

Environmental Statement

Appendix 2.2: EIA Scoping Opinion

Gundrys Farm Caravan Park

On behalf of Royale Parks (Dorset) Limited

March 2026



Callum Robinson,
Laister Planning Ltd,
Ground Floor,
Oddfellows Hall,
London Road,
Chipping Norton,
Oxfordshire,
OX7 5AR

Date: 19th December 2025

Officer: Oliver Rendle

✉ oliver.rendle@dorsetcouncil.gov.uk

Dear Mr Robinson,

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

**APP/D1265/C/22/3313965: GUNDRY'S FARM, SCHOOL LANE, THREE-LEGGED CROSS,
WIMBORNE, BH21 6RU**

Introduction

Thank you for your email dated 21st November which requests that Dorset Council, as local planning authority and competent authority under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations'), adopts an Environmental Impact Assessment (EIA) Scoping Opinion for the unauthorised EIA development at Gundry's Farm, Three-Legged Cross. Your request was accompanied by a report titled 'EIA Scoping Opinion Scoping Report', prepared by Pea Green Ltd, dated November 2025 ('Scoping Report').

This document presents the EIA scoping opinion adopted by Dorset Council for the unauthorised development which is subject to an appeal (ref: APP/D1265/C/22/3313965) against the Enforcement Notice (Ref: ENF/17/0094) issued by Dorset Council in October 2022.

In adopting this EIA scoping opinion, Dorset Council have taken into account the following 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.

The statutory 'consultation bodies', who are Natural England and the Environment Agency according to Regulation 2(1) of the EIA Regulations, were consulted along with Historic England by virtue of their statutory duties and likely interest in the application in accordance with Regulation 15(4) of the EIA Regulations.

Consultation responses were received from Natural England and the Environmental Agency, which are presented in Appendix A.

Historic England have not responded to the consultation at the time of writing. If a response is received following the adoption of the Scoping Opinion, it will be forwarded to you to assist with determining the scope of the EIA.

Statutory Requirements of the Environmental Statement

The EIA regulations set out the statutory requirements which an Environmental Statement must meet in order to achieve regulatory compliance.

The Environmental Statement must contain the information specified in regulation 18(3), which states that an Environmental Statement must include 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.

Further to the requirements of Regulation 18(3)(f), the Environmental Statement must include the additional information presented in Schedule 4 of the EIA Regulations which is relevant to the proposed development and environmental features likely to be significantly affected. Schedule 4 includes the following:

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 European Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC(88) and Directive 2009/147/EC(89).

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(90) of the European Parliament and of the Council or Council Directive 2009/71/Euratom(91) 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.

In addition, Regulation 18(4) 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.

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 be accompanied by a statement outlining the relevant expertise, or qualifications of such experts, to demonstrate that

this is the case. Please ensure the requirements of Regulation 18(5) are met by the Environmental Statement submitted alongside the planning application.

EIA Methodology

Baseline Conditions ('before state')

The purpose of baseline conditions in EIA is to determine the state of the environment before the development or the 'before state', against which the impacts of the development at the 'after' state are measured to determine the effects of a proposed development.

It is therefore essential that the correct baseline is applied in order to accurately determine the impacts of the development. This ensures that the decision-maker, in this case the Planning Inspectorate, has full knowledge of the likely significant effects of the development when determining the appeal.

You have proposed in Section 4.3 of the Scoping Report that the Environmental Statement should provide two baselines, which are how the previous operator ran the site and how a typical 'good' operator would operate.

Given that the baseline should provide the 'before' state prior to development, please ensure that the baseline data is for the site without any unauthorised use of the land as a caravan site which began in 2017.

The hypothetical situation of how a typical operator may have managed the site is not the actual baseline and therefore should not be applied.

Post development conditions ('after use')

The Scoping Report proposes in Paragraph 5.1.5 that the EIA will test three scenarios for caravan and motorhome stationing at the site based upon a series of assumptions.

The EIA must apply the absolute maximum use of the site of the unauthorised development for caravans and motorhomes (both in Summer and in Winter), or what would be the 'worst case' scenario from an environmental perspective, given the uncertainty around the degree of future use of the site and the risk of substantial environmental harm. This applies the precautionary principle, to ensure the robust evaluation of impacts and to address the risk and uncertainty.

Please note that 'Proposed Scenario 2', which is referred to as the 'site licence' scenario, is not considered accurate and the site licence area does not include the area of the enforcement notice.

Scope of Environmental Topics

Paragraph 1.1.5 of the Scoping Report sets out the topics that will be included ('scoped in') to the EIA, which are:

- Ecology
- Transport
- Air Quality
- Noise

Chapter 13 of the Scoping Report sets out the issues which the applicant has identified as not having the potential for significant environmental effects, which includes:

- Landscape and visual
- Historic Environment
- Land Quality and Soils
- Water Environment and Flood Risk
- Population and Human Health
- Socioeconomics
- Lighting
- Daylight, Sunlight and Overshadowing
- Wind
- Climate Change
- Major Accidents and Disasters

Dorset Council require the following changes to the scope of environmental topics included in the EIA:

- *Lighting*: lighting has been screened out from the EIA. The site is adjacent to the Dorset Heathlands SPA and Holt and West Moors Heaths SSSI. The site may provide foraging grounds for Nightjar considering the characteristics of the onsite habitat (prior to unauthorised use) and proximity to the Dorset Heathlands SPA and Holt and West Moors Heaths SSSI. The site has also been identified as suitable for bats, as explained in the Scoping Report. I understand from Paragraph 8.4.8 of the Scoping Report states that species-specific nightjar surveys and bat activity surveys either have been or will be undertaken to inform the HRA, and the presence of nightjar may become apparent from this survey work. Both bats and nightjar are light sensitive and consideration must be given to the impacts of light upon these species and, if necessary, how levels can be reduced or minimised to prevent impacts as part of a package of mitigation measures. I note that Paragraph 8.4.11 of the scoping report explains that the Ecology Chapter will explore the impacts of lighting upon ecological receptors. However, given the potential for impacts from light spill upon the neighbouring urban area alongside the ecological impacts, lighting may be considered as a matter of amenity alongside other nuisance impacts, such as noise which has also been 'scoped in' to the EIA. Given that lighting has the potential to affect a range of environmental and human receptors, lighting is 'scoped in' to the EIA and must be presented as a stand-alone Chapter which considers the effects of lighting upon both ecological and human health receptors and sets out the mitigation to be implemented.
- *Water*: The Environment Agency in their response to the EIA scoping consultation have raised concerns about the discharge of foul drainage, in particular relating to the unauthorised operational development of toilet and bathroom blocks, septic tanks, water, and wastewater facility. The Environment Agency note that the Planning Inspectorate have raised similar concerns. It is suggested by the applicant in the Scoping Report that the site is of low sensitivity with respect to water and drainage and therefore it proposes that a Flood Risk Assessment & Drainage Strategy as a separate document from the EIA is sufficient. However, the Environment Agency explain that the groundwater is sensitive in this location because it is located upon secondary aquifer A and the site is adjacent to the Horton West Moors Heath SSSI and Dorset Heaths SAC which represents potentially sensitive receptors to any effluent discharges. The lack of information on the proposed foul drainage and volumes of foul effluent produced on site has resulted in uncertainty, resulting in the Environment Agency being unable to make an informed assessment on

the potential impacts arising from the scheme. Applying the precautionary principle, it is necessary for the Environmental Statement to include a Chapter on the impacts upon the Water environment to ensure that the issues raised are fully addressed. Further guidance on the requirements of this Chapter is provided in the 'Advice on Proposed Approach to Assessment of Environmental Topics' Chapter later in this document.

- Landscape and Visual Impacts: Natural England require that the Environmental Statement includes a full assessment of the potential impacts of the development on local landscape character. Therefore, the topic of Landscape and Visual Impacts has been scoped into the Environmental Statement. Further information on the requirements of this Chapter is provided in the 'Advice on Proposed Approach to Assessment of Environmental Topics' section later in this document.

In summary, the EIA should include the following topics:

- Ecology
- Transport
- Air Quality
- Noise
- Lighting
- Water
- Landscape and Visual

Advice on Proposed Approach to Assessment of Environmental Topics

Chapters 8 to 11 of the Scoping Report propose the scope of the assessment including methodology, for each individual environmental topic which the Scoping Report suggests are scoped into the EIA.

This section provides a summary of the comments and requirements of the statutory consultees according to Environmental Topics which have not been addressed elsewhere in this EIA Scoping Opinion.

Please note that this section does not duplicate all of the detailed comments provided by the consultation bodies, but gives an overview of the key points which are raised. For further detail and information on all of the requirements of the consultation bodies, please refer to the representations presented in full in Appendix A.

Water and Drainage

As previously explained, the Environmental Statement must include a Chapter on Water and Drainage following the comments provided by the Environment Agency.

Information on the wastewater drainage system has not been provided. When designing the wastewater drainage system, the Environment Agency recommend that the hierarchy of drainage options set out in The Building Regulations 2010 and Government Guidance¹ is applied. This requires the following options to be considered and discounted in line with the following hierarchy of options:

1. Connection to the public sewer

¹ Planning practice guidance (PPG) for Water supply, wastewater and water quality (paragraph 020 ID: 34-020-20140306), which may be viewed here: <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

2. Connection to a private sewer that drains to a public sewer
3. Package sewage treatment plant or septic tank
4. Cesspool

The Environment Agency require that the foul drainage is connected to the main sewer whenever it is feasible to do so. The Environmental Permitting (England and Wales) Regulations 2016 require that any discharge of sewage or trade effluent made to either surface water or groundwater will need to either comply with General binding rules for small sewage discharges or comply with a permit issued by the Environment Agency, additional to any planning permission that may be required².

Natural England note that the planning system plays a key role in determining development which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality. The Environmental Statement should take account of the risks of water pollution and how these can be managed or reduced.

Landscape and Visual Impacts

Natural England require that the Environmental Statement includes a full assessment of the potential impacts of the development upon local landscape character using landscape assessment methodologies, landscape character assessment and with reference to National Character Areas.

Natural England's representation sets out how the potential landscape and visual impacts should be assessed with reference to National Character Areas and Local Character Assessments, and in accordance with the Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced jointly by the Landscape Institute and Institute of Environmental Assessment.

Natural England require the cumulative effect of the development with other existing or approved development to be considered.

Natural England also require the National Design Guide and National Model Design Code to be taken into account to ensure high quality development, deliver high quality design and deliver high standards of design and green infrastructure.

Ecology

The Environmental Statement should thoroughly assess the potential for the unauthorised development to affect nationally and internationally designated sites. Natural England state that the development site is within or may impact upon the following European/internationally designated nature conservation sites:

- Dorset Heathlands Ramsar
- Dorset Heathlands Special Protection Area (SPA),
- Dorset Heaths Special Area of Conservation (SAC)
- Avon Valley Ramsar
- River Avon SAC
- Solent and Dorset Coast SPA

² Further information about the permitting process can be found at [Septic tanks and sewage treatment plants: what you need to do: Overview - GOV.UK](#).

- The New Forest Ramsar
- The New Forest SAC
- The New Forest SPA

Natural England provide a reminder of the need for a Habitats Regulations Assessment, under the Conservation of Habitats and Species Regulations 2017, in addition to the EIA.

The Environmental Statement must include a full assessment of the direct and indirect effects of the development on the features of special interest within nationally designated sites and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. Natural England also provide the view that the development site is within or may impact on the following national wildlife sites, which are Sites of Special Scientific Interest (SSSI) or National Nature Reserves:

- Holt & West Moor Heaths SSSI
- Horton Common SSSI
- Lions Hill SSSI
- Moors River System SSSI
- St. Leonards and St. Ives Heaths SSSI
- Hurn Common SSSI
- Parley Common SSSI
- River Avon System SSSI
- Town Common SSSI
- Holt Heath NNR

Please ensure that the assessment of effects upon these European and International sites includes effects upon functionally linked land outside of the designated site area. This land may provide important habitat particularly for populations of mobile species that are qualifying features of the site, such as Nightjar for the Dorset Heathlands SPA and constituent SSSI.

The effects upon local wildlife sites, such as Sites of Nature Conservation Interest (SNCI), must also be considered according to Natural England advice, along with opportunities for enhancement and improving connectivity with wider ecological networks.

Natural England's comments include guidance on the ecological effects of impacts upon air quality and water quality. These are particularly relevant given that the unauthorised development has the potential for impacts upon the Dorset Heathlands European/International Site for example from air quality effects due to additional vehicular traffic, and the potential for impacts upon the Moors River SSSI and River Avon SAC and SSSI systems from water quality impacts.

In addition to the assessment of impacts upon designated sites, the Environmental Statement must assess the impact of all phases of the proposal on protected species including, for example, great crested newts (please see advice on District Level Licencing also) and Priority Habitats and Species. This is likely to be important given the presence of bats and other protected species at the site.

Natural England also provide requirements of the Environmental Statement on the assessment of impacts upon Ancient Woodland, such as Barewood Copse and Mannington Copse to the west of the site, and ancient and veteran trees. Advice is also provided in relation to Biodiversity Net Gain, connecting people to nature which must be adhered to during the EIA.

Whilst the Environmental Statement will not include a dedicated Climate Change Chapter, please ensure that Natural England requirements with respect to the climate change effects upon ecology are met in the Environmental Statement.

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

Yours sincerely,

Oliver Rendle

Appendix A: EIA Scoping Consultation Responses

Oliver Rendle
Dorset Council
Allendale House Hanham Road
Wimborne
Dorset
BH21 1AS

Our ref: WX/2025/139500/01-L01
Your ref: APP/D1265/C/22/3313965

Date: 11 December 2025

Dear Oliver

SCOPE OF EIA FOR APPEAL AGAINST THE ENFORCEMENT NOTICE SERVED BY DORSET COUNCIL FOR THE UNAUTHORISED DEVELOPMENT CONSTITUTING A CHANGE OF USE FROM AGRICULTURAL TO A CARAVAN SITE AT GUNDRYS FARM, SCHOOL LANE, THREE LEGGED CROSS IN ACCORDANCE WITH PARAGRAPH 15(4) OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS (2017).

GUNDRY'S FARM SCHOOL LANE, THREE-LEGGED CROSS, BH21 6RU.

Thank you for consulting the Environment Agency on the above Environmental Impact Assessment (EIA) scoping opinion.

Environment Agency Position

The only constraint we have identified within our remit relates to the discharge of foul drainage. We note that no information has been provided in relation to the proposed foul drainage strategy. Therefore, the potential impacts on the environment from this element are currently unknown.

Without further information, we are unable to make an informed assessment on the potential impacts arising from the scheme.

We note the Planning Inspectorate has also raised concerns relating to unauthorised operational development of toilet and bathroom blocks, septic tanks, water, and wastewater facility in Part B of the response letter included within the EIA report.

Groundwater is sensitive in this location because the proposed development site is located upon secondary aquifer A. In addition, the site is adjacent to the Horton West Moors Heath SSSI and Dorset Heath SAC which represents potentially sensitive receptors to any effluent discharges.

Given the uncertainty around the drainage scheme and the volumes of foul effluent that may be produced, we would therefore require further information on the scheme and assessment of the potential impacts either as part of non-EIA supporting documentation or as part of an Environmental Statement. Foul drainage may not necessarily pose a significant environmental risk, particularly if the drainage hierarchy is followed and the scheme is connected to the main sewer network, however without further information the impacts remain unknown.

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

Cont/d..

Advice to LPA - Foul Drainage

The Building Regulations 2010 and Government Guidance contained within the Planning practice guidance (PPG) for [Water supply, wastewater and water quality - GOV.UK](#) (paragraph 020 ID: 34-020-20140306) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Connection to a private sewer that drains to a public sewer
3. Package sewage treatment plant or septic tank
4. Cesspool

Foul drainage should be connected to the main sewer whenever it is feasible to do so. Where this is not possible, under the Environmental Permitting (England and Wales) Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to either comply with [General binding rules for small sewage discharges \(SSDs\) with effect from 2 October 2023 - GOV.UK](#) or comply with a permit issued by the Environment Agency, additional to any planning permission that may be required. This applies to any discharge to ground, inland freshwaters, coastal waters, or relevant territorial waters.

Further information about the permitting process can be found at [Septic tanks and sewage treatment plants: what you need to do: Apply for a permit - GOV.UK](#)

Yours sincerely

Mr. Ololade Ashade
Sustainable Places- Planning Advisor

Direct dial [REDACTED]

Email- wx.sp@environment-agency.gov.uk

Date: 09 December 2025
Our ref: 535404
Your ref: APP/D1265/C/22/3313965



Oliver Rendle
Dorset Council
oliver.rendle@dorsetcouncil.gov.uk
BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Oliver

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Environmental Impact Assessment (EIA) for the appeal against the enforcement notice served by Dorset Council for the unauthorised development constituting a change of use from agricultural to a caravan site
Location: Gundrys Farm, School Lane, Three Legged Cross

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 26 November 2025, received on 26 November 2025.

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

James Ward-Gwilliam
Consultations Team

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 appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 192-196) 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 conserve and enhance 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 Ramsar
- Dorset Heathlands Special Protection Area (SPA),
- Dorset Heaths Special Area of Conservation (SAC)
- Avon Valley Ramsar
- River Avon Special Area of Conservation (SAC)
- Solent and Dorset Coast Special Protection Area (SPA)
- The New Forest Ramsar
- The New Forest Special Area of Conservation (SAC)
- The new Forest Special Protection Area (SPA)

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 187 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) may 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.

Nationally designated sites

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

- Holt & West Moor Heaths
- Horton Common
- Lions Hill
- Moors River System
- St. Leonards and St. Ives Heaths
- Hurn Common
- Parley Common
- River Avon System
- Town Common

The development site is within the following **National Nature Reserve**:

- Holt Heath

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 186 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 192 and 193). 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 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.

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.

Biodiversity net gain

Paragraph 193 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.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used 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.

Landscape

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 105. 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 187 and 188 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 223 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 $1\mu\text{g}$)^[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% 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. If your planning application is affected by Nutrient Neutrality, 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. These solutions or plans should be relevant to the specific planning consultation site.

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

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.