# Help us save the last Green belt between Wimborne and Colehill

Dorset Council has received Outline planning for 55 houses to be built on land off Birchdale Road (also known as Leigh Farm Field) which is in the existing **green belt**. The proposed access would be via Birchdale Road. This is dangerous as it exits onto Wesley Rd and Cranfield Av on a blind bend. These roads are very busy now and that is without construction traffic and extra associated vehicles.

This land is the last piece of green belt between Wimborne and Colehill. It is a precious piece of land that has not been cultivated for over 60 years. It is very rich in biodiversity and is a good start to preventing further climate change. Once this land is built on, despite builders claims, the ecological value will be lost.

The major points for objection are :-

- 1, This land is the last green belt between Wimborne and Colehill.
- 2, The access is totally unsuitable as it meets busy roads on a blind corner.
- 3, The ecological value of the field is important and is home to many animals.
- 4, Wimborne has already more than enough new houses.

To object go to Dorset Council Planning web site, using the reference P/OUT/2024/00563 and follow the link to comment. Closing date is 8<sup>th</sup> March 2024

# We need to stop this OUTLINE PLANNING APPLICATION NOW !





Submitted as attachment via Dorset Council's planning portal

Dorset Wildlife Trust Brooklands Farm Forston, Dorchester Dorset, DT2 7AA

Tel: 01305 264620 enquiries@dorsetwildlifetrust.org.uk dorsetwildlifetrust.org.uk

FAO: Naomi Shinkins Dorset Council South Walks House South Walks Road Dorchester Dorset DT1 1UZ

29th February 2024

Dear Ms Shinkins,

# Application No: P/OUT/2024/00563

**Location:** Land off Birchdale Road Wimborne Minster Dorset BH21 1HU **Proposal:** Outline planning application for a proposed residential development of up to 55 dwellings together with open space and associated works (all matters reserved save for means of access)

Thank you for consulting Dorset Wildlife Trust (DWT) regarding the above application.

DWT **object** to this application due to the unacceptable impacts on the existing ecological interest of the site and its position within an important ecological corridor between the River Stour and rural land to the north of Wimborne and Colehill. The application also currently provides insufficient ecological information with which which to assess the potential impacts of the development upon biodiversity, which should be given due regard as per the Natural Environment and Rural Communities (NERC) Act 2006, National Planning Policy Framework (NPPF) 2023 and Circular 06/2005. DWT can provide further comment once additional information has been submitted.

# Sites of Nature Conservation Interest (SNCI)

The application site lies within 100 m of the Site of Nature Conservation Interest (SNCI); SU00/078 Leigh Common, cited for its semi-improved neutral grassland and secondary broad-leaved and wet woodland habitats.

SNCIs are identified and selected for their local nature conservation value, acting as buffers, stepping-stones and ecological corridors for species between nationally and internationally designated wildlife sites. SNCIs often contain priority habitats and species listed under Section 41 of the *Natural Environment and Rural Communities (NERC) Act 2006.* Section 40 of this Act (as amended) states that *"The public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving and enhancing biodiversity".* 

#### **Dorset Ecological Networks**

The application site lies within an area with a high level of mapped Existing Ecological Network and Higher Potential Ecological Network, giving a strong indication of the ecological importance of this area. These areas have been identified as important habitat areas to support biodiversity and lack of representation of some areas within Dorset's Ecological Network Mapping is not an indication of absence of value, but may just represent an absence of information when not all areas have been surveyed and assessed.

The area includes three SNCIs Woodland House Meadow (SU00/105), important for its rich semi-improved neutral grassland and rush pasture, Northleigh House (SU00/088), important for its relict neutral grassland and Leigh Common (SU00/078) which has semi-improved neutral grassland and secondary woodland, part of which is designated as a Local Nature Reserve and is linked to the application site via the old railway. As a whole, the area has a network of small fields, hedgerows, woodland and watercourses and provides an ecological corridor between the River Stour and the rural land to the north of Wimborne and Colehill. Together the habitats making up this corridor clearly have a significant value for grassland biodiversity which is greater than the sum of its parts and which the proposal site is clearly a functional part of. Retaining this connectivity is crucial to the overall ecological function of the landscape, such as dispersal via corridors and stepping-stones, and as buffers to wider impacts<sup>1</sup>. The National Planning Policy Framework (NPPF) 2023 requires consideration of coherent ecological networks in the decision-making process. Paragraph 185 states that plans should:

"a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

*b)* promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

# Suitability of the site for development

In our March 2021 response to the draft Dorset Council Local Plan consultation DWT objected to the inclusion of this site due to the potential it had for supporting significant ecological value and the lack of ecological baseline information with which it would be possible to determine the suitability of this site for development.

Following this consultation, a series of baseline assessments of proposed allocation sites was commissioned by Dorset Council to provide part of the evidence base for the ongoing Local Plan process. The assessment of the application site was reported in *An Ecological Survey of Land at Leigh Farm [WM06]*. Bryan Edwards, Dorset Environmental Records Centre. October 2021.

As a result of the 2021 survey, the site was identified to be of **Moderate to High Ecological Interest** due to the diverse range of habitats present on this relatively small site and the number of notable plant species present. Sites of High Ecological Interest are considered to be of SNCI quality and are therefore important wildlife site within the county.

This site was not explicitly identified in the Dorset Environmental Records Centre (DERC) survey report as being of potential SNCI quality, however, it was recorded to support eight notable species and therefore considered by the SNCI panel in September 2022.

Based on the description and data reported within the survey report, it is clear that the site has significant intrinsic interest and value for biodiversity, although it does not support particularly exemplary examples of any specific habitat type. On balance, it was concluded that the site was not suitable for selection as an SNCI and that it value lies in the diversity of habitats and ecological niches it provides rather than any one habitat of SNCI quality. However, this does not in any way lessen the value of the site for biodiversity or its important role as part of the Ecological Corridor in this area.

It was understood at the time of the SNCI Panel's consideration that the site was due to be removed from the development allocations in the revised Local Plan due in part to the evidence presented in the DERC Report. It is noted that the Planning Statement (dated January 2024) places significance in the fact that the site was included in DC Local Plan Options consultation, particularly in relation to the Green Belt assessment undertaken at the time but it should be recognised that the ecological value of green corridors is a separate and additional consideration to Green Belt status.

<sup>&</sup>lt;sup>1</sup> Ecological-Networks-Guidance-2020.pdf (dorsetInp.org.uk)

Local knowledge of the site identifies that it has not been cultivated or otherwise agriculturally improved for at least 60 years. And the submitted Planning Statement identifies the area as being classed as Grade 4 Poor agricultural land. This corresponds with the assessment of the site as being of high value for biodiversity with the poor soils of lower grade agricultural land being highly suitable for supporting rich and diverse habitats and locally important refuges for biodiversity.

The SNCI Panel concluded that the high biodiversity value of this site makes it unsuitable for development, however, there is great scope for the site and its habitats to be enhanced for wildlife and for people through appropriate management in the future. As such it has a significant role to play in the provision of high quality green infrastructure in this area.

The potential development of the site as proposed in this application would result in the loss of more than 75% of the existing neutral and acid grassland habitats on the site. As highlighted above, part of the significant value of this site is as part of a network of similar grassland sites including SNCIs that contribute to the connectivity of this important corridor.

For these reasons, DWT continues to object to the development of the site. However, we also have a number of comments regarding the information submitted in support of this proposal specifically:

#### Ecological Impact Assessment

DWT have a number of concerns relating to the accuracy and reliability of the submitted Ecological Impact Assessment (EcIA) report (dated January 2024).

#### Desk study

The ecological baseline described on page 2 includes reference to Holme Moor NNR which is located in Somerset rather than the correct Holt Heath NNR to the north-east.

The list of nationally designated sites fails to identify Holt and West Moors Heaths SSSI approximately 4km north-west of the site.

The desk study should also identify the previous assessment of the site reported in *An Ecological Survey of Land at Leigh Farm [WM06]. Bryan Edwards, Dorset Environmental Records Centre. October 2021.* Though the DERC report is referenced within the EcIA report in relation to the habitat assessment, there is no summary of the conclusions of this survey. The DERC Report also identifies the presence of a latrine in the western part of the field.

#### Habitat assessment

Habitat surveys were undertaken on 10<sup>th</sup> August 2023, which is too late in the season for some of the more notable species of acid grassland habitats in particular to be detected. Many of the characteristic indicator species of these dry parched grasslands are diminutive annuals which appear briefly in spring and early summer before setting seed and withering as the soil dries, the true interest of the grassland therefore may be underrepresented. This is not recognised in the limitations described of the assessment described on p8.

Likewise, the baseline assessment undertaken by DERC for Dorset Council was undertaken in September 2021. This survey was not intended to provide sufficient detail to inform an Ecological Impact Assessment and the timing was suitable to inform a broad overview of the ecological interest of the site but DWT consider that appropriate seasonal timing for the habitats present is essential in order to properly inform an impact assessment.

It is noted that the botanical species list provided in Appendix F of the submitted EcIA report appears to be a direct copy of the list provided within the DERC report, and though a column is provided, does not include the relative frequency of the species which would help provide clarification where the assessment differs from the DERC surveys. In addition, a further non-native species Canadian Goldenrod (Solidago canadensis) was recorded in 2023 but is not listed in Appendix F

Because of this, some aspects of the assessment are incomplete. Common Fleabane (*Pulicaria dysentrica*), which is considered to be a Dorset Notable associated with fen and rush pasture habitats has been missed from this assessment as it was overlooked in the DERC survey summary list - this brings the total number of grassland and fen notables on the site to 8.

In addition, since the 2021 DERC survey, the Dorset Notables lists<sup>2</sup> have been updated to include additional indicator species for hedgerow and scrub habitats. This is in line with the Dorset Biodiversity Appraisal Protocol (DBAP) guidance<sup>3</sup> which requires hedgerow assessment to consider whether a hedgerow qualifies as a Significant Dorset Hedgerow using the methodology described in *Identifying and Assessing Significant Dorset Hedgerows. Bryan Edwards, Dorset Environmental Records Centre (January 2022).* 

This guidance has not been used in assessing the hedgerows on the site and four additional species recorded are recognised as Hedgerow and Scrub Notables and indicative of long-standing and undisturbed hedgerows and scrub habitats which are likely to support a richer ecology. These additional species recorded on the site are Lady Fern (*Athyrium filix-femina*), Broad Buckler-fern (*Dryopteris dilitata*), Male Fern (*Dryopteris filix-mas*) and Water Mint (*Mentha aquatica*).

# Protected species surveys

The majority of the surveys for protected species are incomplete. The badger survey methodology undertaken or to be undertaken has been completely redacted so it is not possible to determine what approach has been taken or whether this survey has been completed. However, the submitted EcIA identifies that bat transect and static detector surveys are ongoing, with data collected only from August and September 2023, Dormouse surveys are ongoing with data from August to October 2023 only, Invertebrate surveys have yet to be undertaken and reptile surveys are incomplete with two surveys undertaken in 2023.

It is not possible for a reliable assessment of the ecological value of the site and assessment of impacts to be undertaken based on this incomplete data and there is not sufficient evidence to secure the necessary detail that would be required for your authority to approve any proposals for mitigation, compensation and enhancement,

### Assessment of Likely Significant Effects on Important Ecological Features

Table 7: Assessment of Effects on Important Ecological Features summarises the anticipated impacts, mitigation and compensation measures for the identified features.

DWT note that the need to balance access and recreational use of greenspace with the creation and maintenance of high value habitats has been recognised.

As above, the assessment here is limited by the acknowledge absence of full survey data for protected species.

In relation to the habitats on site, in perpetuity management of retained and enhanced habitats on site by a nature conservation organisation such as Dorset Wildlife Trust is proposed. It is essential that any proposal to transfer management of a site of this nature is accompanied by sufficient ongoing funding provided by the developer to ensure that management in perpetuity can be supported.

# Arboricultural Assessment

Dorset Wildlife Trust note and support the comments made by Dorset Council's Tree Officer in their consultation response regarding the absence of sufficient consideration of trees and hedgerows in the layout design and the lack of information regarding how these will be adequately protected.

#### **Biodiversity Plan**

<sup>&</sup>lt;sup>2</sup> Dorset Notable Plants by Habitat - DERC 2023

<sup>&</sup>lt;sup>3</sup> Dorset Biodiversity Appraisal Protocol Guidance for Consultants - Section B Mitigation (dorsetcouncil.gov.uk)

The application is not accompanied by an approved Biodiversity Plan and certificate of approval from Dorset Council's Natural Environment Team (NET) in line with the Dorset Biodiversity Appraisal Protocol (DBAP). Before a Biodiversity Plan can be approved, it is essential that all relevant ecological surveys have been completed and used to fully inform an Ecological Impact Assessment. Currently, the majority of the surveys proposed have not been completed and therefore the assessment of potential impacts is incomplete. Your authority cannot come to a fully informed planning decision until the full information is provided.

I hope these comments are useful; please contact me should you have any queries about our response.

Yours Sincerely,



Mariko Whyte Conservation Officer – Planning and SNCI Nature-based Solutions Team

01305 264620 planning@dorsetwildlifetrust.org.uk