

Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010
Consultation Responses
Part 1**

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Allen A

From: Dr A Allen[SMTP:BURST@EMAILMEFORM.COM]

Sent: Monday, December 20, 2010 3:16:29 PM

To: email-LDF

Subject: Feedback via the 'Where shall we build in Bere Regis 2012-2026?'

Auto forwarded by a Rule

**What is your
postcode?***: BH20 7LA

**Should funding
become
available for a
new school, do
you support
the above
option?:** Yes

Comments:

As the chair of Bere Regis First School, I am replying on behalf of the Governing Body. A new school is essential as the current building is too small and too old to provide the facilities and resources required by children from 9-11.

**2. If you do not
support the
above option
because you
think there is a
better site for a
new school,
please tell us
where below:
(Please tick
only one):**

Comments:

**Should no
funding
become
available for a
new school,
which of the**

**above
alternative
options do you
support?
(Please tick
only one):** Other (Please comment where below)

**Please choose
A or D:** D

Comments: The governors support any option that will enable the development of a new school and do not have strong opinions for either option.

Name: Dr A Allen

Address: Mistover Knapp
Hollow Oak
Bere Regis
BH20 7LR

Email address: steal63@tiscali.co.uk

Angel P

From: Paul Angel[SMTP:PAULANGEL.SWANAGE@GMAIL.COM]
Sent: Sunday, December 19, 2010 7:55:56 PM
To: email-LDF; Steve Dring
Subject: Core Strategy Pre-Submission Response On Behalf of Education Swanage
Auto forwarded by a Rule

Dear Mr Dring,

I am writing with reference to Purbeck District Council's Local Development Framework Core Strategy Pre-Submission Document. I write on behalf of local campaign group Education Swanage and would like to draw attention in particular to the council's decision regarding the former Swanage Grammar School site.

Education Swanage is a community campaign group dedicated to the continuation of secondary schooling within the town of Swanage, a cause supported by Swanage Town Council and by a majority of Purbeck District Councillors. Our group is composed of parents, teachers, school governors and community representatives and is advised and supported by The Co-operative College and the charity Human Scale Education.

We are informed by the Department for Education that we will be moving on to the Business Case stage of Free School development early in the New Year. Following confirmation of the proposed closure of Swanage Middle school, we are working towards the opening of an 11-16 Free School in 2013.

Swanage has a limited number of potential sites for a new school, and only one existing building of an appropriate size which is currently vacant. Education Swanage spoke at an early stage to the owner of Swanage Grammar School, who at first was open to discussion but who indicated, just prior to the council meeting at which the future of the land was to be decided, that he is not interested in discussing the conversion of the empty school building into a Free School.

There is some disagreement over the suitability of the building - the owner's advisors are telling him that the building can not meet modern standards, while Partnership for Schools, who have seen the external condition of the building at first hand, have expressed enthusiasm and asked us to actively pursue a lease on the site. They recognise that it would be foolish to build a new school when an empty one exists in an ideal position, close to playing fields and amenities. The landowner wants to demolish the building, which is much loved locally, and replace it with a modern care home alongside a number of affordable homes.

At the PDC Core Strategy meeting we made it clear that we were not opposed in principle to

housing on part of the Swanage Grammar School site, but that we felt it would be wrong to allocate the site for housing and a care home, ruling out the potential refurbishment of the school building, before the issue had been fully explored in conjunction with Partnership for Schools and the Department for Education and the local community. In an ideal world, the existing playing field would be retained for a new school, but we are sensitive to the owner's need to see a return on his investment and it is clear that there is room for both the school building and the housing the owner wishes to build.

It would be possible, with the owner of the Swanage Grammar School site and neighbouring landowners working in co-operation, to build a care home, the number of affordable homes originally envisaged, and even new PCT and other community facilities, alongside a refurbished school. We are aware that neighbouring sites may be available for development and would like to suggest that it is in the best interests of Swanage to determine what the town needs in terms of infrastructure before determining that such a key location is turned over for residential use alone.

We were pleased, therefore, that the decision by Purbeck District Council to remove the site from the Core Strategy was unanimous, and it was clear that many members had taken time to consider the matter beforehand, based on communication from our own group and other members of the public, and detailed consultation with the landowners' agents.

We would request that the former Swanage Grammar school site remains outside the Core Strategy in order to allow proper consideration of the site in the best interests of local needs and wishes. It is our hope that once Partnership for Schools comes forward with a costed proposal regarding the lease of the building, the owner will reconsider his current position and see that a new school on the site, directly funded by central government, will be to the advantage of both existing and future residents of Swanage and himself.

Yours sincerely,

Paul Angel

11 Exeter Road
Swanage
BH19 2BL

19th December 2010

Core Strategy Pre-Submission Response On Behalf of Education Swanage

Dear Mr Dring,

I am writing with reference to Purbeck District Council's Local Development Framework Core Strategy Pre-Submission Document. I write on behalf of local campaign group Education Swanage and would like to draw attention in particular to the council's decision regarding the former Swanage Grammar School site.

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There is some disagreement over the suitability of the building - the owner's advisors are telling him that the building can not meet modern standards, while Partnership for Schools, who have seen the external condition of the building at first hand, have expressed enthusiasm and asked us to actively pursue a lease on the site. They recognise that it would be foolish to build a new school when an empty one exists in an ideal position, close to playing fields and amenities. The landowner wants to demolish the building, which is much loved locally, and replace it with a modern care home alongside a number of affordable homes.

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Yours sincerely,

Paul Angel

Arne Parish Council



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

	Your Details	Agents Details <i>(where relevant)</i>
Title	Miss	
Name	MD Weller	
Job Title <i>(where relevant)</i>	Clerk	
Organisation <i>(where relevant)</i>	Arne Parish Council	
Address	5 Border Drive Upton Poole	
Postcode	BH18 5DU	
E-mail	debbie_weller@arneparishcouncil.org.uk	
Tel. Number	01202 624261	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

Post: Planning Policy, FREEPOST RSAX-LTRK-TRKE, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

Late or anonymous representations will not be accepted. All representations received will be published on the Council's website along with your name.

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm in the District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

An example of a completed form is available on the Council's website.

Alternatively, if you would like help completing this form please contact the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments. Do you consider it necessary to participate at the oral part of the examination?

<input checked="" type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

--

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature MD Weller

Date 17.12.2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : CEN	Paragraph: 7.3.8	Map: 9
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>	<input type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Arne Parish Council strongly supports the extended settlement line to Wareham side of the A351 as the bypass is a definitive boundary for Wareham Town and the rural parish of Arne.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

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(tick all that apply)

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(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
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(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Arne Parish Council strongly supports the increase from 40% to 50% affordable housing.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

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Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Arne Parish Council is concerned that there are very few areas available for affordable housing development due to the 400m buffer around protected heathland. Scotts Close, Stoborough Green was always going to have another 6 houses built for either social or affordable housing. A small triangle of non-managed poor quality SSSA land, cut off from the main heathland and SSSA site by the bypass, is blocking the parish council's wish to build there.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Page 66 - Residential (C3) development that would involve a net increase in dwellings only after each site has been independently and individually investigated for impact on local designated land and proven through credible evidence to have adverse effect upon the integrity of the Dorset Heaths' International designations.

Ashvilla Estates Ltd



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details		Agents Details <i>(where relevant)</i>
Title		Mr
Name		Nick Paterson-Neild
Job Title <i>(where relevant)</i>		Associate
Organisation <i>(where relevant)</i>	Ashvilla Estates Ltd	Barton Willmore
Address		Beansheaf Farmhouse, Bourne Close, Calcot, Reading, Berkshire
Postcode		RG31 7BW
E-mail		nick.paterson- neild@bartonwillmore.co.uk
Tel. Number		0118 9430000

Responses should be sent to:

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Alternatively, if you would like help completing this form please contact the Planning Policy Team.

For further information, visit http://www.dorsetforyou.com/purbeck_consultation, email or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

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All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments. Do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> Yes, I wish to participate at the oral examination
---	--

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

Ashvilla Estates are the promoters of strategic residential led development of land to the West of Wareham.

We recommend that further mixed use urban extensions are identified within the Core Strategy which can deliver housing in the early part of the plan period, in order to meet economic and housing needs, sustain rural communities and provide for a balanced, measurable and deliverable pattern of sustainable growth, focussed on existing settlements such as Wareham, key public transport corridors and ensuring the jobs to homes balance is retained, to achieve sustainable social and economic growth as protection of environmental constraints.

Notwithstanding the evidence of the need for higher housing provision that provided for by the 2,400 homes in the Pre-Submission Core Strategy, the Council proposes only 360 of the proposed 1,280 additional homes (taking into account 760 completions and 360 commitments in the period 2006 to 2010) in Central Purbeck (which includes Wareham). Government Office for the South West has advised in relation to the Preferred Option Consultation that:

“Given Wareham’s central location in the district, it would appear to provide the best accessibility for the whole of the district for the provision of higher order services... Having a large proportion of the new housing proposed for rural Purbeck concentrated at Wareham, would therefore seem the most appropriate location in terms of reducing the need to travel through choice of location...

...As in sustainable travel/creating sustainable communities terms concentrating growth at Wareham would seem to be substantially preferable, reasons to outweigh this consideration would need to raise even greater sustainability concerns. It would therefore seem necessary to explore further whether and how a more substantial extension to Wareham could be accommodated at Wareham.”

Therefore the Council’s proposal to accommodate only 28% of the remaining housing requirement at Central Purbeck is inadequate and demonstrates the imbalance in the Council’s approach.

Wareham should be the focus for sustainable development and the Core Strategy should plan for an urban extension of at least 700 homes at West Wareham. The development of 200 homes at Worgret Road within the bypass is therefore the first step to create a sustainable extension to the west of Wareham which should include a further 500 homes beyond the bypass. To respond to the level of housing need and the objective of securing sustainable development at Wareham, land will be required within and beyond the western bypass road to enable development needs to be met (not least to meet SANG requirements).

Therefore Ashvilla Estates wish to participate at the Examination in Public to make submissions to the Inspector in relation to the compliance with legal requirements as well as the tests of soundness.

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature Nick Paterson-Neild, Barton Willmore
On behalf of Ashvilla Estates Ltd

Date 17th December 2010

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Policy : LD	Paragraph:	Map:
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It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

We agree that it is appropriate to focus development at the most sustainable settlements within the District. In addition, we also consider that the Core Strategy is right to identify that Wareham is one of the most sustainable locations for focusing new development within Purbeck District. The settlement hierarchy should reflect the direction of growth.

However, we question the justification to place Upton alongside Wareham and Swanage in the settlement hierarchy. Two thirds of Upton lies within 400m of protected heath land where no new residential development is allowed.

Core Strategy Background Paper 10: Settlement Strategy identifies Upton as having only 12 community services and facilities compared with 27 and 26 in Wareham and Swanage respectively. Wool and Corfe Castle have substantially higher facilities and yet are classed as Key Service Villages. Upton is identified in the Background Paper as being "severely constrained in terms of absolute constraints (heathland, tidal flooding), as well as being surrounded by Greenbelt." As such the hierarchy should be modified to place Upton below Wareham and Swanage.

The Core Strategy is unsound as it seeks to elevate the status of Upton in terms of settlement hierarchy as a location to direct development in th most sustainable locations, in spite of the Council's own evidence of the constrained nature of Upton.

Moreover the policy should be modified to state that new development should be concentrated within and adjoining the settlement boundary of towns to ensure that it reflects other policies and the spatial vision of the Core Strategy.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Move Upton to become a second tier settlement in the hierarchy and insert additional text to state new development should be concentrated within "and adjoining" the settlement boundary of the Towns...

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(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

The Core Strategy fails to deliver a sufficient level of housing to provide for need and to reflect the evidence base:

The Core Strategy is unsound as it fails at the first hurdle to consider additional growth options at the most sustainable locations for development including Wareham. The Council highlight the acute nature of need for new homes, citing that the average house price is 11 times the average wage and the SHMA set a requirement to provide 409 new affordable homes per annum. Recent ONS household population projections confirm the need for 4,000 homes rather than the 2,400 proposed. Delivering new homes is a key Government objective in PPS3 and the Core Strategy fails to have due regard to the overwhelming evidence base and the ability to accommodate a sustainable urban extension at Wareham which will comply with the Habitats Regulations and more effectively address need.

There are currently 1,660 households on the Council's waiting list. The Council accepts in paragraph 1.1.6 of Background Paper 5: Housing Supply, that few landowners are willing to gift land for affordable housing (so called rural exception sites) and in paragraph 1.1.7 that the Council is powerless to influence or restrict

second homes. Since 2006 the Council has averaged only 50 affordable homes per annum. The Joseph Rowntree Foundation have established that Purbeck has the 15th highest house price to income ratio out of 350 local authority areas in the country.

Settlement Hierarchy:

The settlement hierarchy fails to provide sufficient focus to Wareham and Swanage in terms of the distribution of development. The evidence is of an overwhelming case for new homes to meet local need. The Core Strategy must reflect the evidence of demographic, housing and economic need as well as reflecting the infrastructure and environmental carrying capacity of the housing market area. Too much emphasis has been placed on the weight given to environmental constraints, including AONB. This is made in spite of the profound weight of evidence relating to economic and social need, the jobs to homes balance, as well as sustaining rural market towns in the hinterland of the conurbation.

Wareham, the dominant market town in Purbeck, with a variety of services and facilities, located on the Weymouth-Poole railway line is the most suitable location for new planned development, providing an opportunity to seek to reduce reliance on car-borne journeys and to reinforce the long term sustainability and viability of Wareham as a key market town. A solution within the District is essential to meet the basic needs of the population in terms of providing housing and in sustaining the local economy.

Jobs and Homes Imbalance:

The Core Strategy must address the jobs and homes imbalance. The consequence of jobs/homes mismatch is that local people are unable to buy into the local housing market and look for housing elsewhere, leading to migration out of the region or more long distance commuting. Dorset CC area has a predicted excess of jobs over people between 2001-2016 of between 8,700 and 10,200 across a range of growth scenarios.

Rural areas suffer from acute affordability problems, exacerbated by limited housing supply, leading to increasing unsustainable development patterns and constraint to rural and urban economic growth. For example, Purbeck has delivered only 67% of its Structure Plan required housing between 1996 and 2005.

It is therefore vital for firms to be able to recruit skilled replacement labour or their production, innovation and overall competitiveness will be affected, and inward investment may be jeopardised.

Housing requirement based on Need:

All LPAs must establish through evidence a sound housing requirement, which must take into account housing need and demographic growth. The fact that the Council are only proposing to make provision for 2,400 dwellings over the plan period when provision should clearly be made for at least 5,150 in total in line with the evidence based approach of the Regional Strategy, has a detrimental, knock-on effect on the establishment of an appropriate strategy. Therefore it is considered that the housing requirement for Purbeck must now be reconsidered as part of the Core Strategy process against the background of local need to ensure that the housing requirements of the District are met.

Distribution of Housing Within Purbeck:

Further mixed use urban extensions must be identified within the Core Strategy which can deliver housing in the early part of the plan period, in order to meet economic and housing needs, sustain rural communities and provide for a balanced, measurable and deliverable pattern of sustainable growth, focussed on existing settlements such as Wareham, key public transport corridors and ensuring the jobs to homes balance is retained, to achieve sustainable social and economic growth as protection of environmental constraints.

Notwithstanding the evidence of the need for higher housing provision, the Core Strategy proposes only 360 of the proposed 1,280 additional homes at Wareham, with 460 at Swanage and 460 at Upton and the villages and the countryside. Government Office for the South West has advised in response to the October 2009

consultation that:

“Given Wareham’s central location in the district, it would appear to provide the best accessibility for the whole of the district for the provision of higher order services... Having a large proportion of the new housing proposed for rural Purbeck concentrated at Wareham, would therefore seem the most appropriate location in terms of reducing the need to travel through choice of location...

...As in sustainable travel/creating sustainable communities terms concentrating growth at Wareham would seem to be substantially preferable, reasons to outweigh this consideration would need to raise even greater sustainability concerns. It would therefore seem necessary to explore further whether and how a more substantial extension to Wareham could be accommodated at Wareham.”

Therefore the Council’s proposal to accommodate only 28% of the remaining housing requirement at Wareham is inadequate and the spread of 36% homes across Upton and the villages demonstrates the imbalance in the Council’s approach.

Wareham should be the focus for sustainable development and the Core Strategy should plan for an urban extension of at least 500 homes at Wareham. The strategic allocation of 200 homes at Worgret Road within the bypass is therefore the first step to create a sustainable extension to the west of Wareham. To respond to the level of housing need and the objective of securing sustainable development at Wareham, land will be required within and beyond the western bypass road to enable development needs to be met (not least to meet SANG requirements - see below).

Testing Higher Growth Options:

Paragraphs 6.13 and 6.14 refer to additional work to investigate higher level growth, and the first stage is to test strategic growth proposals against the Habitats Regulations. Reference is made to the fact that such work will take time and lead to uncertainty over the outcome and would delay the Core Strategy further. An immediate review is then proposed to the Core Strategy to deliver additional housing growth should that be viable.

Footprint Ecology have examined growth options including land to the west of Wareham at Worgret Manor, promoted by Ashvilla Estates Ltd. The scale of the opportunity for SANG and associated habitat enhancements and new access arrangements at Worgret Manor Farm is very large. In total the land available at Worgret Manor Farm extends to around 125 ha. This area under the control of Ashvilla Estates Ltd. extends from south of the town within the bypass, along the Frome floodplain, across the western bypass and along the floodplain north of the Frome in the SSSI, and over an extensive area of improved pastureland around the Manor; across the deep cutting of the Wareham Swanage railway, and beyond, north and south of the Dorchester railway line to include an area of sandy arable, formerly under forage maize.

Even allowing for the eventual development of up to 35 ha near the bypass, there would be at least 90 ha to be used as SANG, incorporating significant opportunities for habitat enhancements and nature conservation education.

Furthermore, the scale of the potential SANG allows a proper strategic examination of the most useful level of development west of Wareham. Assuming a similar ratio to that used in the Thames Basin heaths, of a notional minimum 8ha of SANG per 1000 new residents, a SANG with an area of 90 ha, providing walks of up to 7.5 km, could theoretically support recreational use by an additional population of up to 11,250 new residents. Utilising Natural England’s household occupancy ratio of 2.4, this would accommodate for the development of up to 4,687 new dwellings which by far exceeds the maximum number of dwellings considered at Wareham within the Core Strategy. In practice, it is accepted that the provision rate for SANG may be higher than the 8ha/1000 standard, but it is clear that the size of the Frome Valley SANG is unlikely to be a constraint on the westward growth of Wareham. A report prepared by EPR for Ashvilla Estates is lodged with these representations to provide further detail on this matter.

Windfall Allowance:

The Council's Character Area Potential approach is a windfall allowance and this is entirely inappropriate. PPS3 provides particularly clear advice on the inclusion of housing derived from windfall sources being included within calculations of housing supply. Paragraph 59 of PPS3 states that:

“Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified.”

This is also addressed elsewhere within PPS3. Paragraph 54 for example states that Local Planning Authorities should identify sufficient specific deliverable sites to deliver housing in the first five years (paragraph 7 states that a 'rolling' 5 year supply should be maintained). Identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Paragraph 55 states that where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.

The Council has failed to demonstrate why it cannot demonstrate specific developable and deliverable sites for the first 15 years of the plan or why broad areas for growth and accordingly the Core Strategy in planning for 55% of the remaining residual housing requirement to 2026 as windfall sites is not justified and is not consistent with national policy.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The Policy should be amended to provide for at least 5,150 dwellings in the period to 2026. No allowance should be made for windfalls and the additional development should be directed towards Wareham and Swanage as the principal towns within the District. Land should be allocated for at least 700 dwellings to the west of Wareham (including the 200 within the bypass).

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : CEN	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

In light of the comments made in relation to Policy HS above a greater quantity of new homes should be planned for in Central Purbeck (Wareham) and the policy should be amended to require around 1,000 homes at Wareham, including 200 inside the bypass and a further 500 at Worgret Manor to the west of Wareham including the provision of a strategic SANG to serve development at Wareham. 50% of these dwellings should be provided as affordable homes.

Paragraph 7.3.8 of the Draft Core Strategy states that there is "currently no obvious site to provide suitable SANGS to mitigate growth to the west of Wareham, although land in the ownership of the private landowner to the west of the bypass could be considered."

The acceptance that the Draft Core Strategy does not have a SANG solution to the proposed development of 200 homes on Worgret Road is a fundamental flaw and which leads to the conclusion that the Draft Core Strategy fails to meet legal requirements, i.e. does not comply with the Habitats Regulations as measures to avoid or mitigate the effect from new housing on the Dorset Heaths SPA have not been demonstrated and the Draft Core Strategy is therefore unsound as it fails to address the impact on internationally protected

sites as required by PPS9 and is not justified as it does not provide the most appropriate strategy or adequately consider the alternatives to the west of Wareham (see EPR report).

Worgret Manor lies on the western periphery of Wareham (with an approximate site area of 125 hectares). Built development can be accommodated on an area of about 35ha with the remainder of the land to the south and west left for the purposes of public open space, recreation and nature conservation.

Wareham is constrained by Green Belt, AONB and the floodplain areas. The only reasonable location to extend Wareham lies on the western edge of the settlement; physically adjoined to the original town, rather than the more detached Northport area, which in itself is constrained by the Green Belt.

The development area lies predominantly to the west of the A351 Wareham by-pass and to the south of the A352. The western extent of the development site is defined by the formation of the Bournemouth to Weymouth railway and the spur to Swanage. The southern boundary generally follows the edge of slope above the floodplain to the River Frome. The majority of the land is currently used for agricultural purposes.

Development on this site could ultimately comprise the following:

- up to 800 dwellings (500 in the first phase to be identified in the Core Strategy) including affordable homes
- SANG (Suitable Alternative Natural Greenspace) area of up to 90 hectares
- employment sites potentially able to provide about 12,000 square metres of floorspace;
- a local centre;
- a public house/restaurant;
- a community hall;
- a terminus for a local high frequency bus service linking the development directly with local schools, the railway station and the Town Centre. This service would be guaranteed for 5 years by Ashvilla.
- cycle ways and footpath links;
- managed ecological areas for Biodiversity enhancement
- contributions to transport improvement works
- Ashvilla will build an on site railway halt and park and walk facility to enable the Swanage railway to make the connection to Wareham.

Worgret Manor is a site which can provide the means with which to provide for the natural extension of the settlement to the west of the site, as the town is constrained by areas of floodplain, topography, AONB and the Green Belt to the south north and east.

Advantages of the Frome Valley SANG

In sum, the realisation of this opportunity would achieve several strategic objectives:

- Greatly enhance the available range of recreation opportunities around Wareham;
- Attract many existing users of the heaths to a nearer alternative recreational facility;
- Offer direct access on foot from new and existing development in the west of Wareham;
- Provide a destination and viewpoint for tourist traffic passing through to Dorchester and west Dorset;
- The potential for a sustainable transport connection between Wareham and Swanage through the provision of a new railway halt with park and walk scheme; and
- Allow the re-creation of what was, historically, heathland and grassland, and an enhancement of biodiversity in the area between Worgret Heath and the Frome, supported by onsite Nature Conservation Education facilities.

Worgret Manor is predominantly used for agriculture and there is no public access over the land at present, it therefore does not have a recreational function.

The value of the site lies in its visual association with the settlement of Wareham and the surrounding landscape. Worgret Manor is on the northern periphery of the Dorset AONB.

The AONB is a substantial constraint; national and regional policy requires its protection. However, AONB is not of the same order as the Habitat Regulations. Policy does allow for development within AONBs, in certain circumstances; and protection beyond the AONB is a regional, not national requirement.

Worgret Manor lies partly within the AONB. It is accepted that development could have a detrimental effect on the AONB. However, national policy requires that effect to be weighed against alternative effects. In the context of the Core Strategy, those alternative effects could be damage to Habitat Regulation sites.

A landscape and Visual Appraisal undertaken for Ashvilla Estates Ltd has identified that the landscape character of the site does not fully reflect the Dorset Heathlands of the AONB. There will be some limited landscape and visual impact on the character and appearance of the AONB, however, this can be mitigated through the design and layout of the built forms of new development and the identification of appropriate areas to introduce new structural landscaping.

The site shares the same topographical characteristics as Wareham, being situated on the same ridgeline with scarp slopes to the north and south. There is a strong relationship between the town and Worgret Manor. A planned extension of the existing town would seek to ensure that this relationship is strengthened both physically and visually.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Policy CEN should be amended to require around 1,000 homes at Wareham, including allocation of 200 homes inside the bypass and a further allocation of 500 homes at Worgret Manor to the west of Wareham including the provision of a strategic Frome Valley SANG to serve development at Wareham. 50% of these dwellings should be provided as affordable homes.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input checked="" type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : Mitigation	Paragraph: 5.48 - 5.58	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

The Habitats Regulations Assessment deals at length with the potential for additional visitor pressure on the Dorset Heaths, but gives insufficient consideration to predicting the effects of further development accompanied by mitigation/avoidance measures. Since Avoidance measures are essential for any site, the strategic ecological advantage of any development option will actually depend on its mitigated effects.

The methods and conclusions of assessment are examined in more depth in the attached report prepared by Ecological Planning & Research Ltd. entitled "Review of Habitat Regulations Assessment undertaken for Purbeck District Council and Comments on Potential for and Effectiveness of, SANG at Worgret Manor"

The general observations at HRA paras 5.48 - 5.50 regarding the need for well located SANG of suitable character to be available prior to development are supported. However, whilst the HRA notes the need for a SANG to the west of Wareham, it says that the Core Strategy "states that there is no obvious site to provide a suitable SANG for growth to the west of Wareham".

Such a SANG would be necessary to make the Core Strategy compliant with the Habitats Regulations, and without it the plan is not deliverable and therefore not legally compliant.

Whilst the HRA is correct in stating that the only options for SANGs provision are to the west of the town", it then gives the example of Binnegar, whose delivery is uncertain. It notes the requirement for a site of 30-40ha, but fails to acknowledge the full potential for a large SANG of up to 90ha to the west of Wareham at Worgret Manor Farm.

The conclusions of the HRA regarding the effects of different development options are therefore not justified.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The Core Strategy could be made deliverable, and thus sound, by the inclusion of reference to the potential for, and availability of, a SANG at Worgret Manor Farm, in the form of a Frome Valley Country Park.

Paragraph 5.58 should be amended to include reference to the potential for a deliverable and highly effective SANG to be provided in conjunction with development west of Wareham necessary to support the town's function as a centre for services in Purbeck.

The plan could be made justified, and thus sound, by the incorporation of the substance conclusions of the EPR assessment of the potential effects of providing a SANG at Worgret Rd. This would also require amendment of the Core Strategy to provide for additional, needed, development west of Wareham.

PURBECK PRE-SUBMISSION DRAFT CORE STRATEGY

**REVIEW OF HABITAT REGULATIONS ASSESSMENTS
UNDERTAKEN FOR PURBECK DISTRICT COUNCIL**

AND

**COMMENTS ON POTENTIAL FOR, AND EFFECTIVENESS OF, SANG AT
WORGRET MANOR FARM, WAREHAM**

**REPRESENTATION
on behalf of
ASHVILLA ESTATES Ltd**

**POLICY CEN;
HRA ETC**



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**REVIEW OF HABITAT REGULATIONS ASSESSMENTS
UNDERTAKEN FOR PURBECK DISTRICT COUNCIL**

AND

**COMMENTS ON POTENTIAL FOR, AND EFFECTIVENESS OF,
SANG AT WORGRET MANOR FARM, WAREHAM**

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Maps

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1.0 INTRODUCTION

Purpose of Representation

- 1.1 This representation on the Draft Core Strategy has been prepared on behalf of Ashvilla Estates by Ecological Planning & Research Ltd. It addresses various scenarios for development west of Wareham, in the context of the Purbeck Core Strategy and the conservation of the Dorset heaths. In particular it considers:
- The advice provided to Purbeck District Council on the Core Strategy and Additional Growth scenarios;
 - Measures necessary for securing the Avoidance of Likely Significant Effects on the Dorset heathlands, of development to the west of Wareham;
 - The character of land at Worgret Manor Farm, and its potential as Suitable Alternative Natural Greenspace;
 - The potential capacity of the land west of Wareham, at Worgret Rd and at Worgret Manor Farm, for residential or mixed-use, development; and,
 - The relative merits of development at Wareham or Wool for further significant development.
 - The appropriate level of growth at Wareham, on the ecological evidence;

Documents Reviewed

- 1.2 The representation addresses the conclusions of the Habitats Regulations Assessments of:
- The Regional Spatial Strategy
 - Consultation Draft Purbeck Core Strategies
 - Pre-submission Draft Purbeck Core Strategies.

- 1.3 It also reviews:

- the Footprint Ecology report, "Purbeck Core Strategy, Implications of Additional Growth Scenarios for European Protected Sites" insofar as they apply to the Worgret site west of Wareham and the Dorset Heaths SPA and SACs (Map 1),
- Background reports on methodology prepared by Footprint Ecology;
- Dorset Heaths Interim Planning Framework and associated documents;
- Research undertaken by EPR Ltd.; and
- Natural England guidance on principles of SANG Location and Design.

- 1.4 We do not, however, specifically address the more widespread effects on Poole Harbour SPA, or the coastal and well-managed visitor sites such as Arne and Studland, but it is clear that these will need to be the subject of further comment in due course.

Regional Planning Background and the Purbeck Core Strategy

- 1.5 The Draft Regional Spatial Strategy (RSS) set a broad framework for growth and development in the sub-region. Notwithstanding the current status of RSS, advice from DCLG is that the technical background to RSS work, for example on housing need, remains a material consideration and must be used to inform development plans.
- 1.6 The technical work underpinning the RSS was subject to both Strategic Sustainability Appraisal and Habitats Regulations Assessment. It created the context for a Dorset Heathlands Joint Development Plan Document (DHJDPD). The DHJDPD is not yet well-developed, but a Sustainability Appraisal of Initial Options concluded that there were no major constraints to sustainability, and that alternative greenspace and cultural opportunities offer potential to maintain a sustainable approach.

Potential Scale of Development Postulated around Wareham

Purbeck Local Development Framework and Core Strategy

- 1.7 The 2006 Draft RSS proposed that a total of 2100 new dwellings should be built in Purbeck by 2026; this figure was subsequently increased in the Proposed Changes by the suggested addition of an extra 2,750 houses in Area of Search 7B at Lytchett Minster, with a concomitant increase to 2400 in the rest of Purbeck.
- 1.8 Purbeck District Council took the view, on advice, that the additional 2750 could not comply with Habitats Regulations tests and has therefore only pursued the 2400 District-wide in its Core Strategy.
- 1.9 The Core Strategy proposals for 2400 dwellings were further developed in the consultation document "Planning Purbeck's Future: Consultation" (September 2009) which envisaged three possible options for growth: a Preferred Option of Distributed Development, and alternative Options A and B with, respectively, greater degrees of development at Wareham and Swanage.
- 1.10 The scales of development then proposed at Wareham between 2012 and 2026 were:

Preferred Option:	Dispersed growth	438
Option A:	Wareham Focus	863
Option B:	Swanage Focus	382

Potential Additional Growth

- 1.10 Government Office for the South West (GOSW) subsequently advised that the District Council should still provide within the District for some proportion of the additional 2750 dwellings originally suggested. The District Council also needed to make provision for some additional houses reflecting the additional monitoring year 2008-9 year to maintain a 15-year horizon.
- 1.11 As part of its response to this GOSW advice, Purbeck considered a further five possible scenarios, each envisaging some degree of growth over and above the 2400, and sought information on the implications of these from Footprint Ecology.
- 1.12 First, a 'Higher Level Growth' scenario was postulated, additional to the 2400 proposed in the Core Strategy, an element of growth based on the typical historical internal growth in number of dwellings, assessed by PDC on the basis of the 'character' of the development. The second ('Lower Growth') scenario was to assume only half this past rate of indigenous growth would materialise.
- 1.13 The remaining three scenarios each envisage three further possible increases above the Core Strategy, each assessed in conjunction with the 'Higher Growth' assumption. The options and accompanying housing numbers are therefore:

Option	Total Dwellings
1. Lower Level Growth (LGO)	2650
2. Higher Level Growth (HLG)	3360
3. Wool Option (HLG + 1000 dwellings at Wool)	4360
4. Wareham Option (HLG + 500 dwellings at Wareham)	3860
5. Lytchett Minster Option (HLG + 500 dwellings at L.M.)	3860

- 1.14 PDC commissioned Footprint Ecology to prepare a further report "Purbeck Core Strategy, Implications of Additional Growth Scenarios for European Sites" (September 2010). This report, which does not purport to be a Habitat Regulations Assessment *per se*, is stated to 'sit alongside' the original HRA. Although it examined the 5 scenarios as extensions of the Core Strategy proposals, the apportionment of the additional lower or higher growth between locations is not clear.

Purbeck Core Strategy; Pre-Submission Draft: September 2010

- 1.15 Following the Consultation, PDC received a majority of public support for the dispersed strategy for growth. The Pre-submission draft of the Core Strategy is open for public consultation from 1 November to 20 December 2010. It proposes that 455 dwellings are likely to be built in the Wareham area, including a specific allocation of 200 at Worgret Rd, Wareham. Of these, the plan considers that 50% of the Worgret Rd allocation should be affordable, contributing to an expected affordable total of 150, against a stated affordable housing requirement of 850 in the same sub-area.

2.0 HABITAT REGULATIONS ASSESSMENTS AND RELATED DOCUMENTS

HRA of the Core Strategy Consultation Draft 2009 ('HRA-CD')

- 2.1 Chapter 5 of the Footprint Ecology Habitats Regulations Assessment of the Purbeck Core Strategy Consultation Draft (September 2009) characterises in summary form the potential types of effect of increased recreational access on heaths in general. It then derives predictions of the additional number of visitors to each heath access point, using drive-time isochrones.
- 2.2 Table 8 of the report summarises the predicted changes, and suggests that, for sites within 5 minutes drive, Option A (Wareham focus) shows a slight preponderance of predicted increases in visits; but that where drive times are within 10 minutes the position is reversed; there is slightly greater preponderance of impacts for Option B (Swanage focus). The report correctly states that there is little difference in practice between the predicted total additional heath visits for all three Core Strategy Options.
- 2.3 In addition, the Footprint report uses a model based on postcode data, developed for the Dorset authorities, to predict the additional number of visitors at various specific heath access points, based on distances between post code areas and access points to heaths. This suggests that all development options, without mitigation, will lead to increased access at many sites. It should be noted that some of the predictions are extrapolations from sites where there is survey data.
- 2.4 The study suggests that Wareham Forest, a very large dispersed site which is not designated in its entirety, and to several sections of which access is encouraged, and Stoborough and Hartland, would be significantly more affected by the Wareham Option A. However, the coastal sites at Studland, also highly managed for recreational access, would be more affected by the Swanage Option B.
- 2.5 It is important to bear in mind that the HRA itself cautions (para 5.7.6) that:
- "the predictions for each access point should be considered as a guide. They should be interpreted with consideration of Site-based factors and the local area. The predictions will be an underestimate where the access point is to a particularly attractive location. Conversely, locations where parking is difficult may be overestimates"*

We entirely concur with this statement; if one is to attempt to influence how people will select recreation sites, it is essential to understand why people find it easy or attractive to visit particular sites in preference to others.

Assessment with and without Mitigation Measures

- 2.6 It is also crucial to note that this assignment of additional visitors is made without mitigation measures being in place. The HRA then suggests that all options will need mitigation, to avoid likely adverse effects alone or in combination; and that such measures should be an integral part of the Core Strategy. Mitigation should include

both on-site access management at heath sites, and alternative green spaces to draw people away from the heaths.

Alternative Recreation Sites

- 2.7 The HRA-CD recognises that the creation of such alternative recreation sites, now widely known as SANGs (Suitable Alternative Natural Greenspace) is an appropriate, though not yet fully tested, form of mitigation. It also suggests that the Natural England Guidelines for SANG in the Thames Basin Heaths could be applicable, as 'many of the principles are generic'. SANG is correctly stated to need to be a long-term provision if the Habitats Regulations are to be satisfied.
- 2.8 The HRA-CD suggests that SANG sites need to be of sufficient size, character, and quality to attract people away from heaths. We note that this is standard in the Thames Basin and the same principles can apply in Dorset. The HRA further states that in order to replicate some of the character that attracts people to heaths, the SANG should:
- " be delivered by a small number of well-located, large sites, each with a critical mass and characteristics to compete with the heaths"*
- 2.9 Furthermore, the HRA-CD then states (5.8.10) that:
- "without knowledge of the exact locations it is impossible to accurately state where SANGs should be implemented, nor indeed how successful they might be, but the following areas may be suitable"*
- 2.10 In relation to Wareham, the report then says that:
- "a location to the west or north west of the town, drawing new residents away from the sensitive locations in Wareham Forest and Hartland/Stoborough/Arne would be particularly important for option A". Given the attractiveness of Wareham Forest and the heaths to the east of Wareham, this will need to be a sufficiently large and attractive site to be at all effective, and there is more uncertainty for this scale of development (sic) that SANG may be effective"*
- 2.11 The HRA-CD concludes that:
- "Mitigation measures, particularly for Option A, will need to be considerable and further work may be necessary to ensure that they can be delivered."*
- 2.12 In relation to the tests in the Habitat Regulations, the report concludes that:
- "If included in the Core Strategy, as recommended, these Avoidance Measures would eliminate the likelihood of significant effects alone. Because there would be no effects on the sites, there could be no contribution to combined effects.*
- The HRA of the Core Strategy will, in these circumstances, be able to record no Likelihood of Significant Effect, alone or in combination"*
- 2.13 Attention is therefore drawn to the fact that, whilst noting the requirement for clarification of the location, extent, and character of a potential SANG to the west of

Wareham, the Core Strategy HRA-CD suggests that if properly designed and implemented, such a SANG could in theory succeed in securing Avoidance of effect. It is also important to note that, *caveats* apart, the same conclusion is drawn for Option A as for the Preferred Option.

- 2.14 There was, then, no suggestion in the Consultation Draft Core Strategy HRA that the Wareham Option A is intrinsically or inevitably unacceptable under the Habitats Regulations. It is also noted that Option A allows for 863 houses, largely to the west of Wareham.

HRA of the Core Strategy Pre-Submission Draft Oct 2010 ('HRA-PSub')

- 2.15 The current Pre-Submission Core Strategy was also subject to Habitats Regulations Assessment. In 'HRA-PSub', Footprint addressed the Pre-Submission Draft Core Strategy, which was provided to them in mid-October. Overall, the document is similar to the previous HRA-CD. However, following the public consultation exercise, the Pre-Submission Core Strategy deals only with the dispersed growth strategy, which proposes development of 455 houses around Wareham up to year 2026.
- 2.16 The HRA-PSub report again notes (para 5.50) that people appear to preferentially visit heaths, and that therefore alternative sites need to be carefully sited and designed, and to replicate some of the character of heaths, which is stated to be "large attractive sites with views". SANGs are observed to need to be "well located, large sites, each sufficient to compete with the heaths". We also note that a high percentage of heath visitors have dogs with them, and that facilities to let dogs off the lead are crucial.
- 2.17 The HRA-PSub at para 5.51 notes that;
- "the following broad locations will be ideal for SANG provision:*
- *Near Wareham, to the west or north west of the town, drawing new residents away from sensitive locations within Wareham Forest and Hartland/Stoborough/Arne. . . Any SANGs provision in these areas will need to be on land not vulnerable to flooding (which would limit its appeal to dog walkers and others)"*
- 2.18 Worgret Manor Farm appears to be the only site likely to be able to meet all these criteria.
- 2.19 When considering Deliverability of Mitigation, the report advises that without the security of mitigation being delivered, the Council would not be able to ascertain that there would not be an adverse effect upon the integrity of the European Sites, SPA and SAC, potentially affected by development proposed in the Core Strategy.
- 2.20 The HRA-PSub therefore suggests that further work is required to examine SANG provision around Wareham, Swanage, and Wool. It is suggested that the present

submission, and work that may flow from it, are a contribution to the examination of the deliverability of mitigation in relation to the Core Strategy.

Implications of Additional Growth Scenarios ('IAGS')

- 2.21 Footprint Ecology was subsequently commissioned by Purbeck to consider the likely effects of the suite of further hypothetical growth options, identified at para 1.9 – 1.13 above. Their report "Implications of Additional Growth Scenarios" ('IAGS', September 2010) reviewed these hypothetical allocations with particular reference to the distribution and accessibility of designated heathland sites in the areas potentially affected, at Wool, Wareham and Lytchett Minster. It also assesses the potential for increased levels of access to the coast and the New Forest, and of changes in water quality and abstraction, and air quality.
- 2.22 It is noted that Footprint have used the 2008 Household survey of SE Dorset to derive an estimate of the overall level of visitor pressure associated with different levels of growth (para 2.15, pg. 20; Liley et al., 2010). In EPR's experience, Household surveys, which record what people say they do, should be interpreted with caution. They may give a reasonable guide to patterns, but quantification is less reliable because it depends on people selecting from a discontinuous range of options.
- 2.23 Furthermore, respondents often clearly over-estimate the amount of exercise they take, as can be shown by comparison of on-site post-code surveys with household interview surveys from the visitor source post-codes, which EPR has undertaken at Thames Basin Heaths sites, including for the Dilly Lane Inquiry in Hart District.
- 2.24 Footprint has also undertaken on-site visitor surveys, although not related directly to the present potential developments and adjacent heathland sites.
- 2.25 To predict the effects of the Additional Growth Scenarios on visitor numbers at a range of specific heathland locations Footprint have used models (see Liley et al., 2006) based on two equations – one for foot and one for car-borne visitors, respectively, derived from the results of the Dorset Heathland Visitor Survey undertaken in 2004.
- 2.26 For each heathland patch access point they predict visitor numbers according to the number of houses surrounding the access point (within 10km) and, for access points where there are parking facilities, the number of car-park spaces. The distribution of potential new housing (details provided by Purbeck District Council) was apportioned to existing postcodes, weighted according to the number of residential delivery points already allocated to each postcode. For the specific additional growth scenarios considered at Wool, Wareham and Lytchett Minster, postcodes were artificially generated based on the likely locations of development.
- 2.27 The Footprint Implications of Additional Growth Scenarios (IAGS) report set out at its Table 4 the predicted increases in visitors, based on assigning through models the

additional propensity to visit between the heathland access points as above. It is important to note, however, that the results do not take into account the attractiveness of sites, parking facilities, ease of access, size of site, or whether access is encouraged.

- 2.28 The report also compares the number of heath access points, the number of car parking spaces, and the number of territories held by the three relevant species of Annex 1 birds; Nightjar, Dartford Warbler and Woodlark.
- 2.29 The Footprint 'IAGS' report summarises its conclusions in the following terms:
"The higher growth scenario (HLG) plus 500 houses at Wareham ... is predicted to result in the highest recreational use of heaths, more than HLG plus 1000 at Wool, or HLG plus 500 at Lytchett Minster"
- 2.30 It is important to note that in fact, despite the conclusion set out above, both the 'HLG plus 1000 at Wool' and 'HLG plus 500 at Wareham' scenarios result in a predicted increase of at least 20% at five heathland patches, with a similar total increase across all heathland patches considered (294.4 and 296.1 extra visits, respectively). These numbers are in the absence of mitigation.
- 2.31 Furthermore the HLG plus 1000 at Wool scenario is anticipated to result in a greater total percentage increase for the five worst-affected patches when compared to the HLG plus 500 at Wareham scenario (56.1 and 23.2 visits, respectively).
- 2.32 The 'IAGS' report goes on to state that:
"The heaths around Wareham are particularly vulnerable and the options for alternative sites are very limited; we cannot see how alternative space could be secured to successfully divert access here. We cautiously suggest that there could be potential to provide alternative green space to the south of Wool that, with a range of other measures, could be sufficient to provide mitigation for the additional growth and housing at Wool"
- 2.33 Albeit that they were clearly made on a precautionary basis, a number of the statements in these two paragraphs are require further examination and clarification.
Clarification of Footprint Conclusions
- 2.34 The following sections of this submission therefore consider the conclusions of the Footprint reports in the light of the evidence on the ground. It is agreed that the options are limited. The land at Worgret Manor Farm, in fact, offers what is likely to be the only opportunity anywhere around the town to create a very large Alternative Greenspace.

3.0 POTENTIAL FOR A LARGE SCALE SANG AT WORGRET MANOR FARM

- 3.1 If it is possible to summarise the conclusions of the three principal Footprint Ecology reports giving advice to Purbeck District Council on the Habitat Regulations, it could be said that in order to secure a deliverable, and thus sound, Core Strategy, further work is required to elucidate what sort of SANG might be possible west of Wareham, and then examine its likely effectiveness.

Need for a SANG west of Wareham

- 3.2 Purbeck District Council acknowledges in the Consultation Draft that the Core Strategy Preferred Option proposals themselves cannot be implemented without the ability to create Avoidance measures in the form of a SANG at the western end of Wareham. The Core Strategy Pre-Submission Draft also states that no site within public control has been identified for such a SANG.
- 3.3 Whatever level of development is therefore ultimately proposed around Wareham, the practical reality is that a SANG is necessary at Worgret Manor Farm. Further, the plan cannot be sound in terms of the Habitats Regulations unless the means of avoidance are identified.

Potential for SANG west of Wareham at Worgret: the Frome Valley SANG

- 3.4 The scale of the opportunity for SANG and associated habitat enhancements and new access arrangements at Worgret Manor Farm is in fact very large. In total the land available at Worgret Manor Farm under the control of Ashvilla Estates Ltd. amounts to around 125 ha.
- 3.5 This area stretches from south of the town within the bypass, along the Frome floodplain, across the western bypass and along the floodplain north of the Frome in the SSSI, and over an extensive area of improved pastureland around the Manor; across the deep cutting of the Wareham Swanage railway, and beyond, north and south of the Dorchester railway line to include an area of sandy arable, formerly under forage maize (**Maps 3 & 6**).
- 3.6 Even allowing for the eventual development of up to 35 ha near the bypass, there would be at least 90 ha to be used as SANG, incorporating significant opportunities for habitat enhancements and nature conservation education (**Map 3**).
- 3.7 At the Frome Valley SANG it would be possible to create visitor access and recreation facilities on a significant scale:
- A network of footpaths giving visual access to the Frome valley, and providing:
 - circular routes of up to 7.5 km.
 - variety of walk lengths between 1.6 km and 7.5 km.
 - Cyclepath and bridlepath facilities linked to Wareham and to the west.
 - Total proposed footpath/cyclepath/bridlepath length of 12.5 km.

10

- Substantial areas of grassland where dogs can be run off the lead, which is a critical requirement for SANG users with dogs;
 - Footpath link with bridge across the Wareham A351 bypass near the edge of the Frome floodplain, connecting the SANG with southwest Wareham;
 - Country Park style car park, viewpoint and picnic area at the prominent knoll off the Dorchester Rd A352 (Appendix 1, Photo 9), also providing a western access to the SANG path network beneath the Dorchester railway line;
 - Second parking area adjoining the SANG, with direct access through or along the edge of development west and on/off the A351 bypass;
 - Possible park, walk and ride car park to be used by visitors using the Swanage Railway, with a new halt, thereby offering a sustainable transport connection between Wareham and Swanage;
 - The potential for extensive habitat restoration through the conversion of existing arable to heathland and acid grassland, and enhancement of grassland composition in the pasture areas to improve the 'naturalness' of the SANG and provide a semi-natural connection between the Frome valley and the heaths to the north; and
 - A Nature Conservation Education Centre with connections to Wetland Enhancement Areas, viewpoints and a bird hide.
- 3.8 We strongly support the Habitats Regulations Assessment of the Core Strategy, and the IAGS, where they stress that the nature of any site is an important determinant of its likely effectiveness in attracting people away from the heaths. Similarly, Natural England Guidelines for the character and quality required of Thames Basin Heaths SANG stress that a natural countryside experience is necessary to attract visitors.
- 3.9 In this respect the Frome Valley SANG site seems unparalleled. When walking within the site, one looks directly across, and indeed it is hard to ignore, the expanse of river valley to the south, and the chalk ridge at Corfe (Appendix 1), with a distant view of the castle. This is a spectacular view southwards, of a landscape rich in natural habitats and scenic features, from land that, at present, has no public footpaths or other public access.
- 3.10 It should also be noted that when considering the extent and attractiveness of a SANG, it is not necessary for all the attractive features to be within the site itself; the land at Worgret Farm, because of its extensive views of south Purbeck, feels part of a much larger area, and indeed this is a characteristic it particularly shares with heaths.

Advantages of the Frome Valley SANG

- 3.11 In sum, the realisation of this opportunity would achieve several strategic objectives:
- Greatly enhance the available range of recreation opportunities around Wareham;
 - Attract many existing users of the heaths, particularly dog-owners, to a nearer alternative recreational facility;

- Offer direct access on foot from new and existing development in the west of Wareham;
 - Provide a destination and viewpoint for tourist traffic passing through to Dorchester and west Dorset;
 - Offer the potential for a sustainable transport connection between Wareham and Swanage through the provision of a new railway halt with park and walk scheme,
 - Allow the re-creation of what was, historically, heathland and grassland, and an enhancement of biodiversity in the area between Worgret Heath and the Frome,
 - Support the provision by onsite Nature Conservation Education facilities.
- 3.12 Furthermore, the significant scale of the potential SANG allows a proper strategic examination of the most useful level of development west of Wareham. For any planning strategy to comply with the Habitats Regulations, it will need full implementation of Avoidance measures. Examination of the likely additional effects of new residents on heathland sites near Wareham, without mitigation, and then basing planning judgments on the predicted differences under a range of planning strategies, is therefore not the most productive way of using the available knowledge.
- 3.13 If the HRA assessment is to exert any valid influence on site selection at all, it must in practice rely upon assessing the availability and effectiveness of SANG sites that comply with the general Natural England guidance referred to above.
- 3.14 The limits on size of development therefore depend not upon the location of the development, but upon the scale and effectiveness of the related SANG.
- 3.15 Assuming a similar ratio to that used in the Thames Basin heaths, of a notional minimum 8ha of SANG per 1000 new residents, a SANG with an area of 90 ha, providing walks of up to 7.5 km, could theoretically support recreational use by an additional population of up to 11,250 new residents. Utilising Natural England's household occupancy ratio of 2.4, this would accommodate for the development of up to 4,687 suitably located new dwellings; a figure which far exceeds the maximum number of dwellings considered at Wareham of 955 (HLG plus 500 at Wareham).
- 3.16 In practice, it is accepted that the provision rate for SANG may have to be somewhat higher than the 8ha/1000 standard, but it is abundantly clear that the size of the Frome Valley SANG is unlikely to be a constraint on the westward growth of Wareham. However, it should also be borne in mind that the Frome Valley SANG is perfectly located relative to the new development, being walkable from all areas.
- 3.17 The Frome Valley SANG would therefore have a very substantial capacity to cater for people arriving on foot from either the new residential development or from Wareham Town, with or without dogs, as well as providing a convenient car-borne destination for outdoor recreation, a range of semi-natural habitats and outstanding views of the Frome Valley, the Purbeck chalk ridge and Corfe, all in an area which is at present not accessible to the public.

4.0 COMMENTARY ON MATTERS CONCERNING WORGRET RAISED IN THE IAGS

- 4.1 The Footprint report 'Implications of Additional Growth Scenarios' (IAGS) was asked to contemplate the possible effects of greater levels of development than had been proposed in the Core Strategy Consultation Draft Options.
- 4.2 At IAGS page 34, para 2.68/2.69, Footprint Ecology consider the potential for a SANG west of Wareham. It notes that, given the constraints, the only feasible direction is westwards towards East Stoke. At para 2.68 the document refers to the 2006 plans promoted by Ashvilla in the following terms:
- "Detailed consideration of the area immediately around Wareham would seem to indicate that there is little potential for an effective SANG. . . potentially the only opportunity lies to the west of the town, towards East Stoke. Plans produced by Ashvilla Estates Ltd (dated 2006) set out potential development outside the Wareham settlement boundary to the west of the Wareham bypass. These plans include 36 ha of informal open space and provide an indication of the type and size of SANG which might come forward"*
- 4.3 The report then says that:
- "Our interpretation of these plans and knowledge of the area would indicate that such an area of green space would be ineffective in diverting pressure away from the heaths. There are two busy roads. . . and the green space is split into 3 small patches by the railway"*
- 4.4 It should first be noted that the land west of Wareham, shown green on IAGS Map 7 is not the extent of what Ashvilla are proposing as SANG in this area; it does not show the SANG extending across the Wareham bypass.
- 4.4 Map 3 shows that there is around 31 ha of SANG in the first compartment alone, between the bypass and the Swanage railway, with a further 36.6 ha south/southwest of the two railway lines. Furthermore, the effective extent of these areas is, in terms of one's experience on the ground, much larger because of the extensive views over the Frome valley and towards the Purbeck ridge (Photographs in Appendix 1). About a quarter of the site is on the Frome floodplain, but some seasonal winter flooding of this area is not a constraint on achieving an effective SANG.
- 4.5 The Footprint report implies that the Swanage branch railway is a detractor, but in practice to the site user it is almost invisible, lost in the birch scrub on the cutting faces, and in any event, is an attractive bracken feature (Appendix 1, Photos 4 & 5). Further, to some visitors, whether they actually arrive on the train or not, the restored steam equipment is likely to be a significant attractor. In any event, the service on both the Swanage branch and the Dorchester lines is relatively infrequent and unlikely to inhibit dog walking.
- 4.6 In relation to the separation of the site into compartments, this in fact presents an opportunity to create a variety of semi-natural habitats, a site feature that has been

shown to be highly valued by dog walkers, and provide different walking experiences in relation to the various points from which there are views southwards.

- 4.7 The smaller northern 12.5 ha compartment along the Dorchester Road (Appendix 1, Photo 9), far from being a small ineffective patch of green space would provide an important focal point for visitor access. A large country park style car park would be well publicised and have safe access off, and immediately south of, the A352. This would become a well-used local viewpoint, with a path leading south from the well-screened car park to a prominent knoll with picnic site and viewpoint offering outstanding views of Purbeck to the south.
- 4.8 This compartment also offers opportunities for habitat restoration. The re-creation of lowland heathland (UK BAP habitat) here would be a valuable contribution to biodiversity in the local area, the potential for which is indicated by its sandy soil types and past use for growing forage maize, and by the historical habitats shown on the OS 1st Edition County Series 1:10,560 map (Map 5).
- 4.9 Parts of the SANG, to which there is visual access, would have seasonally controlled recreational access. Access arrangements would be determined following a more detailed evaluation of the nature conservation interest and degree of flood risk. This includes land on the floodplain of the Frome, outside the designated SSSI, described in the Tithe Map (1846) as 'Cow Common' and 'Moor'.
- 4.10 The likely effectiveness of the SANG is examined in the following section, but it must be clear that the comments at IAGS para 2.68 need re-examination and qualification.

5.0 LIKELY EFFECTS OF THE WORGRET MANOR FARM PROPOSALS

5.1 A number of points should be borne firmly in mind in connection with the potential for SANG at Worgret Manor Farm:

- Potential Access to Worgret Heath SSSI/SPA;
- Demonstration of Avoidance of Effect on the SPA/SACs - the 'No Net Effect' argument;
- Comparison between effects of Development and SANG at Wool and Wareham, and;
- Implementability of the Plan.

Access to Worgret Heath SSSI

5.2 In relation to Worgret Heath, the nearest point of the SPA (Map 2), it should be noted that there is no access immediately from the SANG area to this part of the European Site. The Footprint data notes that there is very limited access to Worgret Heath by car, with only two possible car spaces. It is difficult to envisage any significant increase in car-borne recreation at Worgret.

5.3 There is a public footpath adjoining the extreme west end of the Ashvilla land, but it would be possible to either use this western end as seasonal SANG, or close the access from the Ashvilla land to the footpath, so that there would then be no public access to the path leading across the A352 to Worgret Heath during the Annex 1 bird breeding season, if that was thought necessary.

Avoidance of Effect and the 'No Net Effect' argument

5.4 Judicial Review of the Dilly Lane case at, Hart, Hants, confirmed a number of important principles regarding SANG:

- First, the High Court upheld the validity of the Secretary of State being able to rely on proposals agreed with Natural England as statutory adviser;
- Second, that suitable Avoidance measures might be relied on to demonstrate 'No Likely Significant Effect' and thus obviate the full procedures of the Habitats Regulations test of Adverse Effect on the site's integrity; and,
- Third, that it is the Net effect on the site that needs to be considered.

5.5 With respect to the third point, the Secretary of State, in determining the application had taken the view, which was in effect upheld by the High Court, that, when deciding the likelihood of significant effect of residential development on an SPA, the benefit of the SANG in drawing existing residents away from their use of the site should be taken in the balance, as well as the propensity for new residents to visit the SPA.

- 5.6 A correctly located SANG therefore has a double advantage, both in providing for new residents, and in drawing existing resident users of heaths away from the heaths, at least on some occasions.
- 5.7 It follows that, distance, accessibility, and site attractiveness, etc, being equal, the greater the number of existing residents in the catchment of the new SANG, the greater must be the effect in providing a new opportunity for them, and thus the greater the protection of the SPA.

Comparative implications of SANG at Wool or Wareham

- 5.8 The existing population figures set out in the Core Strategy-PSub, for settlements within south-east and central Purbeck, are as follows:

Wool – 2230;

Bovington – 1500;

Wareham – 5690;

Sandford – 2125.

Reference to **Map 4** shows that the existing residential dwellings, and thus potential recreational users of the nearby heaths, at Wool and Bovington would fall within the 5km catchment of SANG provided at Wool, whilst those at Wareham would not. Approximately 3,700 existing residents might be considered within the 5km catchment of a SANG at Wool.

On the other hand, a Frome Valley SANG at Worgret would include within its 5km catchment not only Wareham and Sandford, but also Wool, though not Bovington. Thus, around 10,000 existing residents live within the 5km catchment of the Frome Valley SANG at Worgret.

- 5.9 Postcodes can also be used as an indication of the likely number of residential dwellings and consequently potential recreational users falling within respective catchments of SANG schemes. **Map 4** shows that 504 postcodes fall within the 5km catchment of the Frome Valley SANG, whilst only 290 postcodes fall within a notional 5km catchment of Wool.
- 5.10 Using either the Core Strategy population figures for settlements within the respective SANG catchments, or the number of postcodes, it is clear that a far greater number of existing residential dwellings and potential recreational users are within driving distance of the Frome Valley SANG than would be the case for Wool.
- 5.11 Given the proximity of the Frome Valley SANG to Wareham town, this difference is likely to be greater for people travelling on foot to the SANG. Foot access is particularly important for people with dogs.
- 5.12 Therefore the SANG provided at Worgret Manor will have a greater potential to lower the existing baseline of recreational pressure on nearby heathland sites and would

therefore be more successful in securing a No Net Effect solution to Avoidance of Effect on the SPA/SAC.

- 5.13 Visitor and resident surveys would need to be undertaken to determine the site-specific pattern of recreational access to heathland sites and other green spaces in the vicinity of Wareham, to ensure the attractiveness and ultimately the efficacy of the SANG in securing complete Avoidance of Effect as described above.

Implementation of the Plan

- 5.14 The Core strategy appears to accept that its provisions cannot be implemented without a SANG in the Worgret area. Ashvilla Estates are thus able, subject to the usual agreements, to further the aims of the Core Strategy.
- 5.15 It is also noted in the Core Strategy that it is difficult to be specific as to potential SANG sites, because to do so would prejudice implementation by creating ransoms. If the Worgret SANG site is indeed the only or principal opportunity for SANG in the area west of Wareham, there must be clear planning advantages in including it in the Core Strategy, which, as is noted by Footprint, is a requirement of the Habitats Regulations Assessment of the Core Strategy.

The appropriate level of growth at Wareham

- 5.16 Wareham is the geographical centre of Purbeck District, and has been consistently identified in the Core Strategy drafts as its service centre, with a presumption that this status will be maintained. This in itself requires a significant degree of development, as the catchment required to maintain the economic health of any service increases over time.
- 5.17 The Core Strategy consultation has suggested that the public's preference is for a dispersed development strategy. The result of the District Council pursuing that option is that the development at Wareham should be restricted to around 200 dwellings at Worgret Rd, whereas up to 900 dwellings will be allowed around Swanage.
- 5.18 Given that a SANG is essential at Worgret Manor Farm, and that such a SANG is easily implemented and has ample capacity for a much greater level of growth, there may be strategic planning advantages in reverting to development scenario that envisages the maintenance of Wareham as a service centre, rather than

6.0 CONCLUSIONS

A number of conclusions can be drawn from the research undertaken and the resulting points raised in this Representation:

1. Up to 90 ha of land, of highly suitable quality to create a SANG, is available on Ashvilla land west of Wareham.
2. The Ashvilla land is the only significant SANG opportunity close to Wareham.
3. A SANG immediately west of Wareham is required in any event to be included in the plan in order to make the Core Strategy implementable and sound.
4. The Habitats Regulations Assessments of the Core Strategy and the Options for Additional Growth recognise the scale of the SANG requirement, but do not appear to have properly examined the potential of a Frome Valley SANG.
5. The HRAs assess the future increase in recreation pressure on the Dorset heaths without mitigation. This is an inappropriate basis for advising on the distribution of future development, because any such effects are required to be Avoided if the Plan is to be sound.
6. A Frome Valley SANG could deliver many of the elements of a Country Park, including up to 12km of paths, cycleway and bridleways, car parks, viewpoint and picnic site, railway halt, restoration of arable and improved pasture to semi-natural vegetation, etc.
7. The 'dispersed' growth option adopted in the Core Strategy in fact places the majority of new dwellings up to 2026 in the Swanage area. The Plan should provide for substantial growth at Wareham, as the service centre of Purbeck.
8. The Ashvilla land is well located to accommodate future growth and could incorporate a SANG that would have capacity to secure Avoidance of Effects for a much higher level of growth than is in fact sought.
9. Whatever level of development is selected at Wareham, a Frome Valley SANG would have a much larger catchment of existing residents, around 10,000, than would be the case with a SANG at Wool, and would have advantages in reducing pressure on the heaths.

EPR Ltd, December 2010

Appendix 1: Photographs Referred to in the Text (as shown in Map 6)



Photo 1: View looking towards the Purbeck Ridge across a large area of open grassland.



Photo 2: Views across the Frome Valley.



Photo 3: Area of open grassland looking towards the Swanage Railway cutting.



Photo 4: The Swanage Railway passing through a gorse scrub lined cutting.



Photo 5: Large open field south of the Mainline Railway, looking towards the knoll adjacent to Dorchester Road (A352).



Photo 6: South-facing Bracken slope adjacent to the Swanage Railway.



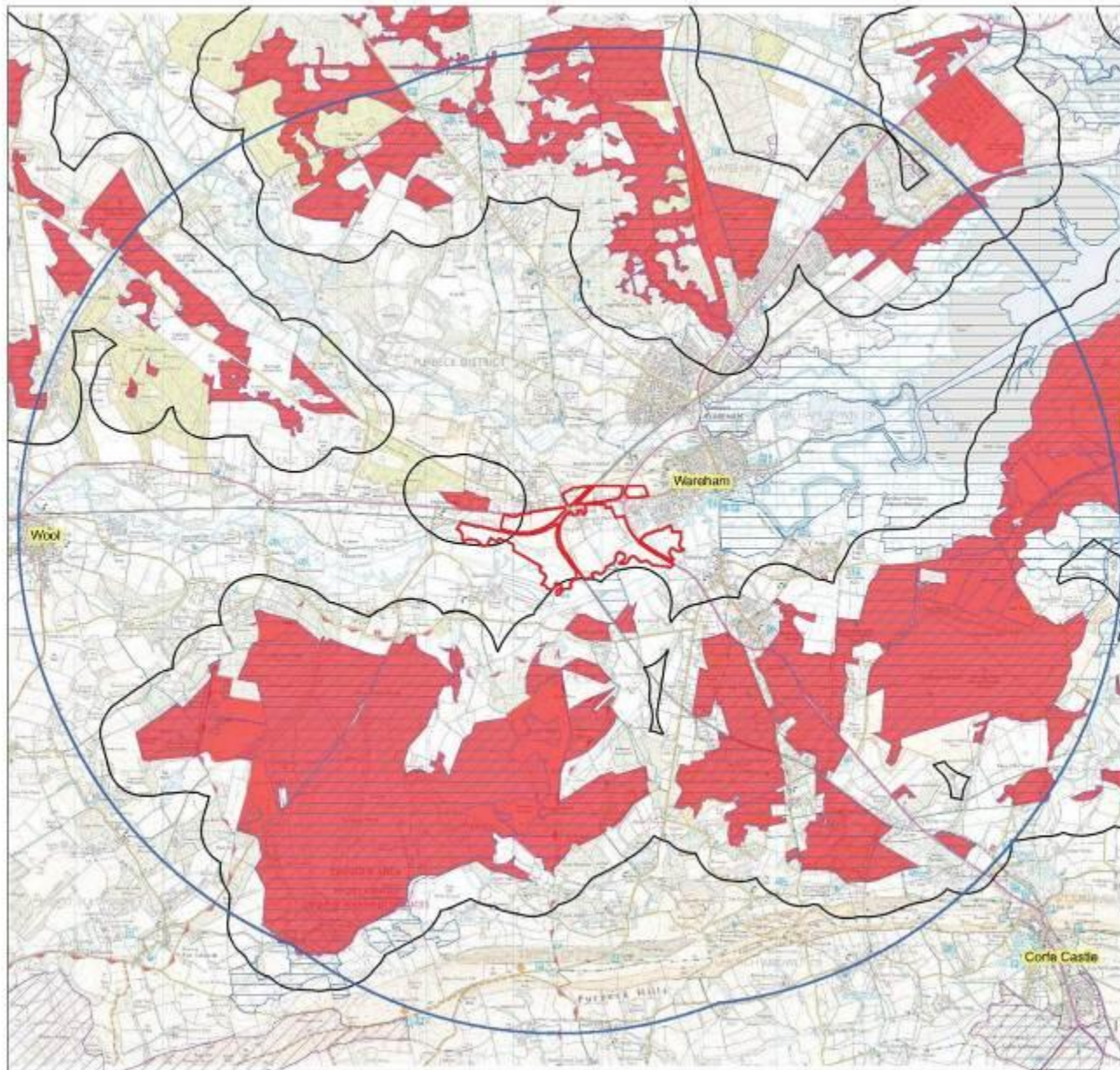
Photo 7: Views from the top of the Bracken slope across the Frome Valley.



Photo 8: Views from the top of the Bracken slope across the Frome Valley & Purbeck Ridge.



Photo 9: View looking towards the Purbeck Ridge and across the Frome Valley from the top of the knoll south of Dorchester Road (A352).



MAP 1 Site Location & International Nature Conservation Designations

KEY

-  Site boundary
-  5km linear distance from site boundary
-  Special Protection Area (SPA)¹
-  400m linear distance from SPA boundary
-  Special Area of Conservation (SAC)²
-  Ramsar site³

¹ Dorset Heathlands SPA

² Dorset Heaths SAC; Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC

³ Dorset Heathlands Ramsar site; Poole Harbour Ramsar site

SCALE: 1:43,000 at A3

0 500 1,000 1,500 2,000 2,500 Metres



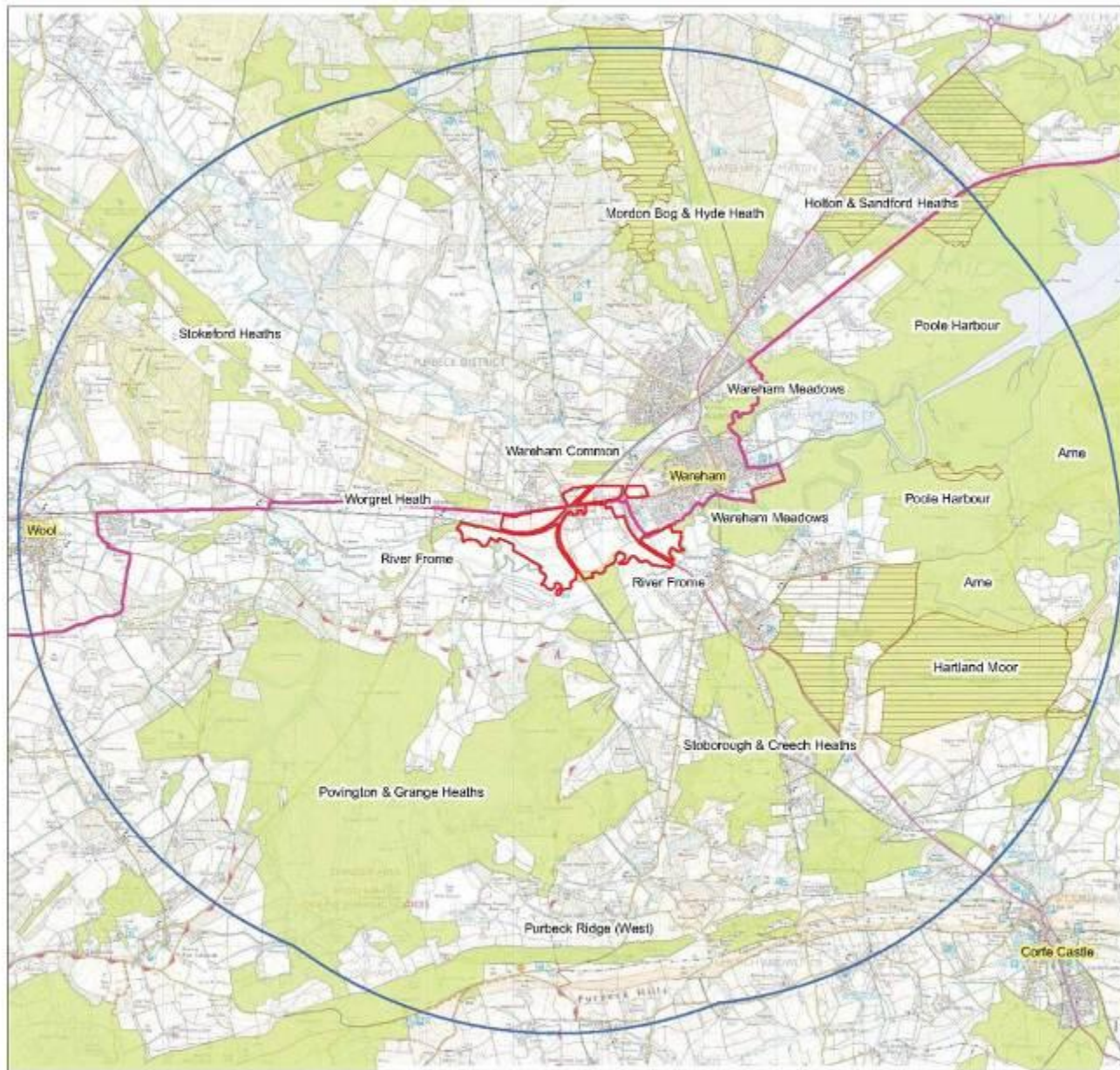

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PROJECT: Wargret Manor Farm

DATE: December 2010

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MAP 2 Site Location & National Nature Conservation Designations

KEY

- Site boundary
- 5km linear distances from site boundary
- Site of Special Scientific Interest (SSSI)
- National Nature Reserve (NNR)
- Dorset Area of Outstanding Natural Beauty (AONB)

SCALE: 1:43,000 at A3

0 500 1,000 1,500 2,000 2,500 Metres

N



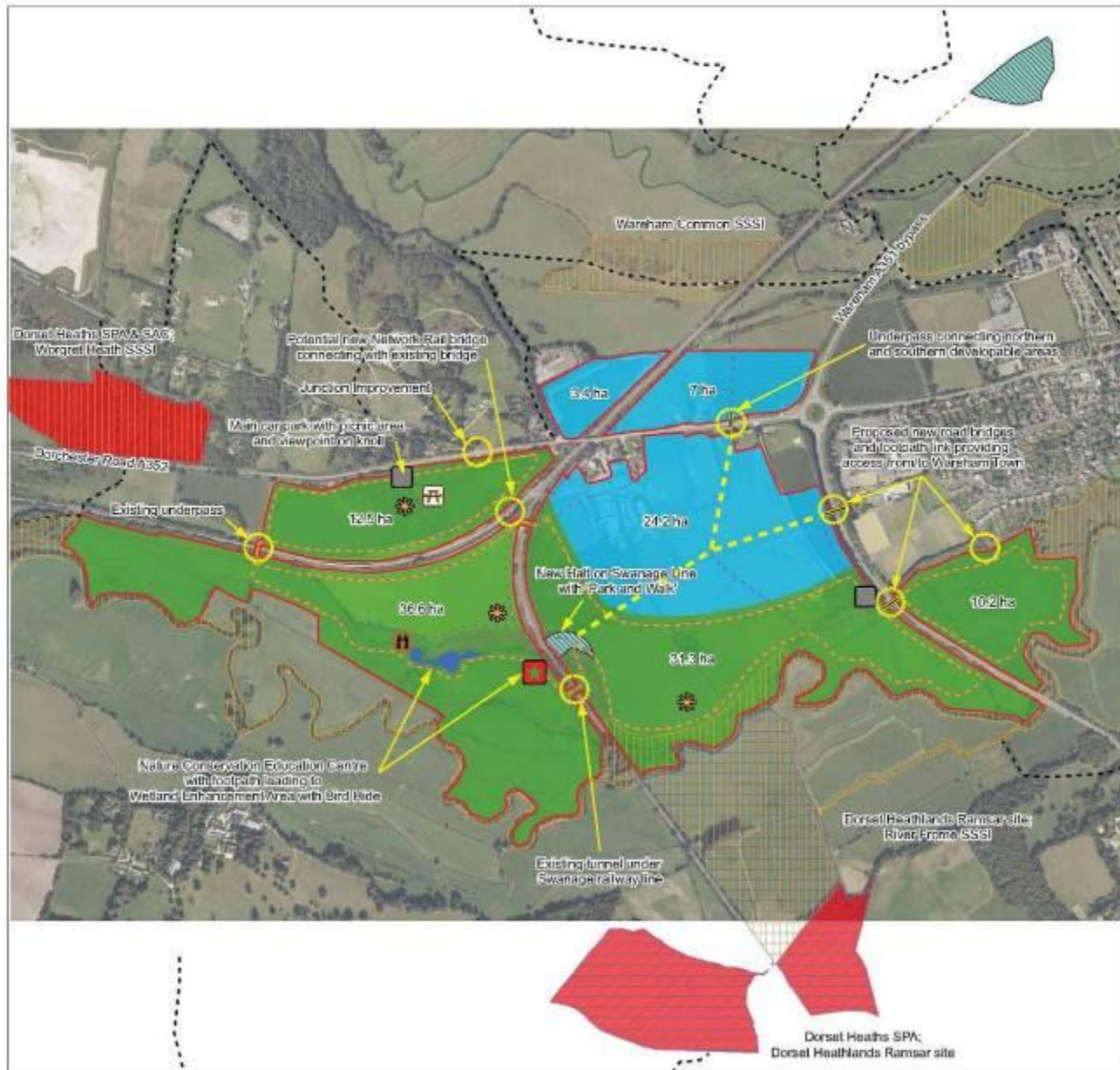
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DATE: December 2010

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MAP 3 Potential Frome Valley SANG Layout

KEY

Existing features

- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Ramsar site
- Site of Special Scientific Interest (SSSI)
- Site of Nature Conservation Importance (SNCI)
- Public Right Of Way (PROW)


Proposed features

- Site boundary
- Developable area (34.6 ha)
- Suitable Alternative Natural Greenspace (SANG: 90.6 ha)
- Footpath/cyclepath/bridleway*
- Footpath with seasonally controlled access*
- SANG circular walk (7.5 km)
- Car park
- Viewpoint
- Picnic area
- Nature Conservation Education Centre
- Bird Hide
- Park and Walk/Park and Ride
- Road bridge/underpass
- Road link

* Total proposed footpath length 12.5 km

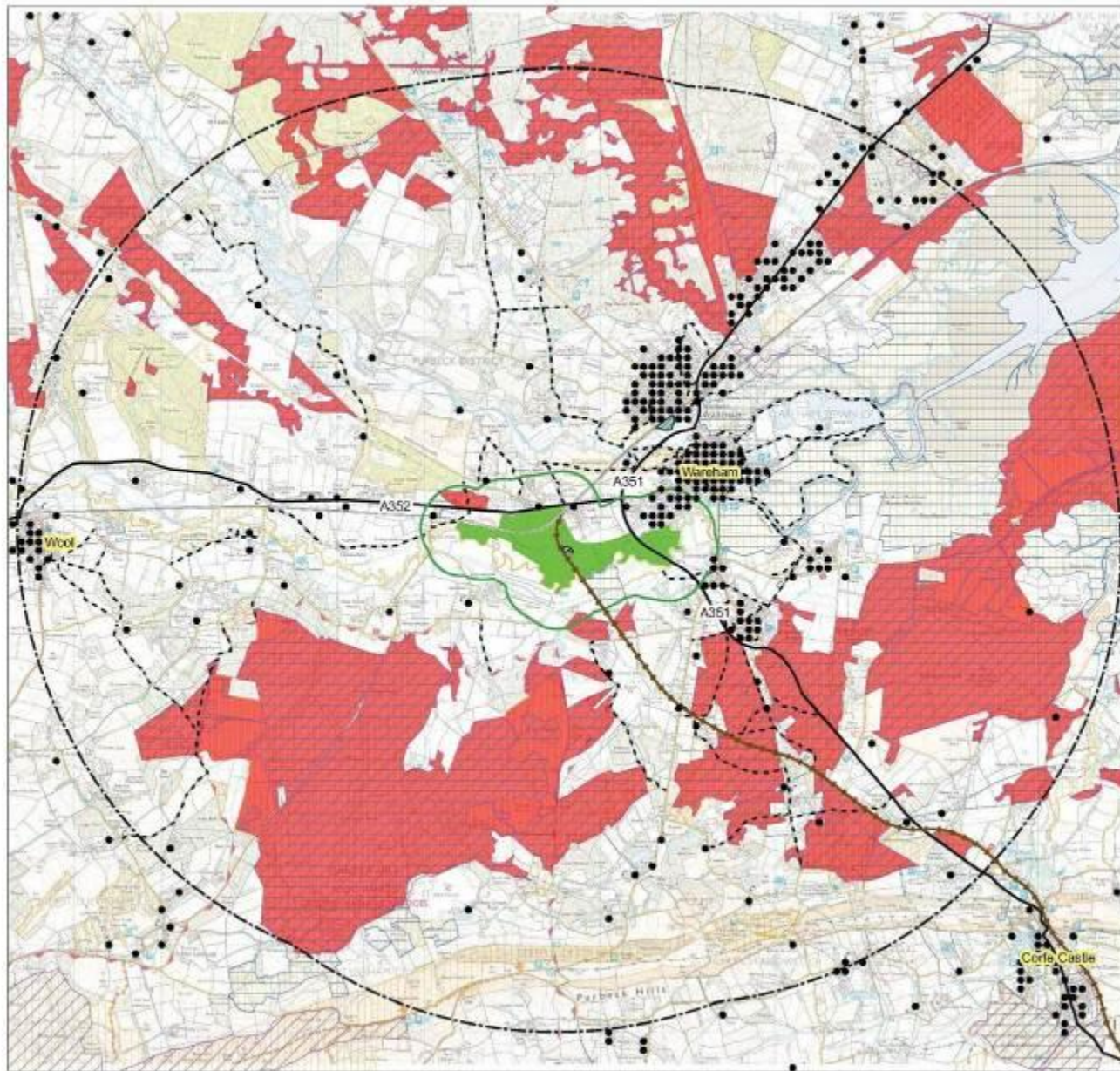
SCALE: 1:5,000 at A3

0 100 200 300 400 500 Metres


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DATE: December 2010

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MAP 4 SANG Visitor Catchments & Access Opportunities


KEY

- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Ramsar site
- Site of Special Scientific Interest (SSSI)
- SANG (90.6 ha)
- 400m linear walking catchment from SANG
- 5km linear driving catchment from SANG
- Postcode points (N = 504 within 5km distance band, residential & business)
- Major A roads A351 & A352
- Public Right Of Way (PROW)
- Swenage Railway
- Potential new Halt with Park and Walk scheme at Frome Valley SANG, proposed Park and Ride at Northport

SCALE: 1:43,000 at A3

0 500 1,000 1,500 2,000 2,500 Metres

N



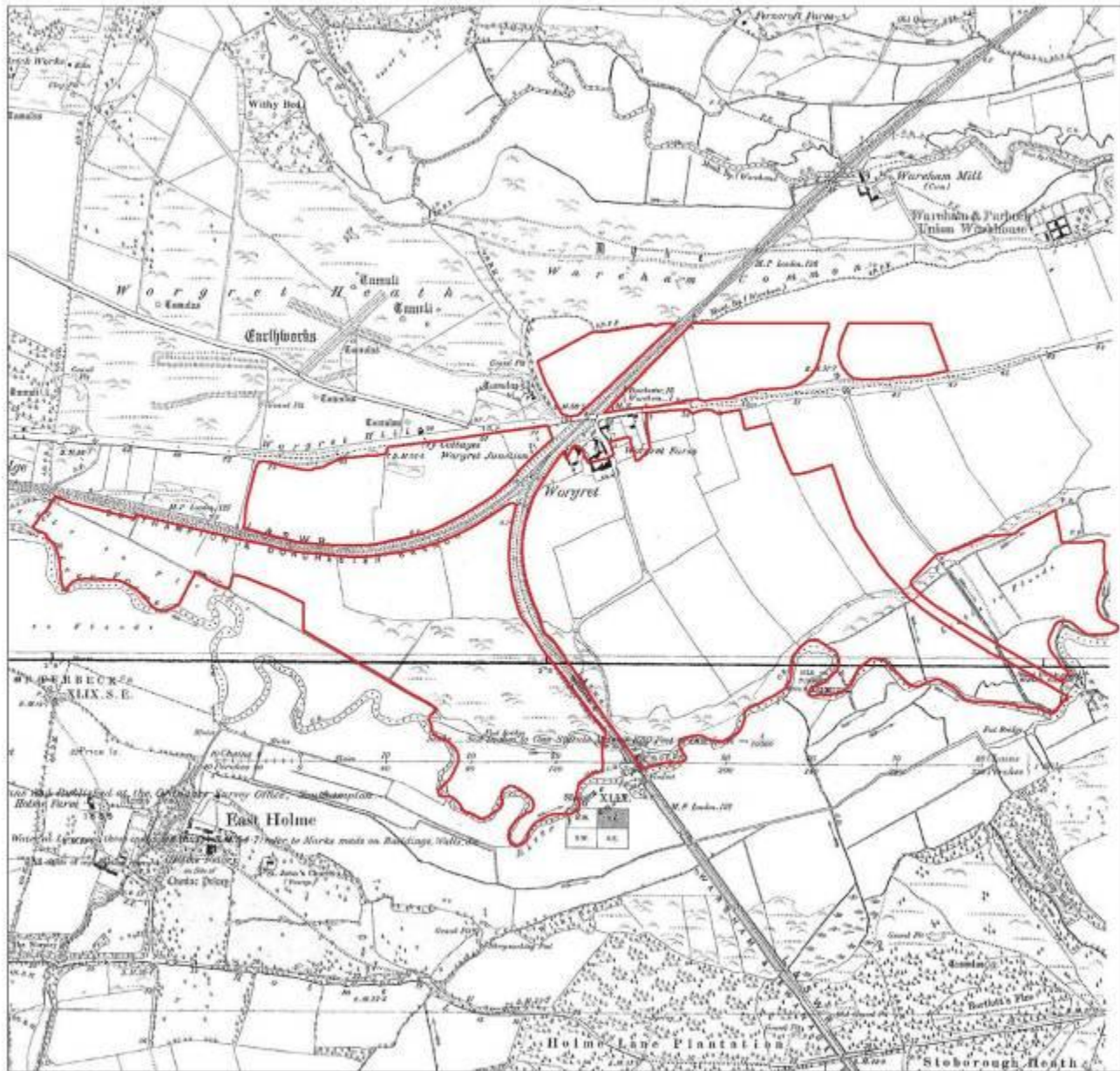
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DATE: December 2010

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MAP 5 Ordnance Survey County Series
1:10560 Map, Surveyed 1867

KEY
 Site boundary

SCALE: 1:5,000 of A3




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DATE: December 2010

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MAP 6 Locations of Photographs Referred to in the Text

KEY
 Direction that photograph was taken

SCALE: 1:5,000 at A3
 



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 DATE: December 2010

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