



**Hampshire &
Isle of Wight
Wildlife Trust**

Beechcroft House
Vicarage Lane
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Hampshire
SO32 2DP
01489 774400

Robert Thain,
Planning Case Officer
Appletree Court,
Beaulieu Road,
Lyndhurst
SO43 7PA

Dear Mr Thain,

25/10114 | Full planning application for the demolition of existing outbuildings and the erection of 140 dwellings (including affordable housing), public open space (including alternative natural recreational greenspace), SuDs, landscaping, access and associated works | Land off, SNAILS LANE, BLASHFORD, ELLINGHAM HARBRIDGE & IBSLEY BH24 3PG

Hampshire & Isle of Wight Wildlife Trust **objects** to the proposed development on the grounds of insufficient information supplied in the outline application to assess the environmental and ecological impact on nationally and locally important wildlife sites and protected species.

The Trust manages nearby Blashford Lakes Nature Reserve, which forms part of Avon Valley Ramsar, SPA and the Avon Valley SSSI. The SPA encompasses the lower reaches on the River Avon and its floodplain between Bickton and Christchurch. It includes one of the largest expanses of unimproved floodplain grassland in Britain and supports a nationally important assemblage of breeding wetland bird species, especially wading birds.

Blashford Lakes is one of the foremost important freshwater reserves for wildlife in the region and a critical node of the Avon Valley designations and nature recovery network. The Trust provides an extensive and significant educational role for visiting schools, community groups and families. Infrastructure provides for quiet recreation and enjoyment of the nature reserve setting.

Local Plan 2016 -2036

We note that the proposed site has been allocated by NFDC (Strategic Site 15: Land at Snails Lane, Ringwood). In our response to the New Forest District Council's Local Plan review (Our reference 14.7.09.1 dated 15th September 2016) we raised concerns with the development of this site. We highlighted the site's known use by notable breeding birds specific to the Avon Valley SPA & SSSI designations. With regards to Blashford Lakes, we stated that a development of this size and in the heart of the Blashford Lakes complex could result in impacts of increased recreation and disturbance. We considered then this location to be an unsustainable location and sought the opportunity to discuss our concerns with NFDC.

This proposal is a near identical application to Ref: 18/11606, which the Trust responded to in January 2019 (Our reference 13.10.3.12). We highlighted more recent bird survey data indicating further use of the site by notable species (wintering and probably breeding) and expressed our disappointment by the failure to consider recreational impacts on Blashford Lakes and the implications for the Trust's management of access infrastructure and increased wardening.

We consider that the section 9.143 in the supporting text of Strategic Site 15 has not been fulfilled in the current application, with regards to contribution to access [Blashford Lakes], provision of natural recreational greenspace for habitat mitigation [in light of net loss on site and likely increased disturbance at Blashford Lakes], site-specific bird surveys required to confirm their contribution to in combination loss of supporting habitat to internationally designated species and to be mitigated as required [see also LNRS below].

Recreation mitigation strategy

The application's recreation mitigation strategy has failed to address likely increased recreation on Blashford Lakes and the implications for management of associated infrastructure. We consider this to be in contravention of the strategic site requirements and of Policy ENV1 of the NFDC Local Plan *that development will only be permitted if appropriate mitigation, management, and monitoring measures are secured in perpetuity to prevent adverse effects on international nature conservation sites.*

Given proximity to the proposed development, the reserve will experience increased visitor numbers, leading to disturbance of wildlife, damage to habitats and erosion of access infrastructure. These impacts have not been assessed by the applicant, are not addressed in the Environmental Statement, with assumptions that the Recreation Mitigation Strategy addresses all Policy requirements within the site or through mitigation contributions that do not include the most impacted, designated site (Blashford Lakes).

Policies CCC1 & ENV4

The land in question has been used by notable breeding birds and supports significant wintering numbers that form part of the internationally significant population across the local complex of sites. It also forms part of the River Avon floodplain, where seasonal flooding highlights the need to retain flood retention and more naturally functioning floodplains. The applicant does not demonstrate, beyond reasonable doubt, that the loss of flood retention, will not exacerbate climate related extremes of fluvial and groundwater flooding, pertinent to Policy CCC1.

Policy ENV4 requires new developments to retain and enhance wildlife corridors and features that contribute to green infrastructure, which we do not consider to have been fulfilled. Recreational disturbance and encroachment on Blashford Lakes Nature Reserve has significant consequences for conservation management and resources. This impact extends beyond the site itself, undermining the broader nature recovery network. Hampshire's emerging Local Nature Recovery Strategy identifies a significant proportion of land within the application boundary as Areas that Could be Important for Biodiversity (ACB). It has strategic relevance to the local landscape and designated features.

Recently published Government guidance for local planning authorities relating to LNRS adoption states that for planning decisions: *“The Local Nature Recovery Strategy is an evidence base which contains information that may be a ‘material consideration’ in the planning system, especially where development plan documents for an area pre-date Local Nature Recovery Strategy publication. It is for the decision-maker to determine what is a relevant material consideration based on the individual circumstances of the case.”*

We consider the applicant’s assessment of environmental constraints, and location suitability to be subjective and not based on robust assessment and sufficient mitigating measures. In addition to recent guidance regarding the LNRS, we consider this omission to be a significantly material factor to reject the current application while adhering to the enhanced statutory duties set for local authorities on nature recovery within the Environment Act (2021).

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Best regards,

Lorna Selby
Policy & Advocacy Officer