

Date: 08 October 2019  
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**BY EMAIL ONLY**

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Dear Mr Yuille,

**Wareham Neighbourhood Plan Examination**  
**Location: Dorset**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has recently been made aware of further information submitted in respect of the above Examination. Correspondence dated 22 August 2019 from Carter Jonas.

Natural England would draw the Inspectors attention to a number of matters.

Firstly the promoter has submitted draft SoCGs to which Natural England is not a signatory although Natural England has been consulted.

Natural England advise that whilst a SANG delivery approach is set out (shown in dark green on Plan A) which *could* secure the proposed housing allocations as originally submitted in the plan north of the railway line at Wareham this has not been agreed with the promoter nor has Natural England seen any written confirmation from the land owner that the areas of land outside of the promoters option proposed as SANG would in fact be made available. Natural England was in agreement with the Neighbourhood Plan Group (NPG) that a SoCG including the promoter and Landowner could help to resolve matters. This is not agreed by the promoter.

Therefore for the purposes of consideration under the Habitats Regulations Natural England advise that the delivery of SANG against the allocations in the Plan may not be considered as certain as land outwith the promoters option is required. Because this necessary mitigation is uncertain, whilst a Likely Significant Effect would be concluded it does not follow that an adverse effect on integrity can be avoided.

Because of this issue Natural England has advised the NPG on other mitigation approaches aimed at delivering the agreed allocation in the Plan area.

Natural England note that Welbeck are now raising an additional housing allocation site to the north/east of Bere Road. Natural England has raised consistent and serious reservations about this proposal with the landowner the current promoter and a previous advisor to the landowner. This advice relates to the following points:

- The proposal to wrap new housing around the northern part and into the current allotment site brings the development very close to the existing access track into Wareham Forest. This part of Wareham Forest has numerous European and internationally designated sites and is a very attractive recreation destination with evidenced levels of existing public access.

This attractiveness of this area and the fact that it is within easy walking distance of the possible housing area decreases the likelihood that an effective SANG can mitigate against an increase in recreational use of Wareham Forest by foot access.

- The lack of agreement about access/layout of the development leads to the same concern that, apart from a likely access at A (Fairway Drive) on the appended plan, there will also be access from a spur at Seven Barrows Road (B) which will facilitate ready preferential access to the forest (325m to the access track which forms part of the way marked Hardy Trail and Poole Harbour Trail leading into the forest). A much more direct access would also be possible if the allotment access road was open (C) where it is only 30m to the start of the route. In comparison I have estimated that the distance to gain access to the proposed SANG land from the end of Seven Barrows Road is 580m through the new housing (I have not included the narrow path adjacent to the allotments as part of the SANG).
- I am concerned that there is no specification for the narrow link proposed to the SANG adjacent to the new allotments, in my experience such links need to be agreed to ensure that they are functional and do not deter users because of negative features.
- The lack of discussion/agreement with the promoter concerning the SANG land outlined in Plan B leads to further serious concerns about its effectiveness and deliverability as well as its potential to lead itself to harm to the designated sites.
- The proposed car parks(size unspecified) and crossing point may not be relied upon as deliverable, this proposal requires a transport and safety assessment because these lie in a point on the Bere Road where visibility, particularly from vehicles coming from Wareham is limited by two ridges to the south. Whilst the speed limit is 50 mph, local experience is that this is exceeded. In addition there is HDV access to the minerals/waste operation just to the north. Natural England consider it uncertain that this can be delivered in the manner proposed if at all following a traffic assessment. The principle of the proposal in intercepting other users is welcome, but the details are currently uncertain and so may not be relied upon.
- There is an additional risk, which is not considered due to lack of information, that the additional SANG land would serve to draw more residents by car, towards a location where if they cannot park they would then visit the already well used Sika Trail carpark which leads into Wareham Forest and a suite of designated heathland sites. This could easily have the unintended consequence of increasing pressure on the designated sites because of the existing car parking facility.
- Natural England currently advises that visitors are less likely to cross over from one area to the other and therefore each side would function as a discrete SANG area, so the indicative joint perimeter walk of 3.4km would not be suitable for consideration under the SPD guidelines subject to onsite considerations.
- The promoter has commented to Natural England that they have surveyed the SANG in relation to SPA birds. This information has not been made available to Natural England for consideration. Extensively managed fields such are as those proposed and in close proximity to the designated sites are likely to be used by foraging nightjar as well as woodlark, both SPA birds.
- Natural England is not aware of any report/survey which assesses the existing biodiversity interest of the additional SANG land or the proposed allotment site in order to assess the potential impacts.
- Natural England would normally wish to secure agreement with the promoter about the phasing of mitigation land coming forward and in this case secure an agreement in principle that any SANG capacity will be made available to other allocations in a timely and affordable manner and not subject to excessive charges which adversely affect other planned development coming forward. Natural England would wish the authority to be assured that the requirements do not compromise other policy objectives. No such details or assurances have been provided rather the opposite with considerable uncertainty about delivery remaining.

As for the proposed additional allocation it is clear that the new SANG area will be less effective in drawing many existing local residents on foot from Northmoor, because of existing habituation to using Wareham Forest but also because, for some, the forest is easier to access, the detraction of

the narrow linking pathway are evident compared to a SANG directly abutting the residential area.

However when considered from a wider perspective the proposal certainly represents a positive step towards mitigation of the proposed developments north of the railway including that proposed north east of Bere Road. As set out above there are a number of key aspects relating to the SANG functionality which are not resolved and have not been the subject of any wider considerations. The effect of this is that, in spite of the larger SANG area indicated in Plan B, Natural England are not able to advise the Examiner that we can be certain that the measures can be delivered or that they will be effective in avoiding an adverse effect on the integrity of the designated sites.

More recently correspondence (4/10/2019) (Annexe B) submitted to the Purbeck Local Plan makes reference to the proposed SANG (Plan B) having capacity for 1000 units, Natural England would afford no weight to this assertion which is unsupported by any local survey or other evidence, on balance this type of assertion raises many more concerns about attracting users who are then deflected into Wareham Forest and the suite of protected heathlands nearby. The meeting note makes it clear that this was discussed as part of an informal meeting with two staff members who had not been briefed and who have no local knowledge of the area and context, this is clearly acknowledged in the meeting (10 Sept 2019) note and disclaimer. The meeting note does specifically state an intention by the promoters consultant on 10 September 2019 to consult with the local Natural England staff and advice to provide survey information for consideration. The advice in this letter represents Natural Englands formal advice to the Examiner concerning the proposal set out by in the correspondence dated 22/8/2019 from Carter Jonas.

In summary Natural England advise that further evidence would be required before we can confirm that a suitably functional SANG is available and will in fact be able to meet the needs of the scale of development now advocated by Welbeck in addition to that identified in the Neighbourhood Plan.

Natural England note that the additional housing site proposed does not form part of the Wareham Neighbourhood Plan and that the NPG have also worked with Dorset Council, a land owner and Natural England through a SoCG to provide sufficient certainty concerning mitigation delivery around revised allocations on the same sites identified in the neighbourhood plan (excluding a requirement to allocate the land west of Bere Road following green belt release through a revised local plan) to demonstrate that the mitigation measures proposed can be delivered and would have no adverse effect on the integrity of the European and Internationally protected heathlands.

The consideration of the proposed additional allocation to the north/east of Bere Road and SANG indicated in Plan B is a matter for the Neighbourhood Plan Group and the Examiner but the proposal for an additional allocation, which is considered above presents a number of risks and uncertainties concerning adverse effects and delivery of mitigation measures.

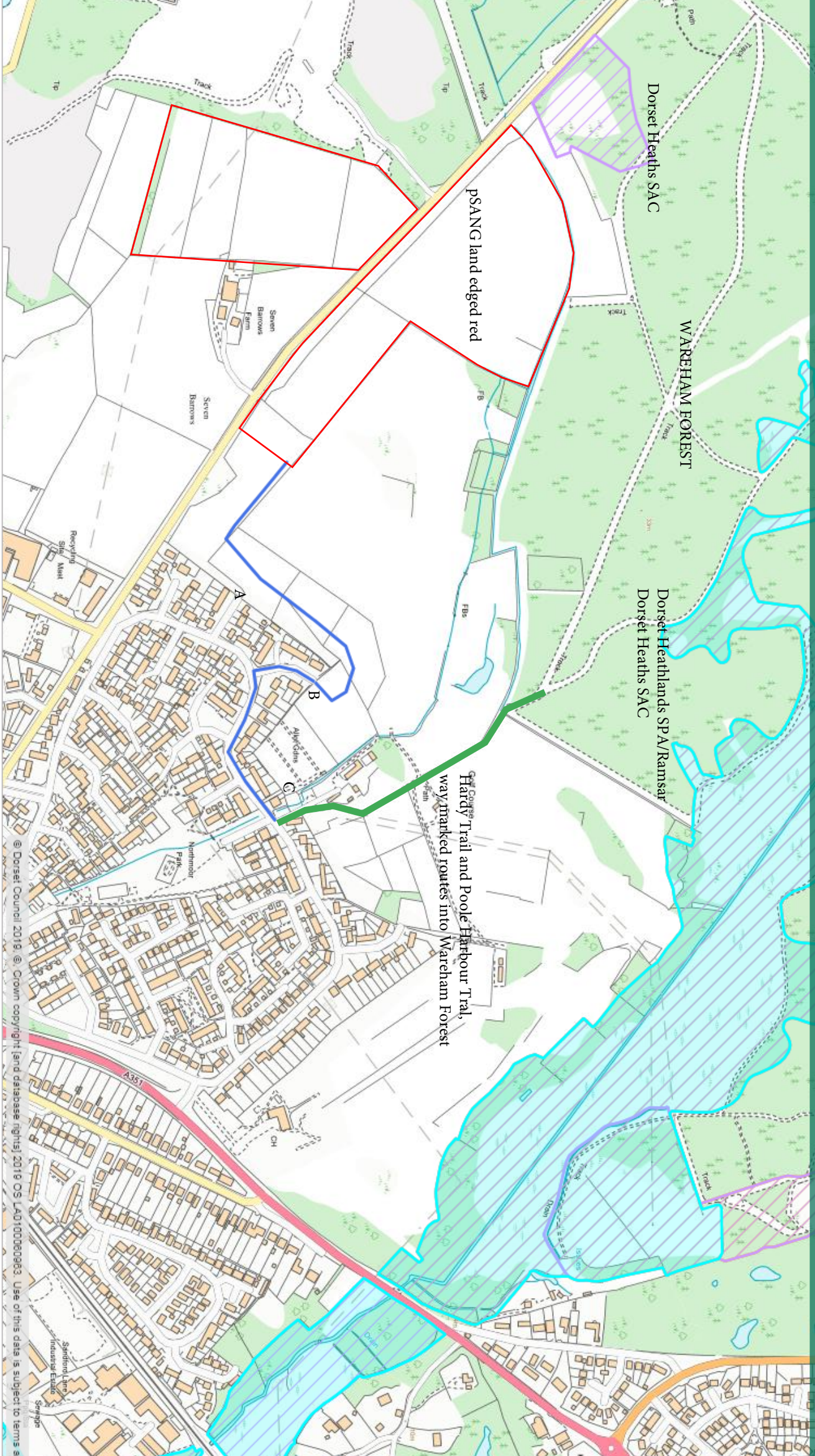
I trust this advice will assist you in considering the plan further.

Yours sincerely

Nick Squirrell  
Conservation and Planning Lead Advisor  
Dorset and Hampshire Team  
Dorset, Hampshire and Isle of Wight Area Team  
Natural England  
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Annexe A

Location map of additional SANG area and points/locations mentioned in the advice letter.



Dorset Heathlands SAC

WAREHAM FOREST

Dorset Heathlands SPA/Ramsar  
Dorset Heathlands SAC

PSANG land edged red

Hardy Trail and Poole Harbour Trail,  
way marked routes into Wareham Forest

A

B

C

Seven Barrows

Northmoor Park

A351

Santolone Lane Industrial Estate

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Annexe B

Email and meeting note submitted to Dorset Council regarding the Purbeck Local Plan

**From:** Steve Boyt  
**Sent:** 04 October 2019 16:51  
**To:** Frances Summers <[frances.summers@dorsetcouncil.gov.uk](mailto:frances.summers@dorsetcouncil.gov.uk)>  
**Subject:** FW: Wareham SANGs

**From:** Andrew Hodgson [<mailto:andrew.hodgson@welbeckland.uk>]  
**Sent:** 04 October 2019 16:37  
**To:** Sue Bellamy <[sue.bellamy@dorsetcouncil.gov.uk](mailto:sue.bellamy@dorsetcouncil.gov.uk)>; Hilary Jordan <[hilary.jordan@dorsetcouncil.gov.uk](mailto:hilary.jordan@dorsetcouncil.gov.uk)>  
**Cc:** Dominic Farmer <[Dominic.Farmer@ecologysolutions.co.uk](mailto:Dominic.Farmer@ecologysolutions.co.uk)>; Sensecall, Steven <[Steven.Sensecall@carterjonas.co.uk](mailto:Steven.Sensecall@carterjonas.co.uk)>; Canavan, Peter <[Peter.Canavan@carterjonas.co.uk](mailto:Peter.Canavan@carterjonas.co.uk)>; Steve Boyt <[steve.boyt@dorsetcouncil.gov.uk](mailto:steve.boyt@dorsetcouncil.gov.uk)>  
**Subject:** Wareham SANGs

Good afternoon Sue/Hilary/Steve  
The contents of this message can be shared.

As mentioned in my email to you of the 18<sup>th</sup> Sept I have been having discussions with the Estate re including additional land which im pleased to say they have agreed to.

We have also undertaken a meeting with high ranking Natural England personnel about the project. Attached are the agreed minutes of the meeting. As can be seen they are positive and have the ability to mitigate both of Welbeck's potential development sites in North Wareham and would provide greater recreational access to green belt land which would be a positive.

Our ecologist has undertaken a walk over of all the potential additional land and has not identified any features that would preclude its use as SANGs land. Whilst further work/investigations are required I would suggest there is sufficient evidence that land north of Bere Road should not be discounted on ecological grounds and indeed its release has the potential to bring great recreational/ecological benefits to the area.

Such a SANG (Plan B) could have potential capacity of c1,000 dwellings of district wide importance.

As mentioned in my email of the 18<sup>th</sup> I would welcome the opportunity to discuss matters with the Council.

I will be in attendance of some of the EIP next week should you wish to have a meeting.

Kind regards

Andrew



**Andrew Hodgson**  
Partner | Strategic Land

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## NORTH WAREHAM, DORSET

### MEETING NOTE

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#### Attendees:

Marc Turner – (Natural England) **MT**  
Andrew Smith – (Natural England) **AS**  
Dominic Farmer – (Ecology Solutions) **DF**

**Date of meeting: 10<sup>th</sup> September 2019**

#### PURPOSE OF MEETING

1. The purpose of the meeting was to discuss the options for the provision of Suitable Alternative Natural Greenspaces (SANGs) to mitigate new development in Wareham.

#### DISCUSSION

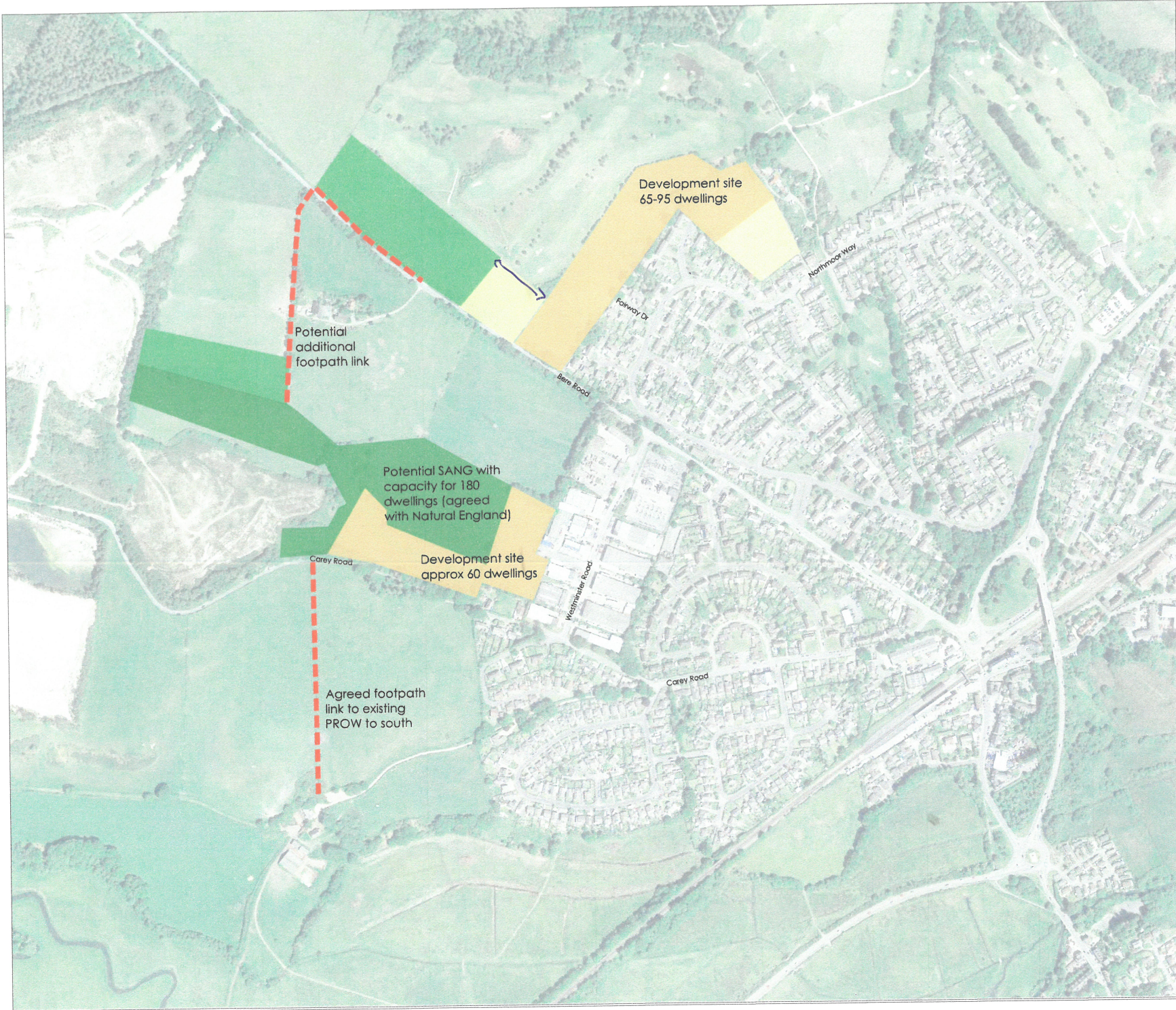
2. **DF** tabled Plans A and B that were submitted to the Neighbourhood Plan Examiner on 22 August 2019 (attached to this note of meeting) and used the response provided by Nick Squirrell (**NS**) on 1 August 2019 detailing the concerns raised over the SANG option presented to him at that time (essentially Plan A).
3. **DF** also explained that **NS** had provided a response through the Discretionary Advice Service (DAS) service agreeing to the SANG area in the south (as identified on the plans).
4. **MT** raised that using Thames Basin Heaths (TBH) principles a site of 5ha (the scale of the southern SANG) would be deemed to have a catchment of 2km. As such, technically this SANG could be capable of mitigating both development sites (60 + 95 dwellings = 155 dwellings) given an agreed capacity of circa 180 units.
5. **DF** stated that despite this, and given **NS**'s concerns over the ease of access to the Wareham Forest to the north, his clients had sought to provide additional land and footpath links to address development North of Bere Road (NBR) and ensure that the proposed SANG would give certainty of appropriate mitigation to meet the necessary legal tests (and capacity to accommodate other developments in the area subject to appropriate financial contributions) – hence Plan A. Following receipt of **NS**'s 1 August email **DF** confirmed that Plan B had been produced and

submitted to the examiner for the Neighbourhood Plan but **NS** had not been contacted directly for his view. This Plan B adds around 14ha of land to the original 5ha.

6. **MT** stated that his comments would all be caveated that they were subject to him visiting the site (as this was not part of the Area he usually covered). However, in principle he could not see that Plan B would not address all of the concerns raised by **NS**.
7. **DF** stated that he believed that Plan A was in itself acceptable and could be adapted to address **NS** comments (and/or it was disagreed that all of the comments were valid). **MT** stated that whilst it may be a 5 or 6 out of ten rated SANG the Plan B was top quality and would potentially be capable of mitigating a high proportion of additional development in the Wareham area.
8. **MT** stated that where land bordered areas of concern (i.e. access to the Wareham Forest in the north) this could be fenced where necessary much as has been done at the Transport Research Laboratory (TRL) site in Bracknell (that **MT** knew ecology Solutions had been involved in).
9. **MT** and **AS** raised that perhaps the key issue for the SANG would be designing a safe road crossing over Bere Road. It may be that the car parks serving the SANG either side of the road would slow road speeds in any event. It also may depend about whether this is a busy/fast road at times when dog-walking is primarily done (i.e. 6/7am and 6/7pm usually times outside peak traffic flows). There should be at least one safe crossing and there could be many options that would depend on the traffic assessment, e.g. islands, pelican crossings etc. **MT** also raised it would be preferable if a second crossing point could also be provided, this may not be as formalised as the primary crossing and could simply constitute some finger posts either side of the road with breaks in hedges. This gives the option of a walking circular route that avoids a 'figure of 8' pinch point where this is only a single crossing point.
10. **MT** stated that the proximity of the SANG to both the developments was a significant plus point. **DF** explained that the development design for NBR would also make walking to the Wareham Forest as awkward as possible. **DF** also pointed out that reaching the SANG was the same walking distance from the furthest dwelling to the SANG as it was to reach the Wareham Forest from the nearest dwelling to the Forest. **MT** cited that the provision of the allotments also provide a good 'buffer' between the built form and the SANG but that the provision of a footpath link alongside/through the allotments was a benefit.
11. The presence of a Scheduled Ancient Monument (SAM) within part of the SANG should not be deemed as a negative. The SAM could simply be avoided so it is not walked over, it provides a focal feature (a key item listed for SANGs to have) and it could be fenced with appropriate interpretation provided. **MT** referred to the boards at the TRL site as being the 'platinum standard' for interpretation and if similar could be provided then this would also be a positive.
12. **AS** stated could it be confirmed if the 'agreed footpath link to existing Public Right of Way (PROW) to south' links to a footpath/PROW that goes east towards the built form (as again this would further improve access/links for existing residents to be encouraged to use the SANG). **DF** confirmed he would check revert of this was a PROW or other access was possible.

13. **DF** raised **NS**'s comment about the adjacent landowners agreement/awareness to public access being proposed adjacent and said he felt this was not Natural England's (NE) remit and that the owner would have the usual ability of any public person to comment/object to the proposals. **MT** confirmed this was not NE's remit and agreed with **DF**.
14. **DF** confirmed that not all of the SANG land for Plan B had been fully surveyed but that it was of a similar nature to that which had been surveyed and agreed as suitable SANG by **NS** in the south. **DF** also confirmed the suite of surveys completed for the NBR development land and SANG land as per Plan A. However, **DF** stated that biodiversity surveys would be conducted and, if necessary, discounts to capacity could be applied (this would be the same in instances where designated sites etc are included in a SANGs site). However, none of the land proposed is supporting habitat to any of the Annex 1 bird species for the Special Protection Area (SPA) (as such surveys had been conducted).
15. **DF** also confirmed that deliverability of the land could be assured (given **NS**'s comment about it including areas outside of Welbeck Land's option with the Estate) but would also be subject to agreeing appropriate financial contributions for other developments to rely on the SANG as mitigation.
16. On this basis **DF** concluded by stating that he felt that all of the points raised in **NS**'s 1 August correspondence were dealt with by Plan B and could potentially be addressed by Plan A. **DF** also raised that as the Estate owned a large amount of land in the Wareham area including Wareham Forest itself that Welbeck were in a unique position of having a number of options in a highly constrained area. **DF** pointed to other options that were not necessary in the context of Plan B but that could have been brought forward, including appropriate designed 'dog parks' to intercept walkers into the Forest (e.g. on a triangle of land adjacent to the footpath into the Forest opposite the existing allotments) and management of Wareham Forest itself. **MT** agreed that such options would likely also be considered as appropriate mitigation if required but would only comment if these were brought forward formally and more detailed provided).
17. **AS** suggested that **NS** could be formally consulted on the Plan B option going forward and that he would appraise **NS** of the meeting discussions held.
18. The meeting concluded.

*The above note represents discussions held during an informal meeting, the views expressed by Natural England do not constitute a statutory response or advice, which will be made by Natural England in its role as statutory consultee to the competent authority. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response made by Natural England.*



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- Key:
- Existing allotments and potential new location of allotments if moved
  - Proposed SANG
  - Potential additional SANG land
  - Footpaths links

# PLAN A

24.07.18 NZ AB

Rev	Date	Description	Drawn	Chkd

Client  
 Welbeck Land II LLP

## Boyer

Project  
 Wareham and Sandford

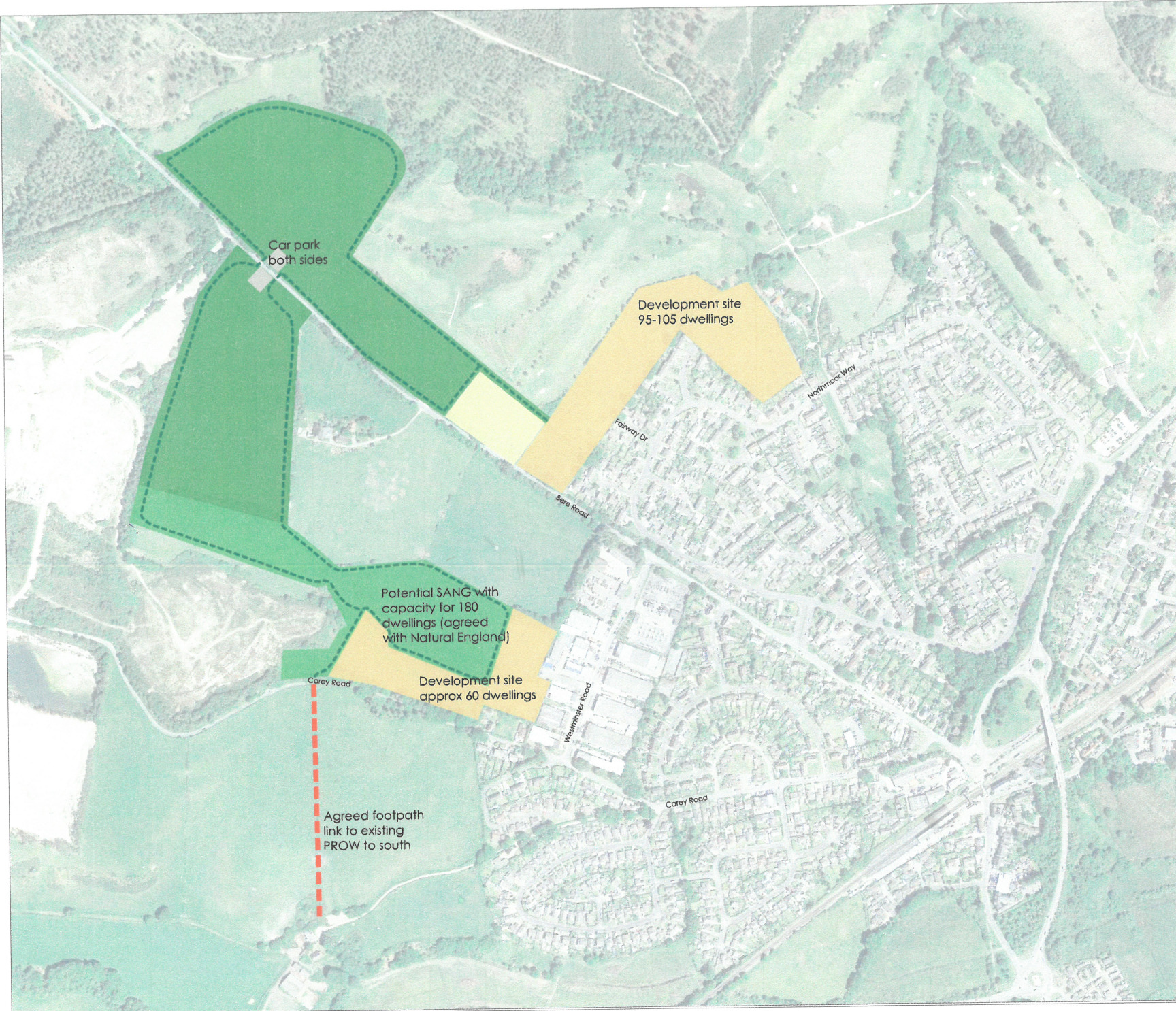
Drawing Title  
 Wareham - SANG

Drawing No. 901 Job Ref. 18.2003

Scale @ A3 1:5000 Revision -

Scale Bar 0 50 100 150m

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- Key:**
- New allotments
  - Proposed SANG
  - Potential additional SANG land
  - Potential car park
  - Footpath link
  - Indicative perimeter SANG walk of c 3.4 km

PLAN B

A	19.08.19	Revision - SANG	NZ	AB
-	24.07.19		NZ	AB
Rev	Date	Description	Drawn	Chkd

Client  
 Welbeck Land II LLP

Boyer

Project  
 Wareham and Sandford

Drawing Title  
 Wareham - SANG

Drawing No. 901      Job Ref. 18.2003

Scale @ A3 1:5000      Revision A

Scale Bar: 0 50 100 150m

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