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Our ref: Purbeck DC Core Strategy EIP  
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**BY EMAIL ONLY**

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Dear Mr Dring,

**Planning Purbeck's Future: main modifications to the Core Strategy**

Thank you for consulting Natural England about the above proposed modifications. Natural England has the following observations on the proposed main modifications. The proposed main modifications that are of interest to Natural England are listed below.

We have not responded using the supplied form because mostly, each of our comments relate to a number of different modifications so it would have been extremely inefficient to respond in this way. Nevertheless I trust that our comments are clear.

MM14 Policy NW Purbeck (heaths and Poole H water quality)

MM18 7.2.9 Amend text water quality Poole Harbour

MM20 Policy CEN: Central Purbeck (Heaths)

MM21 Policy CEN: Central Purbeck (Poole H water quality nitrogen neutral)

MM23 Wareham Common SSSI

MM24 delete Nutcrack Lane as potential SANG

MM25 Wareham Common SSSI

MM26 7.3.10 Poole Harbour water quality

MM 28 Policy NE:NE Purbeck (heaths)

MM29 Policy NE:NE Purbeck (Poole H water quality)

MM30 Policy NE:NE Purbeck (Poole H water quality)

MM32 7.4.8 Heaths and Poole Harbour water quality

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MM33 Map 14 deletion at Lytchett M

MM35 Policy SE: South East Purbeck (Heaths)

MM38 Policy SE: South East Purbeck (AONB)

MM41 7.5.8 Addressing impacts on European protected habitats and wildlife

MM43 8.2.3 New para re countryside

MM45 Policy CO: Countryside

MM47 Policy CO: Countryside

MM52 BIO Policy BIO: Biodiversity and Geodiversity

MM54 Policy DH: Dorset Heath International Designations

MM55 8.8.7.5 Poole Harbour Water Quality

MM56 8.8.7.7 Poole Harbour Water Quality

MM70 LHH Landscape, Historic Environment and Heritage

MM75 Inset map 6 (delete Nutcrack Lane potential SANG)

MM80 New appendix 5; insert SANG guidelines

Natural England **supports** all of these modifications and we agree with the conclusion of the HRA that the proposed modifications do not introduce any additional effects that have not been dealt with by the 2011 HRA report.

Natural England welcomes the text insertions into the Monitoring Framework below.

**Appendix 3** Monitoring Framework

**Trigger** : Failure of mitigation for European protected sites:

**Indicator** : Rise in net number of visitors to European protected sites or failure to provide nitrate mitigation.

**Appendix 3** Housing

**Indicator:** That sufficient nitrogen mitigation has been provided by new housing in the Poole Harbour catchment

**Target:** Sufficient nitrate mitigation has been provided to offset the increase in population equivalents (PE)<sup>1</sup>.

We have the following additional comments.

The Core Strategy refers uses the term Suitable Alternative Natural Greenspace (s) SANGs throughout but in a manner which is not consistent with use elsewhere in south east Dorset. The acronym should be SANG or SANGs but not SANGS (Suitable Alternative Natural Green Space). This requires a minor modification for consistency.

MM8, the wording proposed in relation to specially protected sites does not reflect the strict tests required through the Habitats Regulations, "*bearing in mind*" is a weak phrase and should be

modified. Further this policy and MM9 refer only to European sites and should include reference to International sites (Ramsar sites) or perhaps better refer to the CS policy affording protection. Natural England advise that this may be resolved through an addition to the Glossary as follows:

**European site** is a term used throughout the CS to simplify the document, it refers to nature conservation sites which are subject to the requirements set out in the Habitats Regulations 2012 eg SPA and SAC sites and as a matter of government policy Ramsar sites (NPPF para 118).

Modifications MM14, MM17, MM28 refer to "Heathlands Plan", Natural England is unclear as to what plan this term refers to. Natural England considers it may refer to the planned Joint Dorset Heaths DPD. If this is the case then a simple additional definition should be included to this effect in the Glossary.

Modifications MM 14, 20, 24, 28, 31, 33, 35, 42, 47, 54, 75 plus MM80. These modifications relate to policies and text about specific areas and development in relation to the Dorset Heaths internationally designated sites. Many of these modifications are cited as being 'in response to Natural England's concerns'; the reasons why the plan would be unsound, or not legally compliant, without them that are given relate solely to the NPPF. However, there is an additional reason why these modifications are important to the soundness of the plan and this relates to the Habitats Regulations. The amendments introduce additional clarity about measures required so that developments proposed within the Plan will be able to meet tests within these Regulations. Thus they increase the certainty that these developments will be able to be delivered and in this way make a positive contribution to the soundness of the plan.

Modifications MM 14, 18, 21, 26, 29, 30, 32, 41 plus MM 54 and 55. These modifications relate to policies and text about specific areas and development in relation to the SPA and Ramsar site of Poole Harbour. Again, some of these are cited as being 'in response to Natural England's concerns'; the reasons why the plan would be unsound, or not legally compliant, without them that are given relate mainly to the NPPF. As above, a similar argument applies and the modifications again make a positive contribution to the soundness of the plan.

Modifications MM 23, 25. These modifications are important in ensuring the protection of Wareham Common SSSI, potentially at risk from proposed development at Wareham, and is therefore important for the soundness of the Plan.

Modification MM 52. The need for this policy is evident given the NPPF. We have a minor points about the wording. Whilst we welcome the general aim of the second bullet regarding the 'potential' SPA the text could be taken to mean that these areas have a formal status of potential SPA when this is not in fact the case. We would suggest modifying the text to read '*within the vicinity of areas that support nationally significant numbers of Annex 1 bird species (nightjar and woodlark) undertake a risk based approach to ensure there is no significant adverse effect upon these species and their habitats*'. The areas that this refers to would be better identified in a brief text addition. It comprises not only the areas outside the current SPA that you have identified; there are other smaller areas that support these birds too. There appears to be a simple omission in the text of the 3<sup>rd</sup> bullet which does not address potential direct effects on SSSIs which although unlikely, are still possible. One way of addressing this omission would be to delete '*indirect*' from its current position in this bullet and add '*....for example **an indirect effect of disturbance from increased public access***'. The possibility of indirect, direct and cumulative effects are referred to in the last part of the policy which provide an appropriate explanation of the requirements.

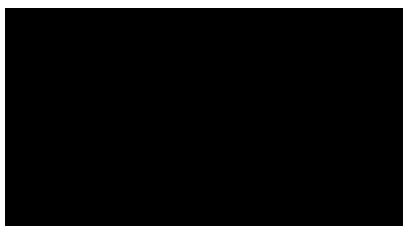
Modification MM 70. Natural England considers that this modification is important for the soundness of the plan in the light of the fact that no specific policy covering potential effects on the AONB is proposed.

Natural England welcomes the comments made by the RSPB.

If a further public hearing session is required Natural England would wish to participate at the oral examination.

For any correspondence or queries relating to this consultation only, please contact Andrew Nicholson or Nick Squirrell. For all other correspondence, please contact [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely



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