



Cranborne Chase Area of Outstanding Natural Beauty



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26th April 2023

Dear Ursula

P/OUT/2023/01166 – Land at Ringwood Road Alderholt; Mixed Use Development of up to 1,700 dwellings, care home, business park, village centre retail community and health facilities, open space and SANG, solar array, access roads and associated infrastructure. Outline application with all matters reserved apart from access off Hillbury Road.

Thank you for consulting the AONB Partnership on this major proposal in the setting of the Cranborne Chase Area of Outstanding Natural Beauty. This AONB is both to the north and west of the application site.

As you will see from your files, this AONB commented briefly on the EIA Scoping Opinion last year. This AONB Partnership is **concerned** that issues raised then are not adequately addressed in the submitted application.

The Partnership has the following comments on the proposal.

1. The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles one County, three county scale Unitary, and one District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage.

2. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital.
3. This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' policies for the management of this nationally important area and the carrying out of their functions in relation to it, as required by section 89 (2) of the CRow Act. The national Planning Practice Guidance [Natural Environment paragraph 040 (21.07.2019)] confirms that the AONB and its Management Plan are material considerations in planning.
4. The National Planning Policy Framework (July 2021) states (paragraph 174) that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, which include AONBs, commensurate with their statutory status. Furthermore, it should be recognised that the 'presumption in favour of sustainable development' does not automatically apply within AONBs, as confirmed by paragraph 11 and footnote 7, due to other policies relating to AONBs elsewhere within the Framework.
5. For decision making the application of NPPF policies that protect an AONB 'provides a clear reason for refusing development proposals' (paragraph 11[d]). Furthermore paragraph 11(b) explains that, for plan making, being in an AONB provides 'a strong reason for restricting the overall scale, type or distribution of development in the plan area'.
6. It also states (paragraph 176) that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation and enhancement of wildlife and cultural heritage are important considerations in these areas. This paragraph is also clear that the scale and extent of development within all the designated areas of AONBs and National Parks should be limited. Furthermore, development within their setting should be sensitively located and designed to avoid or minimise impacts on the designated areas.
7. Paragraph 177 is explicit that when considering applications for development planning permission should be refused for major development, other than in exceptional, public interest, circumstances. Footnote 60 also provides for the decision maker to regard development less than the threshold defined in the NPPF glossary as 'major' in the context of an AONB or National Park.
8. The Planning Practice Guidance, paragraph 042 highlights the importance of AONB and National Park settings, their contributions to natural beauty, and the harm that can be done by poorly located or designed development especially where long views from or to the AONB are identified. Paragraph 041 is clear that NPPF policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for development, and any development in an

AONB will need to be located and designed in a way that reflects its status as a landscape of the highest quality.

9. Local government (including planning authorities), Ministers of the Crown, individual councillors, any public body, statutory undertakers and holders of public office also have a statutory duty in section 85 of the CRoW Act to have regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, in exercising or performing any functions relating to, or so as to affect, land in an AONB. This is explained in NPPG [Natural Environment paragraph 039, (21.07.2019)] which also confirms this applies to the setting of an AONB.
10. More detailed information in connection with AONB matters can be found on the AONB [website](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB, I would draw attention to our [Good Practice Note on Colour in the Countryside](#).
11. This AONB is, as I expect you know, in one of the darkest parts of Southern England and hence the visibility of stars and, in particular, the Milky Way, is a key attribute of this AONB. On the 18th October 2019 this AONB was designated the 14th International Dark Sky Reserve in the world. Development that could contribute to light pollution, and hence impact adversely on those dark night skies, has to be modified so that such impacts are eliminated.
12. The AONB is, therefore, concerned about light pollution. Any external lighting should be explicitly approved by the Local Planning Authority and comply with the [AONB's Position Statement on Light Pollution](#) and the more recent [Good Practice Notes on Good External Lighting](#) and [Paper by Bob Mizon on Light Fittings](#). In this location that means all lighting complying with Environmental Lighting Zone E1 as defined by the Institute of Lighting Professionals 2021.
13. The submitted documentation rightly sets out that the immediate context of the site would be extensions of the Stour and Avon Tributary Valleys landscape character area of the Chalk River Valleys landscape character type and the Martin – Whitsbury landscape character area of the Downland Hills Open Chalk Downland landscape character type of the AONB's landscape character assessment. Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#). Nevertheless, this AONB Partnership is **concerned** that only the visual interrelationships between the site, the proposed development, and this AONB are considered to a realistic extent in the submitted documentation.
14. On the 30th May 2022 the Cranborne Chase Area of Outstanding Natural Beauty Board endorsed a Position Statement on Biodiversity Gain (see our web site), and the Board looks to that guidance having immediate effect. That means that each property should have at least one bird box, one bat box, and one bee brick incorporated into the structure, and pro rata for larger developments. That level of provision is, nevertheless, fairly basic but is seen by our Board as making an immediate contribution to environmental net gain rather than waiting

International Dark Sky Reserve 2019

for the outcome of Government's consultations on national guidance. Our Board's position is that this Area of Outstanding Natural Beauty should, without delay, make a contribution to environmental net gain whenever there is development approved, at whatever scale, within this AONB or its setting. The Board has confidence that you will take this guidance on board if you are minded to consider an approval. The proposed bird, bat, bee box/brick provision appears to be rather less than this basic level.

15. The proposal is located on the southern edge of Alderholt village, and the eastern boundary abuts the joint Hampshire and New Forest District Council boundary. The scale of the proposed development would, according to the submitted Design Guide, increase the existing village population of 3,171 by more than double. Depending on the occupation levels [2.5 to 3.5 persons per unit] that increase could be between 4,250 and 5950 [Sport England's response], or 3,740 as given in para 10.106 of the ES. The proposal does, therefore, envisage a very major change to the scale and character of the village that would occur over a 15 – 20 year period [on the basis of the stated maximum dwelling build rate of 125pa], and more than doubling the built up area.
16. The proposal is clearly of a strategic scale that ought to be subject to the full analysis of the Local Plan preparation process. That should, of course, give full weight to AONB matters as indicated in the NPPF. Whilst I note that major development at Alderholt was one option in the Draft Local Plan 2021 that draft received a vast amount of adverse comment and is, therefore, undergoing a thorough reassessment. The applicant team seem to put far too much emphasis on the possible allocation of major development at Alderholt as their reason for promoting the development when that has not actually happened. It would appear, therefore, that at the current time the proposal [no matter how sensitively detailed] is contrary to established policy.
17. As you may know, the perceived housing need in and around this AONB is for affordable dwellings, and that is echoed in the adopted AONB Management Plan. The provision of affordable housing in any development proposal is, therefore, an element that can be **welcomed**.
18. The primary road westwards from Alderholt, and the proposed major development, is the B3078 through Cranborne, which is within this AONB. That road is known as Castle Street within Cranborne and there is not only a sharp T junction with the High Street at its western end but also house frontages direct onto the highway, with very limited pedestrian space, and making widening impossible. There is also a narrow section between brick walls a short distance south of the Castle Street / High Street junction. Despite this AONB raising the issues of increases in construction and operational traffic last year [item d of my response], the submitted documentation **fails to address adequately** these matters which are of importance to both the AONB and the community of Cranborne.
19. The submitted traffic documentation **confuses** matters by projecting forward traffic to 2033 and setting out in tables those forecasts without current baseline

figures. The traffic from the development appears to be added to those enhanced forecasts. That process seems to hide traffic growth arising from the early stages of the development and the construction phases and then simply adds the operational traffic from the final phases. Nevertheless, that process indicates an increase in operational traffic arriving in Cranborne of over 25%, with the remainder of the traffic going in the Fordingbridge and Ringwood directions. In addition, there would also be construction traffic for the greater part of two decades.

20. I have **not found any mitigation** for the traffic impacts on Cranborne and the AONB in the submitted documentation. Clearly that does not respond to this AONB's declared concerns nor does it comply with policy and practice guidance. The statement in ES para 8.259, that the average daily trips into Cranborne would increase by some 700 to around 3,400 [but that is based on only 8% of traffic heading in that direction] and this could be mitigated by localised widening, is unrealistic. Similarly, Table 8.1 and its supporting text grossly **understate** the traffic and physical impacts of additional vehicles and people on the AONB so the magnitude of impact and significance of effect are whittled down. There is, for example, no mention of damage to verges and the associated diffuse sediment pollution to water courses often raised by NE. All that appears to demonstrate a lack of understanding of the tranquillity and characteristics of this AONB.
21. There appears to be rather too much 'shorthand' in the ES, moving swiftly to light touch mitigation and conclusions about low and negligible effects of impacts **without those impacts being identified**. Without that identification it is very difficult for the LPA, and its consultees, to see where impacts have been avoided, what the impacts actually are, the extent to which they can be mitigated, the scale of the proposed mitigation, and the residual unmitigated impacts and effects.
22. This AONB Partnership is **very concerned** by the scope for confusion in relation to the provision of suitable alternative natural green space [SANG]. Para 8.198 indicates that these are provided to mitigate the impacts of the development on European sites of wildlife importance. A formula appears to have been applied to achieve the area of SANG for wildlife purposes. However, elsewhere comments are made about the SANG mitigating impacts on this AONB. That has been done without the benefit of identifying the impacts or the extent and scale of them. It appears, from the detailed text about the provision of dog walking in SANGs, that the applicant team perceive the AONB as simply a dog walking area. Again, that seems to demonstrate a lack of understanding and appreciation of the complexity, character, characteristics, and functions of an AONB.
23. There appears to be further confusion or **misunderstandings** within the applicant team in connection with this AONB's International Dark Sky Reserve status and appropriate, dark sky compliant, lighting that will also meet the requirements of wildlife. The Light Report refers to Environmental Lighting Zone E2, which does permit the upward emission of light and hence not just a degree of light pollution but also light that does not comply with guidance for wildlife [eg

bats]. The landscape section of the ES more correctly refers, para 8.254, to 0% upward light emission. This AONB **strongly advises** that any proposed lighting should meet the requirements of Zone E1 in order to comply with DNS and wildlife criteria.

24. I see that the visuals / plans for the potential development do not show roof lights. The AONB **strongly supports** that design approach because roof lights have significant capacity to emit light pollution into the night skies, and roof lights are frequently positioned in locations that are very difficult to reach, and operate, integral blinds or louvres to prevent light emission.
25. This AONB Partnership is acutely aware, from its experience with Neighbourhood Plans, that the provision and availability of Doctors' Surgeries are all too often given insufficient weight when rural communities are expanded. This Partnership is also aware of offers of community facilities put forward at the time of a planning application that do not actually materialise. We **disagree** with the assessment, para 10.107, that the effect on health services would be negligible. To avoid such situations this AONB **strongly recommends** that if a permission is being considered then it should have a condition attached that the offered Doctors' Surgery must be constructed and functioning before more than 50 of the new dwellings are occupied.
26. The application appears to include a 6.5 ha solar array, but there is very little information provided about it. Such industrial features warrant full planning scrutiny and if a third one is required adjacent to the developed area and SANGs then this AONB **strongly recommends** it should be treated as a separate application. This AONB is also aware that the energy from local solar arrays may not feed into local communities but be sold to cities hundreds of miles away. This raises the issue of local sustainability, and this Partnership **recommends** that all the energy from local solar arrays within the vicinity of the proposed development should be used to supply the development, if approved, with appropriate planning conditions tying the development and the arrays. It also seems rather strange that none of the visuals or plans of the proposed development show roof mounted / installed technologies for the capture and utilisation of renewable energy. That seems to be a major **missed opportunity** for enhancing the sustainability of the proposed development.
27. The AONB Partnership is, therefore, **very concerned** that the application as submitted [and that has been done without consultation with the AONB team] does not realistically identify the impacts of the builders, occupiers, and their vehicles of the proposed 'new village' development on the physical and experiential features and characteristics of this AONB. Furthermore, there are no proposals to compensate the AONB or offset the negative impacts and effects of greater numbers of vehicles and people on the tranquillity, remoteness, and physical fabric of this AONB. The AONB Partnership is aware that it is not easy to quantify impacts and effects, and is happy to discuss how these can be compensated for.
28. This AONB Partnership **concludes** that effectively the application is asking the development management process to pre-empt the strategic Local Plan

process. Therefore, despite the obvious effort invested in the design work, the application is of a strategic scale and should not be approved prior to the wider consideration of strategic options via the Local Plan process.

29. The Partnership is also acutely aware of the recent reserved matters decision that indicated that all landscape and environmental matters would have been considered at the outline permission stage. Clearly the current application does not have that degree of detail and, interestingly, refers many times to putting off refining many quite substantial issues until the 'reserved matters' stage. There does, therefore, seem to be a rather quixotic situation where access is being sought from only one road, Hillbury Road, but the documentation shows an access off Ringwood Road and a new spine road cutting across, and blocking off, Ringwood Road. Whilst the documentation is illustrative, it seems obvious the applicant team have a fairly clear idea of the overall development they are seeking to achieve and, therefore, 'reserved matters' might merely refine the particular elements of the Design Code being applied to a particular phase of development. Although it is feasible and possible to apply conditions to outline permissions, the potential complexities of granting an outline permission when so many matters may be likely to be regarded as having been fully considered, when they have not, militates weightily against granting a permission.

I hope these comments are helpful to you and I would, of course, be happy to comment on any further information you may receive.

Yours sincerely

Richard Burden

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For and on behalf of the Cranborne Chase AONB Partnership Board

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