

Date: 23 December 2014  
Our ref: 135214  
Your ref: 3/14/0871/FUL



**BY EMAIL ONLY**

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Dear Mr D. Smyth

**Planning consultation: A detailed application for demolition of existing buildings and redevelopment to provide 210 dwellings; formation of a new feeder road, priority junction, site access and footpaths off Boundary Lane; estate roads and parking; a replacement cricket pavilion of 200sqm; informal open space and recreation (inclusive of retained cricket pitch); landscaping; lighting; bat barn for a replacement maternity bat roost; and a Nature Reserve. An outline application with all matters reserved for the erection of a care facility of up to three storeys and no more than 80 beds, and car parking.**

**Location: St Leonards Hospital 241 Ringwood Road St Leonards Ringwood Hants BH24 2RR**

Thank you for your consultation on the above dated 20 October 2014 which was received by Natural England on 20 October 2014. Thank you for agreeing to extend the deadline for Natural England to respond to the application.

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.

**Objection: further information required**

Overall the application does not have sufficient detail to allow Natural England to provide a clear assessment of the proposal and therefore advise your authority about the effect of the proposals on European, international or nationally important sites, European protected species and priority biodiversity habitats and species.

**dHRA**

Natural England concur with much of the dHRA supplied. However the HRA has several important failings which are detailed below.

The current SANG Strategy, whilst providing a suitable area does not provide a suitable level of additional capacity for new access. Natural England advise that the proposed package of measures requires substantial refocusing but this is within the scope of the FDPlan for the most part. Such modifications will reflect better the advice already provided by the authority and Natural England. There is no evidence to show how the proposed measures will be secured for the duration of the development. The HRA has not at this time taken account of the need to provide a SAMM contribution and the applicant will need to consider how this requirement accords with the districts position in respect of CIL contributions.



At this time Natural England advise that these critical avoidance measures as set out in the SANG Strategy do **not** provide sufficient information to allow Natural England to conclude that the proposal will **not** have a likely significant effect on the nearby European and internationally designated sites. Further the absence of an agreed way forward on SAMM mitigation provides additional uncertainty. In the absence of this additional information Natural England advise that the authority should carry out an Appropriate Assessment under the Habitats regulations 2010.

Additional information is also required in the following areas:

**Moors River SSSI**, confirmation that ie existing crossing point has sufficient capacity for greater flows.

**SNCI management**, further clarification is sought in a number of areas such as proposed habitat extents, translocation areas, boundary treatments, access routes, monitoring, phasing, tree removal, landscape integration with forest, responsibilities, surface water drainage etc. Natural England advise that the applicant needs to provide a simplified map summarising the following points:

- Development boundary
- Area of existing SNCI
- Area of SNCI not affected by proposal
- Area of land to be managed for nature conservation post development
- Broad areas to be retained as heathland/acid grassland and woodland

**Bats/dormice**, the proposed mitigation measures need to be reviewed in the light of advice.

This information may be supplied in the form of method statements etc within an agreed time frame and secured through planning agreements/conditions.

### **Landscape Masterplan**

The plan indicates substantial areas of habitat described as “*Native scrub and understorey, Refer to Habitat Strategy Plan*”, this reference is unclear and Natural England advises that this matter needs to be resolved as it may be a proposal contrary to the objectives for the SNCI. The Masterplan does not include consideration of the adjacent SANG and is requiring screening etc on the basis that the development site is in isolation. This should be reviewed with an plan which integrates the restoration of open habitats into the more enclosed visual experience in the forest and also takes account of the potential effects of the Navitus proposals. The developer has the benefit of some good structural assets to break up the landscape in the SNCI and SANG these are not maximised at present.

Natural England’s detailed comments are provided in the following Annexe.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Nick Squirrell. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Nick Squirrell  
Conservation and Planning Lead Advisor  
Dorset and Hampshire Team  
Dorset, Hampshire and Isle of Wight Area Team  
Natural England

## Annexe 1

### SANG Strategy

Natural England and the local authority were consulted about the SANG requirements and have provided detailed advice. This has focussed on additional capacity through new walking routes as well as increased open areas to allow spreading room within the forest areas. The proposals made by the applicant appear to focus on using existing tracks which are already used and upgrading tracks to easy access. Further the focus for enhancement is close to an existing well used carpark as well as the Navitus wayleave and working compound which is problematical at least in the short term.

The applicant has put some weight on easy access routes however whilst this aspect must be considered in relative terms the function of the SANG is primarily aimed at those likely to have adverse effects on the nearby heathlands where such provision is very much less. The relative prioritisation of this against other priorities must be examined.

Natural England concur with the view that no additional car parking be provided.

At present the areas noted as “visually diverse” in the northernmost part of the forest, whilst close to the car park are little used as they are ridged, have dense understory and surrounding ditches preventing easy access. Natural England and EDDC have advised on the need for the creation of larger open areas which are consistent with the wooded heath objective if the applicant has secured sufficient agreement with the owner. If the tree cover of 20% suggested in the wooded heath specification is agreed as discrete areas with an open habitat matrix a more suitable and different greenspace is created. It is not clear to what extent the applicant will be able to secure suitable SANG enhancements beyond the existing pathways.

The extent of the SANG proposed offers potentially substantial gains for SANG use, as noted the current policy with regards dog waste should be improved into line with the Dorset Dogs green standard.

The proposal to facilitate wild play in part of the SANG is of interest however Natural England advise that it is not appropriate to focus such use on one part of the SANG it would be more suitable to facilitate such an activity as a summer activity with a small resource provided to the Urban Heaths Team to organise a trial local event with FC participation once the development is completed.

The use of sculpture is welcomed as this can lead the new residents to explore the forest/SANG, the time frame over which the provision is made and costings are not specified though.

Junior orienteering/wide games – such activities are not appropriate to the SANG approach.

Natural England advise that the provision of a shelter in a primarily forested area is not appropriate to the SANG approach. Such facilities are not found on heaths nor is their justification for the diversion of resources away from securing SANG functionality for this purpose.

The proposal to allow for post development modification in consultation with new residents is innovative and welcomed.

Provision of benches and infrastructure at 50m intervals requires review, such provision is not consistent with heathland experience.

Access routes across the SNCI to the SANG are not agreed at this time, an existing concrete road provides ready access. This matter needs to be resolved with the Dorset Wildlife Trust.

The overall proposal for the SANG does not address issues hi-lighted in the advice of Natural

England and the authority. In essence the proposal is an upgrading of the forest infrastructure rather than the provision of additional capacity to natural greenspace. The lack of substantial open spaces to draw users into the forest makes it likely that users will access the cricket ground as the nearest open space to throw a ball for their pet. The SANG could address the need to provide a sensitive and graded interface between the proposed development and the dominant dense and hard edged forestry blocks. An opportunity to provide a considered approach to this interface, given the substantial effect of the Navitus proposal, should be taken at this time. The clear advice to provide a focal point at the only available topography has not been followed. Opportunities to create/enhance wetland features remain and should be considered. The SANG strategy as currently framed does provide a sufficient area however not provide sufficient additional user capacity. Natural England advise that specific details need to be reviewed and clarified such that the proposal is clear and unequivocal.

There is no information available showing how the management of the SANG will be secured (funded or enforced) for the duration of the development.

At this time Natural England advise that this critical avoidance measure as set out in the Strategy does not provide sufficient information to conclude that the proposal will not have a likely significant effect on the nearby European and internationally designated sites. In the absence of additional information Natural England advise that the authority should carry out an Appropriate Assessment under the Habitats regulations 2010.

### **Moors River SSSI**

The applicant is proposing to upgrade the pumping of foul sewage to the Wayside Road station and thereafter to rely on existing infrastructure. Natural England is concerned that the proposed development, 210 units and 80 additional care home spaces will place a substantial additional pressure on the gravity fed link to the Palmers Ford STW during the operational phase. Natural England seek the applicants confirmation that the proposal will not be likely to lead to additional breakouts into the Moors River SSSI. Should this be the case Natural England advise that the applicant should bring forward a suitable avoidance measure agreed with the water authority.

### **Reptiles**

The survey has confirmed the presence of EPS reptiles within the application site although not within the area where development is proposed. Habitat management is proposed which will enhance the degraded habitats for the species and other reptiles. It is critical that the heathland habitats within the SNCI and out into the Forest which also supports rare reptiles are maintained and enhanced. The SANG strategy proposes a 30m buffer of trees adjacent to the development site which if implemented would prevent this movement. Similarly the habitat management plan for the SNCI needs to maintain heathland links between the heathland in the west and east to allow for movement of animals.

### **SPA birds**

Natural England advise that wintering Dartford Warblers and woodlark are recorded from elsewhere in the forest and that they may be expected to occur in the SNCI with suitable management/restoration. In addition if public access is controlled then there can reasonably be expected to be nightjar and Dartford Warblers breeding on the SNCI. Provision of a mix of fruiting trees amongst the trees adjacent to the housing area and care home would enhance the area for both wintering birds and badgers.

The applicant has proposed a project to radio track cats, this is welcomed by Natural England and the applicant is advised that this measures should be secured through a specific contribution and delivered by a local partner. The use of any deterrents will need to be under the agreement and supervision of the manager of the SNCI. The effectiveness of deterrents will also impact on reptile populations.

The proposed mitigation in the form of additional bird boxes is welcomed by Natural England.

### **Bats**

Natural England note the high diversity of bats present including maternity and day roosts. The mitigation measures proposed at this time, creation of a bespoke bat house and the provision of 52 bat boxes will need to be considered through the Natural England licensing process should the application be granted. Natural England raises some general points for consideration. The Bat House is considered a temporary rather than permanent solution to the loss of the bat roosts in buildings, further it is an unusual visual design which is considered likely to attract attention from local residents making the mitigation vulnerable. Natural England advise that the applicant should consider the following:

- The dimensions of the bat house do not appear to be in accordance with the recommended internal dimensions for the species (5x5m)
- Whilst bat boxes are proposed the bats currently use buildings and thus on a like for like basis a proportion of the new buildings should have bat access, bat bricks and access to roof spaces. This would provide a more suitable and permanent solution for the bats to utilise.
- The roof space over the new cricket ground provides a good opportunity for a controlled bat roof space facility.

### **Dormouse survey**

The results indicate a transient and very low population level confined to the northern edge of the application site only. The location and status should not affect habitat restoration proposals elsewhere on the SNCI. Whilst the Navitus wayleave passes through the connecting habitat, this is a matter for their advisors, during the site visit various enhancements were discussed in respect of scrub enhancements. The planting of suitable native fruiting species will add value to mitigation proposed. Natural England advise that the number of additional dormouse boxes proposed should be reviewed in the light of discussions about habitat management in the northeast part of the site.

### **Habitat translocation**

Natural England has provided advice about the suitability of the proposed location for translocation of grassland habitats directly. The applicant has been provided with alternative and more suitable locations to translocate the grassland resource than the area proposed which represents an area of former wet heath which has the best potential for rapid restoration.

### **Habitat management in the SNCI**

Natural England advise that this is a critical aspect to securing the long term recovery of priority BAP habitats and species. The applicant will need to secure this by agreement with a suitable partner such as the Dorset Wildlife Trust. At this stage such agreement whilst possible in principle has yet to be discussed. Natural England note that the applicant agrees with the views that grazing management will be critical to restoration, a number of other issues requiring resolution before an application is determined are detailed below:

- Ownership of the SNCI including cricket ground (securing the grassland value is best achieved by a lease from a conservation body to the club)
- Tree felling necessary for restoration should be secured as part of the application
- Compartment objectives require agreement as an outline of the Nature Conservation Management Plan
- Monitoring responsibilities within the SNCI need to be resolved
- Phasing of key works needs to be agreed as well as timing of transfer of land ownership
- Responsibilities/liabilities need to be clarified
- The applicant should liaise with the Fire and Rescue Service once an agreed plan is available about a suitable location for a suitable fire hydrant(s), to be secured through a condition.

## Monitoring

The details of the specific monitoring proposed will need to be reviewed in the light of any agreement with the organisation managing the SNCI. In particular the duration and frequency will need to be agreed and secured so that it ties in with the development phases.