

## **Biodiversity and geodiversity (BIO, DH, PH)**

*11.1 How can it be certain that the proposed heathland mitigation measures (primarily the SANGS) would be sufficient and could be satisfactorily provided, bearing in mind that their precise details about their form and means of implementation appear not to be known?*

Natural England has expressed concerns about this issue in our previous responses. In circumstances where an effective SANG, associated with a specified development in the Core Strategy, is required to meet Habitats Regulations requirements there is a danger that, if this cannot be delivered at application stage or there is significant doubt about its effectiveness, then housing allocations on which the Plan depends would not be deliverable. Natural England therefore welcomes the statements of common ground that have been prepared by the District Council and are of the view that these go some way towards removing the uncertainty in this regard.

But in order that the competent authority can ascertain that there is no adverse impact on the integrity of the European sites we would advise that further policy restrictions that secure the necessary mitigation in the form of effective SANGS need to be introduced. These need to be specific to the particular housing allocations so they should be part of the area policies in chapter 7, and within the policy rather than the text. The current wording eg '*New open space to mitigate impacts on nearby heathland*' is too general.

We have considered changes that the District Council is proposing to address this point and are of the view that they are sound.

For SANGS that are not associated with particular individual developments (strategic SANGS) and funded through the IPF, SPD or heathland DPD, the location and form of SANGS are not known but nevertheless there is a clear mechanism for their implementation.

*11.2 What is the role of the Joint Dorset Heathland DPD and should there be greater reference to it?*

Natural England sees the primary role of the heathland DPD is to put the interim measures now implemented through the IPF onto a sound long-term footing. We support the strategic approach across SE Dorset and the joint working because we believe it aids delivery and promotes consistency. We would expect the DPD to facilitate the provision of strategic SANGS and make appropriate links between the European sites where increase in pressure is predicted and the location of strategic SANGS together with other mitigation measures.

*11.3 Should a risk-based approach be taken towards non SPA habitats used by species listed in Annex 1 of the EC Birds Directive?*

Natural England has advocated such a risk based approach, although not to all areas used by Annex 1 birds. Rather, we have advised that it should be applied to areas that support a sufficiently large population (>1% of the national population) of Annex 1 birds that there remains the possibility that they could become part of the SPA network. In Purbeck this applies to areas of mixed coniferous plantation and heath that, together with other similar areas in other parts of the wider Dorset heathland area, support some 5% of the national population of nightjar and 1-2% of woodlark. Natural England supports the minor amendment proposed by the District Council in response to our representation. We note that under paragraph 118 of the NPPF, potential SPAs should be given the same protection as European sites.

*11.4 Is it sufficiently clear that developers should only provide mitigation to meet the demands arising from their development?*

For a SANG to function so that there is no net increase in recreational pressure on European sites, it cannot only cater for the development itself; some of the existing recreational use on the European heathland sites must also be diverted on to the SANG. This is because it is inconceivable that a SANG will be so attractive that residents of new houses never visit the designated heathlands. Of course the more effective a SANG is in catering for new residents the less needs to be the component of existing use that it attracts. This point regarding SANG use is key element of the SANG strategy.