

FAO: Ursula Fay
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26th May 2023

By email only: Ursula.fay@dorsetcouncil.gov.uk

Dear Sir or Madam,

Planning application P/OUT/2023/01166 at Alderholt. 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 faculties; 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)

The RSPB's interest in this planning application is as follows:

1. The potential for this proposed development to adversely impact a number of internationally important wildlife sites, in combination with other plans or projects, including:
 - The Dorset Heathlands Special Protection Area (SPA) and the New Forest SPA through increased recreational use arising from new residential development at Alderholt
 - The River Avon Special Area of Conservation (SAC) through potential eutrophication impacts
 - Potential eutrophication impacts on Christchurch Harbour SSSI. There is evidence that this site is functionally linked to coastal SPAs along the south coast of England including Poole Harbour SPA
2. The potential to adversely impact populations of Annex 1 breeding bird species, including nightjar, a qualifying species of the Dorset Heathlands and New Forest SPAs
3. The potential for similar impacts on other important species, including New Forest breeding curlew

The RSPB **OBJECTS** to this application on the grounds that insufficient environmental information has been provided by the applicants. It is therefore not possible to properly assess the potential impacts of the proposal on the above National Site Network sites and qualifying species, especially when considered in combination with other proposed developments in this area. We cannot conclude no adverse impact on the various internationally important sites or qualifying species like nightjar. Further comments are provided below.

In Dorset Council's Local Plan Options Consultation January 2021, recognition was given to the environmental sensitivities of the Alderholt location, notably its proximity to the Dorset heathlands and the River Avon. The Council included a requirement for any new development to ensure that there would

be no adverse impacts on internationally important sites. The village of Alderholt lies approximately 600m from the Dorset heathland boundary on its western side. The application site can be considered as functionally-linked land to the neighbouring heathlands, and the proposal may give rise to harmful effects on the adjacent protected sites. There are potential water quality impacts on the River Avon SAC. It should be noted that the River Avon flows into Christchurch Harbour SSSI and there is evidence that this site is functionally-linked to coastal SPAs along the south coast of England including Poole Harbour. Potential eutrophication impacts on Christchurch Harbour should be recognised. The Council should require mitigation to ensure nitrate and phosphate neutrality should it propose any development at Alderholt. This is because the River Avon is a freshwater ecosystem which is sensitive to phosphate pollution. There is likely to be a displacement of people to the New Forest SPA both during and post-development. We have concerns about the impacts of these people on the SPA itself, and on other sensitive species, such as curlew.

There were limitations identified by the Bird Survey Report, including the timing of the work, which may have increased the likelihood of missing certain species. A more complete picture would be useful, taking into account seasonal variation. Nevertheless, the survey identified both foraging and breeding nightjar activity within and adjacent to the site and concluded that most of the nightjar activity falls within or close to the 400m Dorset Heathlands consultation zone, highlighting the functional-linkage of this area. The application proposes to use much of the remaining land between the village and the designated sites as SANGs, and we welcome the significant area included as SANGs within this application. However, we have concerns that the extra volume of people here will have an adverse impact on the number of nightjar territories in this area. There is limited assessment of the current visitor use of Cranborne Common, and no assessment of the likely impacts of additional visitors to designated heathland sites during and post development. The visitor count was undertaken during the summer heatwave and is likely to represent an underestimate of likely use. The likely high volume of recreational pressure on the SANGs is likely to displace existing nightjar territories, and proposed mitigation does not adequately address this. We would expect to see a robust monitoring plan in place to ensure the efficacy of the SANGs prior to works commencing on site. If they do not provide adequate suitable compensatory habitats, further remediation work would be required.

Much of this area is proposed as SANGs within the application, but a significant amount has been earmarked for solar farms. There has been little or no mention of the likely in combination effects of this proposal alongside other potential developments in the area. The Environmental Statement fails to address all of the consented planning applications in the area, including proposed mineral and waste developments, and the cumulative impacts of these proposals has not been fully assessed. The solar farms would broadly separate the SANG from Cranborne Common, and the impact of this on nightjar activity has not been assessed. This could result in further loss of habitat connectivity.

Whilst the function of the SANGs may be to provide recreational areas that mitigate for impacts on the designated sites, there is a missed opportunity to recreate heathland habitats in these areas. Most of the sites proposed have been identified by RSPB Heathland Extent and Potential (HEAP) mapping as suitable for heathland restoration. Within the Information for Habitats Regulations Assessment, there is advice quoted from Natural England's 'Supplementary Advice on Conserving and Restoring Site Features' (5.3) which highlights that '*Restoration of open heathland is required on those areas where it has declined compared with the historic open heathland extent*'. This would be a significant step towards providing connectivity and creating resilient ecological networks on a landscape scale. The Bird Survey Report (5.13) also suggests that '*The inclusion of heathland areas within the landscape plan within the 400-metre buffer with the adjacent heathland would provide additional habitat for heathland species such as nightjar, woodlark and Dartford warbler. These areas should be fenced with post and rail fencing with mesh to prevent access by dogs. The heathland areas should include short sward areas and patches of bare ground to provide optimum foraging for woodlark.*' The proposal as it stands does nothing to address this.

Therefore, we object to this application on these grounds.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Tomalin', with a stylized flourish at the end.

Nick Tomalin

RSPB New Forest Conservation Officer

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