

# Purbeck Local Plan Review 2019

## Matter F: Environment

### Further Representations

Wednesday 7 August 9.30am

	<b>Consultee ID</b>	<b>Name/Organisation</b>
1	1188067	Welbeck Land
2	1189887	Ms Clare Lees
3	1187112	Wool Flora & Fauna Group
4	1185234	Mrs Rachel Palmer
5	1192344	Trees for Dorset
6	1190865	Dr Anthony Warne
7	1190693	Lulworth Estate, Redwood Partnership, Mr A Jackson
8	996330	Nuclear Decommissioning Authority
9	1186743	Natural England

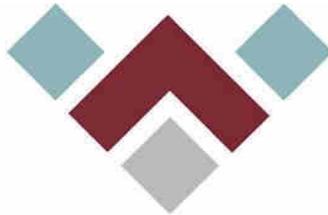
**PURBECK LOCAL PLAN 2018 - 2034**

**EXAMINATION IN PUBLIC**

**RESPONSE TO MATTER F: ENVIRONMENT**

**ON BEHALF OF WELBECK LAND**

**JUNE 2019**



**WELBECK LAND**

**Carter Jonas**



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## 1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter F: Environment
- Issue 1: Environment Policies
  - Question: 7

This statement should be read in combination with the Welbeck responses to the inspector’s others Matters.

## 2.0 INSPECTOR'S MATTER F: ENVIRONMENT

**Issue 1: Environment Policies (Policy E1, Policy E2, Policy E3, Policy E4, Policy E5, Policy E6, Policy E7, Policy E8, Policy E9, Policy E10, Policy E11 and Policy E12)**

**Q7. Are policies E7 (Conservation of protected species), E8 (Dorset heathlands), E9 (Poole Harbour) and E10 (Biodiversity and geodiversity) justified, effective, consistent with national policy and where relevant compliant with the requirements of the Habitats Regulations?**

- 2.1 Welbeck considers that policies E7, E8, E9 and E10 are sound insofar as the supporting evidence identifies potential negative effects on species and habitats and these policies seek to conserve and enhance that which is important to each location.
- 2.2 Both the Local Plan and Wareham Neighbourhood Plan (NP) are supported by Habitats Regulations Assessments (HRA). The Local Plan strategic identification for around 300 new dwellings in Wareham (200 considered in the HRA) and the Neighbourhood Plan site allocations both produce the conclusion that a SANG is required. The SANG is necessary to protect the nearby European and International Nature Conservation Sites from the impact of increased recreational and urban pressures likely to result from development of sites in the NP potentially 180 dwellings in total.
- 2.3 Welbeck considers that the need for a SANG and its delivery is a strategic matter, as it is necessary strategic mitigation for growth identified in the Local Plan. Therefore the allocation of the SANG should be explicitly made in the Local Plan. An additional modification to **Policy E8** would be helpful to the clarity of the Plan if the allocations and their SANGs are listed here, drawn from other site specific policies in the Plan.
- 2.4 In support of a strategic policy the Dorset Heathlands Planning Framework 2015-2020 SPD sets out policy and quality standard guidelines for the provision of SANG. To ensure that this SPD continue to be properly supplemental to the parent policy document it will need a strategic policy to amplify, and Welbeck respectfully suggests that a modestly modified policy E8 (as set out above) would be ideal.
- 2.5 Moreover to the strategic need for a policy direction before the NP can provide additional detail, given that Green Belt release is fundamental SANG (and housing) strategies of the Local Plan and Wareham NP, and that the submitted NP is unable to release such sites or provide assurances over their delivery, the NP should be paused. This pause should be until such time as the Purbeck Local Plan has been adopted and which will provide the strategic direction required for an informed NP.
- 2.6 The provision of a SANG is a complex and expensive matter and insufficient evidence is currently available as to the ability of proposed NP allocations (H5 and H6) to make significant financial contributions towards its delivery. The entirety of the Wareham Neighbourhood Plan area is located within the 5km core recreational catchment for the Dorset Heaths European sites. As such all residential development required by the Local Plan and provided by the Neighbourhood Plan has the potential to result in an adverse effect on its integrity in combination.
- 2.7 The SANG proposed within the Local Plan at Morden Park Corner – by comparison to that in Wareham – is a simpler delivery task. The beneficiary of the holiday park is also the provider of the SANG, therefore the provision of the SANG is directly linked and viable. Whilst all parties are agreed that all sites that rely on a SANG would need

to make a payment towards the SANG there is no further information provided within the Wareham Neighbourhood Plan. Welbeck has concerns that other brownfield sites proposed to be allocated in the Neighbourhood Plan are not viable (or necessarily available) as matters stand and will not be able to make SANG contributions which demonstrably threatens the delivery of both housing and SANG.

- 2.8 For its part, regarding the SANG at Wareham, Welbeck has entered into a Statement of Common Ground with the Wareham Town Council, to demonstrate that it can be delivered.
- 2.9 Welbeck has worked closely with Natural England to consider potential options as to what land within Welbeck's control or that of the wider Estate may be suitable as a Habitat Improvement Plan area (HIP) or SANG. This has included considering the different potential capacities of the various options.
- 2.10 The output of the exercise has been to identify several potential mitigation strategies. The smallest being a HIP suitable for c40 dwellings and the largest being an enlarged SANG suitable for c180 dwellings. At this stage the delivery of any option has not been proven in terms of land assembly, appropriate land value, construction, and ongoing management.
- 2.11 Works to demonstrate the delivery of suitable mitigation are ongoing. At present Welbeck can only offer moderate to reasonable confidence in the ability to deliver a HIP suitable for c40 dwellings specifically to serve the 'Carey Road' (H4) allocation. It is recognised that the full delivery of 60 dwellings at H4 triggers the need for a SANG as will the proposed development of the other allocated sites at NP policies H5 and H6. The initial delivery of 40 dwellings at H4 can be achieved as to not compromise the eventual total delivery of 60 dwellings.

Post Green,  
Lytchett Minster,  
Poole,  
BH16 6AP

Helen Nolan  
Programme Officer  
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Westport House  
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Wareham BH20 4PP

[plp.programmeofficer@dorsetcouncil.gov.uk](mailto:plp.programmeofficer@dorsetcouncil.gov.uk)

May 20<sup>th</sup>, 2019.

Dear Ms Nolan

### **Lytchett Minster – Flood Risk Study**

On 5 March 2019 I met with the Purbeck District Council planning policy team to highlight updated evidence on flood risk in Lytchett Minster that had been prepared by Dorset County Council and which Dorset County Council had presented at a meeting in November 2018. I undertook at the meeting to write to confirm the conversation held (see attached email of 6 March 2019).

I also attach subsequent related email correspondence from Steve Boyt of Purbeck District Council (now Dorset Council) dated 6 March 2019, 14 March 2019, 9 April 2019 and 16 May 2019.

On the basis of the content of the 16 May 2019 I wish to alert the Inspector to this overall matter, and trust that the Inspector will accordingly be notified by planning policy officers on the findings of the review of evidence as soon as possible.

I have always believed and continue to believe that Lytchett Minster was ruled out of the Strategic Plan Housing Allocation as a result of a campaign led by local group LYMPWatch alleging flooding which was then backed by 'the Jacobs report'. I firmly believe that Lytchett Minster, were it not for false rumours of flooding, would have provided a much better location for strategic housing development than any of the other sites now offered. In short, I believe correcting this evidence is critical and goes to the heart of the quality of the Strategic Plan placed before the Inspector.

Yours sincerely

Clare Lees

cc Steve Boyt Purbeck District Council

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**From:** Clare Lees

**Sent:** 06 March 2019 13:36

**To:** Ken Bean <KenBean@purbeck-dc.gov.uk>

**Cc:** Steve Boyt <SteveBoyt@purbeck-dc.gov.uk>; Bridget Downton <BridgetDownton@purbeck-dc.gov.uk>; Oliver Chamberlain, Chichester; Max Thurgood, Clarke Bond; Andrew Elliott, Terence O'Rourke; Ron Hatchett, Bloor Homes>

**Subject:** Meeting yesterday with Ms Bellamy and Mr Bean.

Dear Mr Bean and Ms Bellamy,

Thank you for meeting with Max Thurgood, Director at Clarkebond, Oliver Chamberlain, land agent and me yesterday in your offices at Purbeck District Council. We asked for the meeting to bring to your attention a thorough and all encompassing study undertaken by Dorset County Council (as the Lead Local Flood Authority) and funded by the Environment Agency to investigate possible pluvial (surface water) flooding at Lytchett Minster (given that the EA has already concluded that there is no fluvial flooding present). This was a two year study and a report on the findings was presented to Max, Oliver and myself along with representatives from Lympwatch, the pressure group against development in Lytchett Minster, Bill Pipe, Purbeck District Councillor and Paul Johns, Flood Warden for Lytchett Minster and Upton Town Council, on the 23rd November, 2018. Sadly, despite a councillor from Purbeck District Council and the Flood Warden from Lytchett Minster and Upton Town Council being present at the presentation you appeared unaware of the findings of the study.

The submission documents to the Purbeck Local Plan Review contains an Environment Document, SD17 Strategic Flood Risk Assessment, which relies upon and references the Jacobs report entitled Lytchett Minster Flood Risk Study. This is a desk top study based on recorded evidence, and information supplied to them by some interested parties and by its own admission doesn't include any detailed modelling. In the light of the new and comprehensive surface water modelling study completed by DCC we believe it is incumbent upon you to withdraw the current conclusions in SD17 relating to Lytchett Minster and delete all reference to the Jacobs report. SD17 and the Jacobs report, in the light of the new DCC study, are both now inaccurate and misleading and SD17 requires updating to the latest evidence that is in the possession of DCC LLFA and public domain. You are under a duty not to knowingly present misleading information to the Inspector.

I look forward to hearing from you and hearing what action you propose to take to rectify this situation.

Yours sincerely,

Clare Lees.

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**From:** Steve Boyt <[SteveBoyt@purbeck-dc.gov.uk](mailto:SteveBoyt@purbeck-dc.gov.uk)>  
**Subject:** FW: Meeting yesterday with Ms Bellamy and Mr Bean.  
**Date:** 6 March 2019 15:44:25 GMT  
**To:** Clare Lees  
**Cc:** Ken Bean

Dear Ms Lees

Thank you for your e-mail, Mr Bean has asked me to prepare a response in his behalf. I have arranged to meet with colleagues at Dorset County Council to discuss the issues relating to flood risk around Lytchett Minster raised in your e-mail and during the meeting you had with colleagues on the 5<sup>th</sup> March. I will respond to the matters raised in your e-mail relating to the Council's Strategic Flood Risk assessment after the meeting with Dorset County Council (this is likely to be toward the end of next week [ending Friday 15<sup>th</sup> March] or early in the following week [beginning Monday 18<sup>th</sup> March]). If you have any further queries in the meantime please don't hesitate to call me on 01929557385.

Yours sincerely

Steve Boyt

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**From:** Steve Boyt <[SteveBoyt@purbeck-dc.gov.uk](mailto:SteveBoyt@purbeck-dc.gov.uk)>  
**Date:** 14 March 2019 at 08:20:26 GMT  
**To:** Clare Lees  
**Cc:** Ken Bean  
**Subject:** RE: Meeting yesterday with Ms Bellamy and Mr Bean.

Dear Ms Lees

My colleague and I met with officers at Dorset County Council yesterday to discuss flood risk around Lytchett Minster. I am expecting to receive some further information from the County Council – once I have received and analysed this information I will respond to the matters raised in your e-mail. I hope to complete my response next week, but I will keep you updated I anticipate a delay. If you have any questions relating to the issues that we have been discussing in the meantime please don't hesitate to give me a call on 01929557385.

Yours sincerely

Steve Boyt

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On 9 Apr 2019, at 15:55, Steve Boyt <[steve.boyt@dorsetcouncil.gov.uk](mailto:steve.boyt@dorsetcouncil.gov.uk)> wrote:

Dear Ms Lees,

I writing to provide you with an update on my response to your query. My colleagues and I are working on undertaking a comparison between the flood risk modelling carried out by the Lead Local Flood Authority (LLFA) and that presented in the Council's strategic flood risk assessment (SFRA). I expect this work to be completed in early May. When the analysis is completed the Council will be able to decide whether the: i) SFRA needs to be updated, and ii) Inspector examining the Purbeck Local Plan needs to be updated with the emerging evidence relating to flood risk in advance of the oral hearings. If you have any questions relating to this e-mail please don't hesitate to give me a call on 01929557385.

Yours sincerely

Steve Boyt

**Steve Boyt**  
**Planning Policy Officer**  
**Planning and Community Services**

**Dorset Council**

01929557385  
[dorsetcouncil.gov.uk](http://dorsetcouncil.gov.uk)

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**From:** Clare Lees  
**Sent:** 15 May 2019 11:54  
**To:** Steve Boyt <[SteveBoyt@purbeck-dc.gov.uk](mailto:SteveBoyt@purbeck-dc.gov.uk)>  
**Cc:** Frances Summers <[FrancesSummers@purbeck-dc.gov.uk](mailto:FrancesSummers@purbeck-dc.gov.uk)>; Anna Lee <[AnnaLee@purbeck-dc.gov.uk](mailto:AnnaLee@purbeck-dc.gov.uk)>; Oliver Chamberlain, Chichesters  
**Subject:** Re: Purbeck Local Plan Review 2019

Dear Mr Boyt,

I am wondering whether you have any update having seen the flood risk modelling carried out by the LLFA. I hope you will agree with me that the inspector needs to be informed of a substantial change in the assessment of flood risk in Lytchett Minster. At present SD 17 is misleading.

With best wishes,

Clare Lees.

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On 16 May 2019, at 15:29, Steve Boyt <[steve.boyt@dorsetcouncil.gov.uk](mailto:steve.boyt@dorsetcouncil.gov.uk)> wrote:

Dear Ms Lees,  
I am very sorry for the delay in response. Unfortunately I have not yet been able to complete the analysis on flood risk around Lytchett Minster – I expect the work to be completed in the last week of May (if necessary this will allow the Council to update the Inspector on this matter in course of responding to the matters, issues and questions that she has raised).

If you have any further queries relating to this e-mail please don't hesitate to call me on 01929557385.

Yours sincerely

**Steve Boyt**  
**Planning Policy Officer**  
**Planning and Community Services**

**Dorset Council**

01929557385  
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**From:** Clare Lees  
**Sent:** 16 May 2019 16:08  
**To:** Steve Boyt <[SteveBoyt@purbeck-dc.gov.uk](mailto:SteveBoyt@purbeck-dc.gov.uk)>  
**Cc:** Anna Lee <[AnnaLee@purbeck-dc.gov.uk](mailto:AnnaLee@purbeck-dc.gov.uk)>; Frances Summers  
<[FrancesSummers@purbeck-dc.gov.uk](mailto:FrancesSummers@purbeck-dc.gov.uk)>  
**Subject:** Re: Purbeck Local Plan Review 2019

Dear Mr Boyt,

Will the update you give to the Inspector be made public and if so, will there be time and opportunity for me to respond to your update? Please can you give me some timetable and idea of the opportunities I will have to respond to this important matter?

With best wishes,

Clare Lees.

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On 17 May 2019, at 08:04, Steve Boyt <[steve.boyt@dorsetcouncil.gov.uk](mailto:steve.boyt@dorsetcouncil.gov.uk)> wrote:

Dear Ms Lees,

Thank you for your e-mail. The Council's response to the Planning Inspectors Matters, Issues and Questions will be published, along with all the other further statements submitted by representors. The Planning Inspector has prepared a guidance note for representors on the pre-submission draft Purbeck Local Plan on making further statements in support of their original representation (please follow this link to Council's website to access the document - <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/local-plan-review-purbeck.aspx> (presented under the heading 'Procedural correspondence'))).

I have extracted part of the guidance (paragraphs 18 – 21) below which relates to further statements based on Inspectors Matters, Issues and Questions:

'Any representor may submit a further statement in support of their original representation in advance of the Hearings. However, if a further statement is submitted it should address only the Matters, Issues and Questions that I have identified and should be limited to those questions directly related to the scope of the original representation. There is no need to re-state points already made but neither should wholly new arguments or important information, which ought to have been provided during the consultation, be put forward. A separate statement should be provided for each Matter addressed.

Oral and written representations carry equal weight, therefore there is no requirement to submit a further statement and you may rely on your original representation if you wish to do so.

All statements, whether electronic and/or in paper form, should be sent to the Programme Officer by 5pm on Friday 7 June 2019. No new evidence or documents should be submitted at the Hearings or afterwards unless specifically requested.

It would be helpful to me if statements focused on:

- What part of the Plan is unsound?
- Which soundness test of those set out in the National Planning Policy Framework (and detailed in paragraph 6 above) does it fail?
- Why does it fail (probably summarising the key parts of your original representation)?
- How can the Plan be made sound?
- What is the precise change/wording that you are seeking?

The guidance note also includes an appendix which provides direction on the format for further statements. If you have any queries relating to the guidance note or making a further statement I suggest you contact the Programme Officer, Miss Helen Nolan on 07773 615820 or via e-mail at [atplp.programmeofficer@dorsetcouncil.gov.uk](mailto:atplp.programmeofficer@dorsetcouncil.gov.uk) . If you have further questions relating to this e-mail please call me on 0192955385.

Yours sincerely

**Steve Boyt**  
**Planning Policy Officer**  
**Planning and Community Services**

**Dorset Council**

01929557385  
[dorsetcouncil.gov.uk](http://dorsetcouncil.gov.uk)

Please Consider all representations from Rachel Palmer that are Environmental as from **Wool Flora and Fauna** and Trees for Dorset. This is to avoid unnecessary repetition for the inspector

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## Matter F Environment

**Question 1** Areas of A.O.N.B may be overplayed in landscape value viz a viz large fields of oil seed rape contrast with photos already submitted. The proposed National Park for Dorset could offer great protection for Dorset's woodlands and trees.

Question 7 Conservation of Protected species E7 not effective. What are the supplementary Planning Documents and are Buffers involved in Nationally protected sites.

E10 Biodiversity Protection is not consistent with national policy nor commitments of the Government in its Biodiversity strategy mission to halt overall Biodiversity loss – support well function Ecosystems or establish coherent ecological networks or the N.P.P.F as it calls for moving to net loss of Biodiversity to achieving net gains.

1. Biodiversity loss can and has been shown to occur through development (see previous submission by Wool Flora and Fauna). However the following points demonstrate how Biodiversity losses occur and gives examples :
2. Species Loss- Corner of Bovington Lane Autumn Ladies Tresses 70-100, 4 years ago to accommodate a cycle path and due to Wessex Water infrastructure improvement. Wessex Water in liaison with the Dorset Naturalist seeded the verge with wild flower seed (Wessex Water is a very environmentally aware company but they were unaware of the Orchids and different soil was replaced). The flowers are flourishing and look very pretty but here is a case where mitigation replaces less environmentally sensitive species for a rarer species. Infrastructure is likely to account for much Biodiversity loss. To avoid removal by ignorance every mature tree would need to be surveyed for NIEC Lichens in particular and a Fungi survey carried out in Autumn in Coombe Wood. Rare cornflowers would be lost if the site on Organic Farmland North West of Winfrith roundabout is built on. Slow worms (W.A.C.A.) are likely to decline from a widespread disturbance across the village by increased number of cats and cat kills. Each site should be surveyed for slow worm presence.
3. Habitat Loss including Priority Habitats (see Appendix) A wild area of scrubland at the North of Cologne was destroyed when houses were built here. As a result Turtle Dove (Red Alerts) was lost from the Parish. Further downgrading of the Ecosystem-registered as a 60% downgraded to date will increase the decline of fish observed to date by local fishermen. Decline of fish numbers is likely to make this a less favourable habitat for otters (WACA & NERC).

The paucity of comments on protection of trees is deplorable Policy 13. Yet these woodlands account for a massive Biodiversity input – 2/3's of our British Breeding Birds rely on trees and woodlands as part of their habitat. Trees were lost due to infrastructure supply East of Cologne Road 10-15 years ago with loss of Fungi species with Mycorrhizal links with them. Trees are always hard hit by development with damage to roots as a direct effect . They are particularly vulnerable to Infrastructure Provision . Wessex Water (highly responsible environment provider) removed a mature oak tree (Oaks provide habitat for 4000 species) in upgrading water supplies

north of Bere Regis.

Another habitat likely to be effected by removal for site access and Infrastructure are hedgerows. – A Priority habitat. These support corn buntings, (Red List concern) in the village on the site to the North West of Winfrith roundabout by providing nesting sites – a place to breed. This is also true for yellowhammers (Red list). Wool parish has a very widespread occurrence of hedgehogs this almost certainly due to hedges providing corridors and Natural Networks. Hedgehogs can travel 4 miles a night. Increased use of fences for new developments will contribute to hedge loss. Owls, Tawny (Amber Alert) and Bats rely on hedges for corridors to hunt for voles and moles which in turn rely on the shelter provided by hedgerows.

4. Biodiversity Loss through loss of natural corridors and networks including the potential loss or deterioration of the outstanding habitat mosaic of Wool. Increase in roads for access to sites widening of roads and provision of cycling routes and loss of road verges will account for many losses. Amphibians such as frogs require these damper areas, also grass snakes, smooth snakes and the water vole NERC and WACA once widespread through the village and using the stream in Wool village to connect the habitats in the Frome is likely to be lost from this Natural Corridor.
5. Biodiversity Loss by disturbance. People pressure – dog walkers and children is likely to increase in open green spaces and woodlands. Increasing use of footpaths along the Frome has already caused a decline in Kingfishers (Amber Alert) and the Cuckoo (Red list) although still occurring in the North of the Parish Bovington Training Area and in the Western part of the Frome water meadows and in Coombe Wood has already declined. Along the Frome decrease in the Warbler nests by disturbance could be responsible as these are used for nesting. The effect of disturbance can be reflected conversely by areas in the Parish under the Bovington Training Area. being People Free in large having the greatest number of rare species and those in decline e.g. the Wood Warbler (Red Alert).
6. Pollution, the effect of pollution on the river Frome and likely losses e.g. the Lamprey and Salmon BAP and NERC will be dealt with by Dr Warne on sewage. Air Pollution Levels of nitrogenous substances will increase due to a vast increase in car numbers if this plan goes ahead – guesstimate in excess of 1000. This will exert its most damaging effects on Corticolous Lichens (on trees) in the Parish. Davies et al 2007 states there is plenty of evidence that nitrophytic species (e.g. Xanthoria and Physcia) increase to the detriment and loss of sensitive species (especially N.I.E.C. lichens). I carried out a small lichen survey with school children around Poole some years back and found a negative correlation with non nitrophytic species at zones further and further away from Poole centre. A public inquiry held in Plymouth for a new power station several years ago sited how the impacts of atmospheric pollution could be observed and resulted in refusal for the development (Dr Oliver Gilbert) N.P.P.F. states 3.13 Purbecks own Environmental statement on the Infrastructure Capacity Study states allocations of land for development should prefer land of lesser environmental value, so why has it chosen Wool a Biodiversity Hotspot listed for Purbeck as the site of the greatest number of houses bar Moreton. Wool has

reached its carrying capacity for development that will not result in widespread Biodiversity loss. It is symptomatic of Purbeck's seeming ignorance and lack of awareness of Development Pressure on Biodiversity that a bed care home and Community hub is planned on land not only partly of moderate environmental sensitivity but with over half the site on land of higher sensitivity Parcel 7 and Coombe Wood as a SANG on land mapped as of Higher Sensitivity

Inadequacy of Biodiversity and Green Infrastructure Policy 13 to prevent Biodiversity loss in Wool.

7. Flight paths can be interrupted for migrating birds e.g. Blackcap and Nightjar (red alert) Wool is a Bee rich parish with a swam occurring on a fence even in the centre of the village and Environmental groups of children finding comb from wild bees in 2 Ancient Woodlands. Their movement from flower rich places such as the organic farmland fields will be interrupted by increasing traffic. Honey Bees are providers of a large slice of the National Economy.

**Question 7** Policy E10 and the Council's commitment to ensure no Biodiversity loss by developments Priority Species and habitats including SNCI's and LNR's and veteran trees affecting are inadequate.

- a) How can adverse impacts be avoided. All the evidence I have previously produced suggests the unlikelihood of this being possible. I have stated how mitigation measures of disturbance will fail on my submission re Coombe Wood and examples from the L.N.R. 8 Acre Coppice. Once lost from a habitat the loss barring re-introduction is permanent e.g. as stated the loss of the Turtle Dove from the Parish where mitigation would have been impossible without stopping the development. Measures that should protect sensitive environments are not sustainable e.g. loss of the Marsh creation from Woolbridge Heath from anti-social behaviour on motorbikes even though on the Bovington Training Area even with regular wardens in place. Anti-social behaviour at the Northern end of 8 Acre Coppice resulted in the chopping down of semi mature oak trees to build a den. How does one mitigate against this?
- b) How will one mitigate against damage to Ancient Veteran Trees in Coombe Wood or disturbance of ground nesting birds? Will a 24 hour patrol and policing be carried out? See my previous comments from the Yorkshire Naturalists paper on failure to prevent damage and disturbance. Defra's strategic noise map notes there is potential for noise disturbance in Coombe Wood. How do you mitigate it – a notice suggesting abiding by the Woodland Code will not suffice. Again and again the SHLAH mentions mitigation and in the P.D.C. Dorset Biodiversity Partnership Management Group. Mitigation is frequently a licence to go ahead with plans that could be Environmentally damaging. Everything seems to be possible subject to mitigation, e.g. the statement risk of surface water flooding can be mitigated in THEORY! But this will only be in place after the plan has been produced. Anyway nowhere seemingly in mitigation followed up by suggestions as to how. The SHLAH frequently mentions tree surveys will need to be carried out to see which trees and

hedges need retaining, why choose sites abundant in trees and surrounded by important and ancient hedgerows D.C.C carried out a thorough tree survey of Bovington Middle School site but this is timely and costly. Who will carry out such surveys? Who will pay? Tree officers will soon have added load of overseeing and dealing with the huge numbers of Ash trees suffering from Ash Dye Back.

- c) Policy E10 mentions improvement or creation of habitats (Ancient Woodland unrecratable )and ecological networks. This plan will drive roughshod through many such existing networks in Wool.

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1. Rivers and Streams
2. Oligotrophic and Diatrophic lakes
3. Ponds
4. Mesotrophic Lakes
5. Eutrophic standing waters
6. Arable Field Margins (Organic fields in particular)
7. Hedgerows
8. Wet Woodland
9. Mixed Deciduous Woodland
10. Lowland Dry Acid Grassland (Bovington Training Area on Bagshot Beds)
11. Calcareous Grassland (South of the Parish)
12. Purple Moorgrass and Rush Pasture (Scraps on Bovington Training Area land)
13. Reed Beds
14. Open Mosaics on previously developed land (Winfrith Area)
15. Lowland meadows and Flood Plains

## **Species Definitions**

NERC- Natural Environment on Rural Communities Act.

WACS- - Wildlife and Countryside Act

B.A.P – Biodiversity Action Plan

Rarity a Serious Decline Red and Amber Alert RSPB / BTO

Mycorrhizal Association Fungal hyphae and Tree Roots

Saproxyllic Rotten and Dead wood insects

Lobarion Community of Lichens and other Ancient Lichens

R.I.E.C. – Revised Index of Ecological Continuity more recently N.I.E.C.

**ENVIRONMENT.**

Dr A.C.Warne 1190865

Ecologist & Entomologist.

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## **ENVIRONMENT.**

My comments are primarily about the environment but inevitably apply to other sections of the plan. Cross references are indicated.

### **Matter A Legal Compliance**

#### **Issue 4 , Achieving Sustainable Development – an environmental objective.**

##### **Question 2 Environmental Test**

In my response to the plan I only indicated that I did not feel the plan was sound based on environmental grounds. These are my reasons:

1. The plan has been conceived subjectively by first generating a list of sites that had either been previously rejected or were put forward by past applicants and in the case of Wool the “Vision for Wool” put forward by Savilles/ Weld Estate then using supporting documents that are heavily biased to support the core plan. For example the environmental background paper concludes that there are no fundamental issues with infrastructure. Existing problems of nitrates in the River Frome SSS I and Poole Harbour SPA are either not mention or glossed over, yet these are a major existing problem threatening the value of these sites for wildlife. This lack of fundamental infrastructure issues is contradicted by the SHLAA2016. The Site Selection Background Paper 2016 states that the preferred option was: new infrastructure led approach with a focus on sustainable locations where ever possible, so why was this abandoned?
2. The SHLAA2015 supporting document demonstrates the subjectivity again as its arguments against development of some sites apply equally to the selected sites, for example: being within 400m to 5 km of international important Heathland, contributing to the nitrate problem in Poole etc. The SHLAA15 appears to be the version that was used to select sites. In the later SHLAA2016 it is clearly stated that for the larger sites in Wool there is no sewage works capacity to handle their output. The current sewage works site at Wool is very constrained and it is unlikely that it could be both expanded and include nitrate stripping on the present site. The long term costs of nitrate stripping on top of expanding or rebuilding the existing facility are not mentioned but who would pay? It is very confusing having 2 SHLAA documents that don’t complement but contradict each other.
3. The consideration of local biodiversity is biased towards nationally important sites and species but in the NPPF 19 biodiversity is separate from nationally important sites which implies to me that the biodiversity of the matrix within which the important sites exist is regarded as essential. This is recognised by DEFRA in their report “The 25 year Environment

Plan” that refers to wildlife rich habitat outside the present protected networks and that sites should be “bigger and more joined up”. The mosaic of habitat supporting the biodiversity richness of Wool is a remarkable example of this.

4. The Sustainability Report by Capita is appalling - many words saying nothing and completely dismissive of any negative impacts.
  
5. The environmental background paper is also subjective when it claims Wool and East Burton are parts of the district with fewest environmental constraints, completely failing to recognise the enhanced wildlife value of organic farmland. Neither Wool Fauna and Flora Group nor I as an individual with a deep knowledge of the biodiversity of the Wool area and beyond were consulted during compilation of this supporting paper despite the extent of our knowledge being conveyed to Purbeck District Council on several occasions. We totally disagree with it and its ambiguous conclusion “that there are no fundamental issues with infrastructure but that significant issues may need to be addressed” (but this is very unspecific). Most of the land proposed in Wool is Organic farmland that should be regarded more highly both as farmland and because a wide range of surveys have demonstrated the organic farmland is on average 30% richer in Biodiversity than conventional farmland and surveys around Wool have confirmed this and indeed found in some areas are more than 30% richer than neighbouring conventionally farmed areas.

## **Matter F Environment**

### **Question7 Policies E7, E8, E9. E10**

There is obviously some confusion in dealing with biodiversity in deciding whether only nationally important species should be considered or whether much wider biodiversity should. Over most of Britain it is only the rare and uncommon species that are sufficiently known about but where evidence is available for the much wider biodiversity of an area it should be taken into account. Purbeck District Council had the important biodiversity of Wool pointed out in meetings, in responses to consultations, the existence of a chapter in a book about Wool and a website about it drawn to their attention but have chosen to ignore it all.

#### **E7.Conservation of Protected Species and Habitats**

Protected areas only cover the nesting sites of species not feeding sites. The Habitat and Species Directive Article 4(1) states: sites should correspond to the places ....which present the physical and biological factors essential to their life and reproduction so there is a case that the woodlands and watermeadows over which Nightjars feed should be included.

The provision of a SANG to take pressure off the Heathland is rather vague for the Wool area. Coombe Wood has been mentioned but not in name in the plan itself (indicated by a star on the proposals map). Ancient woodlands such as Coombe Wood are likely to have a very high biodiversity but when I asked the owner for permission to survey this and other woods to the south of Wool this was denied, so I am unable to make comparisons with other woods in the area but on a size basis this wood is likely to be very good. A narrow strip of ancient woodland on the south of the Bovington Ranges has for example over 500 species of beetles recorded suggesting that at least 750 species could be present in Coombe Wood. Yorkshire Naturalists Trust have published the results of a survey of recreational damage to nature reserves (Bulletin of the Chartered Institute of Ecology and Environmental Management issue 97, 2017) that finds problems are closely related to proximity to settlements. My own experience on a National Nature Reserve within Purbeck district heavily used by the public is that requests to keep dogs on a lead in the nesting season are blatantly ignored. There is no indication of how a SANG would be managed and how it would be paid for but for areas that became open access under the CROW Act it was were assumed would be kept an eye on by the county rangers service ,but this service is now very depleted due to DCC finance cuts. Natural England's response to the plan consultation implies there is another area for the SANG as they say substantial nitrate offsets would be provided suggesting that an area of arable land could be made the SANG.

#### **E8.Dorset Heathlands**

This policy to reject new dwellings within 400m of the SPA & SAC boundaries has not been adhered to by Purbeck DC, see my original response to the plan concerning residential caravans on the edge of Winfrith Heath.

## **E9 Poole Harbour**

The Habitats Regulations 2017 require under section 24 that damaging operations should be notified to the appropriate nature conservation body. The existing situation and the adverse changes that these housing proposals may make to Poole Harbour are not thoroughly considered. Purbeck DC have talked about housing development being Nitrate neutral but housing only includes 20% of the nitrates flowing into Poole Harbour. Despite the existing Poole Harbour nitrate plan at least one industrial dairy unit at Newburgh farm (equivalent to a small village) has been recently approved by PDC without any consideration of slurry disposal despite the plan for Poole Harbour saying 80% of nitrates come from agriculture. In addition Ammonia from such intensive farming slurry storages and disposal is also detrimental to wildlife such as Lichens, unpleasant for countryside users and has been the subject of recent debate about its harmful effects on human health. See also the submission by Wendy Riddle to the PDC consultation. Also Matter E Q. 4 & 5 Matter H Q 1.

- Policies are only as good as their application, Purbeck DC has not applied policies to which they are signatories, so what can we expect from the policies in the local Plan?

## **E10 Biodiversity and Geodiversity.**

It has been extremely frustrating that knowledge of the biodiversity of the Wool area gathered by those who know the area extremely well has been ignored and the assessments by consultants from outside the area have been accepted. The Wool area has exceptionally high biodiversity. Studies show that its biodiversity (for by example over 1000 species of beetle have been recorded – 25% the British fauna) is as high as very few other areas in Britain and those are mostly National Nature Reserves or large areas such as The New Forest. This considerable biodiversity underpins the important protected species and a loss of general biodiversity could threaten these. This biodiversity richness is because many biotopes are juxtaposed or there are few barriers between them. About half the species are recorded outside the protected sites and include the same proportion of Rare and Nationally Notable species. Fragmentation of the countryside is recognised as one of the drivers of biodiversity loss. The biodiversity of some of the biotopes is enhanced by being organically farmed.

The universal antidote throughout is that loss of biodiversity can be mitigated for or enhanced but when there is such great diversity as is present in Wool there can only be loss, enhancement or biodiversity net gain is virtually impossible where there is already such high biodiversity (raising water levels on the watermeadows could increase biodiversity in this biotope but would not replace the biodiversity lost to housing and its infrastructure. Mitigation would in any case need to start many years before there is any habitat loss to enable species to transfer, which is not as easy as it sounds. The organic farmland margins are at least 30% richer than comparable conventionally farmed land nearby. It takes many years to qualify for Soil Association Organic status even so this is much shorter than the time needed to mitigate for its biodiversity loss. The hedges between the organic fields are on the face of it fairly recent and a superficial assessment might dismiss them but they and the associated field margins are of great significance for their biodiversity. Matter H Issue 3Q 1

Corridors are much talked about to mitigate for losses but as the proposed new housing would run in an elongate east-west band this would break the continuity between biodiverse habitats on the

north and on the south of Wool. There is already evidence of losses caused by roads forming barriers with the regular deaths of hedgehogs, badgers and deer, these are visible but many less visible species are also casualties including large numbers of bumblebees, important as pollinators.

### **Conclusions**

The plan studiously avoids the mention of a proposal for a National Park despite the remarkable richness of the biodiversity of Purbeck being frequently referred to by Purbeck DC, their consultants and by many who responded to the consultation. Designation of a National Park would be the best start to protect and manage the areas biodiversity.

I do not feel that the Environment policies add up to fulfil the environment criteria test of Sustainable Development and inconsistency and subjectivity make the plan very unsound.

Dr A.C.Warne

Ecologist & Entomologist.

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**Purbeck Local Plan**  
**Submission Draft Plan – January 2019**

**Statement on Matter F: Environment**

**By**

**Savills on behalf of the Landowners of the  
Wool allocation covered by Policy H5.**

**Representation no. 1190693**

**June 2019**





## **Matter F: Environment**

**Issue 1: Environment Policies (Policy E1, Policy E2, Policy E3, Policy E4, Policy E5, Policy E6, Policy E7, Policy E8, Policy E9, Policy E10, Policy E11 and Policy E12)**

**Q1. Is policy E1 (Landscape) effective and consistent with national policy particularly in respect of areas designated as an AONB, heritage coast and World Heritage Site?**

Paras 41 – 43 of the MOU address landscape considerations for the Wool allocation concluding that there are no significant landscape constraints with appropriate mitigation.

**Q2. (a) Has the Plan had regard to the statutory duties in relation to designated heritage assets set out in Sections 66(1) and 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990?**

**(b) Is the wording of policy E2 (Historic Environment) clear and justified having regard to these statutory provisions?**

**(c) In so far as policy E2 relates to designated and non-designated heritage assets does the wording of the policy appropriately address heritage assets in the round and is it consistent with national policy?**

Historic England has confirmed that it has no in principle objection to the Wool allocation. See para 45 of the MOU.

**Q3. (a) Is policy E3 (Renewable energy) justified, effective and consistent with national policy?**

**(b) Does criterion d of the policy comply with the requirements of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)?**

No comment

**Q4. Is policy E4 (Assessing flood risk) justified, effective and consistent with national policy?**

The Wool allocation complies with this policy. (See paras 19 – 22 of MOU)

**Q5. (a) Is policy E5 (Sustainable drainage systems (SUDs)) justified, effective and consistent with national policy?**

The Wool allocation complies with this policy. (See paras 19 – 22 of MOU) (See Appendix for illustrative masterplan.)

**(b) Is the change (MM3) to the policy indicated in the schedule of possible modifications [SD14] necessary to ensure that the Plan is sound?**

No comment

**Q6. (a) Is policy E6 (Coastal change management areas (CCMAs)) justified, effective and consistent with national policy?**

**(b) The policy refers to the CCMAs being identified on the policies map. However, these do not appear to have been included on the version of the policies map submitted with the submission version of the Plan. Should they be?**

No comments

**Q7. Are policies E7 (Conservation of protected species), E8 (Dorset heathlands), E9 (Poole Harbour) and E10 (Biodiversity and geodiversity) justified, effective, consistent with national policy and where relevant compliant with the requirements of the Habitats Regulations?**

SANG is agreed for the Wool allocation as per the MOU paras 35-38

Ecology and compliance with the Nitrogen SPD are dealt with at para 39-40 of the MOU.

**Q8. Is policy E11 (Development next to sewage treatment works and pumping stations) justified and effective?**

No comment

**Q9. (a) Does policy E12 (Design) incorporate appropriate measures to ensure good design in new developments?**

In respect of Policy E12 Design Para 65 and 66 of the MOU with the Council states:

*o the landowners believe that the reference at criterion (e) to avoiding and mitigating any harmful impacts is unduly onerous and would be better qualified in terms of 'significant' unacceptable impacts.*

*o the Wool landowners are concerned at the supporting text at paragraph 104 referencing the applicability of various supplementary planning documents alongside policy E12, including the District Design Guide 2014, the DCC residential car parking strategy 2012 and, in particular, the Wool Townscape Character SPD 2012. The Wool landowners are concerned that the use of these documents which pre-date the NPPF is neither justified nor consistent with National Policy, and that the reference that they should be 'read alongside' policy E12 is ambiguous. The Wool landowners believe that these documents should consequently have little weight.*

**(b) Is the policy capable of effective implementation?**

Changes are needed to address the above.

**(c) Are the criteria of the policy sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?**

Changes are needed to address the above.

## **Statement on Matter F: Environment**

### **List of appendices**

Appendix 1 – Wool Vision Plan – 470 homes

Appendix 2 – Wool Vision Plan – 650 homes

Appendix 3 – Wool Illustrative masterplan – up to 1000 homes

Appendix 4 - SANG concept plan

# Appendix 1 – Wool Vision Plan – 470 homes



title: Wool Vision Plan - 470 homes

project: Wool Development

revision: A (6 June 2019)

client: Weld Estate/Redwood Partnership

date: 28 March 2019

job no: WIPL 425429

drawn by: SM/VT

drawing no: MP003

checked by: RB

- Land reserved for future school, if required
- Neighbourhood Equipped Area for Play
- Local Equipped Area for Play
- Public open space
- SuDS basin/public open space
- Land reserved for future school, if required
- SuDS swale
- Existing public right of way
- Proposed pedestrian and cycle link to wider countryside/rights of way
- Site Boundary
- Scale 1:5000 @A3
- 20m buffer from pipeline centre (suggested maximum working area to allow pipeline removal)

## Appendix 2 – Wool Vision Plan – 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title: Wool Vision Plan - 650 homes

project: Wool Masterplan      revision: -

client: Weld Estate/Redwood Partnership      date: 03 December 2018

job no: WIPL 425429      drawn by: SM

drawing no: MP002      checked by: RB

- Land reserved for future school, if required
- Neighbourhood Equipped Area for Play
- Local Equipped Area for Play
- Public open space
- SuDS basin/public open space
- SuDS swale
- Existing public right of way
- Proposed pedestrian and cycle link to wider countryside/rights of way
- Site Boundary
- Scale 1:5000 @A3

# Appendix 3 – Wool Illustrative masterplan – up to 1000 homes



**title** Illustrative Masterplan  
**project** Wool Masterplan  
**client** Weld Estate/Redwood Partnership  
**job no** WPL 262769  
**drawing no** MP001  
**revision** C (07 Mar 2018)  
**date** 07 Jan 2016  
**drawn by** SP/ SM  
**checked by** CO/ RB

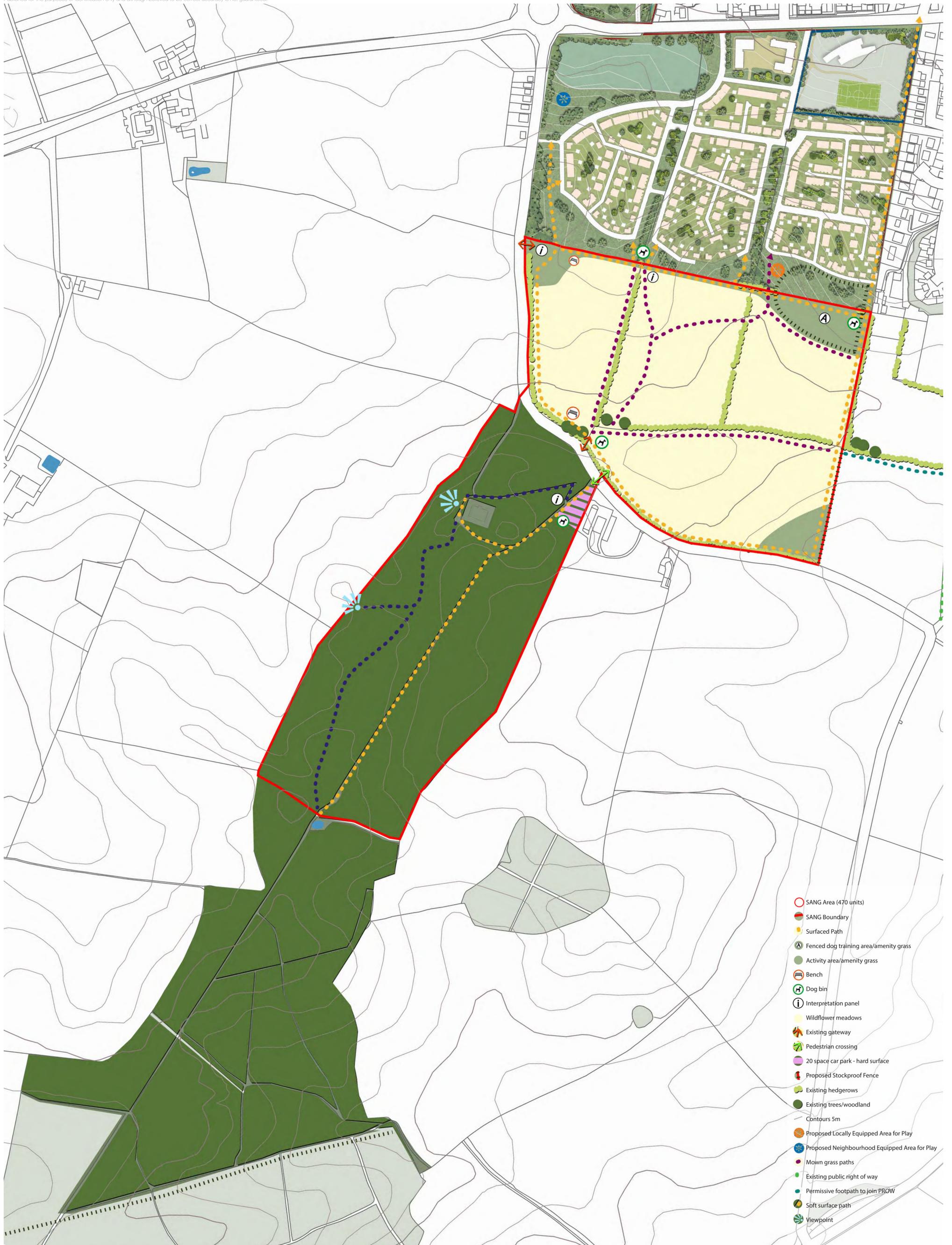
- Development Parcels
- Public Open Space
- School Grounds
- Existing Road
- Proposed Primary Street
- Proposed Secondary Street
- Public Rights of Way
- Proposed Footpath
- Trees/ Hedgerows
- Listed Buildings

- Proposed Local centre
- Vehicle Access Point
- Cycle and Pedestrian Access
- Allotment
- Sport Pitches

- NEAP
- LEAP
- Area of Natural Play
- SuDS
- Community Garden

- Food Store
- Community Centre & Village Hall
- The Wellbridge Practice
- Site Boundary
- Scale 1:5000 @A3

## Appendix 4 – SANG Concept Plan



- SANG Area (470 units)
- SANG Boundary
- Surfaced Path
- A Fenced dog training area/amenity grass
- Activity area/amenity grass
- Bench
- Dog bin
- i Interpretation panel
- Wildflower meadows
- Existing gateway
- Pedestrian crossing
- 20 space car park - hard surface
- Proposed Stockproof Fence
- Existing hedgerows
- Existing trees/woodland
- Contours 5m
- Proposed Locally Equipped Area for Play
- Proposed Neighbourhood Equipped Area for Play
- Mown grass paths
- Existing public right of way
- Permissive footpath to join PROW
- Soft surface path
- Viewpoint

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project | Wool - Suitable Accessible Natural Greenspace (SANG)  
 client | Weld Estate  
 date | 22/05/2019  
 drawn by | VT  
 checked by | RB

drawing | Proposed SANG  
 job no. | WIP262769  
 drawing no. | 5004  
 rev | -

scale | 1:5000@A1



Our Ref: MV/ 15B802553

28 May 2019

Ms Helen Nolan  
Programme Officer  
Purbeck District Council  
Planning & Community Services  
Westport House, Worgret Road  
Wareham  
Dorset, BH20 4PP

Dear Ms Nolan,  
**Purbeck Local Plan Review**  
**Representations on behalf of the Nuclear Decommissioning Authority**  
**and Magnox**

We are writing on behalf of the Nuclear Decommissioning Authority ("NDA") and Magnox Limited ("Magnox"), as occupiers and operators of the Winfrith Nuclear Licensed Site, in respect of the Purbeck Local Plan Review. Avison Young are our appointed professional property advisors and provide planning advice across the NDA's UK wide estate.

#### **Overview**

This letter relates to the Winfrith Nuclear Licensed Site and associated infrastructure located near Wool, operated by Magnox Limited who is appointed by the NDA to carry out decommissioning and land remediation activities in accordance with a site decommissioning programme.

Representations were made on 28th November 2018 in relation to the Pre-Submission Draft Consultation.

Further representations were also made on 30th April 2019 in relation to following discussions with the promoters/landowners of the Wool Housing Allocation H5 (Lulworth Estate) in connection with the Winfrith Sea Discharge Pipeline which connects the Winfrith facility (to the west of Wool) with the sea (to the south of Wool) and passes through the land identified for 470 homes under policy H5 Wool within the draft Purbeck Local Plan.

NDA and Magnox have remained in discussions with the promoters/landowners for the Wool Housing Allocation H5 and wish to withdraw and replace its earlier representation of 30th April with the following statement:

*"Magnox notes the proposed H5 Wool Housing Allocation set out in the Draft Purbeck Local Plan 2018-2034.*

*It is the intention of NDA/Magnox to decommission the redundant pipelines that are referred to in Criterion g of the policy, which run along the western boundary of the development plot identified as "Land to the*

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West of Chalk Pit Land and Oakdene Road" in Policy H5 Wool Housing Allocation.

Magnox is currently undertaking an options assessment to determine the best remediation solution, which includes engaging with landowners and stakeholders. No decision has been reached on the future decommissioning strategy for the Sea Discharge Pipelines; therefore no timeframe can be placed on the when decommissioning may take place. The results from historic annual pressure testing of the pipelines has confirmed their integrity and hence does not lead Magnox to believe that there is any land contamination present.

NDA/Magnox is grateful to the Council and Lulworth Estate (in their indicative housing masterplan for the H5 site) for the recognition of our easement and wider buffer zone along the route of the pipeline (drawing reference MP003 dated 28th March 2019), which supports and does not prejudice any future remediation solution.

The buffer zone is considered an adequate safeguarding buffer to future housing development and NDA/Magnox does not perceive any material impact."

If you require any further information in respect of this letter, then please contact us.

Yours sincerely,



**Matt Verlander MRTPI**  
**Director**  
**0191 269 0094**  
**[matt.verlander@avisonyoung.com](mailto:matt.verlander@avisonyoung.com)**  
**For and on behalf of Avison Young**

Date: 07 June 2019  
Our ref: [Click here to enter text.](#)  
Your ref: [Click here to enter text.](#)



**BY EMAIL ONLY**

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Dear Ms Doward,

**Purbeck Local Plan (2018 – 2034)**

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

Natural England submit the following comments/advice concerning the Purbeck Local Plan for consideration at the Examination in Public.

**Matter E, Issue 4**

**Draft Poole Harbour Recreation SPD**

Natural England has been working closely with the authority and the former Borough of Poole to secure a suitable strategic mitigation approach which will allow new housing to come forward within the agreed area where pressures have been shown to arise. This approach is similar to the heathland and nutrient SPDs in as much as it enables small development which would not individually be able to provide mitigation to come forward by making a contribution to a strategy which delivers the necessary avoidance/mitigation measures. The SPD has been consulted on prior to the Local Government Review and Natural England have been advised that both authorities intend to adopt it as and when their own decision making arrangements are established. Interim arrangements are in place for the small number of developments commencing in this period.

The Local Plan should be modified such that suitable references are made within policy and the following site allocations. Natural England has agreed with the promoter and authority the requirement in Statements of Common Ground for the Upton (H7), Lytchett Matravers (H8). The proposed revision to the Green Belt at Wareham to facilitate the Neighbourhood Plan will also lead to allocated developments to which the SOD will apply. It appears that the most suitable place for a modification would be at H3 see below.

Policy H3, the overarching Housing policy, reference is made at c) and d) to heathland and nutrient mitigation requirements. An additional point should be inserted to make reference to the need to secure appropriate mitigation measures to avoid additional recreational pressure on Poole Harbour SPA and Ramsar. This is consistent with the policy approach of ensuring that applicants are fully aware of the scope of requirements and matters requiring to be addressed.

Natural England has advised the applicant in its Pre-submission comments that this policy should make full and clear reference (at point L) to the need to avoid biodiversity losses and to secure biodiversity Net Gain in accordance with NPPF (175 d). Currently as the bridging policy it is not compliant with the NPPF.

Natural England is concerned that Policy 3 – dealing with allocated sites does not therefore have

weight over policies H12-15 which deal with other housing provision and has advised a cross reference on the supporting text to the requirements of Policy E8 and E9 to avoid uncertainty to applicants. This should be addressed in supporting text as these requirements can have significant impacts on these smaller developments and early engagement with the authority can help to avoid or resolve the matters.

Natural England would anticipate reaching an agreement with the authority over suitable wording modification for consideration at the examination.

#### **Matter E issue 4**

Policy H8 Small sites

Natural England concerns are set out in the Pre-submission consultation advice. The authority has proposed the modification below.

Monitor the number and spatial distribution of homes permitted ~~on~~ **through the** small sites **policy** to ascertain whether the cumulative impacts of development are likely to have significant effects on European sites that would require mitigation.

Natural England's concern relates to additional residential developments in the 400m to 5km area where a development (in other respects acceptable) subsequent to a completed development is unable alone to deliver mitigation eg a Heathland Infrastructure Project which could have been delivered were both projects to have come forward in a planned manner. The threshold for requiring a SANG for example is 50 dwellings. This policy could constrain developments in nearby settlements which are both in close proximity to a particular part of the designated sites.

#### **Matter F, Issue 1**

Policy E9 Poole Harbour

This policy required a minor modification as the Borough of Poole is now Bournemouth Christchurch and Poole (BCP) . The policy should be reworded as the authority has now consulted over an SPD and it should be shortly be adopted. Suggested wording adjustments are below:

*The Council and BCP have carried out a consultation on a Recreation in Poole Harbour SPD which will be adopted in time for the Local Plan. Development proposals for any net increase in homes, tourist accommodation or a tourist attraction around the edges of the harbour (as defined in the SPD) will need to avoid or mitigate adverse impacts arising from recreational activity on Poole Harbour.*

Natural England would anticipate reaching an agreement with the authority over suitable wording modification for consideration at the examination

Policy E10 Biodiversity and geodiversity

Natural England has made detailed comments concerning the preceding paragraphs to ensure suitable reference should be made to two protocols established by the Dorset Council. This will assist developers as well as the authority in properly applying the requirements of the NPPF regarding moving from biodiversity loss to an overall net gain. Further the authority is advised to make use of the work funded by the Local Enterprise Partnership and delivered through the Local Nature Partnership which defines and makes publicly available the Dorset Ecological Network and potential Ecological Network plans. These will facilitate applicants in formulating proposals which are consistent with the Governments policy on Biodiversity Net Gain and a Nature Recovery Network. Natural England advise that with suitable modifications to supporting text the plan will be in conformity with government policy advice.

#### **Matter G**

Modifications MM9 and MM10 are welcomed by Natural England as is the assumed adjustment to

the Policy plan for the development area.

**Matter H**

Policy I1,

The authority developed the Local plan prior to Local Government Review and is now part of a larger authority. Natural England is aware of proposed modifications to the CII Regulations and also to other mechanisms such as Unilateral Agreements and the use of S111 agreements to secure mitigation in the case of proposals taking advantage of permitted development adjustments etc. Natural England advise that the Inspector should ask the authority to consider if the list of mechanisms in the policy represents in any way a restriction on enabling developments. For example the insertion of the word "including" would add flexibility to the authority.

I trust this advice will be of assistance.

Yours sincerely

Nick Squirrell  
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Natural England  
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