

SD93: Strategy for mitigating the effects of new housing on European sites and justification for changes to green belt boundaries at Morden

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Appendices

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Introduction

1. The Council has prepared this paper following the first week of examination hearings into the Purbeck Local Plan which were held between Tuesday 2nd July and Friday 5th July 2019. In the course of the hearings the Council committed to undertake a series of actions relating to:
 - Habitats Regulations 2017 (Matter A, Issue 5);
 - Green Belt (Matter C, Issue 1).
2. All of the relevant actions have been presented in a schedule and published on the Council's website [SD84] (<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/local-plan-review-purbeck.aspx>).
3. This paper provides the Council's response to:
 - Action 6 – 'Undertake further work with Natural England to clarify the Council's approach to mitigation measures for housing development on unallocated sites.'
 - Action 16 – 'Prepare statement on the distribution, capacity and alternatives for SANG placement. Include information on deliverability status of each SANG, and information about the homes which would be mitigated for by the proposed strategic SANG at Morden.'
4. The Council has presented its response to Action 16 first as its strategy around strategic SANGs forms part of the mitigation measures for housing development on unallocated sites. This paper has also been prepared in the context of Action 24 which required the Council to 'Give thought to implication of any increase in housing numbers on spatial strategy?'

Action 16 – ‘Prepare statement on the distribution, capacity and alternatives for SANG placement. Include information on deliverability status of each SANG, and information about the homes which would be mitigated for by the proposed strategic SANG at Morden.’

Approach to screening for likely significant effects and mitigating adverse effects

5. In the context of its strategy for meeting housing need, the Council’s approach to screening for likely significant effects on European sites, and mitigating these effects, takes account of: the distribution of European sites across Purbeck and the expected distribution of housing.
6. Supplementary planning documents (SPD) have been prepared to support the local plan policies by informing and guiding the assessments of impacts, under the Habitats Regulations. The adopted and emerging SPDs take account of the most relevant/up-to-date scientific evidence and the European sites conservation objectives. The SPDs identify both:
 - indirect – *in the form of the impacts of recreational activities connected with the occupation of new homes; and*
 - direct – *in the form of nitrogen emissions into Poole Harbour;*

likely significant effects. To be effective, the mitigation for the in-direct effects of recreational activity has to influence the behaviours of the people occupying the new housing (as well as that of existing residents).

7. This paper focuses on the Council’s strategy around the likely significant effects referred to in the Council’s Habitats Regulations Assessment (HRA). It does not serve the purposes of the HRA that was specifically undertaken for the Purbeck Local Plan in order to meet the requirements of the Habitats Regulations 2017. The Council has committed [SD89] to update its HRA following the first week of examination hearings, but remains satisfied that its approach meets the requirements of the Habitats Regulations 2017.

Mitigating adverse effects from housing development

8. Local authorities in south east Dorset whose administrative area is within 5 kilometres of protected heathland and which have responsibility for the determination of residential planning applications, have worked together following the introduction of the Habitats Directive by the European Union, enacted as the Habitats Regulations 2017, to identify the potential impacts of additional development on and visitor access patterns to Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), and develop a joint strategy for avoiding or mitigating the impact of development. It is a matter of Government policy to apply the same approach to Ramsar sites.

9. The evidence is that the impact arising from additional residential development close to protected heathland sites could not be mitigated and so the authorities do not allow additional residential development within 400m of protected sites. Proposals for other types of development within 400m are considered on a case by case basis.
10. Between 400m and 5km of protected sites the authorities have devised a strategy to enable mitigation of residential development through the provision of Heathland Infrastructure Projects (HIPs) and Strategic Access Management and Monitoring (SAMM).
11. Suitable Alternative Natural Greenspace (SANG) is the most significant element of heathland mitigation but by no means the only one. Other Heathland Infrastructure Projects include, but are not limited to, heathland support areas (HSA) where increased access is provided adjacent to protected heathland to disperse the existing pressure on the protected sites, as at Soldiers Road near Arne.
12. Appendix E of the Dorset Heathlands Framework SPD 2015-2020 provides guidance for the establishment of Suitable Accessible Natural Greenspace (SANG) Quality Standards for the Dorset Heaths.
13. The other strand of mitigation is access management. The authorities fund the Urban Heaths Partnership to carry out Strategic Access Management and Monitoring. The partnership:
 - co-ordinates Police and Fire Brigade responses to incidents on heathlands and works with them on 'Operation Heathland' (an initiative raising awareness of the impacts of fire, vandalism and antisocial behaviour on heathlands and seeking to prevent them);
 - influences behaviour of children on protected sites through education programmes;
 - influences users of the sites through on-site wardening and the Dorset Dogs project; and
 - co-ordinates the monitoring programme.
14. Other access management projects include directing dog walkers and cyclists away from Upton Heath and onto Upton Country Park and SANG and visitor access management on the Arne peninsula. The project to encourage dog walkers and cyclists into Upton Country Park is partly implemented. A crossing refuge has been installed in the middle of the road linking Upton Woods and the Upton SANG across a main road which forms a barrier. Phase two requires signage to be installed.
15. The National Trust is leading on the development of an access management strategy for the Arne peninsula which the Council will contribute to.
16. In 2016, the Council commissioned AECOM to undertake a review of the Council's approach to heathland mitigation. The Exploring Heathland Mitigation in Purbeck report concludes that the current approach to mitigation in Purbeck remains appropriate and robust.

Suitable Alternative Natural Green Spaces (SANGs)

17. SANGs are an important component of the Council's strategy for mitigating the adverse effects from housing in Purbeck on European sites. This paper focuses on SANGs in response to the Action from the examination hearings – there are other important elements in the mitigation strategy which are referred to above and in the Council's HRA.
18. In response to Action 16 the Council has sought to provide further clarity around its preferred strategy for mitigating the effects from housing on European sites with SANGs. The Council recognises, and has separate strategies for mitigating, the likely significant effects of homes on Poole Harbour Special Protection Area. In some instances SANGs may also serve to offset nitrogen emissions from new homes (by taking agricultural land out of use) and/or divert recreational pressures away from Poole Harbour.
19. This paper:
 - Provides a list of existing and planned SANGs in the Purbeck area over the period of the local plan;
 - Identifies their capacity and their potential to operate as a 'strategic SANGs'; and
 - Considers the suitability of alternative 'strategic SANGs' presented in connection with 2016 housing options at Bere Farm and Lytchett Minster.

SANGs provision

20. In and around Purbeck there are a number of site specific and strategic SANGs, which are operating, have been agreed in connection with a planning application, or are proposed to address the effect from an allocation. The site specific SANGs and the strategic SANGs serve slightly different functions. Site specific SANGs provide doorstep opportunities for daily recreational activities. Strategic SANGs provide alternative opportunities for people travelling to visit (often from further afield over a wider catchment) protected sites on a less frequent basis. In some situations, a site specific SANG due to its location and/or size can also provide strategic mitigation. The table below summarises the size and status of SANGs. Once a resident is in their car a wide range of heathland sites are within easy reach.

SANG	Size ha	Status
Upton Woods	5.2	<i>In operation</i>
Bog Lane, Stoborough	13.98	<i>In operation</i>
Frenches Farm, Upton	7.5	<i>4.8 in operation</i>
Swanage	6.7	<i>In operation (Official opening August)</i>
Bere Regis	4.5	<i>Agreed in neighbourhood plan</i>
Wool	32.7	<i>Proposed in PLP 2019</i>
Moreton SANG and Heathland Support Area	18 + 23	<i>Proposed in PLP 2019</i>
Lychett Matravers	7.6	<i>Proposed in PLP 2019</i>
South of Warmwell Road, Crossways; (western edge of Purbeck plan)	22.4	<i>Agreed in local plan</i>
Frome Valley Road, Crossways; (western edge of Purbeck plan)	5.62	<i>Agreed in local plan</i>
Upton Farm SANG (eastern edge of Purbeck plan)	32.3	<i>In operation</i>
Morden	37	<i>Proposed in PLP 2019</i>
Burnbake	10	<i>In operation</i>

Table 1: Operational, agreed and proposed SANGs in and around Purbeck

21. The Wareham Neighbourhood Plan is currently being examined. The Neighbourhood Plan Steering Group and a site promoter have been in discussion around providing a site specific SANG for land to the West of Westminster Road (around 60 homes) and for allocated development to the north of the railway line (as defined in the emerging neighbourhood plan for around 45 homes). These discussions have not concluded, but there is potential to deliver the SANG.

SANGs functioning

22. As part of the work around considering their capacity, and ability to operate as strategic SANGs, the Council has analysed SANGs' functioning, using methodology developed for the Thames Basin Heaths. The Thames Basin Heaths mitigation and monitoring schemes have been in place longer than those in south-east Dorset and have identified standards for the functional influence of SANGs based on their size as follows:

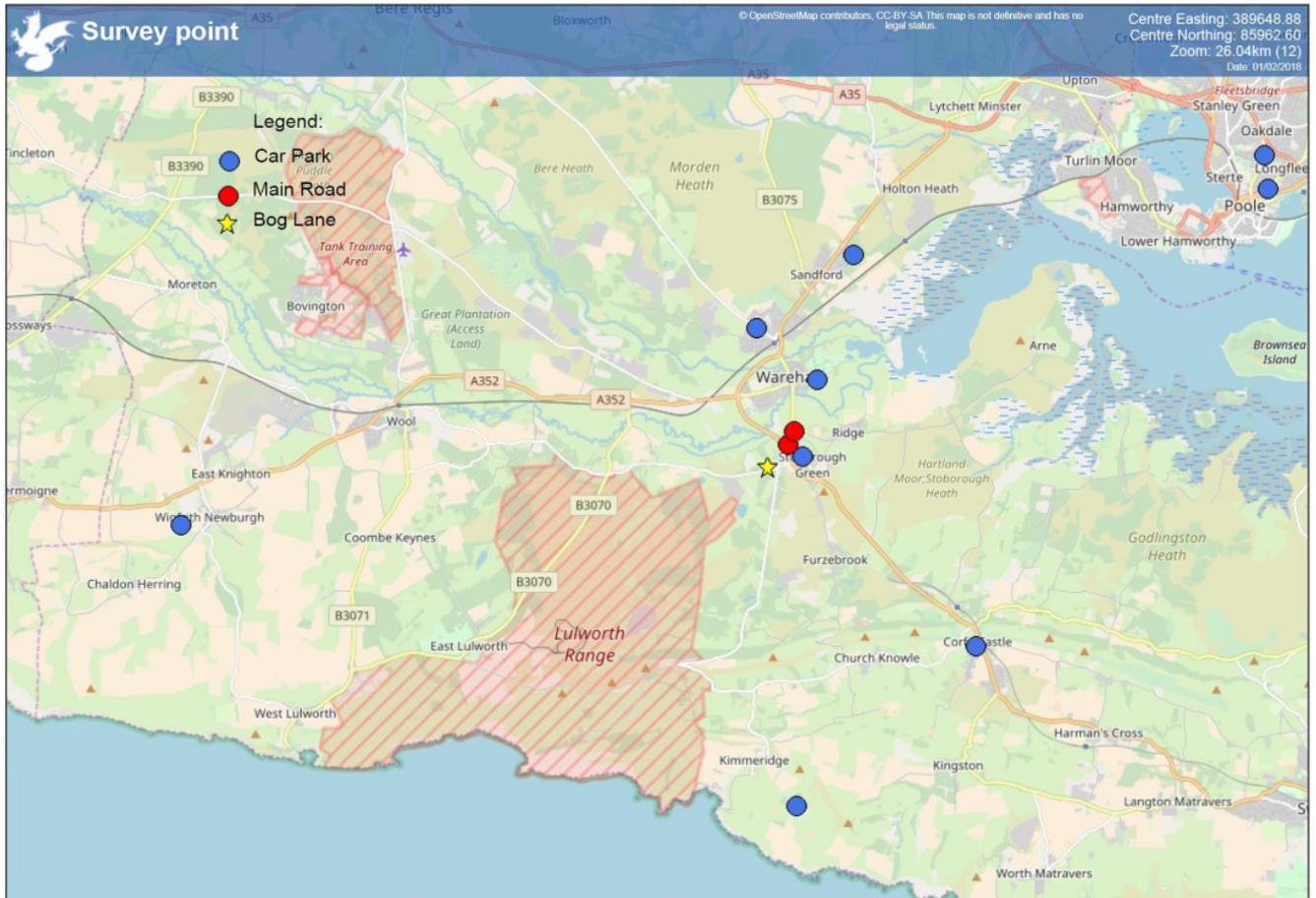
- SANGs of 2-12ha – a catchment of 2km
- SANGs of 12-20ha – a catchment of 4km
- SANGs of 20ha+ - a catchment of 5km

23. Information from monitoring reports for Bog Lane¹ and Frenches Farm² about distance travelled to the sites by users support the Council's use of these standards to identify the functional influence of SANGs.
24. Map 1 (Map1: proposed development, all SANG provision, employment sites, spheres of influence, presented before Appendix 1 below) shows the functional sphere of influence of each SANG according to the Thames Basin Heaths standards. Whilst the information from monitoring reports validates the Council's use of the Thames Basin Heaths methodology for analysing SANG catchments, the Council has also taken account of site specific visitor data around the use of established SANGs in Purbeck as part of its strategy. Dorset Council and BCP will review access catchments to the current SANGs and those being delivered in the near future as part of the SPD refresh work.
25. The median distance travelled to Bog Lane in Stoborough by visitors entering by the car park on Holme Lane was 5.53 km, but for visitors entering via the footpath on the main A351, the median distance was only 0.76km. The maximum distance travelled by visitors questioned during the survey was 12.7km from the Poole direction and 11.9km from Winfrith. The number of visitors in this first survey (Appendix 1) was low but more recent people-counter data provides evidence of increased visitor usage since the introduction of additional signage and promotion in April 2018. Chart 1 shows raw data from the car park people counter which has not been calibrated and should be used to indicate trends rather than exact numbers.

¹ Bog Lane monitoring

² Frenches farm monitoring

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Map 2: Insert map from Bog Lane monitoring report, annotated with visitor postcodes.

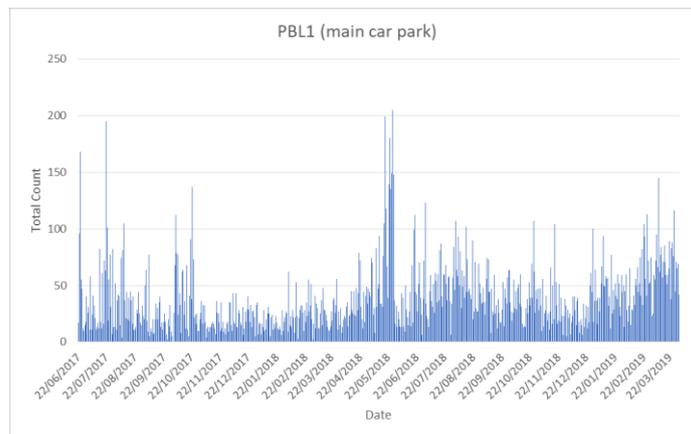
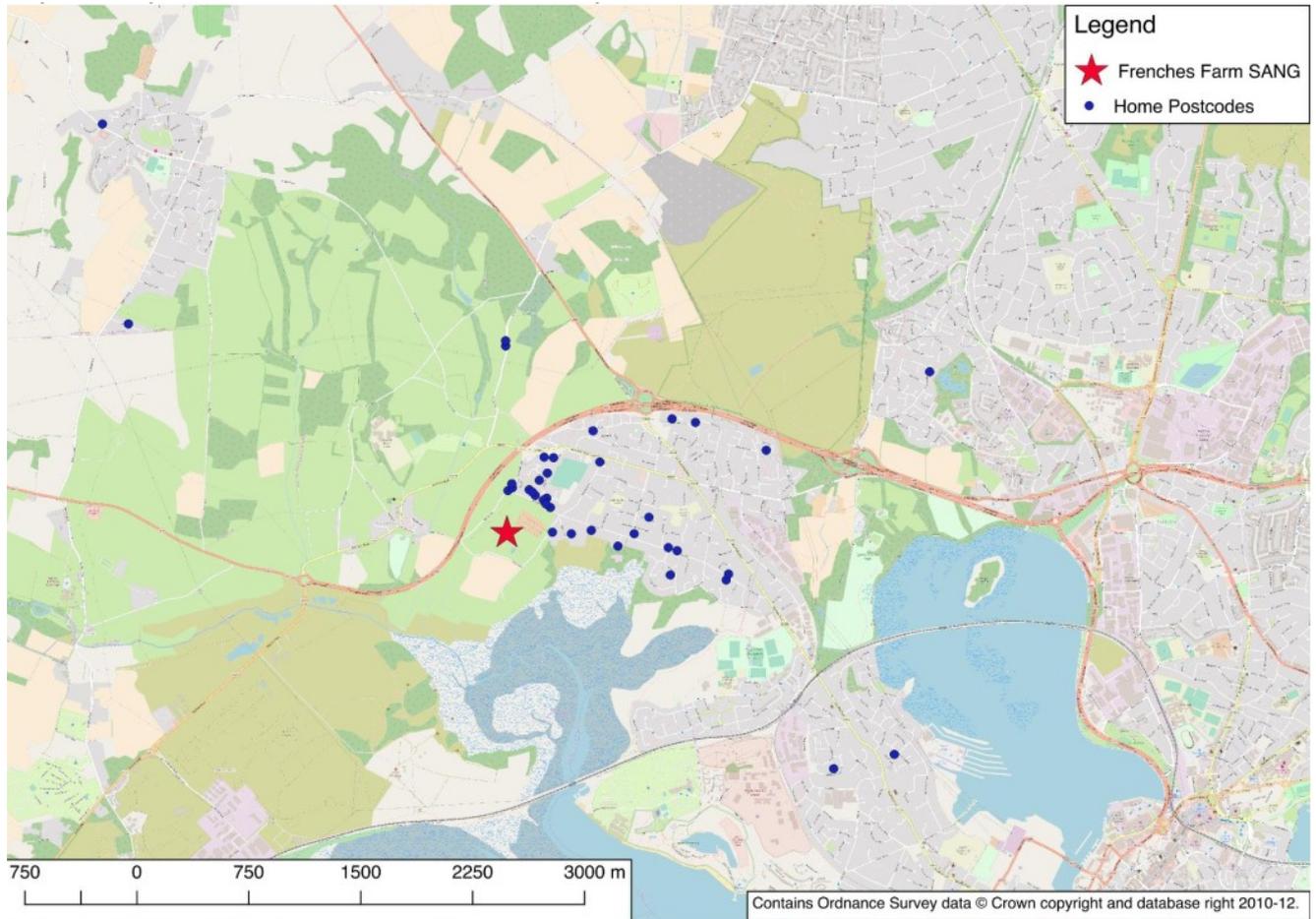


Chart 1: Raw people counter data for Bog Lane SANG

26. Visitor data for Frenches Farm SANG at Upton (Appendix 1) indicates that the median distance travelled by commercial dog walkers is 8.64km, local dog walkers is 0.91km, wildlife watchers 0.35km and others users 0.61km .



Map 3: Insert map from Frenches Farm monitoring report annotated with visitor postcodes.

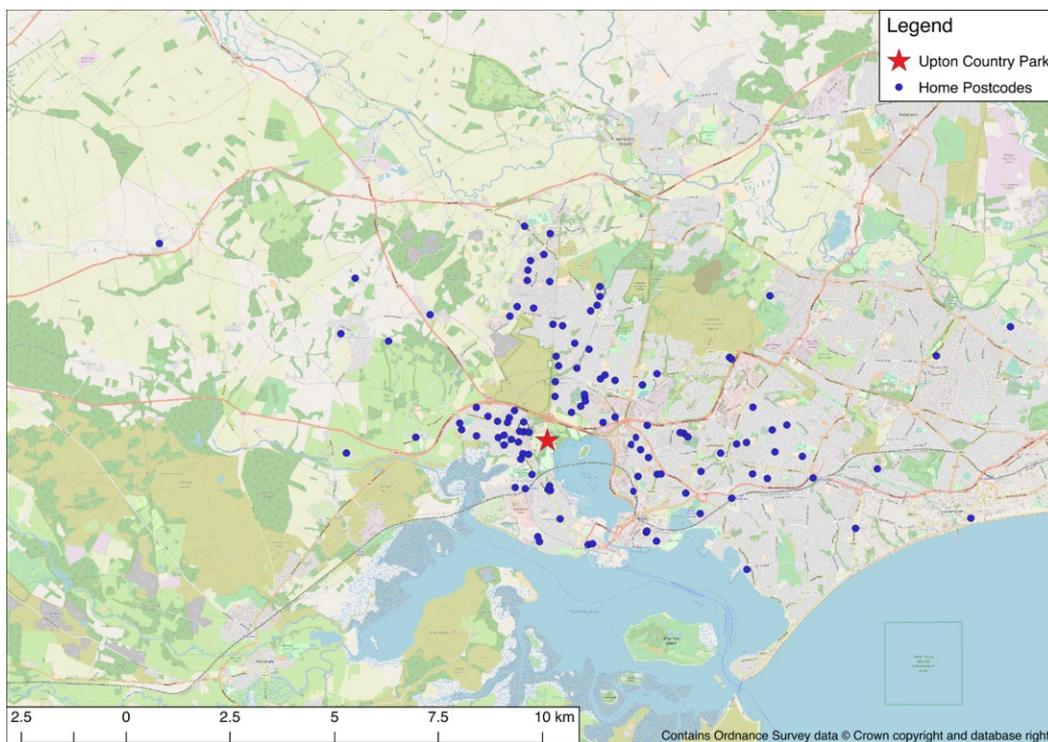
27. Monitoring of Upton Farm (UF) SANG (part of Upton Country Park (UCP)) from 2015³ and 2018⁴ shows that the distance travelled to the SANG varies according to the users' reason for visiting. Key findings from the monitoring report are summarised in the table below - all distances are expressed in kilometres and as a 'median' of the total.

³ Upton Country Park SANG visitor monitoring 2015

⁴ Summary of Visitor Monitoring at Upton Country Park SANG (Phase 1, Round 2) August 2018

Main activity	UCP 2015	UF SANG March 2018	UF SANG Aug 2018
<i>Cycling</i>	173.21	2.76	
<i>Dog walking</i>	1.67	1.69	2.44
<i>Family Outing</i>	5.99	5.22	4.98
<i>Short-cut</i>		0.81	
<i>Walking</i>	3.04	3.13	5.29
<i>Wildlife watching</i>		10.05	
<i>Commercial dog walking</i>			6.54
<i>Jogging/running</i>	1.72		1.97
<i>Other</i>	11.65		4.05
<i>Grove Woods entrance</i>	3.12		2.65
<i>Car park</i>	1.59		3.22

Table 2: Median distances travelled by visitors to Upton Farm SANGs



Map 4: Upton Country Park Visitor Data annotated with the position of visitor postcodes

Capacity of existing/proposed SANGs to provide strategic mitigation

- SANGs' capacity is affected by their natural features, size, design and their spatial relationship with homes and European sites. The Council has sought guidance from Natural England on the capacity of existing and proposed SANGs (including those identified in the Bere Regis Neighbourhood Plan and Purbeck Local Plan). The assessments have been based on published information around their size, location and the development that they relate to (for example the Council has relied on the information presented in the 2016 Options Consultation for the 'alternative' SANGs

around Bere Farm and Lytchett Minster) and an understanding of the characteristics of European sites and their settings.

29. The starting point for Natural England's assessment of SANG capacity involves applying a ratio of 16ha per 1000 population. This calculation is then adjusted to take account of the housing site's/SANG's location, the SANG's natural interest features (attractiveness) and site constraints, e.g. an attractive SANG on the doorstep of a new development with no site constraints, such as SNCI (Site of Nature Conservation Interest) would have a greater capacity than a site at a distance with constraints.
30. The table below provides an indication of existing and proposed SANGs' capacity (a comparison between alternative SANGs at Bere Farm and Lytchett Minster are presented in the next section of this paper), their potential to address the effects from more homes and whether there might be opportunities to increase their capacity through enhancements.

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SANGs	Size ha	Sphere of influence TBH	Number of homes in related planning application	Spare capacity (expressed in numbers of homes)	Potential for enhanced capacity – Yes/No
<i>Existing site specific SANGs</i>					
Upton Woods	5.2	2km	N/A	Unassessed	Yes
Bog Lane, Stoborough	13.98	4km	153 homes (6/2014/0621).	c.300	Yes
Frenches Farm, Upton	4.83	2km	70 homes (6/2017/0308)	c.90	Yes
Swanage	6.72ha	2km	182 homes (142 with planning permission plus 40 at application stage)	c.52	Yes
Burnbake	10	2km	Campsite	Unassessed	Yes
<i>Agreed in neighbourhood plan</i>					
Bere Regis	4.5	2km	105 homes (allocated through Policy BR7: Residential Development, in the Bere Regis Neighbourhood Plan).	c.50	Yes
<i>Site specific SANG proposed in Purbeck Local Plan</i>					
Wool	32.7	5km	470 homes (allocation through Policy H5 in the Purbeck Local Plan).	c.460	Yes

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SANGs	Size ha	Sphere of influence TBH	Number of homes in related planning application	Spare capacity (expressed in numbers of homes)	Potential for enhanced capacity – Yes/No
Upton – Existing SANG Frenches Farm, Upton	4.83 delivered in connection with 6/2017/0308	2km	70 delivered (6/2017/0308) with capacity for a further 90 homes (allocation through Policy H7 in the Purbeck Local Plan)	c80 if a further 2.17ha provided to mitigate effects on nitrogen emissions from homes in H7 is added as an extension to the existing SANG.	Yes
Moreton SANG and HSA	18 + 23	5km	490 homes (allocation through Policy H4 in the Purbeck Local Plan).	c.130	Yes
Lytchett Matravers	7.6	2km	150 homes (allocation through Policy H6 in the Purbeck Local Plan).	c.260	Yes
<i>Site specific SANGs agreed in neighbouring local plan</i>					
South of Warmwell Road, Crossways	22.4	5km	500 (reference WD/D/16/000378).	c.120	Yes
Frome Valley Road, Crossways	5.62	2km	140 (reference WD/D/17/003036).	Unassessed	No
<i>Strategic SANG</i>					
Upton Farm SANG	32.3	5km		Unassessed	Yes
Morden	37	5km		c.250-300	Yes

SANGs	Size ha	Sphere of influence TBH	Number of homes in related planning application	Spare capacity (expressed in numbers of homes)	Potential for enhanced capacity – Yes/No
Totals					
			<u>2377 homes</u>	<u>C1682 homes</u>	

Table 3: Review of SANGs capacity

Morden Holiday Park and SANG

31. Map 6 in the Purbeck Local Plan Part 1 (2006-2027) presented details of the expected distribution of housing land over the plan period. The table below summarises the expected number of homes in the spatial areas of the northwest, south west, central, north east and south east parts of Purbeck.

Spatial Area	Source of new homes	Total numbers of homes
<i>North West</i>	Completions	30
	Known sites (including commitments, character area potential and Council owned sites)	30
	Settlement extension at Bere Regis	50
	Windfall	10
	Total dwellings	120
<i>South West</i>	Completions	240
	Known sites	110
	Windfall	10
	Total dwellings	360
<i>Central</i>	Completions	50
	Known sites	210
	Settlement extensions	200
	Windfall	15
	Total dwellings	475
<i>North East</i>	Completions	230
	Known sites	230
	Settlement extensions	120
	Windfall	25
	Total dwellings	605
	Completions	280

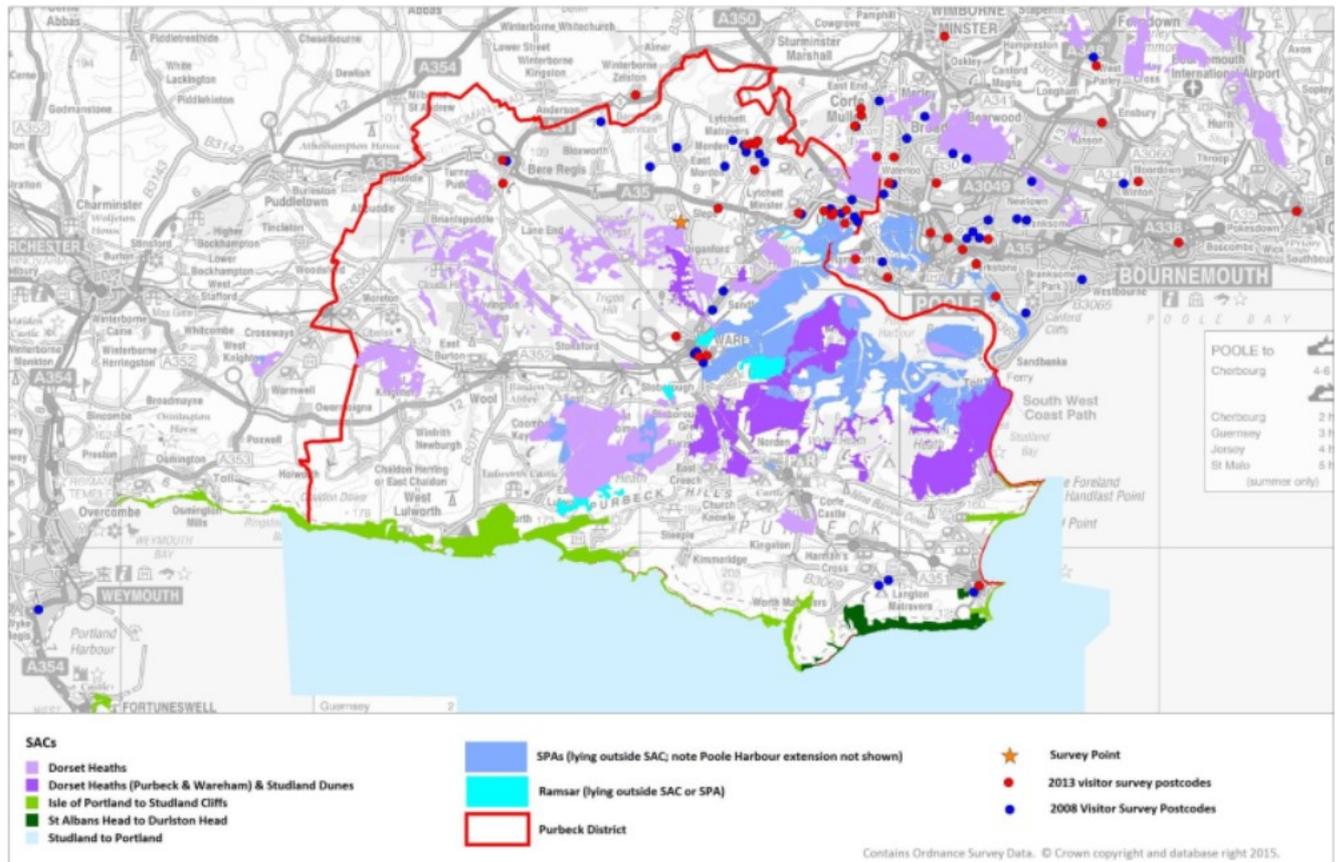
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<i>South East</i>	Known sites	460
	Settlement extensions	200
	Windfall	20
	Total dwellings	960

Table 4: Distribution of housing land supply in the Purbeck Local Plan Part 1

32. The Council’s housing monitoring report [SD38] states that 1,600 new homes were completed between April 2006 and March 2018 in the first 12 years of the Purbeck Local Plan Part 1. This amounted to around 63% of the homes identified in the land supply.
33. The HRA for Purbeck Local Plan Part 1 identified a need for a strategic SANG in the north of the District between Bere Regis (north west spatial area – 120 homes) and Lytchett Matravers (north east spatial area – 605 homes). Natural England have confirmed that they consider the assessment presented in the HRA for the Purbeck Local Plan Part 1 is robust and that a strategic SANG is needed.
34. The Council expects that the settlement extensions anticipated in the north west spatial area will be delivered through the Bere Regis Neighbourhood Plan (the Council has made an allowance for 105 homes in the identified housing land supply). The settlement extensions identified in the Purbeck Local Plan Part 1 in the north east area have planning permission (Lytchett Matravers, for 46 dwellings, planning permission 6/2018/0063) or have been completed (Upton, for 70 dwellings, planning permission 6/2017/0308).
35. A strategic SANG is needed in the north of Purbeck to:
 - provide an alternative location specifically for those people visiting Morden Bog SSSI, SPA, SAC and Ramsar which is within the wider Wareham Forest area (visitor data from Sherford Bridge, immediately south of the proposed SANG and north east of Morden Bog indicates that the majority of visitors to the protected Morden Bog access the site along the A35 corridor, Bere Regis in the west and Lytchett Matravers, Corfe Mullen and Poole in the east); and
 - address the additional effects of new housing development expected in this part of the area (including completed and expected windfall development, and allocations from earlier plans).

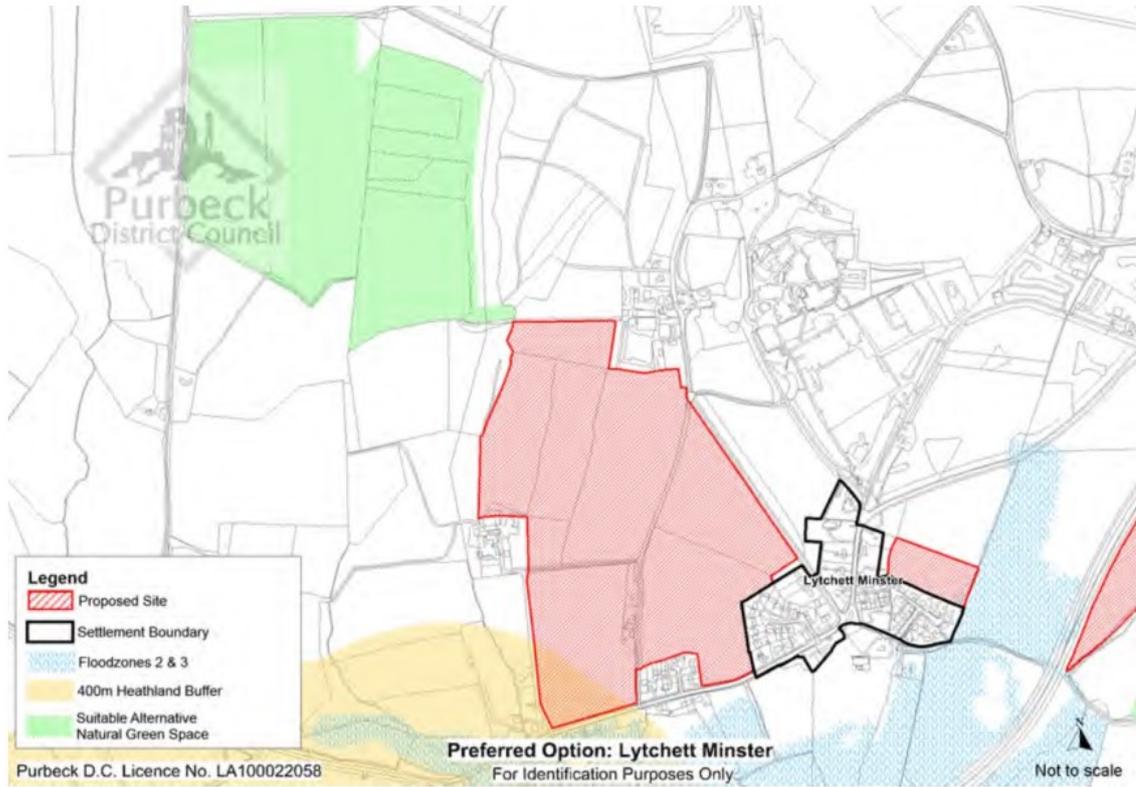
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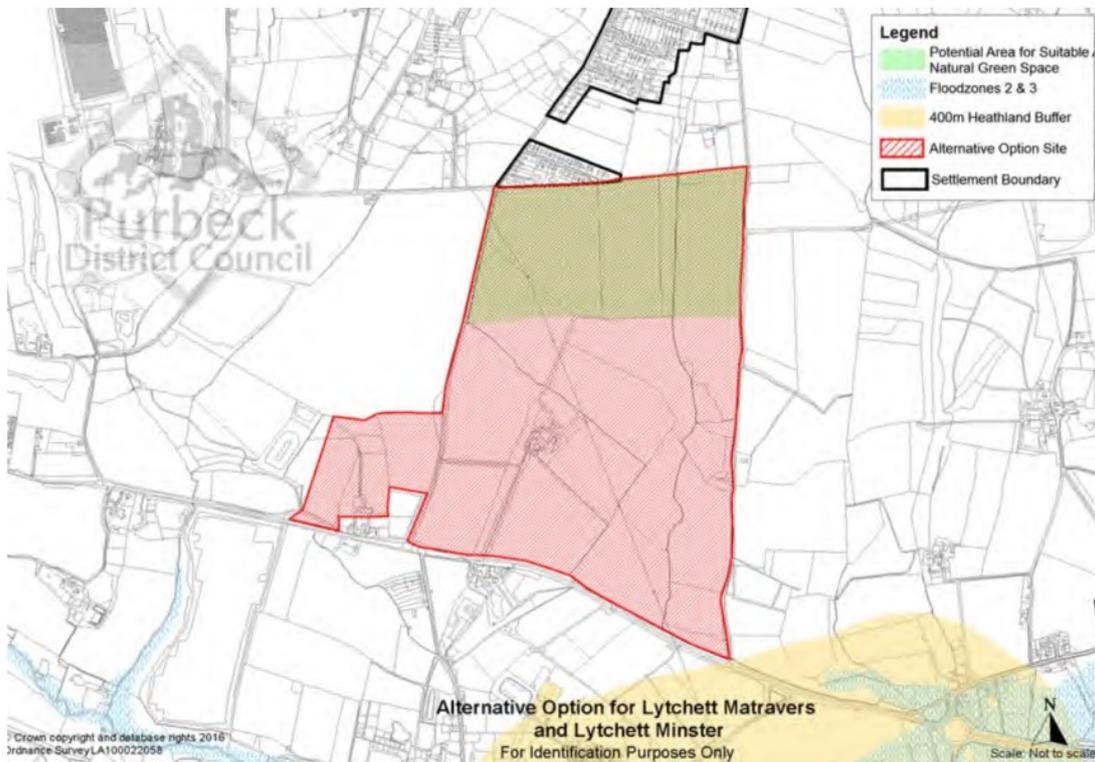
Map 5: Sherford Bridge location of visitor postcodes

36. Most of the land in the north of Purbeck that might be suitable as a SANG is either owned by the Charborough Estate (western area including Morden) or the Lees Estate (eastern area including Lytchett Minster). Using the information presented in the 'Partial Review Options Consultation Document 2016' (<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/past-consultations-and-evidence.aspx>), the Council has identified three alternatives for a potential strategic SANG in the north of the area: Morden Park/Wareham Forest (as identified on the policies map of the Purbeck Local Plan) and those SANGs associated with the Bere Farm and Lytchett Minster housing options sites.

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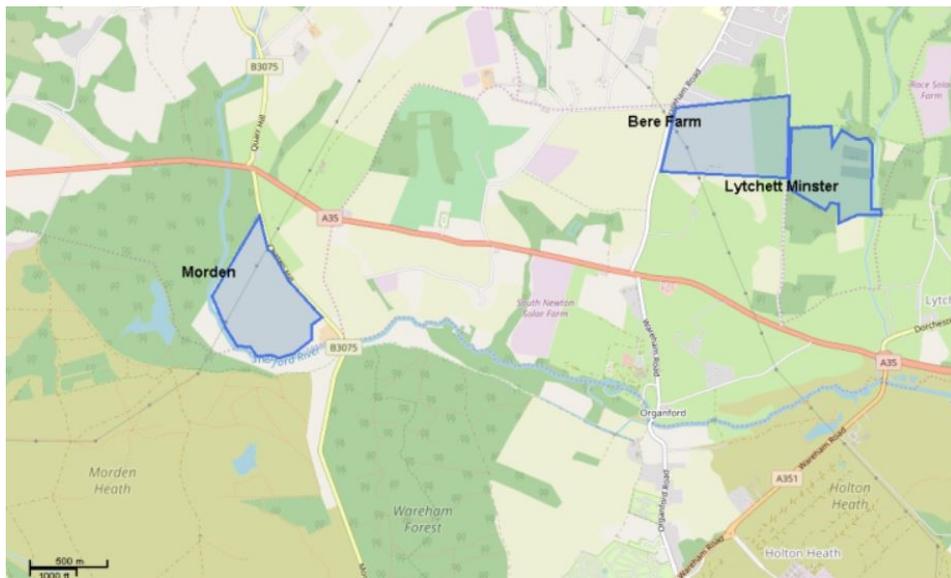
Map 6: Option for 650 homes and SANG at Lytchett Minster



Map 7: Option for up to 1,000 homes and SANG at Bere Farm

Suitability of alternatives for strategic SANG in the north of Purbeck

37. As presented in the 2016 options consultation, Natural England have advised that a 34 hectare SANG for around 1,000 homes at Bere Farm would not have excess capacity to act as a strategic SANG, or be in an appropriate location relative to the European sites at Morden Bog. The SANG at Morden would have strategic capacity to address the effects from between 250 and 300 homes (in addition to the holiday) and the proposed SANG at Lytchett Minster would have capacity to address the effects from a further 350 homes at the settlement. Map 8 shows approximate size and locations of the SANGs.



Map 8: Approximate location of SANGs considered

	Green Belt release (in hectares)	SANG provision (in hectares)	Spare capacity (expressed in numbers of homes)
<i>Morden holiday park</i>	76	37	C 250 to 300
<i>Bere Farm new village</i>	84.38	34.12	None
<i>Lytchett Minster housing</i>	28.9	40	350

Table 5: Alternatives for strategic SANG

38. Based on the information presented in the 2016 options consultation the Council does not consider that the proposed SANG relating to Bere Farm can reasonably act as a strategic SANG.

39. Natural England have advised that:
- a. the characteristics of the possible SANG site at Morden/Wareham Forest mean that it will perform more effectively than either of the alternatives at Bere Farm and Lytchett Minster (the possible SANG sites at Bere Farm and Lytchett Minster would take longer to establish before they functioned as effectively and are designed for use by adjacent residential occupants); and
 - b. the position of the Morden Park/Wareham Forest SANG is likely to contribute toward bringing Morden Bog into a favourable conservation status by reducing existing adverse effects (encouraging visitors to use the proposed SANG rather than the adjacent European site) and avoiding likely significant effects from plans and projects (including homes in the Bournemouth Christchurch and Poole Council area as well as the homes suggested at the holiday park).
40. Natural England has advised the Council that it 'is not aware of any other strategic SANG locations identified in a suitable location' to address the requirements outlined above (Appendix 2 Natural England's SANG advice note). The Council has not considered whether there are exceptional circumstances for strategic SANG at Bere Farm or Lytchett Minster because it does not consider that these are suitable options to meet the need for a strategic SANG in the north of Purbeck. The Council's consideration of exceptional circumstances for the strategic SANG at Morden/Wareham Forest are presented in its green belt study [SD56].

Monitoring the effectiveness of mitigation

41. As well as site specific SANG visitor data, the Urban Heaths Partnership co-ordinate and report annually on:
- bird monitoring;
 - vehicle counts at selected car parks;
 - incidents, including fires, off road vehicle access;
 - sensor (people counter) data; and
 - calendar data that may influence the data collected, e.g. weather, school term-times.
42. In 2014 a report was published looking at the trends in populations of key bird species on the SPAs which confirmed no declines attributable to additional development. More recently in 2017 an Update on the Dorset Heathland Implementation Group Monitoring Framework has been published confirming the current monitoring arrangements. Currently a visitor perception survey of people visiting protected heathlands is underway ahead of the review of the SPD.
43. The commitments around monitoring allow the Council to refine and update its mitigation strategy. The Council is also committed to monitoring the effectiveness of the mitigation strategies presented in the supplementary planning document for the Poole Harbour Special Protection Area.

Action 6 - The Council's approach to mitigation measures for housing development on unallocated sites.

Housing land supply

44. Action 24 from the hearings required the Council to 'Give thought to implication of any increase in housing numbers on spatial strategy.' This action is addressed in separate papers, but as part of its response to Action 6 this paper also presents an updated housing supply which takes account of the re-calculated housing need assessment.
45. The Council's updated housing land supply [SD85] includes estimates of unallocated residential development that it expects to be delivered in those existing settlements with a boundary (as identified in the settlement hierarchy⁵), on small sites through Policy H8, as well as the numbers of homes completed in the first year of the local plan and those already granted planning permission (commitments).

Source of Housing Supply	Number of homes
Completions April 2018 to March 2019	73
Extant planning permissions at 1 April 2019	512
Unconsented Purbeck Local Plan allocations	
- <i>Lytchett Matravers: Blaney's Corner</i>	25
- <i>Lytchett Matravers: East of Flower's Drove</i>	30
- <i>Lytchett Matravers: East of Wareham Road</i>	95
- <i>Moreton Station: Redbridge Pit & Caravan Site</i>	490
- <i>Upton: West of Watery Lane</i>	90
- <i>Wool: West of Chalk Pit Lane and Oakdene Road</i>	320
- <i>Wool: North East of Burton Cross Roundabout</i>	90
- <i>Wool: North West of Burton Cross Roundabout</i>	30
- <i>Wool: North of the Railway Line</i>	30
Total unconsented Purbeck Local Plan allocations	1,200
Unconsented Swanage Local Plan allocations	40
Neighbourhood plan allocations and sites	
- <i>Bere Regis</i>	105
- <i>Wareham</i>	190
Total neighbourhood plan allocations and sites	295
Windfall	809
Small sites policy sites	138
Total	3,067

Table 6: Revised housing land supply

⁵ The Council has prepared a further modification [MM33] to the Purbeck Local Plan [SD01A] which shows where the Council consider that the settlement hierarchy should be inserted in the supporting text to Policy V1.

46. This paper provides further clarification on the likely distribution of unallocated housing in the Council's land supply and considers whether there is sufficient certainty that mitigation measures will avoid, or sufficiently reduce, the adverse effects of residential development on European sites. In response to this task the Council sought greater certainty over the distribution of each source of unallocated homes identified in the Council's land supply.

Allowance for windfall housing in existing settlements with a boundary over the plan period: 809 new homes (62.2 homes each year over the plan period [excluding the first two years])

47. The estimates of the numbers of homes that the Council expects to be delivered in existing settlements are based on a review of earlier delivery rates⁶ – for these reasons it has not been possible to accurately predict where new homes in existing settlements will be delivered.
48. Despite this, the Council's settlement hierarchy and the size of existing settlements provide some broad indication on the distribution of unallocated development within existing settlement boundaries.
49. The Council's settlement hierarchy identifies the following settlements as having a boundary:
- Towns – Swanage, Upton and Wareham;
 - Key service villages – Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford, Redbridge Pit / Moreton Station and Wool;
 - Local service villages – Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh; and
 - Other villages with a settlement boundary: Briantspuddle, Chaldon Herring, Church Knowle, East Burton, East Lulworth, Harmans Cross, Kimmeridge, Kingston, Lytchett Minster, Studland, Ridge and Worth Matravers.
50. There is likely to be greater opportunity for further growth within the larger settlements (i.e. towns and key service villages). Most of the larger villages are positioned on the eastern (Lytchett Matravers, Sandford, Upton and Wareham) and south eastern (Corfe Castle and Swanage) areas of Purbeck. Redbridge Pit / Moreton Station and Wool are positioned on the western side of Purbeck (in proximity to the railway line and the A352) [SD85].

Mitigation measures for windfall development

51. Planning policies in the Purbeck Local Plan (including E7 to E9, H3 to H7 and H8/H12) provide a framework for undertaking a screening for likely significant effects and an appropriate assessment. Supplementary planning documents relating to Dorset Heaths and Poole Harbour (including the supplementary planning document relating to nitrogen emissions and the emerging document relating to recreation) provide further information, and guidance, in completing these assessments.

⁶ The Council's paper [SD87] on five year supply of housing land provides a detailed explanation of how the Council has sought to calculate a windfall allowance in its housing land supply. The calculation is based on a detailed review of completed sites over the preceding five years. The Council has made a number of adjustments when making its calculations in order to make a reasonable assessment over windfall allowance over the plan period – these adjustments include discounting the homes which were delivered on sites allocated through the Purbeck Local Plan Part 1 and not taking account of residential caravans on a caravan site which the Council recognised following a historic planning permission/certificate applications.

52. Taking account of the likely distribution of windfall housing (based on the settlement hierarchy of the plan) and guidance from Natural England, the Council is satisfied that the assessment framework in planning policies/supplementary planning documents, strategic access management/monitoring and the network of existing/proposed Suitable Alternative Natural Green Spaces (SANGs) provide the necessary certainty that windfall housing will not adversely affect European sites. A range of additional HIPs have been already considered by other authorities in south east Dorset as cost effective measures which are open to the Council to implement, these include off road cycle facilities, fenced training areas for dog owners, access improvements to control and direct parking near to designated sites etc and these offer local solutions to enable developments to come forward whilst providing appropriate mitigation.
53. The Council has carried out a further analysis around the distribution, capacity and alternatives for SANGs as part of this paper in response to Action 16.

Small sites policy: 138 new homes

54. Thirty one small sites beyond the settlement boundaries are listed in the Strategic Housing Land Availability Assessment (SHLAA) [SD22] as potentially suitable for development, and these sites are estimated as having capacity for 446 new homes. As part of this paper the Council has completed a more detailed review of the suitability of those 'possible small sites' listed in the submission SHLAA [SD22] and assessed the sites' suitability against a revised small sites policy (prepared following the first set of examination hearings in July 2019).
55. The Council has used the methodology described in paragraphs 13 to 17 of the SHLAA to undertake a 'high level' assessment of those potentially suitable small sites listed on pages 227 to 237 of the SHLAA report, taking account of the original SHLAA assessments but also considering them in the light of the suggested modifications to Policy H8 (presented below). Table 2 provides a summary of the suitability of the potential small sites (the detailed assessments which underpin the review are presented in a separate document).
56. After completing the further review the Council has amended its estimates of delivery from the small sites policy, based on an identified total of 16 potentially suitable small sites with capacity for 138 new homes. This is 15 fewer sites than were identified in the submission SHLAA [SD22] and represents 308 fewer homes.

Settlement	Site reference	Estimated capacity
East Chaldon	SHLAA/0013	4
East Chaldon	SHLAA/0114	4
East Lulworth	SHLAA/0120	3
Moreton	SHLAA/0096	15
Stoborough	SHLAA/001	11
Stoborough	SHLAA/002	11
Swanage	SHLAA/0055	29
West Lulworth	SHLAA/0066	4
West Lulworth	SHLAA/0067	4
West Lulworth	SHLAA/0113	4
Winfrith Newburgh	SHLAA/0070	9
Winfrith Newburgh	SHLAA/0073	15
Winfrith Newburgh	SHLAA/0118	7
Winfrith Newburgh	SHLAA/0117	3
Winfrith Newburgh	SHLAA/0072	7
Winfrith Newburgh	SHLAA/0076	8
Total		138

Table 7: Distribution of small sites

57. As a consequence of this further assessment work the Council now considers that fewer homes are likely to be delivered on small sites.

Mitigation measures for small sites policy

58. As part of its response to this action the Council has considered the drafting of Policy H8 in the Purbeck Local Plan and whether the terms of the policy are sufficiently robust around screening for likely significant effects to European sites and completing appropriate assessments. Following discussions with Natural England, the Council has

suggested that Policy H8 should be modified to provide greater direction around screening for likely significant effects (including greater restrictions on the number of homes permitted on small sites adjoining lower order settlements – the Council considers that this change is more precautionary and will give greater opportunity to take full account of any in- combination effects from small sites) and when completing the necessary appropriate assessments. The modified policy which the Council has asked the Inspector to consider is presented below and in an updated schedule of modifications.

Policy H8: Small sites next to existing settlements

Outside the Green Belt, applications for residential development will be permitted on sites adjoining the settlement boundaries of towns, key service villages, local service villages and other villages with a settlement boundary (as listed in the settlement hierarchy), provided that:

- a. the scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of
 - i) 30 homes on any single small site adjoining a town;*
 - ii) 20 homes on any single small site adjoining a key service village;*
 - iii) 15 homes on any single small site adjoining a local service village;*
 - iv) 5 homes on any single small site adjoining other villages with a settlement boundary;**
- b. individually and cumulatively, the size, appearance and layout of proposed homes does not harm the character and value of any landscape or settlements potentially affected by the proposals;*
- c. the development would contribute to the provision of a mix of different types and sizes of homes (including affordable homes) to reflect the Council's expectations in Policies H9 and H11 or, where expressed in a neighbourhood plan, those of the relevant local community; and*
- d. the effects of proposed homes, individually and in combination with other development, on national, European and International sites are screened to assess whether they are likely to be significant. Where necessary planning applications must include full details (including upkeep over the lifetime of the development) of mitigation to avoid or suitably reduce adverse effects.*

59. Subject to these changes, the Council considers that planning policy H8 provides a suitable framework to screen proposals for likely significant effects and undertake an appropriate assessment. Supplementary planning documents relating to Dorset Heaths and Poole Harbour (including the supplementary planning document relating to nitrogen emissions and the emerging document relating to recreation) provide further information, and guidance, on completing these assessments.

60. Taking advice from Natural England, the Council is satisfied that:

- revised planning policies,
- supplementary planning documents; and

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- information around the likely distribution of small sites (presented in Table 2) and existing and proposed mitigation (including those deemed necessary to mitigate a specific effect from development in an individual planning application) that has been presented in respect to Action 16;

provide sufficient certainty to demonstrate that the adverse effects from homes on small sites can be avoided or mitigated.

Completions and extent planning permissions: 585 new homes

61. Those housing sites where development has been completed in the first year of the plan, or where planning permission has been granted for new homes, include both major and minor scale of development. Full lists of both scales of development are presented in the Council’s revised housing land supply report and revised five year supply report.

Site location	Planning Reference	Commitment on site
Former Playing Fields Northbrook Road East, Swanage	6/2016/0769	52
Northbrook Road West, Swanage	6/2017/0713	90
Prospect Farm, Swanage	6/2017/0359	20
Land adjacent to Wessex Water Reservoir, Purbeck Road, Lytchett Matravers	6/2018/0287	25
Land at Huntick Road, Lytchett Matravers	6/2018/0063	46
Spyway Orchard, Durnford Drove, Langton Matravers, BH19 3HG	6/2015/0687	28
Binnegar Hall Worgret Road East Stoke BH20 6AT	6/2018/0417	23
Manor Farm Caravan Park, Church Lane, East Stoke BH20 6AW	6/2018/0675	20
Total		304

Table 8: Details of outstanding major extant planning permissions (April 2018 to April 2019) in the updated housing land supply.

Mitigation measures for completions and extant permissions

62. Site specific mitigation has been secured for the larger scale housing developments identified in the table above (6/2016/0769 and 6/2017/0713). The Council has collected financial contributions through the Community Infrastructure Levy (CIL). These

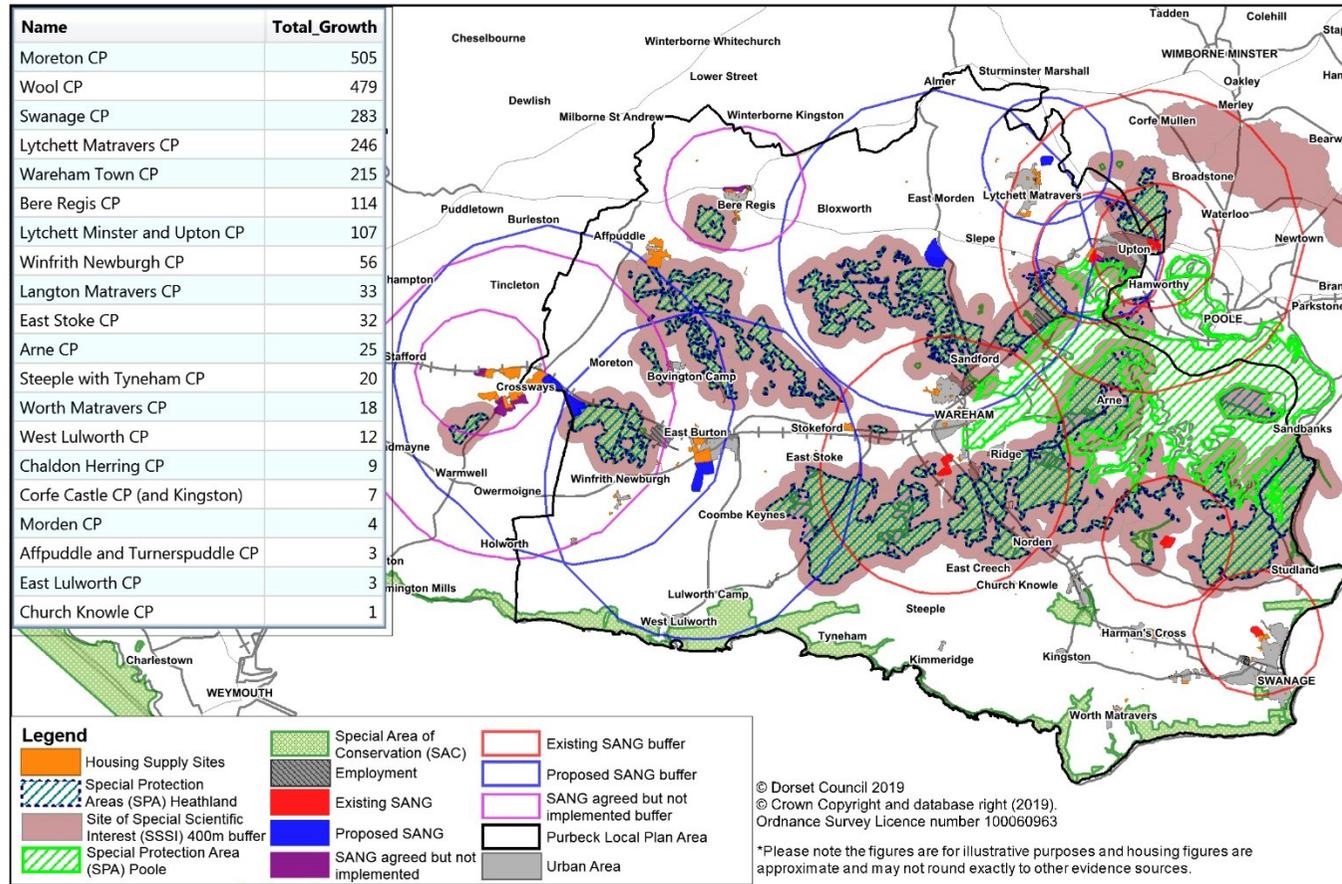
contributions fund strategic access management mitigation and monitoring. Collected CIL contributions will also be used to help fund strategic SANGs identified in the Council's mitigation strategy (Map 1).

63. The Council is satisfied that there is sufficient certainty to demonstrate that the adverse effects from homes on completed and permitted developments can be mitigated.

Conclusion

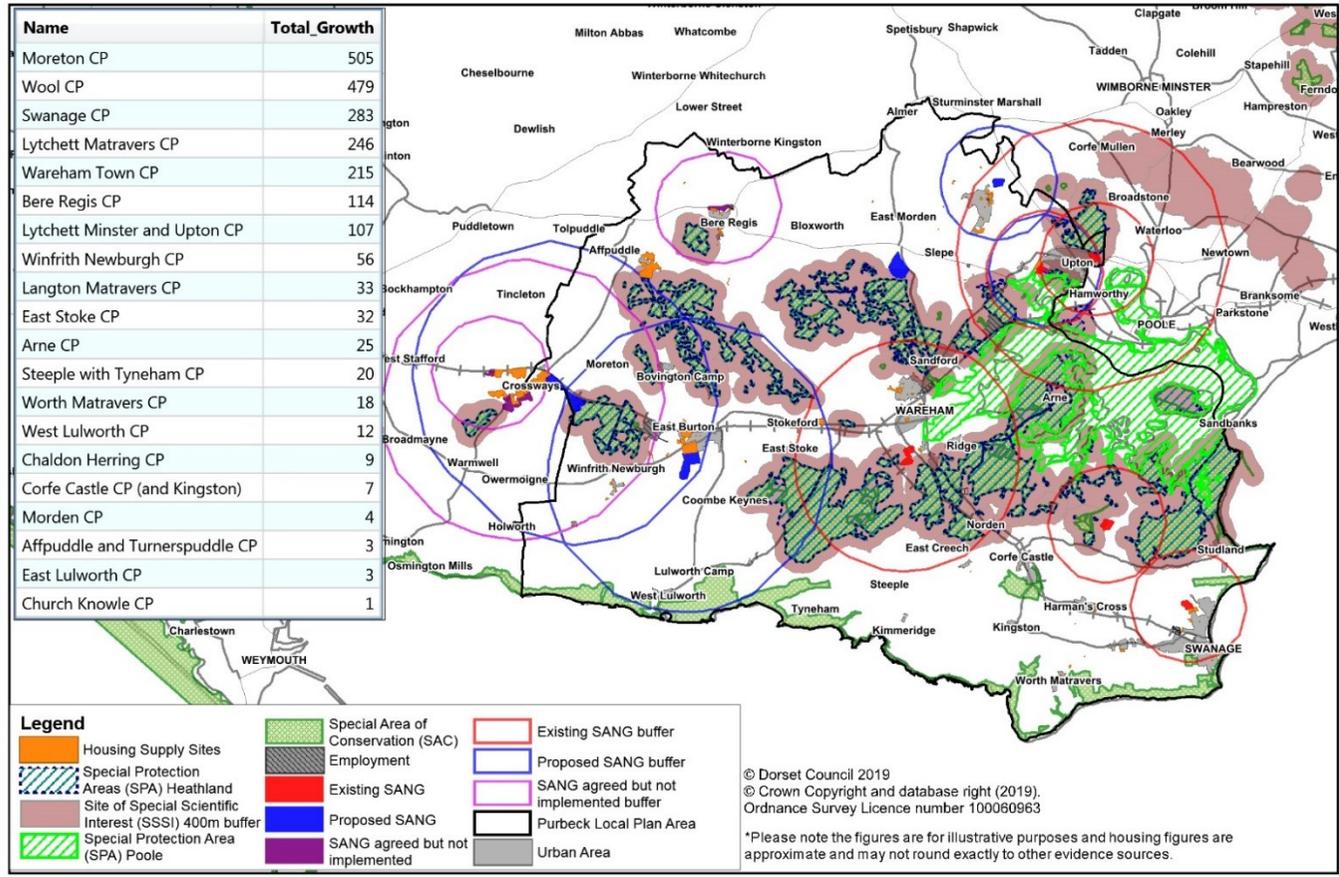
64. The Council has carried out further analysis around the numbers of homes it expects to be delivered from each unallocated source in the identified housing land supply. Where possible the Council has sought to identify, or indicate, the position of the housing sites on a map relative to existing and proposed SANGs mitigation (as presented in response to Action 16).
65. Taken together with mitigation measures that have already been delivered, and the proposed strategic mitigation for European sites, the Council considers that the policies in its local plan provide certainty when plan making that the adverse effects from unallocated residential development can be mitigated.

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Map 1(a) Development and all existing and proposed SANGs

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Map 1(b) Development and existing and proposed SANGs excluding Morden