (DBAP) Guidance. The DBAP is designed to meet the requirements of Natural England Protected Species Standing Advice and to address the mitigation hierarchy as set out in the National Planning Policy Framework (2021). This means development must avoid, mitigate, and compensate impacts on biodiversity, and requires development to provide biodiversity net gain.

All DBAP applications are required to provide net gain. However, it is expected that The Environment Act 2021 will make biodiversity net gain mandatory in November 2023. Given the likely timescales involved, they recommend that proposal is designed at an early stage to achieve a minimum 10% biodiversity net gain, and that the latest biodiversity metric is used to achieve this.

The Natural Environment Team have also indicated that the potential mitigation measures provided in the Scoping Report do not appear to be comprehensive. It is recommended that the applicant ensures that, early in the design phase, the mitigation hierarchy is implemented to do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with decision-makers, should the applicant compensate for losses that cannot be avoided.

The Natural Environment Team also state that ecological surveys should be up to date to ensure that mitigation is based on the most recent findings, as there can often be significant delay between the EIA Scoping stage and submitting a planning application. Therefore, please ensure that ecological surveys are undertaken in line with the CIEEM advice note 'On the Lifespan of Ecological Reports & Surveys'.

Archaeological aspects

The following Scheduled Monuments, which are defined as 'sensitive areas' according to the EIA Regulations, are located in the areas surrounding the proposed site:

Scheduled Monuments including:

- "Bowl barrow in Plumley Wood, 630m east of decoy pond, on Cranborne Common" approximately 810m to the south west of the site; and
- "Length of deer park bank and ditch at Alderholt" approximately 450m to the north of the site.

In addition, the following Listed Buildings are located in the areas surrounding the site:

- "Grade II Church of St James" approximately 670m to the north west of the site;
- "Grade II Alderholt War Memorial Cross" approximately 670m to the north west of the site;
- "Grade II Primrose Cottage" approximately 780m to the south east of the site; and
- "Grade II Fernhill Cottage" approximately 955m to the south east of the site.

Historic England advise that the local authority's conservation and archaeology advisers are closely involved throughout the preparation of the application impact assessments. They are best placed to advise on local historic environment issues and priorities (including access to data held in the Historic Environment Record), adverse impacts on non-designated archaeological assets and other elements of the historic environment; required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Steve Wallis, Senior Archaeologist at Dorset Council, has recommended that archaeological trial trenching following a geophysical survey is undertaken prior to determining an application (see Paragraph 6.11 of EIA Scoping Report). In addition, Steve Wallis notes that there is reference to 'Further evaluation to either remove/record potential buried assets' in paragraph 6.109 of the EIA Scoping Report. However, this should refer to 'Further excavation' as evaluation is what happens before determination to give an understanding of a development's archaeological impact, and so is not mitigation.

Historic England have also commented on the archaeological assessment and concur with the proposal to undertake further archaeological assessment within the proposed application site in the EIA scoping report. They advise that the Environmental Statement should include a geophysical survey and archaeological trial trenching in the area of the proposed surface development, in order to identify and investigate any below-ground archaeological remains present within the affected areas.

Historic England considers that there is potential for significant archaeological sites to be discovered on the application site. They confirm there are records of several Bronze Age bowl barrows, in the area of woodland south of Alderholt and Cranborne Common, some of which survive as low earthworks and are designated as scheduled monuments. The presence of the barrows indicates that contemporary Bronze Age settlement was situated nearby, and the lower land, extending towards Alderholt Common is a possibility. There is therefore potential for significant archaeological sites to be discovered on the application site, and the Environmental Statement should consider their significance in terms of the heritage setting. They would

expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these sites. Any significant Bronze Age remains discovered on the application site (e.g. remains of barrow burials) are likely to be of national importance and come within the scope of NPPF Footnote 68 which states that 'non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, 'should be considered subject to the policies for designated heritage assets'.

Landscape and Visual Impact

Cranborne Chase and West Wiltshire Downs AONB, a sensitive area according to the EIA Regulations, is located approximately 1.7km north west of the site.

The Cranborne Chase and West Wiltshire Downs AONB Team advise the following should be adequately covered in the Landscape and Visual Chapter of the Environmental Statement:

- An assessment of the recreational impacts on the AONB of such a significant development, and influx of a large number of residents, a short distance from the boundary;
- An assessment of the impacts on tranquility of the AONB from a large mixed development based around a road that leads directly into the AONB;
- The Cranborne Chase and West Wiltshire Downs AONB is the 14th International Dark Sky Reserve (IDSR) in the world and the LPA has an obligation to reduce light pollution (not simply minimise the increase in light pollution). The Environmental Statement should include IDSR matters and compliance;
- The primary route through the proposed development leads directly into the AONB, and one of its key villages, Cranborne. The impacts of traffic both during construction and on-going operation should be included in the Environmental Statement;
- The impacts and scale of the above effects should consider how these impacts could be avoided, mitigated, or compensated for; and
- Assessments of cumulative impacts, in the context of the AONB, should include all recent and potential development on all sides (not just from the Alderholt direction).

The Senior Landscape Architect at Dorset Council has advised that the full effects of the proposal should be addressed through a comprehensive Landscape and Visual Impact Assessment (LVIA) and this should be carried out in line with best practice guidance (Guidelines for Landscape and Visual Impact Assessment Third Edition – Landscape Institute and Institute of Environmental Management and Assessment). The production of photography and visualisations should be prepared in accordance with the Landscape Institute's Technical Guidance Notes 06/19.

The LVIA should assess the sensitivity of landscape and visual receptors to the proposed development and provide an indication of the magnitude of change and the significance of likely effects. It must be an objective assessment, display clarity and transparency in its reasoning and should be produced in accordance with the following:

- Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (3rd Edition, 2013), produced by the Landscape Institute and the Institute of Environmental Management;

- Landscape Institute Technical Guidance Note 06/19 Visual Representation of Development Proposals; and
- Landscape Institute Technical Information Note 08/19 Visual Representation of Development Proposals: Camera Auto Settings.

The submitted LVIA will be assessed in accordance with:

- The Landscape Institute Technical Guidance Note 01/20 Reviewing Landscape and Visual Impact Assessments (LVIA's) and Landscape and Visual Appraisals (LVA's).

Flooding

The Environment Agency's consultation response states that there are areas of fluvial flood risk within the site, predominantly along the western boundary, but note that built development will not be located within these areas. They explain that the designs will need to take account of any increases in flood risk over the lifetime of development, but provided these areas are avoided in terms of built development, and used for compatible uses only, the Environment Agency are unlikely to raise concerns. Elements of the scheme such as drainage, water resources and pollution impacts during construction, will need to be managed as part of any planning application.

According to the Flood Risk Management Team at Dorset Council, the scope for assessment of flood risk and surface water management set out in the EIA scoping report appears to be appropriate. The applicant is advised to prepare their conceptual surface water drainage strategy based on a 45% climate change rainfall uplift, rather than the 40% uplift stated in the scoping report. If required, a detailed response from the Flood Risk Management Team at Dorset Council regarding the quantum and nature of Sustainable Drainage Systems (SuDS), and flood mitigation, would constitute pre-application advice and be chargeable.

If you have any questions about the information submitted in this letter, please do not hesitate to contact me.

Yours sincerely,

Yvonne Wiacek

Appendix A: Consultation Responses

Date: 20 December 2022

[Click here to enter text.](#)



Yvonne Wiacek
Dorset Council

BY EMAIL ONLY

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Dear Yvonne

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017)

Location: Land at Alderholt, Ringwood Road - EIA Scoping Opinion

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 19 December 2022.

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.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Regards

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Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the Dorset Environmental Records Centre (DERC).

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

International and European sites

The development site is within or may impact on the following European / Internationally designated nature conservation site(s):

- Dorset Heathlands European Sites (SAC, SPA and Ramsar)
- River Avon SAC
- New Forest European Sites (SAC, SPA and Ramsar)
- Solent Marine European Sites (SAC, SPA and Ramsar)

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)

fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 181 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) will need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment

<https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Possible impact pathways that should be assessed include:

- Recreational impacts on Dorset and New Forest Heathlands.
- Hydrological impacts on the River Avon including nutrient loads and water consumption within the catchment.
- Water quality impacts on the Solent Marine Sites through increased nutrient loads.
- Air quality (all sites)

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest**:

The application site lies in close proximity to the following sites:

- Cranborne Common SSSI
- Verwood Heaths SSSI
- Bugdens Copse and Meadows SSSI
- Holt and West Moors Heaths SSSI
- Eddlake Bog SSSI
- Bouldsbury Wood SSSI
- Moors River System SSSI
- River Avon System SSSI
- Avon Valley (Bickton to Christchurch) SSSI

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 180 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The development site lies in close proximity to ancient woodland.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland. The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Biodiversity net gain

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature

conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

The Dorset Biodiversity Appraisal Protocol

The scheme should ensure it meets all the requirements of the Dorset Biodiversity Appraisal Protocol including the provision of a Dorset Council Natural Environment Team agreed Landscape and Ecological Management Plan (LEMP). Further information on the protocol may be found at:

<https://www.dorsetcouncil.gov.uk/countryside-coast-parks/countryside-management/biodiversity/the-dorset-biodiversity-appraisal-protocol>

Landscape

Nationally Designated Landscapes

The development site may lie within the setting of the Cranborne Chase Area of Outstanding Natural Beauty.

The NPPF (paragraph 176) provides the highest level of planning protection for these nationally designated landscapes.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). [Planning Practice Guidance](#) confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by

the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon

store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and

The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88%

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#)

(2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.



Ms Yvonne Wiacek

Direct Dial: 0117 975 1338

Dorset Council

Our ref: PL00791907

16 December 2022

Dear Ms Wiacek

**The Town and Country Planning (Environmental Impact Assessment) Regulations 2017
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT Alderholt Meadows, Fordingbridge**

Thank you for your letter of 13 December 2022 consulting us about the above EIA Scoping Report. The proposal is for a large residential development of approximately 1,700 dwellings covering 122 hectares. Below we offer some comments on historic environment issues which we hope will help clarify the level of information which the local authority needs for this application.

Introduction

It is for the local authority to determine whether an EIA should be prepared for the proposed development. In this particular case, we would expect that an application (whether it is in the form of an EIA or an ES or impact assessments accompanying a planning application) to examine the potential impacts upon all heritage assets likely to be affected.

This would include designated heritage assets and their settings, together with potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This covers buildings, historic open spaces, historic features and the wider historic landscape including below-ground archaeology.

It is for the application to demonstrate that heritage assets will not be unjustifiably harmed. It is therefore essential that the EIA, ES or Heritage Statement accompanying a planning application bases the size of the study area, the scope of its assessments



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of physical impact on archaeological remains, and on the settings of heritage assets, on demonstrable evidence, and omissions from assessment need to be properly justified and supported by appropriate evidence.

In response to your consultation, and from the information we have, we have reviewed the designated heritage assets in the vicinity of the proposal for potential impact on their settings and significance by the proposed development.

Please note that our main focus in EIA consultations is on high grade designated heritage assets (i.e. Scheduled Monuments, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Registered Battlefields). We are not in a position to assess impacts on other designated and undesignated heritage assets (including Grade II listed buildings and non-designated archaeological assets). The exceptions to this are heritage assets which are significant to the setting of a designated heritage asset, or archaeological sites which may potentially be of national importance and/or of equivalent significance to a scheduled monument, (and which come within the scope of NPPF footnote 68 which states that non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. This may potentially apply to significant survivals of Bronze Age ritual or funerary sites such as barrows, or to domestic occupation sites.

Archaeological heritage assets in the area of the proposal site

In general, archaeological remains in the lowland heath areas of Dorset and Hampshire tends to be dominated by Bronze Age remains, when the areas were occupied by farming communities. The most visible remains are the communities' burial monuments, made in a variety of forms of circular 'round barrow', the most common of which are bowl barrows.

This applies to the area close to the proposal site, in the area of woodland south of Alderholt and Cranborne Common. where there are records of several Bronze Age bowl barrows, some of which survive as low earthworks and are designated as scheduled monuments.

Barrows are a type of Bronze Age funerary monument that was once a distinctive feature of the heathland landscape of this area. Prehistoric barrows are an important historic element today's multi-period landscapes, where they often occupy prominent locations and frequently form the earliest visible evidence of human occupation. Their considerable variation of form and longevity as a monument type provides important information on the diversity of beliefs and social organisations in early prehistoric society and on the landscape within which they were constructed. Most examples of prehistoric barrows, both nationally and regionally, date from the Bronze Age. Most have been reduced or levelled by later cultivation, or enveloped by forestry or built



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development, and those barrows that survive in good condition are of especially high regional and national significance and public value.

The Scoping Report by Rapleys (Ref SRS/22-00541, October 2022) notes that, there is evidence to indicate Bronze Age activity within and surrounding the proposal site notes (paragraphs. 6.103, 6.104).

Archaeological sites in this kind of landscape can be difficult to identify without detailed investigation, especially for the kinds of human activity likely to have taken place here, which might leave traces in the form of flint tools or flint-working debris, or burning, pits, post-holes and ritual deposits etc. Also significant are sites containing palaeoenvironmental and geoarchaeological evidence of changes in the local landscape as a result of human activity, but again methodical investigation is usually required in order to identify potential sources of such evidence.

The location of the accompanying settlement sites occupied by barrow communities is often unknown, as the sites are usually only found by archaeological survey and investigation. It is generally assumed that the communities lived on lower ground in valleys. However, this depends on the local topography and drainage, and allowance also needs to be made for dispersal of community activity, including ritual and funerary activity, across the landscape. The presence of the barrows indicates that contemporary Bronze Age settlement was situated nearby, and the lower land, extending towards Alderholt Common is a possibility.

In short, there is potential for remains of further Bronze Age activity to survive in the area of the application site. There have been a number of Neolithic hand tools found within the proposed site allocation including an early Bronze Age axe.

Any sites with archaeological or palaeoenvironmental evidence of human occupation or land use here during the prehistoric period, especially the Bronze Age, would be highly significant both for their own intrinsic interest and for their potential contribution to an understanding of the archaeological and environmental context of the neighbouring scheduled monuments in their setting. Importantly, any archaeological sites here would also have their own setting and associative value in relation to the scheduled barrows, thereby enhancing their heritage significance.

Additionally, any significant Bronze Age remains discovered on the application site (e.g. remains of barrow burials) are likely to be of national importance and come within the scope of NPPF Footnote 68 which states that ‘non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, ‘should be considered subject to the policies for designated heritage assets’.

Assessment of potential development impact on buried archaeological remains

The presence of archaeological remains on a development site, and the consequent



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need for mitigation through layout and design or through archaeological investigation and recording, can have a significant effect on proposals. In areas where waterlogged archaeological remains are present, then the potential impacts of development on drainage and groundwater levels, and thus on the preservation of the remains, also needs to be taken into account.

With regard to assessment of physical impacts on heritage assets, we would expect the area of proposed surface development to include appropriate survey and ground investigation, including geophysical survey and archaeological trial trenching, in order to identify and investigate any below-ground archaeological remains present within the affected areas.

We agree with the the recommendations within the application Scoping Report by Rapleys (paragraph 6.110 and 6.111) that further archaeological assessment within the proposed application site will be necessary.

For further advice on archaeological assessment and mitigation, we refer you to the local authority advisor on archaeological matters, Steve Wallis, Senior Archaeologist at Dorset Council.

Potential development impact on the settings of heritage assets

The application Scoping Report by Rapleys summarises the designated heritage assets in the vicinity of the proposed development site. These comprise a series of scheduled Bronze Age round barrows and the Deer Park boundary to the north. We agree with the assessment (paragraph 6.108) and consider that, in view of the local topography and the distance of the monuments from the application site, the proposed development would not have significant impact on the settings of these heritage assets, and in our view this would not require detailed assessment. We therefore have not included further details on assessment of settings of these designated scheduled heritage assets.

However, we would draw attention to points mentioned above about any significant archaeological sites discovered on the application site, and their significance in terms of heritage setting.

Firstly, all heritage assets have a topographical presence and a setting, including those consisting of buried remains, and irrespective of whether they are designated or not. Secondly, the way in which an asset is experienced in its setting is also influenced by our understanding of the historic or archaeological context of the asset and the relationship or association between historic places. Thus, any sites discovered in the application site which contain significant archaeological or palaeoenvironmental evidence (especially from the Bronze Age), would have their own setting and associative value in relation to the neighbouring scheduled barrows, through their



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potential contribution to an understanding of the archaeological and environmental context of the scheduled monuments in their setting. (NPPF Annex 2; *Planning Practice Guidance: Conserving and enhancing the historic environment*, para. 013); Historic England, *The setting of heritage assets (Historic Environment Good Practice Advice in Planning: 3)*

Relevant national planning policies

Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (NPPF para 189).

Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail 'should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation' (NPPF para 194).

Local planning authorities themselves should 'identify and assess the particular significance of any heritage asset that may be affected by a proposal' and 'take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal' (NPPF para 195).

'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets' (NPPF Footnote 68).

The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given **great weight**, and any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification (NPPF paras 199, 200). Whilst some other planning concerns are given similar weight in the NPPF, none are given a greater sense of importance. The more important the asset, the greater the weight should be.

Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, should be wholly exceptional (NPPF para 200). Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it



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can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (NPPF para 201). If a proposal cannot be amended to avoid all harm, then if the proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (NPPF para.202).

Also relevant here are:

NPPF para 197, which states that, in determining planning applications, local planning authorities should take account of ‘the desirability of sustaining and enhancing the significance of heritage assets’, the ‘positive contribution that conservation of heritage assets can make to sustainable communities’, and ‘the desirability of new development making a positive contribution to local character and distinctiveness’.

NPPF para 205 regarding the need for developers ‘to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.’

Recommendation

We consider that, in line with NPPF policies, notably paragraphs 194, 195 the supporting information for a development of the kind proposed here, (whether it is in the form of an EIA or an ES or impact assessments accompanying a planning application) should include appropriately detailed coverage of the potential archaeological implications of development, and consideration of potential mitigation measures (including mitigation by design through appropriate layout to minimise impact on important or sensitive remains, or through archaeological investigation and recording).

We **recommend** that the comments made in the letter above should be taken into consideration in the scoping and preparation of the application and its supporting EIA. This is in line with national planning policy (including NPPF policies in paragraphs 194, 195, 197, 199, 200, 202, 203, 205, 206).

We also **recommend** that the local authority’s conservation and archaeology advisers are closely involved throughout the preparation of the application impact assessments. They are best placed to advise on local historic environment issues and priorities (including access to data held in the Historic Environment Record), adverse impacts on non-designated archaeological assets and other elements of the historic environment; required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Yours sincerely,



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Sasha Chapman

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cc: Steve Wallis, Senior Archaeologist, Dorste Council



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Yvonne Wiacek
Dorset Council
58-60 (Stratton House) High West Street
Dorchester
Dorset
DT1 1UZ

Our ref: WX/2022/136860/01-L01

Date: 15 December 2022

Dear Ms. Wiacek,

OUTLINE PLANNING CREATION OF A GARDEN VILLAGE OF UP TO 1,700 DWELLINGS, 10,000SQM EMPLOYMENT SPACE, LOCAL CENTRE, GREEN INFRASTRUCTURE INCLUDING PROVISION OF SUITABLE ALTERNATIVE NATURAL GREENSPACE (SANG) AND ASSOCIATED HIGHWAY/DRAINAGE AND OTHER SERVICES

LAND EITHER SIDE OF RINGWOOD ROAD, ALDERHOLT MEADOWS, FORDINGBRIDGE

Thank you for consulting us on the EIA Scoping Opinion for the above proposal. We have not identified any significant concerns within our remit.

We note the scoping report acknowledges there are areas of fluvial flood risk within the site, predominantly along the western boundary, but states built development will not be located within these areas. The designs will need to take account of any increases in flood risk over the lifetime of development, but provided these areas are avoided in terms of built development, and used for compatible uses only, we are unlikely to have any issues.

There are elements such as drainage, water resources and pollution impacts during construction, that will need to be managed as part of any planning application. However, we consider these can be adequately covered as part of the proposed EIA scope and through other supporting information provided outside the EIA.

The final comment we wish to make is in relation to considering the impact of increased nutrients on the River Avon catchment due to increased foul drainage. We are unsure if this will be adequately covered in the EIA scope as proposed. The local planning authority and Natural England should be able to provide further information on managing this.

Yours sincerely,

Matthew Pearce
Planning Advisor

Email – swx.sp@environment-agency.gov.uk

Environment Agency
Rivers House (Sunrise Business Park) Higher Shaftesbury Road, Blandford Forum, Dorset, DT11 8ST.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

End

From: Burden, Richard <RichardBurden@cranbornechase.org.uk>
Sent: 15 December 2022 17:08
To: Environmental Assessment <environmentalassessment@dorsetcouncil.gov.uk>
Cc: Nunn, Linda <LindaNunn@cranbornechase.org.uk>; Tonkin, Steve <SteveTonkin@cranbornechase.org.uk>
Subject: RE: Land at Alderholt, Ringwood Road - EIA Scoping Opinion

Hello Yvonne

There is rather a lot to digest in a short time, and the AONB does not have the resources to reallocate at short notice.

I can, however, attach a note about the significance and status of AONBs and this one in particular.

I have had a quick look through the document and see the proposal includes 1,700 dwellings, 10,000 sqm of employment space, a 'local centre', green infrastructure, and associated highway and drainage features together with other services. There seem to be a number of issues that have not been covered, or adequately covered.

- a. For example, there does not appear to be any assessment of the recreational impacts on the AONB of such a significant development, and influx of a large number of residents, a short distance from its boundary.
- b. Tranquillity is a key feature of this AONB and the impacts on that of a large mixed development based around a road that leads directly into the AONB should be assessed.
- c. You probably know that CCAONB is the 14th International Dark Sky Reserve in the world, and that the constituent LPAs have an obligation to reduce light pollution, not simply minimise the increase in light pollution. IDSR matters and compliance ought, therefore, to be included in an EIA.
- d. As I have mentioned, the primary highway through the proposed development leads directly into this AONB, and one of its key villages, Cranborne. The impacts of traffic both during construction and on-going operation should be included in the EIA. The traffic situation in Castle Street Cranborne is already difficult and the proposed development could add substantially, and significantly, to the problems there.

The EIA should, having identified the impacts and the scale of them, consider how those impacts could be avoided, mitigated, or compensated for. The latter is an important issue as it is very unlikely that a development of the scale envisaged would not have impacts that impact adversely on this nationally important landscape.

Assessments of cumulative impacts, in the context of this AONB, mean taking into consideration recent and potential development on all sides, and not just from the Alderholt direction.

Basic AONB information

I can confirm that neither the applicant nor the agent have sought pre-application advice from the AONB team.

The AONB Partnership advises that the following information is taken fully into account.

1. The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding

natural beauty of this area which straddles two County, two county scale Unitary, and three District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage.

2. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital.
3. This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' policies for the management of this nationally important area and the carrying out of their functions in relation to it, as required by section 89 (2) of the CRow Act. The national Planning Practice Guidance [Natural Environment paragraph 040 (21.07.2019)] confirms that the AONB and its Management Plan are material considerations in planning.
4. The National Planning Policy Framework (July 2021) states (paragraph 174) that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, which include AONBs, commensurate with their statutory status.
5. Furthermore, it should be recognised that the 'presumption in favour of sustainable development' does not automatically apply within AONBs, as confirmed by [paragraph 11 and footnote 7](#), due to other policies relating to AONBs elsewhere within the Framework.
6. For decision making the application of NPPF policies that protect an AONB 'provides a clear reason for refusing the development proposed' (paragraph 11[d]). Furthermore paragraph 11(b) explains that, for plan making, being in an AONB provides 'a strong reason for restricting the overall scale, type or distribution of development in the plan area'.
7. It also states (paragraph 176) that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation and enhancement of wildlife and cultural heritage are important considerations in these areas. This paragraph is also clear that the scale and extent of development within all the designated areas of AONBs and National Parks should be limited. Furthermore, development within their setting should be sensitively located and designed to avoid or minimise impacts on the designated areas.
8. Paragraph 177 is explicit that when considering applications for development planning permission should be refused for major development, other than in exceptional, public interest, circumstances. Footnote 60 also provides for the decision maker to regard development less than the threshold defined in the NPPF glossary as 'major' in the context of an AONB or National Park.
9. The Planning Practice Guidance, paragraph 042 highlights the importance of AONB and National Park settings, their contributions to natural beauty, and the harm that can be done by poorly located or designed development especially where long views from or to the AONB are identified. Paragraph 041 is clear that NPPF policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for development, and any development in an AONB will need to be located and designed in a way that reflects its status as a landscape of the highest quality.

10. Local government (including planning authorities), Ministers of the Crown, individual councillors, any public body, statutory undertakers and holders of public office also have a statutory duty in section 85 of the CROW Act to have regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, in exercising or performing any functions relating to, or so as to affect, land in an AONB. This is explained in NPPG [Natural Environment paragraph 039, (21.07.2019)] which also confirms this applies to the setting of an AONB.
11. More detailed information in connection with AONB matters can be found on the AONB [website](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB. I would draw attention to our [Good Practice Note on Colour in the Countryside](#).
12. This AONB is, as I expect you know, in one of the darkest parts of Southern England and hence the visibility of stars and, in particular, the Milky Way, is a key attribute of this AONB. On the 18th October 2019 this AONB was designated the 14th International Dark Sky Reserve in the world. Development that could contribute to light pollution, and hence impact adversely on those dark night skies, has to be modified so that such impacts are eliminated.
13. The AONB is, therefore, concerned about light pollution. Any external lighting should be explicitly approved by the Local Planning Authority and comply with the [AONB's Position Statement on Light Pollution](#) and the more recent [Good Practice Notes on Good External Lighting](#) and [Paper by Bob Mizon on Light Fittings](#). In this location that means all lighting complying with Environmental Lighting Zone E1 as defined by the Institute of Lighting Professionals 2021.
14. The site links to the Stour and Avon Tributary Valleys landscape character area of the Chalk River Valleys landscape character type of the AONB's landscape character assessment. Other routes lead to the Martin – Whitsbury landscape character area of the Downland Hills landscape character type. Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#). That document can be viewed in [FULL](#) on our [web site](#).
15. On the 30th May 2022 the Cranborne Chase Area of Outstanding Natural Beauty Board endorsed a Position Statement on Biodiversity Gain (see attachment), and the Board looks to that guidance having immediate effect. That means that each property should have at least one bird box, one bat box, and one bee brick incorporated into the structure. That level of provision is, nevertheless, fairly basic but is seen by our Board as making an immediate contribution to environmental net gain rather than waiting for the outcome of Government's consultations on national guidance. Our Board's position is that this Area of Outstanding Natural Beauty should, without delay, make a contribution to environmental net gain whenever there is development approved, at whatever scale, within this AONB.

Hope that information is helpful to you.

Season's Greetings Richard

Richard Burden BSc DipCons MSc MCMI(rtd) MCIPD FLI PPLI
Chartered Landscape Architect
Principal Landscape & Planning Officer ([part-time, Mon-Wed](#))

Cranborne Chase Area of Outstanding Natural Beauty

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Hosted by Wiltshire Council

Click to get our web site and [AONB Management Plan](#)

14th International Dark Sky Reserve in the World; [Dark Night Skies](#)

From: Biodiversity Protocol <biodiversityprotocol@dorsetcouncil.gov.uk>
Sent: 20 December 2022 17:54
To: Environmental Assessment <environmentalassessment@dorsetcouncil.gov.uk>
Subject: RE: CONSULTATION: Land at Alderholt, Ringwood Road - EIA Scoping Opinion

Dear Yvonne,

Many thanks for consulting us on the EIA Scoping for this proposal. With regard to impacts on protected sites, I hope that Natural England will provide detailed comments on this so we will defer them.

First and foremost we recommend that impacts on biodiversity are addressed by following our [Dorset Biodiversity Appraisal Protocol Guidance](#). The DBAP is designed to meet the requirements of Natural England Protected Species Standing Advice and to address the mitigation hierarchy as set out in the National Planning Policy Framework (2021). This means development must avoid, mitigate, and compensate impacts on biodiversity, and requires development to provide biodiversity net gain. All DBAP applications are required to provide net gain. However, it is expected that The Environment Act 2021 will make biodiversity net gain mandatory in November 2023. Given the likely timescales involved, we recommend that proposal is designed at an early stage to achieve a minimum 10% biodiversity net gain, and that the latest biodiversity metric is used to achieve this.

The potential mitigation measures provided in the Scoping Report do not appear to be comprehensive however we recommend that the applicant to ensure that, early in the design phase, the mitigation hierarchy is implemented to do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with decision-makers, should they compensate for losses that cannot be avoided.

Ecological surveys should be up to date to ensure that mitigation is based on the most recent findings. We would encourage the applicant to ensure that ecological surveys are undertaken in line with the CIEEM advice note 'On the Lifespan of Ecological Reports & Surveys'. Where these surveys are more than 18 months old a professional ecologist will need to undertake a site visit and may also need to update desk study information and then review the validity of the report based on the factors given in the advice note. As there can often be significant delay between the EIA Scoping stage of a planning application and submitting a planning application, we recommend that ecological surveys are kept up to date in line with this advice note.

Kind regards
Sam

Ecology Unit
Natural Environment Team
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Dorset Council

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From: Steve Wallis <steve.wallis@dorsetcouncil.gov.uk>

Sent: 12 December 2022 15:56

To: Ursula Fay <Ursula.Fay@dorsetcouncil.gov.uk>

Cc: Oliver Rendle <oliver.rendle@dorsetcouncil.gov.uk>

Subject: RE: P/ESP/2022/07270 - Environmental Impact Assessment Scoping Report, Land at Alderholt, Ringwood Road

Thanks Ursula – will do, please see below!

Hi Ollie – I've had a look at the 'Archaeology and Cultural Heritage' section of the report. There are a few comments I ought to make.

Firstly, paragraph 6.110 refers to the geophysical survey – the report on this is the one I sent to Ursula in my previous email. Then, paragraph 6.111 refers to discussion to be held about evaluation by trial trenching – as I said in the previous email, Andy Reid of Wessex Archaeology and I have had a discussion where I gave the view that the trial trenching is also needed pre-determination.

And to continue the point but to go back a paragraph to 6.109, there is a reference to 'Further evaluation to either remove/record potential buried assets.' I think what is actually meant here is 'Further excavation' as evaluation is what happens before determination to give an understanding of a development's archaeological impact, and so is not mitigation.

Hope this makes sense and happy to discuss further if that would help.

Best wishes

Steve

Steve Wallis
Senior Archaeologist
Place Services
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From: LLFA Planning <llfaplanning@dorsetcouncil.gov.uk>
Sent: 15 December 2022 07:51
To: Yvonne Wiacek <Yvonne.Wiacek@dorsetcouncil.gov.uk>
Cc: LLFA Planning <llfaplanning@dorsetcouncil.gov.uk>
Subject: CONSULTATION: Land at Alderholt, Ringwood Road - EIA Scoping Opinion

Hi Yvonne,

The scope for assessment of flood risk and surface water management appears to be appropriate.

I would request that the applicant prepares their conceptual surface water drainage strategy based on a 45% climate change rainfall uplift, rather than the 40% uplift stated in the scoping report.

A detailed response regarding the quantum and nature of SuDS, and flood mitigation, that may be required for the site and appropriate levels of documentation, would for us, constitute pre-application advice. We would need to charge the applicant for that level of detailed response.

Is there a planning reference for this application so that I can file this response accordingly?

Please let me know if I can be of further assistance.

Best regards

Alister Trendell
Project Engineer
Place Services
Dorset Council

dorsetcouncil.gov.uk



Wednesday 4th January 2023 – sent by email to Sarah.r.smith@rapleys.com

Dear Sarah

Further to our e-mail below, enclosing our EIA Scoping Opinion, I have received a further consultation response from our Minerals and Waste Team.
The information should be included in your Environmental Statement and I apologise for the omission in our scoping response.

Minerals and Waste

Most, if not all, of the land in question is safeguarded under Policy SG1 of the Minerals Strategy 2014. The information submitted in support of this application did refer to the safeguarded mineral but did not include how it is proposed to address this designation. Should this proposal progress to a full application, Dorset Council as Mineral Planning Authority would require a mineral assessment to determine the quality/quantity of mineral at the site, and possibly a proposal for prior extraction of some proportion of the mineral to avoid sterilisation of the mineral by built development. This is a statutory requirement.

The Environmental Statement should contain a thorough assessment of the likely effects which the proposed development might have upon these elements. Reference should be made to the Bournemouth, Dorset and Poole Minerals Strategy 2014, the Bournemouth, Christchurch, Poole Dorset Mineral Sites Plan 2019 or the Bournemouth, Christchurch, Poole and Dorset Waste Plan 2019, all of which comprise part of the statutory development plan, and all of which will be relevant should a housing application be submitted.

If you have any questions, please contact me.

Kind regards, Yvonne

Yvonne Wiacek
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