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Purbeck District Council: Core Strategy  
Examination in Public  
Submission on behalf of ZBV (Winfrith) Ltd

Reference: 4953

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**Matter 11: Biodiversity and Geodiversity (Policies BIO, DH and 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 precise details about their form and means of implementation appear not to be known?**

11.1.1 It is considered that the current proposals for heathland mitigation (including SANGs) within the Core Strategy are uncertain and do not provide sufficient detail to ensure that adequate mitigation will be brought forward in line with housing growth. This applies to the proposed allocated housing sites within the Submission Draft Core Strategy, the housing proposed to be delivered on windfall or other unallocated sites (i.e. smaller sites within a widely distributed area) and in terms of the overall required housing growth (which ZBV (Winfrith) consider is currently not planned for in the Submission Draft Core Strategy, refer to Matter 4).

11.1.2 Generally it is considered that the Core Strategy is unclear in relation to the size and design criteria for heathland mitigation and SANGs, and as to how these SANGs proposals would be delivered. In this regard it is considered that there is an overreliance on the Joint Dorset Heathlands DPD, which is currently at Issues and Options Stage (and seemingly the preparation of this DPD has not progressed significantly since 2007) (refer to section 11.2 below in relation to reliance on the DPD).

11.1.3 It is considered that the level of detail provided within the Core Strategy polices in relation to the heathland mitigation and SANGs is unclear and should be strengthened to include: the area of land required, and a site specific allocation which the Council is certain can be brought forward, as

well as the design objectives and criteria required to be achieved for each SANGs sites.

11.1.4 The Core Strategy includes housing site allocations capable of delivering a total of 570 dwellings through settlement extensions across the District. These settlement extensions are proposed at Wareham, Lytchett Matravers, Upton and Swanage (with military housing proposed at Bovington) and represent only 30% of the Council's housing needs targets (2,400 homes) and 15% of the Government's 4,000 housing forecast – thus indicating a reliance on the delivery of a number of smaller-scale (infill) and windfill housing developments.

11.1.5 The 2011 Proposed Changes to the Submission Draft Core Strategy includes indicative allocations for a SANGs sites at only three of the six proposed allocations for housing sites. It is considered that SANGs should be brought forward within the Core Strategy for each proposed allocated housing site to demonstrate that this mitigation can be delivered and therefore additional SANGs proposals should be allocated for Bere Regis, Bovington (military housing only with SANGs to be provided on the MOD landholdings), and Swanage.

11.1.6 The Core Strategy seeks to deliver 50 homes at Bere Regis. The Habitats Regulations Assessment (HRA) of the Core Strategy suggest that a SANGs site should be provided between Bere Regis and Lytchett Matravers, which will be brought forward as part of the Joint Dorset Heaths DPD (however no site is currently allocated) and the HRA states that mitigation in this location could provide opportunities for dog walking and recreation for both settlements. Section 7.1.8 of the Core Strategy states '*Alternatively where suitable mitigation for individual development sites cannot be secured contribution from all housing development will be used to implement mitigation measures*'. This would indicate that there is uncertainty on whether a suitable SANGs site can be brought forward in this location. It is therefore considered that the Core Strategy does not clearly demonstrate that appropriate mitigation can be provided for this allocation.

- 11.1.7 Swanage is proposed for 200 homes, however as stated above, no housing site allocation is provided with the Core Strategy. The HRA states that 15ha of SANGs is required for this allocation; however no SANGs sites are put forward at this stage. The Core Strategy states that the Joint Dorset Heaths DPD will consider the provision of SANGs. It is considered that the Core Strategy does not clearly demonstrate that appropriate mitigation can be provided for this allocation.
- 11.1.8 With regard to the SANGs proposals, these are shown on the Core Strategy proposals maps for Wareham, Upton and Lytchett Matravers. However, as stated above (paragraph 11.1.3) it is considered that further detail should be provided in the Core Strategy on these SANGs allocations. It is also noted that there is uncertainty in relation to the SANGs provision at Wareham.
- 11.1.9 Worgret Road, Wareham (Map 9 of the Core Strategy) includes an allocation of 200 dwellings and the supporting policy states that new open space is required to mitigate potential impacts upon nearby heathland (as well as contributions for open space/recreation provision) and improvements to walking, cycling and public transport access to the site. However, the 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'*. Currently two options for SANGs have been put forward.
- 11.1.10 Furthermore, the HRA report states that: *'This allocation presented the biggest potential concerns with regard to possible recreational impacts. The HRA recommends that near Wareham to the west or north-west of the town, drawing residents away from sensitive locations within Wareham Forest and Hartland / Stoborough / Arne. Given the attractiveness and scale of Wareham Forest and the heaths to the east of Wareham this will need to be sufficiently large and attractive site to be at all effective. There may be potential to enhance Binnegar Common and some of the areas within the Piddle Valley, but further work is necessary to assess the potential of these sites, particularly in comparison to Wareham Forest and Hartland. 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)'. It is therefore considered that there is uncertainty on the delivery of the mitigation measures for the allocation at Wareham and that the Core Strategy should provide further details on the required mitigation, including an allocation of a SANGs site which the Council is certain can be delivered.*

11.1.11 Further, we note that the indicative Wareham SANGs areas are some distance from the proposed strategic housing allocations (c.1.4 - 2.3km to the south / south east of the housing allocation) and within the 400m buffer area of the designated heathlands. It is also noted that Council's own HRA states that the provision of SANGs within the 400m heathland buffer area could actually result in impacts on designated heathlands. It is unclear why these proposed SANGs locations have been deemed appropriate for inclusion within the Core Strategy. It is considered that further assessment / details are required to be brought forward as part of the Core Strategy to demonstrate that these mitigation measures can be delivered to support the proposed housing allocation.

11.1.12 Swanage and Wareham provide the largest housing allocations within the Core Strategy, with 200 proposed on each (providing 400 of the 570 homes supported by housing allocations sites in the Core Strategy). Neither of these sites provides certainty on the SANGs proposals and therefore it is unclear how it can be demonstrated that the required mitigation measures can be delivered. It is considered that further assessment / details are required to be brought forward as part of the Core Strategy to demonstrate that these mitigation measures can be delivered at these two sites.

11.1.13 The HRA for the Submission draft Core Strategy states that: *'The characteristics of the heaths (large attractive sites with views) and spatial distribution of development in Purbeck (scattered across a number of settlements), indicate that SANGS provisions needs to be delivered by a small number of well located, large sites, each sufficient to 'compete' with the heaths. The Core Strategy may not be able to cite particular candidate SANGs owing to the possibility of ransom demands for private land, however there is a need, on the basis of reasonable evidence, to make sure that*

*sufficient appropriate land will be likely to be available*'. The HRA for the Submission Draft Core Strategy also states that: *'As a result of the appropriate assessment work, the assessment team highlighted the following as requiring further work: SANGs provision around Wareham, Swanage and Wool*'. It is considered that this work should be undertaken to support the Core Strategy to overcome the uncertainty of mitigation at these locations.

11.1.14 As set out in Matter 4, of the current housing target within the Core Strategy, only a small proportion have been provided for in the proposed allocated strategic housing sites and ZBV considers that there is an over the reliance on windfall / infill sites or unallocated smaller sites for the delivery of housing within the Core Strategy (approximately 1,070 units). It is unclear what mitigation measures are specifically proposed to be brought forward to support this level of housing on windfall / infill or smaller unallocated sites.

11.1.15 Further, smaller windfall or unallocated sites are unlikely to support the provision of on-site SANGs. Whilst contributions could currently be sort through the Dorset Heaths Interim Planning Framework (IPF) (planned to be superseded by the Joint Dorset Heaths SPD, once adopted), it is unclear what mitigation proposals this funding would support in respects of such dispersed impacts from windfall / infill or unallocated sites. At present the draft SPD only includes for one new project in Purbeck being a fire management strategy. It is acknowledged that the Joint Dorset Heaths DPD (which is currently only at Issues and Options stage) is planned to set out the long-term mitigation strategy to ensure growth in South East Dorset can be accommodated, however at present this is not sufficiently progressed to provide supporting evidence for the Core Strategy.

11.1.16 In relation to employment allocations, the Core Strategy states that *'development at Holton Heath Industrial Estate and Admiralty Park has the potential to isolate an SSSI. As the land is single private ownership there is the opportunity to create, safeguard and enhance an ecological corridor, linking into larger areas of protected heathland. Therefore, further employment development at Holton Heath will be determined following ecological assessment work, which will feed in to subsequent master plans*

*and development briefs. These subsequent plans and briefs will ensure that the nature, scale and location of the development will be such as to enable the Council to ascertain that there will not be an adverse effect on the integrity of any protected site*'. There is therefore a reliance on subsequent plans in relation to required mitigation, and it is considered that there is currently uncertainty over the provision of mitigation measures required to support further employment growth, and that further assessment / details are required in relation to Holton Heath.

11.1.17 As set out at Matter 1 and 4, it is ZBV (Winfrith)'s considered view that the current housing target within the Core Strategy does not meet anticipated demands in terms of need, does not proactively plan for required growth, and does not meet the 5 year supply contingency, both in term of overall housing numbers and the housing trajectory. It is therefore considered that the Core Strategy should provide sufficient proactive planning for mitigation for the required future housing growth for the District. It is ZBV (Winfrith)'s view that further housing sites, along with appropriate mitigation, should be brought forward within the Core Strategy.

11.1.18 The Core Strategy states that: *'It is important that the timing of the mitigation measures coincide with the delivery of housing, and that or ideally mitigation is put in place before the occupation of new housing development*'. In the absence of strengthened Core Strategy policies and the Join Dorset Heaths DPD it is unclear how will be achieved. Furthermore, it is considered that if suitable mitigation is not currently identified in the Core Strategy (as is the case for Bere Regis, Bovington, Wareham and Swanage), this could delay or prevent these housing sites coming forward. Additionally, as set out in Matter 4 and item 1.13 above, ZBV (Winfrith) consider that the Core Strategy does not currently plan for required housing growth and therefore additional mitigation should be earmarked in the Core Strategy to support higher growth scenarios, to build in contingency to housing delivery and to ensure that such mitigation requirements could be delivered in advance of housing development.

- 11.1.19 The Council's 'Implications of Further Growth' cautiously suggests that suitable mitigation for c.1,000 homes in and around Wool could be achieved, however further assessment is required. It is unclear why a site in or around Wool was not taken forward in the Core Strategy when other sites with uncertainty of heathland mitigation have been included. Further, it is unclear why the required additional assessment / work was not undertaken to fully consider options for housing and mitigation in this location.
- 11.1.20 The Dorset Green Masterplan site can deliver c.700 homes plus appropriate SANGs proposals and is therefore a reasonable alternative which should have been considered by the Council in more detail during the plan-making / preparation and prior to the submission of the Core Strategy. Refer to Matter R15 for further details on the Masterplan and SANGs proposals, and Matter 1 in respects of alternatives.
- 11.1.21 ZBV (Winfrith) consider that housing and suitable SANGs proposals can be achieved at the Dorset Green Masterplan site. ZBV (Winfrith)'s land ownership in the area is c.95ha, and therefore the SANGs proposals are deliverable. The SANGs proposals for Dorset Green Masterplan have recently been reviewed, (with the SANGs included within the main site and Heathland Support areas provided on ZBV (Winfrith) land holdings to the west and south), in consultation with Natural England, Dorset Wildlife Trust and RSBP (refer to Matter 15 for further details on the Masterplan and SANGs proposals). ZBV (Winfrith) considered that the revised proposals provide adequate mitigation for the proposed c.700 dwellings and is therefore this reasonable alternative which should be considered further at this stage of the Core Strategy. It is therefore the view of ZBV (Winfrith) that a housing allocation at Dorset Green, along with suitable SANGs mitigation should be included in the Core Strategy.

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

- 11.2.1 The Core Strategy makes reference to the Joint Heathlands DPD stating it will be adopted in 2012. However, since the Issues and Options stage in 2007, no further drafts or consultation have been made publically available. As such,

without an indication of the future status of this document, the emerging Dorset Heathland Planning Framework 2012 – 2014 Supplementary Planning Document (SPD) is the only document which sets out details of proposed Dorset Heaths mitigation. However, the Consultation Draft SPD does not appear to adequately provide details of mitigation to offset the effects of proposed housing allocations or that proposed on smaller infill or windfall sites on designated heathlands.

11.2.2 Further, as it is considered by ZBV (Winfrith) that the current housing numbers do not adequately plan for growth over the plan period and do not demonstrate a required 5 year supply, with adequate contingency (refer to Matter 4). On this basis it is therefore considered that the proposed mitigation measures set out in the Joint Dorset Heaths SPD is insufficient to plan for appropriate mitigation measures to support required growth.

11.2.3 Additionally, it is considered that the Core Strategy relies too heavily on these subsequent plans (refer to Matter 1.3) and that the Core Strategy should encompass further detailed policies in relation to required mitigation measures (refer to paragraph 11.1.1 above) to support housing allocations and windfall sites.

### **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?**

11.3.1 It is not considered that a risk based approach is required for non-SPA habitats used by Annex 1 EC Bird species. In accordance with planning policy and legislative requirements, adequate and reasonable survey work would be required for any planning application and, should Annex 1 bird species as listed in the EC Birds Directive be recorded on a non-SPA site proposed for development, suitable mitigation as well as enhancement measures would be required to ensure the prevent harm and maintain favourable conservation status of the species. HRA screening should be prepared to support any planning applications of such sites, leading to full HRA assessment if required. Therefore, it is considered that protection to such non-SPA habitats and sites used by Annex 1 bird species can be adequately address through planning policy and legislation.



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

- 11.4.1 This should be clarified in the Core Strategy policies and the associated HRA. Further, it is unclear how the requirement for contributions (through the IPF, Joint Heathlands SPD or DPD) would be applied to development proposals which bring forward SANGs or other mitigation.