

Hampshire LNRS consultation

Response Submitted by: East Dorset Environment Partnership

The document appears to be very high level at this stage with no indication of how any of it will be delivered and monitored or, given the nature crisis we face, when it will be delivered.

It could be argued that all of the issues identified in Section 3 of the response form are important. If they are to be ranked then *Climate change* and *Habitat fragmentation and competing land use* should be at the top of the list. Similarly, the listed “opportunities” are all important and interlinked.

The habitat mapping layers do not appear to be accessible if using a desk top PC.

page	para	Comment
12	1.9	The intention to take full account of the natural environment and associated LNRSs of adjacent areas is welcome but there is little evidence of this in the Strategy, only a general statement in some sections about cross border cooperation.
20	2.5	Lowland heath should be included in the list of most threatened habitats
25	2.26	We object to advocating tree planting irrespective of species, habitat or purpose. The Strategy must adhere to Right Tree, Right Place, Right Reason. There is no mention here of the need to hold water back in the landscape by slowing water flow, re-establishing former river flows where they have been canalized, improving habitat management of heathland mires and establishing peat restoration projects to enhance carbon capture.
28	2.42	This identifies that FE is responsible for c30% of woodlands (including commercial coniferous plantation forest) in Hampshire. It would be helpful to identify the extent of non-native conifers particularly where this is over heathland and creating barriers to heathland connectivity and restoration.
28/29	2.46	Deer and grey squirrel. FE confirmed in the 2025 East Dorset Forest Plan consultation that they do not propose to control grey squirrel. Unless they do so, they will negate the efforts of neighbouring land owners.
31		Heathlands
		The New Forest workshop report identifies <i>The future of coniferous woodland, supporting species such as goshawk, crossbill and hawfinch was raised as a potential threat</i> . The emphasis here is totally wrong. It is coniferous forest that threatens biodiversity where it is established on former heathland and where formally adopted commitments to habitat restoration have not been honoured. There will always be a place for the species identified as well as heathland bird species within wooded heath

		<p>and where more commercially driven plantation, felled in rotation, continues.</p> <p>Threats and losses due to minerals extraction are not identified.</p> <p>Where baseline data exist (eg having been thoroughly surveyed for mineral planning applications) they must be used to inform how habitats, vulnerable specialist species and connectivity can be maintained, restored and expanded. Nature is in crisis now.</p> <p>Discussion of opportunities for heathland has been omitted completely! This is fundamental to this area particularly with the connectivity to the Dorset. There is scant but totally inadequate reference to the Purple Haze area on map 4.12 (p131). Much of this is coniferous plantation where heathland restoration should have been achieved already under the 2009 Forest Plan but instead has been allowed to degrade.</p>
34		<p>The Strategy identifies the presence of all 12 of the UK’s species of native amphibians and reptiles in Hampshire. The LNRS Species Recovery Prioritisation Workshop Report proposed four amphibians & reptiles as priority species needing more targeted management – Smooth snake, Sand lizard, Natterjack Toad and Adder, with the reptile species requiring targeted <u>habitat management</u> as a priority. Not only is it difficult to find these species within the Strategy without doing a word search, there appears to be no targeted habitat management to at least conserve existing populations let alone achieve habitat maintenance and restoration to allow for population increase. For example, the area within Ringwood Forest adjacent to Moors Valley Country Park (Purple Haze) has the only remaining viable native sand lizard metapopulation in Hampshire. This MUST be acknowledged in the Strategy. Previous post minerals extraction heathland habitat restoration has failed as have attempts at species relocation locally. This must be addressed rather than blithely proceeding on the assumption that heathland restoration after minerals is possible: HCC have been unable to provide any evidence whatsoever that it can be achieved and recent RSPB research highlights the problems associated with heathland restoration and the need for management in perpetuity.</p>
		<p>We wish to see all of the identified outcomes delivered: ie</p> <ul style="list-style-type: none"> • All existing heathland and acid grassland mosaic in positive management • Restoration of degraded heathland and acid grassland, and • Heathland area is increased and connectivity is improved.
		Greenspace, health, and access to nature
38	2.108	<p>The demand for more trees and joining up forest fragments with accessible wildlife corridors must be tempered by the commitment to Right Tree, Right Place, Right Reason. In plantation forest over heathland, it is restoration of the <u>heathland</u> corridors that must take precedence.</p>

		Description by Area
	Fig 2.4	The mapping of NCAs shows that part of the Dorset Heaths that is in Hampshire. It would be helpful to add a footnote that this is part of 8,500 ha of the Dorset Heaths forming a critical link with the heaths of the New Forest.
		2.4 New Forest and Eastern Dorset Heaths
61		<i>Potential opportunities for nature recovery</i> should include a requirement for clear felling of much coniferous plantation, maintaining heathland rides to retain/restore connectivity and removal of invasive self-sown broadleaved species such as birch, willow and oak.
62		Figure 2.4.2: Nature conservation designations. Ebblake Bog does not appear to have been identified as a Ramsar site: this should be corrected.
65	2.216	<u>Climate change</u> Amend to read, <i>Climate change poses a significant threat to biodiversity and is a major driver in net biodiversity decline. For example, the impact of climate change on flows and temperatures in the streams of the New Forest and East Dorset and the associated impacts on ecology, specifically fish and invertebrate communities. Climate change exacerbates many of the issues for the area's biodiversity listed below and increases fire risk in heathland and forest.</i>
65	2.224	The claim that <i>the future of coniferous woodland is under threat</i> is unsubstantiated and should be deleted from the Strategy. The emphasis here is totally wrong. It is coniferous forest that threatens biodiversity where it is established on former heathland and where formally adopted commitments to habitat restoration have not been honoured. There will always be a place for the bird species identified (goshawk, crossbill and hawfinch) as well as heathland bird species within wooded heath and where more commercially driven plantation, felled in suitable rotation periods, continues.
	2.225	Any review of SSSI Citations should take into consideration all SSSI quality habitat adjacent or close to currently designated sites to ensure delivery of bigger, better and more joined up (as per Lawton).
	2.231	Despite the importance of the New Forest and Dorset Heaths, the Strategy highlights only the connectivity of trees and grasslands as an opportunity. Heathlands appear almost as an afterthought under the sub-heading of <i>Cross border approaches</i> as though that is more important than the habitat itself. Ringwood Forest and Home Wood SINC has long been identified as a BOA yet is not mentioned in the Strategy. While welcoming any cross border collaboration, opportunities for Connectivity of Heathland should be included as a separate heading, discussed and expanded: collaboration is simply a means to achieve this. This is a <u>Nature Recovery Strategy!</u>
75		3. Statement of biodiversity priorities
81		Wetlands, ponds, and ditches

		FR1 should include clear felling of adjacent coniferous plantation adjacent to valley mires eg Ebblake Bog to deliver transitional heathland habitat and maintain high water table.
88		Heathland and acid grassland mosaics
		<p>Priority Outcome – All existing heathland and acid grassland mosaic in positive management.</p> <p>H1 - Management of lowland heathland including scrub control. As discussed below, there must be full recognition, protection and habitat enhancement for the populations of smooth snake and sand lizard at “Purple Haze”, Ringwood Forest (a potential minerals site). ARC evidence and advice is that</p> <ul style="list-style-type: none"> • <i>the only remaining viable native sand lizard metapopulation in Hampshire is within and adjacent to the application site and</i> • <i>the site is significant for smooth snake and sand lizard at county and national level.</i>
89		<p>Restoration of degraded heathland and acid grassland mosaic.</p> <p>H2 - Restoration of heathland from forestry and woodland, including scrub should also include a requirement for the open habitats commitments made in the Forest plans for East Dorset in 2009 and 2025 to be delivered and restore heathland including transitional habitat (mires to wet heath, humid heath and dry and wooded heath). Habitat connectivity is essential.</p> <p>Additional measure to remove invasive non-natives (eg <i>Rhododendron ponticum</i>, <i>Gaultheria shallon</i>, <i>Prunus laurocerasus</i> etc) should be included .</p>
90		<p>H3 - Creation of heathland from arable or improved grassland and mineral workings. This measure must recognise that there is no evidence of successful heathland restoration after minerals. This was discussed at some length at the Hampshire Minerals and Waste Plan Partial Update EiP and detailed evidence submitted by nature conservation bodies.</p> <p>Creation of heathland from arable or improved grassland should note the recent published research by RSPB.</p>
91		<p>Priority Species that will benefit from expansion and management of heathland and acid grassland mosaics.</p> <p>Despite being identified by the LNRS Species Recovery Prioritisation Workshop as priority species needing more targeted habitat management – Smooth snake, Sand lizard, and Adder have not been mentioned here in the list of species. This should be corrected.</p>
		<p>Woodlands</p> <p>Priority Outcome – Existing woodlands enhanced through suitable active management</p>
92		<p>W6 - Management and control of deer and grey squirrel populations.</p> <p>FE are failing to manage populations of these pest species.</p>

92		W9 - Control of rhododendron, laurel and other invasive non-native woodland species. FE are failing to remove invasive non-natives.
		Priority species assemblage - dry heaths with sand and gravel exposures
93		<u>Measures</u> LNRS suggests <i>Consider restoring felled woodland to heathland</i> . High priority should be given to restoring heathland where it has been overplanted with coniferous forest. Rides that have been invaded by scrub (brambles, self-sown birch, willow and oak) should be widened to restore heath/acid grassland – an easy win with no loss of commercial timber! The Strategy should differentiate between native woodland and coniferous plantation over heath. There appears to be no mention of smooth snake or adder, only sand lizard here. Why?
110		Sites of Importance for Nature Conservation (SINCs) Priority Outcome – The condition of SINC habitats is improved. The Strategy has focussed on smaller SINCs and not considered the huge contribution that could be made by Ringwood Forest and Home Wood SINC, which is already classed as a Biodiversity Opportunity Area (BOA) and is the largest SINC in Hampshire.
		4. Maps
127		Map 4.8: Woodland creation or restoration areas
		The legend suggests that the whole of Ringwood Forest and Home Wood SINC should be “restored” to Wood Pasture and Parkland. This is totally inappropriate for the majority of the area. Home Wood is Ancient Replanted and Ancient Woodland but those areas that have not been destroyed by mineral extraction and landfill are heathland and coniferous plantation over heathland. This error is repeated in Map A6.1 (p298) Map A6.3 (p300) identifies this SINC as a Lowland meadow, and purple moor grass and rush pasture opportunities area Map A6.4 (p301): correctly identifies it as a Lowland heath and acid grassland opportunity area Map A6.5: Floodplain and coastal grazing marsh, saltmarsh, reedbed, and lowland fen opportunities map identifies the whole SINC as lowland fen opportunity. There is potential for proper management, expansion and buffering of Ebblake Bog and further mire restoration in the valleys with transitional habitats to dry heathland.
		Map 4.12: Additional sites Much of this area, known as “Purple Haze” should have been delivered as lowland heath under the 2009 Forest Plan. It is currently the subject of a minerals application. Its inclusion in the HWMP Partial Update is being considered following evidence presented at the EiP in February 2025. The Executive Summary of the mineral developer’s (applicants’) survey report states, <i>Based on the standard guidance the site is considered to be a</i>

		<p><i>'Key Reptile Site of National Importance for reptiles. ARC evidence and advice is that</i></p> <ul style="list-style-type: none"> <i>• the only remaining viable native sand lizard metapopulation in Hampshire is within and adjacent to the application site and</i> <i>• the site is significant for smooth snake and sand lizard at county and national level.</i> <p>The surveying ecologist recommended that the site should be designated as SSSI on the basis of the reptiles alone. Favourable status must be maintained for both species. Claiming that priority habitat will be delivered following minerals extraction is based on the totally false premise that it is technically feasible.</p>
134		<p>Map 4.13: Areas that could become of particular importance for biodiversity (ACB) map</p> <p>Ringwood Forest and Home Wood SINC has been omitted despite Ebblake Bog and the Dorset Heaths being adjacent to it.</p>
136		<p>5. Species recovery</p>
166	Table 5.2	<p>Individual priority species</p> <p>The only reference here to reptiles is the adder with a general statement that <i>90% of adder populations surveyed have declined in UK. Requires undisturbed open heath/woodland mosaics with structural diversity. Habitat expansion and connectivity important.</i> This does not appear to have been carried forward to the delivery of open heath/woodland mosaic. Smooth snake is not listed.</p>
195		<p>Priority species assemblage - dry heaths with sand and gravel exposures</p> <p>Identifies sand lizard only at Woolmer and New Forest. The Strategy totally ignores survey data that have been available in HCC and on-line for years.ⁱ</p> <p>The Executive Summary of the mineral developer's (applicants') survey report states, <i>Based on the standard guidance the site is considered to be a 'Key Reptile Site of National Importance for reptiles. ARC evidence and advice is that</i></p> <ul style="list-style-type: none"> <i>• the only remaining viable native sand lizard metapopulation in Hampshire is within and adjacent to the application site and</i> <i>• the site is significant for smooth snake and sand lizard at county and national level.</i> <p>The surveying ecologist recommended that the site should be designated as SSSI on the basis of the reptiles alone. Favourable status must be maintained for both species.</p> <p>Failure to include these populations in this location would be a failure of the Draft LNRS to comply with the Species Recovery Guidance which states (p10) <i>LNRS is a critical new tool for driving the national ambition to increase species abundance and reduce risk of species extinctions.</i></p>

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