

Alderholt Meadows, Fordingbridge

Response to Case Officer regarding Proposed SANG

Background

An outline planning application (P/OUT/2023/01166) was submitted to Dorset Council in March 2023 for:

“Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health facilities; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, and new roads, access arrangements and associated infrastructure (Outline Application with all matters reserved apart from access off Hillbury Road)”

Comments have been received from the Case Officer regarding the proposed SANG, and responses to the points raised are provided below in turn.

Response to SANG Comments

Absence of Annotated Landscape Masterplan for SANG

“Standard requirements include a SANG layout/masterplan. While you have submitted an indicative masterplan for the whole site, I would have expected further details on the layout of the SANG to be included, such as a Landscape Masterplan. I would expect this be annotated explaining how the SANG and residential layout will be designed to encourage new and existing walkers to use it in preference to existing heathland.”

An Environmental Statement has been submitted pursuant to the planning application, which contains a Chapter (9) on Biodiversity. This chapter refers to several Technical Appendices (TA), which include at TA 9.2 ‘Information for Habitats Regulations Assessment’ and at TA 9.4 ‘Outline SANG Creation and Management Plan’.

TA 9.4 includes, at Map 4, an annotated version of the Illustrative Landscape Strategy Plan (Figure 3.1 of the submitted Landscape Strategy, produced by Urban Initiatives Studio, November 2022) showing the various habitat and green infrastructure connectivity features within the proposed SANG. The preceding Map 3 also shows the SANG circular routes set in the context of proposed housing, green infrastructure corridors, 400m linear buffers from the edge of the proposed SANG taken to represent indicative walking catchments (400m being considered an ‘easy walking distance’ - see Appendix D of the ‘The Dorset Heathlands Planning Framework 2020-2025, April 2020’ – referred to as the Dorset Heathlands SPD) and proposed SANG car parks. Both TA 9.2 (Table 8.1) and TA 9.4 (Appendix 1) include a review of the proposed SANG against the SANG quality criteria included at Appendix D of the Dorset Heathlands SPD. The table reviews how the SANG parcels satisfy each of the SANG quality criteria in turn, in doing so explaining the design of the SANG parcels and how they will function to intercept visits arising from the proposed development.

Required Visitor Monitoring of Existing PRoW

“I understand Natural England recommended you carry out visitor monitoring of the existing PRoW to Cranborne Common to inform the Appropriate Assessment. However the submitted survey data was carried out during the August 2022 heatwave and so are likely to under-represent the uses. Your EIA recommends further surveys be carried out and I would have expected this to happen before submitting the application. There was also no questionnaire asking walkers about their activities and use patterns etc. which we have seen on other sites.”

Minutes from the Teams meeting with Natural England, held on 17 June 2022, are appended below. Note f sets out details of Natural England’s request for a visitor count of the existing PRoW running through the proposed SANG:

*“Visitor count advised of bridleway to get baseline. Rest of SANG land not publicly accessible. **Don’t need survey** to find out where people coming from as all local use, no parking. **Just count.**” [my emphasis]*

Natural England was clear that only a visitor count of this PRoW was required to establish a baseline for future monitoring and to demonstrate the SANG’s intercept potential, not to inform any requirement for capacity discounting, and that a full questionnaire survey was not required. The survey was carried out during the summer of 2022, which experienced hot weather conditions, and therefore TA 9.2 has acknowledged the potential for use of this PRoW to have been unrecorded. The survey did, nevertheless, demonstrate that the PRoW is used by people travelling between Alderholt and Cranborne Common on foot, visits that the proposed SANG would helpfully intercept. A repeat survey during more favourable weather condition would help to refine the baseline use of this PRoW, but this could be secured as a pre-commencement condition, to more accurately reflect PRoW use immediately prior to SANG delivery.

Detail regarding Objectives for SANG Management

“Given the scale of this site a Draft SANG Management Plan is appropriate. This has been submitted however it may not include enough detail on specific objectives and how these will be delivered.”

TA 9.4 – the ‘Outline SANG Creation and Management Plan’ – sets out evidence-based objectives for SANG habitat creation and subsequent management, both to secure a functioning SANG in accordance with the quality standards for the Dorset Heaths but also to benefit the existing biodiversity features on site and to secure biodiversity net gains. Due to the outline nature of the planning application, it is envisaged that the submission of detailed planting plans, including SANG furniture, could be secured by planning condition. The applicant would be happy to submit further information prior to determination, but would welcome discussion with the Council regarding the specific information sought.

Confirmation of Accordance with SANG Quality Criteria

“Finally, it is key that Natural England confirm the SANG criteria can be met. I await their response on this. However I note that some of the walking routes do not meet the SPD length guidelines, that there are several ‘pinch points’ and some adjacent uses (existing and proposed) may affect users’ experiences.”

The need for a formal response from Natural England is recognised, however, the Case Officer is directed to the response from Dorset Council's Senior Environmental Assessment Officer which states:

"Jade North, Heathland Mitigation Officer at Dorset Council, completed a site visit with Natural England to discuss the suitability of the SANG. There were no issues raised with regards to the suitability of the SANG."

Also, Dorset's Heathland Mitigation Officer has directly commented on the likely acceptability of the proposed SANG, subject to matters of detailed design, in her consultation response, in particular at points 1, 2 and 6 of that response.

As mentioned above, both TA 9.2 (Table 8.1) and TA 9.4 (Appendix 1) include a review of how the proposed SANG parcels satisfy the SANG quality criteria specified at Appendix D of the Dorset Heathlands SPD.

The above noted, a specific response to the matters referred to by the Case Officer follow:

- Walk length:
"some of the walking routes do not meet the SPD length guidelines"

The SPD states:

"SANGs should aim to supply a choice of circular walking routes.....Given the average length of walks on heathland, a circular walk of 2.3-2.5km in length is necessary unless there are particular reasons why a shorter walk is considered still appropriate. Where possible a range of different length walks should be provided; a proportion of visitors walk up to 5km and beyond so walking routes longer than 2.5 km are valuable, either on-site or through the connection of sites along green corridors."

This recognises the importance of a range of walk lengths, the provision of a circular walk length of 2.3-2.5km, and the function of a connected suite of greenspaces.

SANG criteria 8 then requires:

"8. It should be possible to complete a circular walk of 2.3-2.5km around the SANGs, and for larger SANGs a variety of circular walks"

This refers to SANGs in plural, and the need for 'a' circular walk singularly. This is interpreted to mean that, of an interconnected suite of SANG parcels or 'SANG network', it should be possible to achieve at least a walk of 2.3-2.5km, ideally with options for shorter loops and longer connected routes, but that the 2.3-2.5km walk length is not necessarily required in every SANG parcel within that network.

This interpretation is validated by the first SANG quality guidelines, adopted in the Thames Basin Heaths (TBH) in 2008, the content of which was largely mirrored in the guidelines subsequently adopted in Dorset (albeit that the Dorset guidelines chose to order by 'criteria subject' i.e. accessibility, infrastructure, landscape; whereas the TBH guidelines listed quality criteria according to 'must have' and 'desirable' features).

The 2008 guidelines comment on the function of SANG networks:

“Where long routes cannot be accommodated within individual SANGS it may be possible to provide them through a network of sites.”

Within the proposed SANGs and connected green infrastructure corridors, walks of between 1.2km, 2.3-2.5km, and over 4km will be possible once fully delivered.

The above notwithstanding, the two larger parcels of SANG, which can both accommodate longer walks, provide a sufficient quantum of SANG to accommodate the proposed number of dwellings at a provision rate that exceeds the minimum 8ha/1,000 population. The addition of the smaller SANG parcel (which increases the overall provision rate well above the minimum standard), which will incorporate a variety of semi-natural habitats and provide easy doorstep access for a proportion of the new dwellings for secure dog-off-lead walking opportunities, further strengthens the ability of the proposed SANG network to secure no net increase in recreational pressure on the Dorset Heaths.

- Pinch points
“there are several ‘pinch points’”

There are two narrower sections of SANG, only within the proposed Cross Roads Plantation SANG. However, the existing mature landscape within this SANG and the presence of habitats that closely mirror those available on the Dorset Heaths, in addition to the recognised ability of this parcel to intercept visits to Cranborne Common along the PRow, are considered to outweigh any effect of the limited narrower sections of this proposed SANG. Natural England did not raise concern about perceived ‘pinch points’ during pre-application consultation, rather it was Natural England’s request that this land be incorporated within the SANG network to achieve the aforementioned intercept function.

- Effect of adjacent uses
“some adjacent uses (existing and proposed) may affect users’ experiences”

We are unsure of which ‘adjacent uses’ the Case Officer refers. Nevertheless, the proposed SANG will be extremely well screened from surrounding land uses by either existing mature vegetation or proposed native species planting. As already referred to above, the Dorset Council Heathland Officer and Natural England evidently did not express any fundamental issues with the suitability of the proposed SANG following their site visit, wherein the potential for urbanising effects from adjacent land uses would have been expected to have been identified as a potential failure to meet the SPD’s SANG quality criteria, nor was this identified as an issue in the Heathland Officer’s consultation response.

SANG Phasing

The applicant will submit further information on development phasing, including SANG. This will draw on information already contained within the submitted TAs 9.2 and 9.4, which refer to SANG parcel phasing within Table 8.1 of TA 9.2 and Appendix 1 of TA 9.4.

Appendix 1

Alderholt Garden Village, Note of Natural England Meeting 17 June 2022

Alderholt Garden Village

Note of Natural England Meeting 17 June 2022

Attendees (Virtual Teams Meeting)

Nick Squirrell (NS) (Natural England, NE)
Nigel Jacobs (NJ) (Intelligent Land)
Jason Mound (JM) (Rapleys)
Rebecca Brookbank (RB) (EPR)

Notes

1. RB explained basis of EPR's project involvement – Lindsay Carrington/ABR have completed survey work, EPR is completing assessment and reporting.
2. NJ provided a project update (previously met NE in 2019):
 - a. 1,700 dwellings.
 - b. Mixed-use, employment centre.
 - c. Vision to transform Alderholt into sustainable location, retaining trips in village.
 - d. Previous discussion on SANG – NS requested field to north of solar farm to be brought in to intercept visitors on bridleway that goes to Cranborne Common – this has been achieved.
 - e. They have been in discussions with Forestry England (FE) regarding connections into adjacent land.
 - f. Promoting site via Local Plan – less popular with DC than it was with EDC, assuming likely refusal and subsequent appeal.
 - g. Late August/early September for application.
3. NS comments:
 - a. FE land, good to reach agreement re: access, and manage public access to control access to designated sites (incl. Ringwood Forest). NJ – FE will seek recreational management contribution.
 - b. Within 13.7km of New Forest, NE position is Dorset Heaths mitigation covers issues with NF. However, NFNPA looking at visitor pressure and possible need for additional contributions. [NS to share info if/when he can]
 - c. Lindsay Carrington survey – one GCN pond. DC has District Licensing scheme. Can create ponds in SANGs or enhance/create new ponds in FE land. NJ - 4 sizeable attenuation ponds in SANGs, can create other wildlife ponds in SANG or offsite within blue line.
 - d. Horseshoe bats- likely present (Lindsay Carrington report), good to know routes used, turning up at Hawthorns appeal site. NJ – one known route

across site, dark corridor planned. NS – enhancing acid grassland valuable for NJ, esp. habitats close to SPA (e.g. within NW SANGs).

- e. River Avon/phosphates, Pennyfarthing offsetting scheme in Avon involving land use change (fish farm closure/convert island into wetland). Pennyfarthing may not utilise whole solution, so other developers could pick up remainder. NJ – Trant have run calc. on site offset brings level down, onsite water treatment facility/wetland to mop up residual. NS – could look at fishing lakes around site, look at outflows/management of lakes (type bait permitted etc). FE/Summerlea Estate own lots of land to south, could look at pond enhancement. Engage with estate to discuss options.
- f. SANG. (NJ shared vision doc, SANG now includes NW field including woodland). Larger SANG – 1 car park space/ha. Go for conservative no. of spaces but with room to expand (maybe only deliver 40% at outset, then parking can respond to demand). Include hoggin surfacing, bike racks. NJ – future SANG management to stay with WH White. Visitor count advised of bridleway to get baseline. Rest of SANG land not publicly accessible. Don't need survey to find out where people coming from as all local use, no parking. Just count. Unofficial car park on FE land, don't need to look at for survey as unofficial, but good to know parking capacity.
- g. Overall, most issues seem to have solution. Not entirely sure about SANG – would like link from NW SANG around solar farm to S SANG, with no links towards SPA. [NS to review plans and get back with further response and to advise on requirement for a site visit. John Stobart likely to get involved due to NS capacity and JS leads on nutrient matters.]

EPR, 21/7/21