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# Habitats Regulations Assessment of the Partial Review of the Purbeck Local Plan Part 1; Options



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## Summary

This report provides the Habitats Regulations Assessment of the plan review of the Purbeck Local Plan, being undertaken by Purbeck District Council. The current Local Plan (PLP1) was adopted in November 2012. It is Government policy that local planning documents are continually reviewed in order to remain up to date and informed by current evidence on local economic, social and environmental needs, and national legislation and planning policy. Purbeck District Council is undertaking a review relatively quickly after adoption of the current plan. This is because PLP1 followed a precautionary approach in planning for less housing than was forecasted as needed for the plan period.

Initial screening of the draft Partial Review Issues and Options document identified a range of likely significant effects including those options relating to the overall volume of housing, locations for development, meeting employment needs, managing internationally protected heathlands and the proposal for Morden country park and tourist accommodation. This assessment now considers the plan at the Options stage, with previous concerns having been taken into account by Purbeck District Council in developing the the Options.

An overview of the effect of new growth on the European sites is provided within appropriate assessment section 4, where the various mitigation measures in place as a result of previous Habitats Regulations Assessment work is discussed. The preliminary appropriate assessment work at Issues and Options stage focussed on large housing sites put forward to Purbeck District Council by landowners and developers, and also considered implications of the employment sites identified and the proposal for a country park and tourist accommodation at Morden. At this options stage, some previous housing sites have been discounted and others added, with eight sites now identified as options. Each of the housing sites is screened as having a likely significant effect and each is therefore considered individually within the appropriate assessment at Section 5 of this report, in light of any new information or further detail that may now be available since the initial assessment of the Issues and Options. Employment sites as assessed within appropriate assessment at Section 6, and the Morden country park and tourism accommodation at appropriate assessment section 7.

A number of issues and evidence gaps remain in relation to some of the development allocations, and recommendations are made for further consideration before the draft submission stage of the plan review. Key points relating to the particular housing allocations are:

### **Wool (1000 homes)**

- Key nearby heathland sites are Winfrith/Tadnoll and Hethfelton.
- A good SANG has been proposed, with existing woodland and open areas and attractive views. Some felling, landscaping and parking creation will be necessary, plus promotion of the SANG to ensure it is working effectively. Such measures will need to be tied to the development so as be effective prior to occupancy.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

### **Lytchett Minster (650 homes)**

- Nearby heaths include Upton Heath, Sandford, Holton Heath and Wareham Forest. These should be the focus of any on-site mitigation.
- Checks re foraging nightjar are necessary.

- Checks re flooding/run-off issues and Poole Harbour SPA
- While less of a risk than those to the heaths, development here is relatively close to Poole Harbour and there are risks from recreation to Poole Harbour SPA/Ramsar.
- The SANG should link (for foot access) directly to the new development and that the small block of development to the south be dropped. The SANG is on open, flat farmland with little current interest for visitors; further consideration is therefore necessary to address the SANG design, including landscaping and planting etc.
- The Country Park at Morden could have potential to draw recreation from Lytchett Minster; as such there may be potential for the SANG at Lytchett Minster to be designed so as to complement the Country Park?
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### **Wareham Town (500 homes)**

- There are risks with this location given the proximity of the development to important heathland areas (and Poole Harbour) and the ease of access to those sites from the Wareham bypass.
- The proposed SANG provides around 58ha of greenspace (outside flooded areas). Wording in the plan appears to exaggerate the area provided.
- Despite extensive work by developers, concerns remain that the SANG is bisected by the railway (main line and branch line) and adjacent to busy roads and with housing alongside. This presents a marked contrast to the open rural heaths within a short drive. Clarification is necessary on the potential for railway crossings to reduce the bisected nature of the SANG.
- SANG at Holme Lane associated with PLP1 (and development in close proximity to Worgret Manor) is not functioning well with few visitors arriving by car. Given lack of success with this site, there are concerns regarding the potential for SANGs to work well. Improvements need to be undertaken at the Holme Lane SANG and checks made to ensure this is functioning well prior to further development around the west of Wareham.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### **Moreton Station (350 homes)**

- SANG includes open pit (gravel extension) and concerns over timescale necessary for this to reach its potential
- Mitigation will include land adjacent to Tadnoll Heath to support existing visitor and habitat management. Natural England has approved this.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### **Lytchett Matravers (330 homes)**

- Two sites to the north-east of the village (Flowers Drove and Blaneys Corner) are accompanied by open space (SANG) that Natural England has confirmed could be deliverable to mitigate impacts on nearby heathland.
- The main area of development is to the south of the village and at present no greenspace options have been proposed. Clarification of SANGs provision is necessary before adverse effects on integrity to the heaths can

be ruled out. Development here could however be mitigated through the SANG to the south (associated with Lytchett Minster) if additional capacity were available. It could be possible to monitor the effectiveness of this SANG and how well it draws residents from Lytchett Matravers prior to development taking place at the Lytchett Matravers sites.

#### **North Wareham (205 homes)**

- There are risks with this location given the proximity of the development to important heathland areas (and Poole Harbour).
- The details of the any SANG design are yet to be finalised, but Natural England have confirmed in principal that suitable SANGs could be delivered (around 26ha of potential land have been identified).
- SANG is potentially close to the landfill site and to housing and there may be challenges to create suitable alternatives to the open space and wild feel of nearby heathland sites (such as Wareham Forest and Hartland/Stoborough).
- Development towards the north of the proposed housing block will have easy, direct foot access into Wareham Forest and this may be difficult to deflect.

#### **Upton (100 homes)**

- Development here is adjacent to Poole Harbour SPA (proposed SPA extension runs within a few metres of the proposed housing) and close to heathland fragments to the south of Upton.
- The SANG will be crucial mitigation and is not yet functional. Development may be best phased to allow the SANG (associated with development in PLP1) to become established and fully functional.

#### **Langton Matravers (40 homes)**

- This location has direct foot access to some important parts of the St Albans – Durlston Head SAC where Natural England has identified some concerns regarding recreation impacts. The need for mitigation measures (monitoring and early warning) to address the impacts of increased local use of coastal sites was identified within the PLP1 (section 7.5.10) and this needs following-up. Further information and evidence is necessary to rule out adverse effects on integrity.
- Additional mitigation measures, in terms of direct work with local dog walkers, promoting 'pick-up' and use of routes such as the Priest's Way (where impacts to the SAC would be avoided) may need to be explored.

#### **Harmans Cross (20 homes)**

- A relatively small quantum of development. Will require contributions towards strategic heathland measures.

This assessment will continue to be updated as the various stages of plan development are proceeded through, until final adoption.

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We have drawn on visitor survey data from the Wild Purbeck NIA and also on bird survey data provided by Natural England (see Liley & Fearnley 2014).



## **1. Introduction and Context**

- 1.1 This report provides the Habitats Regulations Assessment of the plan review of the Purbeck Local Plan, being undertaken by Purbeck District Council. The current Local Plan (PLP1) was adopted in November 2012. It is Government policy that local planning documents are continually reviewed in order to remain up to date and informed by current evidence on local economic, social and environmental needs, and national legislation and planning policy. Purbeck District Council is undertaking a review relatively quickly after adoption of the current plan. This is because PLP1 followed a precautionary approach in planning for less housing than was forecasted as needed for the plan period.
- 1.2 The Planning Inspector who examined the PLP1 concluded that the plan was sound and the Council was right to adopt the precautionary approach in the short term, with the intention of exploring the potential for higher housing growth through a separate partial review by 2017. The precautionary approach was taken because at the time that the plan was adopted, the available information did not provide enough evidence to demonstrate that a higher level of growth could proceed without impacts on European wildlife sites. Purbeck is exceptionally important for nature conservation and the European wildlife sites, discussed in more detail below, host a range of habitats and species of European importance. The principal driver behind the partial review will therefore be to investigate the possibility for mitigation measures that will enable the potential delivery of higher housing growth.
- 1.3 This Habitats Regulations Assessment presents the assessment work to date, and continues to be updated alongside the local plan review, until finalisation of the assessment occurs at finalisation of the new plan ready for Examination and adoption.
- 1.4 At this point in time, the Council is preparing the 'Options' for public consultation. This follows a previous Issues and Options stage where the key issues for the district, and opportunities and the range of options for new growth, and for social, economic and environmental improvements were presented. The Options stage has refined the range of options into those that are the preferred direction for sustainable growth in the Purbeck District.
- 1.5 In considering the potential impacts that may affect European sites, the potential risks to heathland sites are particularly pertinent in light of the new growth proposed within the plan. This report draws together all available evidence relating to heathland impacts and possible opportunities to prevent those impacts from occurring, to enable the Council to consider how higher levels of growth than that currently supported by PLP1 could potentially be accommodated without adverse effects on European sites.
- 1.6 The PLP1 is the overarching document steering planning policy in the District, but the Local Plan is also made up of a number of other planning documents, including a specific plan for Swanage, a number of neighbourhood plans and supplementary planning documents. A range of national policy, other plans and strategies, and

additional evidence inform the development of the plan, including the Purbeck Greenbelt Review, the presence of the AONB and the Purbeck Strategic Housing Land Availability Assessment (SHLAA). The SHLAA concluded that there is potentially enough housing land to deliver the additional housing required for the District. This conclusion is of course subject to the range of other assessments and policy considerations that need to be factored in.

- 1.7 The current PLP1 plans for 2,520 new homes between 2006 and 2027. A shortfall of 3,080 is now recognised, and so the Options document for the plan review proposes provision for the shortfall (3,080 between 2013-2033), so that the new plan will therefore plan for 5,600 new homes in total over the plan period.
- 1.8 The planning policies within the current PLP1, and those being shaped for the PLP1 review, are driven by the Corporate Priorities for the Council, which include strong protection for Purbeck’s unique natural environment at their heart. The plan must seek to deliver sustainable development that meets all of the Corporate Priorities, and it is therefore essential that where this Habitats Regulations Assessment seeks solutions to protect European sites, they are also compatible with meeting housing, employment, infrastructure and community needs. Policies need to be in accordance with the implementation of the Habitats Regulations, and can only be taken forward where this is demonstrably the case. However, protection of European sites must also be done in a way that still allows policies within the plan to proceed. The Sustainability Assessment for the plan may need to explain why an option for mitigating for the potential effects of policy implementation has been chosen, and why other alternative approaches may not be viable.
- 1.9 This introductory section of the report provides the background and context for plan level Habitats Regulations Assessment.

### Habitats Regulations Assessment process

- 1.10 A ‘Habitats Regulations Assessment’ is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of a European wildlife site. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exceptional tests are met. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.
- 1.11 The relevant European legislation is the Habitats Directive 1992<sup>1</sup> and the Wild Birds Directive 2009<sup>2</sup>, which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2010, as amended. These Regulations are normally referred to as the ‘Habitats Regulations.’ Legislation sets out a clear step by step approach for decision makers considering any plan or project. In

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<sup>1</sup> Council Directive 92/43/EEC

<sup>2</sup> Council Directive 2009/147/EC

England, those duties are also supplemented by national planning policy through the National Planning Policy Framework (NPPF). This national planning policy also refers to Ramsar sites, which are listed in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites. Formally proposed sites, and those providing formal compensation for losses to European sites, are also given the same protection.

- 1.12 The duties set out within the Habitats Regulations apply to any public body or individual holding public office with a statutory remit and function, referred to as ‘competent authorities.’ The requirements are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. A more detailed guide to the step by step process of Habitats Regulations Assessment is provided in this report at Appendix 1.
- 1.13 In assessing the implications of any plan or project, in this case a local plan, for European sites in close proximity, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other on-going matters that are influencing each of the sites. Every European site has a set of ‘interest features,’ which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or, where necessary restored. Each European site has a set of ‘conservation objectives’ that set out the objectives for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance.
- 1.14 The site conservation objectives are relevant to any Habitats Regulations Assessment, because they identify what should be achieved for the site, and a Habitats Regulations Assessment may therefore consider whether any plan or project may compromise the achievement of those objectives. Further information on European site conservation objectives can be found at Appendix 2 of this report.

### European sites

- 1.15 There are a range of European sites within or near Purbeck District. In fact the District is potentially unique in the extent, range and number of different protected sites, with 20% of the plan area being internationally designated site. Poole Harbour is a large shallow lagoon, classified as a Special Protection Area (SPA) and listed as a Ramsar site. The SPA classification reflects the international importance of the harbour for breeding, wintering and passage birds. The use of the harbour by the various bird species is complex, with different species relying on different parts of the harbour at different times of year (See Pickess & Underhill-Day 2002; Pickess 2007; Underhill-Day 2007; Liley et al. 2009 for further details). Natural England has recently consulted on a proposed

extension to the SPA, which will include land in Purbeck, towards Lytchett Minster/Upton<sup>3</sup>.

- 1.16 Dorset holds some 7500 ha of heathland (see Rose et al., 2000), and much of this is designated as being of European importance. The designated sites are the Dorset Heathlands SPA, the Dorset Heathlands SAC and the Dorset Heaths (Purbeck & Wareham) and Studland Dunes SAC. The sites are also underpinned by national level wildlife designations, as Sites of Special Scientific Interest (SSSIs). The designations at the international and national levels reflect the conservation importance of the sites, which hold internationally important bird species (breeding nightjar, woodlark and Dartford warbler, wintering raptors such as merlin and hen harrier), all six species of native British reptiles and the southern damselfly, a rare dragonfly found at various sites including Norden, Hartland, Creech and Corfe Common. The various rare plants include the Dorset Heath, for which the heaths around Poole Harbour are the British stronghold. Within Purbeck there are famous heathland reserves such as Hartland Moor, Studland and Arne as well as less known sites such as Grange and Creech Heath. Virtually all the sites, apart from the tracts owned by the MOD have public access.
- 1.17 The Dorset coastline is a World Heritage Site and the two coastal SACs (St Alban's Head to Durlston Head with Isle of Portland to Studland Cliffs) form a single unit of cliffed coastline some 40km in length. The hard limestone cliffs, with chalk at the eastern end (near Old Harry and near Lulworth) are interspersed with slumped sections of soft cliffs comprised of sands and clays. The cliffs support two internationally important habitats: namely the vegetated sea cliffs of the Atlantic and Baltic Coasts and the semi-natural dry grassland and scrubland faces. A number of rare plant species are associated with the grassland habitats. The largest population of Early Spider Orchid within the UK occurs on the Purbeck coast between Durlston and St. Aldhelm's Head. Other notable plant species include wild cabbage, Nottingham catchfly and early gentian (the latter is a primary reason for the SAC designation).
- 1.18 The relevant European sites for this assessment are those previously considered in the Habitats Regulations Assessment of the Purbeck Core Strategy – PLP1 (see Liley & Tyldesley 2011; the HRA contains much detailed background relevant to this report), and are:
- Dorset Heathlands SPA
  - Dorset Heaths SAC
  - Dorset Heathlands Ramsar site
  - Poole Harbour SPA
  - Poole Harbour Ramsar site
  - The New Forest SAC
  - The New Forest SPA
  - The New Forest Ramsar site
  - St Alban's Head to Durlston Head SAC

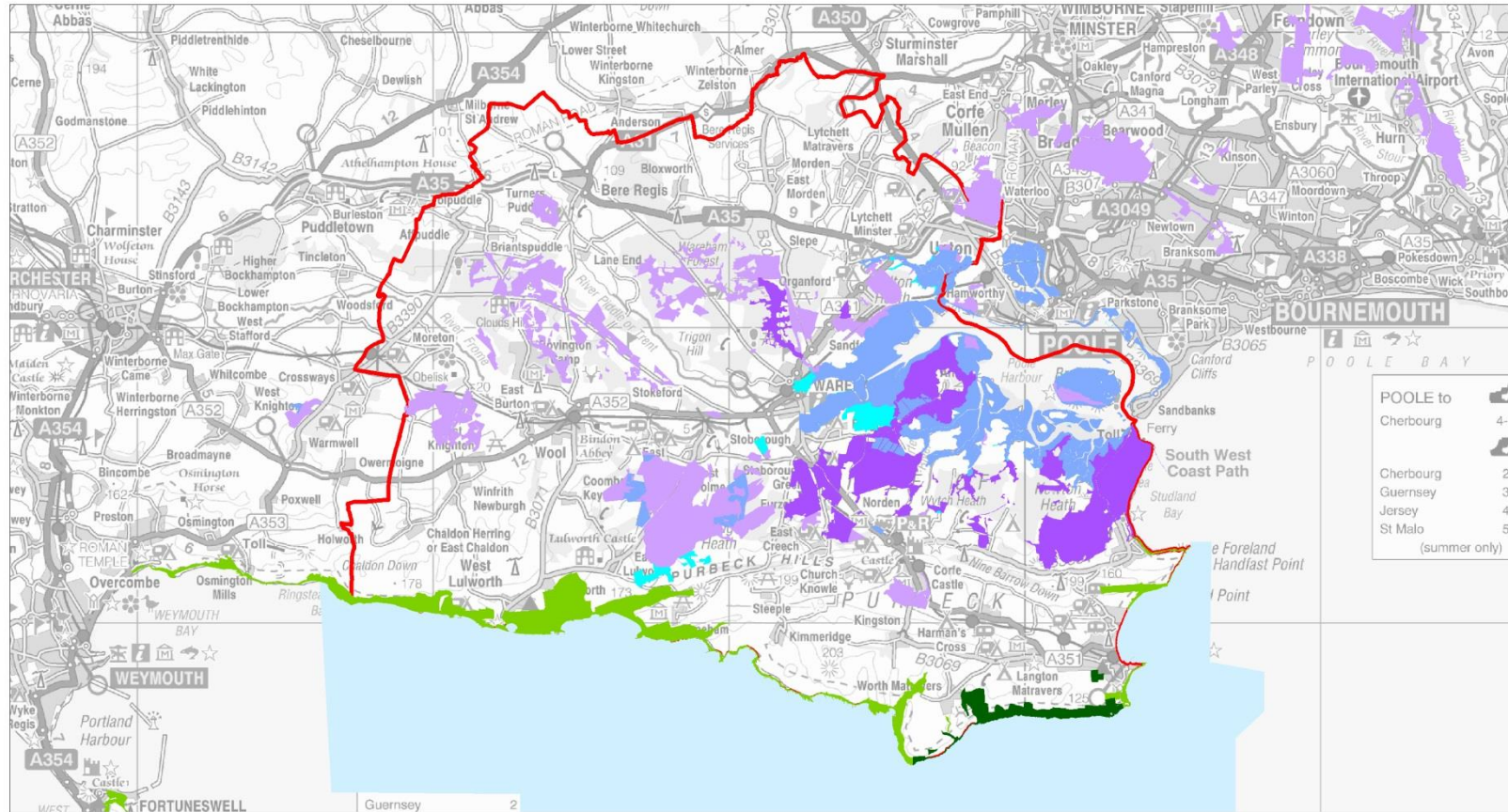
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<sup>3</sup> <https://www.gov.uk/government/consultations/poole-harbour-special-protection-area-extension-comment-on-proposals>

- Isle of Portland to Studland Cliffs SAC

- 1.19 Relevant information on the European site designations and their interest features are provided in Appendix 3.
- 1.20 There are also a number of forestry sites that are not yet designated or classified as European sites but that hold very high numbers of Annex I bird species, particularly nightjar and woodlark. Where a site has been identified as hosting the required quality, extent or populations of species, they may proceed through the selection process and become a European site in future. In addition these forest blocks are often contiguous with the Dorset Heathlands SPA and as such as functionally linked. The NPPF requires competent authorities to treat potential sites as European sites for the purposes of assessing the impacts of plans or projects once they have been formally proposed by Government. Where sites are in the early stages of consideration before being formally proposed, Natural England may suggest that it would be beneficial to have regard for such sites in decision making. This recommendation is made because there may be implications for a project if it is approved and then a formal designation is made later. In such instances a competent authority may be required to review the permission given. For these reasons, it can be beneficial to ‘future proof’ plans and projects by having regard for impacts on sites that may possibly come forward for designation.
- 1.21 Key forest blocks in Purbeck include:
- Wareham Forest
  - Rempstone
  - Hethfelton
  - Moreton
  - Puddletown
- 1.22 Natural England will give locally specific advice regarding when such an approach would be beneficial. In preparing and updating this Habitats Regulations Assessment, Natural England will be consulted to discuss how such sites should be treated.
- 1.23 Irrespective of the benefit of considering sites that may be added to the European site series, it is also important to note that the Birds Directive requires the habitat of all species listed on Annex 1 of the Directive (for which SPAs are classified) to be preserved as far as possible, by requiring Member States to ‘strive to avoid pollution or deterioration’ of such habitats.

**Map 1: European Sites**



POOLE to	Ferry
Cherbourg	4-6
Cherbourg	2 h
Guernsey	3 h
Jersey	4 h
St Malo	5 h (summer only)

**SACs**

- Dorset Heaths
- Dorset Heaths (Purbeck & Wareham) & Studland Dunes
- Isle of Portland to Studland Cliffs
- St Albans Head to Durlston Head
- Studland to Portland

- SPAs (lying outside SAC; note Poole Harbour extension not shown)
- Ramsar (lying outside SAC or SPA)
- Purbeck District

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## 2. Protecting European Sites in Purbeck to Date

- 2.1 The European sites described in the previous section and in detail in Appendix 3 have been the subject of considerable Habitats Regulations Assessment work in recent years, both specifically within the Purbeck District and most notably for the preparation and adoption of PLP1, but also across Dorset as a whole. Collaborative working across authority boundaries has led to the development of agreed approaches to protecting European sites with specific regard for the potential impact of new housing on European sites. This section provides background information on the Habitats Regulations Assessment considerations for the PLP1.

### Housing Levels in PLP 1 and Planning Context

- 2.2 Purbeck District Council adopted the Purbeck Local Plan Part 1 (PLP1) in November 2012. The plan sets out the provision of 2,520 dwellings (120 per annum) between 2006 and 2027. These dwellings are planned through infill development and settlement extensions to Bere Regis, Lytchett Matravers, Swanage, Upton and Wareham. The PLP1 allocates settlement extensions at Lytchett Matravers, Upton and Wareham, but the others will be allocated through neighbourhood plans and the Swanage Local Plan.
- 2.3 The HRA (Liley & Tyldesley 2011) that accompanied the PLP1 was produced iteratively alongside the plan, and cross-references to a considerable evidence base that (in particular) focuses on the Dorset Heaths and Poole Harbour. That evidence base is now also drawn upon to inform the appropriate assessment sections of this report for the consideration of the additional growth to be proposed in the plan review.
- 2.4 Concern regarding development in Purbeck goes back many years - for example the increasing fragmentation of the Dorset Heaths was highlighted in the 1960s (Moore 1962). Studies in the 1990s of fire incidence on the Dorset Heaths showed links to the levels of development (Kirby & Tantram 1999) and reviews of urban impacts focussed on the Dorset Heaths raised widespread concerns (de Molenaar 1998; Haskins 2000). A previous Purbeck Local Plan (2004) was never statutorily adopted due to its failure to implement a strategic housing allocation at Holton Heath, following a public inquiry that focussed primarily on nature conservation issues.
- 2.5 The PLP1 contains a range of mitigation measures and draws on particular pieces of evidence that ensured confidence that the level of housing set out could be delivered. The evidence included a detailed consideration of the effects of development at Lytchett Minster (White *et al.* 2008), detailed considerations of the implications of different growth scenarios (Liley *et al.* 2010), evidence to support HRAs relating to SE Dorset (Liley *et al.* 2006) and a range of visitor studies (Clarke *et al.* 2006; Liley, Sharp & Clarke 2008). Mitigation measures have been carefully developed over a number of years through partnership working. With respect to the heaths, measures are now set out within the Heathland Supplementary Planning Document, and for Poole Harbour there is a Strategy for Managing Nitrogen in the Poole Harbour Catchment.

- 2.6 The NPPF requires local planning authorities to meet their objectively assessed development needs. The PLP1 did not pursue a housing target higher than 2,520 dwellings over the plan period because the Habitats Regulations Assessment supporting the PLP was unable to conclude that the impacts of growth above this level on European protected sites could be successfully mitigated, and Natural England fully supported that conclusion.
- 2.7 The Planning Inspector who examined the PLP1 concluded that the plan was sound and the Council was right to adopt the precautionary approach in the short term with the intention of exploring higher housing growth through a separate partial review by 2017. The principal driver behind the current partial review is therefore to investigate the possibility for heathland mitigation measures that will enable the potential delivery of higher housing growth. The Council is now testing options for delivering additional housing growth and whether adequate mitigation can be secured and implemented.
- 2.8 European protected sites, and the blockages they are perceived to create in the planning system, have been the focus of Government and media attention in recent years. Defra undertook a review of the implementation of the Habitats Directive in 2012 (Defra 2012). Whilst the evidence clearly demonstrated that the European legislation only precluded development in a very small percentage of cases, the review made it clear that a number of improvements needed to be made, most notably with regard to available evidence for assessment, and more positive and close working between Government, Local Planning Authorities, developers and nature conservation bodies to collectively seek solutions that enabled growth and protected European site interests at the same time, wherever possible. It is considered that the approach undertaken by Purbeck to take forward a plan but plan for an early review demonstrates that positive working.
- 2.9 Previous Habitats Regulations Assessment work for the PLP1 (Liley & Tyldesley 2011) identified the following likely significant effects relating to European sites in and around Purbeck:
- Impacts of new housing and recreational pressure on the Dorset Heaths (the Dorset Heaths SAC, Dorset Heaths (Purbeck & Wareham) and Studland Dunes SAC, Dorset Heathlands SPA, Dorset Heathlands Ramsar).
  - Increased recreational pressure on Poole Harbour SPA/Ramsar from shore-based and water based activities likely to increase as a result of new housing.
  - Increased recreational pressure to coastal sites as a result of enhanced transport links and housing (Isle of Portland to Studland Cliffs SAC, St Alban's to Durlston Head SAC).
  - Increased recreational pressure to the New Forest (New Forest SPA/SAC/Ramsar) as a result of increased population and enhanced transport links within Purbeck.
  - Water issues, including abstraction and water quality, affecting Poole Harbour SPA/Ramsar and Dorset Heaths SAC, Dorset Heaths (Purbeck & Wareham) and Studland Dunes SAC, Dorset Heathlands SPA, Dorset Heathlands Ramsar).



- Fragmentation and pressure on heathland sites (Dorset Heaths SAC, Dorset Heathlands SPA/Ramsar) as a result of employment allocation (Holton Heath).
- Air quality issues as a result of increased traffic (Dorset Heaths SAC, Dorset Heaths (Purbeck & Wareham) and Studland Dunes SAC, Dorset Heathlands SPA/Ramsar and Poole Harbour SPA/Ramsar).

2.10 The Habitats Regulations Assessment for PLP1 considered that, without mitigation measures, adverse effects would be likely as a result of the plan alone, either as single elements or as a combination of elements within the plan for each of these issues. However, mitigation measures, which would eliminate these effects, were developed alongside the progression of the plan, and the mitigation measures were integrated into the plan, providing a robust mechanism to ensure that development would not adversely affect the European sites. This previous assessment work informs the Habitats Regulations Assessment of the plan review, which is the subject of this report, in terms of the same sites and issues, as summarised in Table 1.

**Table 1: Summary table highlighting issues and Natura 2000 sites for which adverse effects on integrity were identified within HRA work for PLP1. Table adapted from Liley & Tyldesley (2011).**

Issue	Relevant policies in PLP 1	Natura 2000 sites					Mitigation / Notes
		Dorset Heaths <sup>4</sup>	Poole Harbour	St Albans Head to Durlston Head	Isle of Portland to Studland Cliffs	New Forest	
SAC		✓		✓	✓	✓	
SPA		✓	✓			✓	
Ramsar		✓	✓			✓	
Increased recreational pressure and other urban effects	HS, TA	✓	✓	✓	✓	✓	Increased recreational pressure from development across the District with the potential for an adverse effect on heathland, Poole Harbour and coastal sites. Mitigation through access management and SANGS provision.
Water abstraction	HS	✓					Strategic management of water supplies potentially resolves issue in long term.
Water quality	HS	✓	✓				Detail of mitigation measures relating to Poole Harbour needs to be finalised
Fragmentation	ELS, TA	✓					Employment land at Holton Heath and Winfrith has potential to impact nearby heaths. Detailed assessment required of each site to ensure level of development can go ahead.
Air quality	HS, ELS, TA, IAT	✓					Development in Swanage will have particular impacts for traffic (Stoborough Heath and Corfe Common SSSIs).

<sup>4</sup> By Dorset Heaths we mean the Dorset Heaths SAC, The Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC, the Dorset Heathlands SPA and the Dorset Heathlands Ramsar

### 3. Checking the Options for Likely Significant Effects

- 3.1 In accordance with the Habitats Regulations, and as described in Appendix 1, a step by step process of Habitats Regulations Assessment needs to be undertaken for the plan review, because the reviewed plan will effectively be a new plan, in place to guide the sustainable growth Purbeck for 16 years (or similar timescale depending on consultation feedback on the proposed plan period).
- 3.2 This report includes the previous screening assessment of the issues and options document at Appendix 4. A re-screening has now been undertaken of the Options stage of the plan, checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment sections that follow. The screening and this HRA are based on an early draft of the options circulated by Purbeck District Council in early April 2016. The HRA was then updated (primarily the employment section) in light of a version shared by the Council on 9<sup>th</sup> May 2016. Further minor changes were made in light of a change in title of the review.
- 3.3 The check for likely significant effects provides a provisional screening of the plan. It is undertaken to enable the plan maker as competent authority to do two things; narrow down the elements of the plan that may pose a risk to European sites to highlight those options that are likely to be harmful and, where an option poses a risk but is a desired element of the plan, the screening exercise identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to eliminate those risks. Further assessment and evidence gathering after screening may include, for example, the commissioning of additional survey work, modelling, researching scientific literature or seeking expert opinion.
- 3.4 The options document was in a near final form when it was provided for screening. It will undergo final editing before being published for public consultation. This Habitats Regulations Assessment will also be made available at the consultation of the Options.
- 3.5 The Options document is structured in a way that clearly identified how consultation at the Issues and Options stage has shaped the plan to date, with sections setting out the key consultation comments and how the plan is responding to those.
- 3.6 The Options document identifies key issues, related issues and other issues, in a hierarchy of issues that reflects the earlier Issues and Options document to demonstrate a consistent progression of policy formulation between the two stages. The plan will further evolve into a formalised plan for the pre-submission stage. The housing needs for the District is the primary reason for the early review of the plan, and is therefore a fundamental part of the emerging new plan.
- 3.7 Each emerging policy area and allocation within the Options document is considered in turn in the screening assessment. Table 2 provides the screening assessment for the Options stage of the plan. Where risks are highlighted and there is a possibility of

significant effects on European sites, further more detailed assessment is required. Inevitably there will be precaution in screening elements of the plan and where lack of detail presents uncertainties; it has to be assumed that there could be a potential risk to European sites, as described in Appendix 1 in relation to European case law.

- 3.8 As the plan develops further, screening will continue to be repeated so that the whole plan proposed for adoption has been checked for any possibility of significant effects on European sites. This ensures that the final Habitats Regulations Assessment is based on the final plan submitted for Examination and the assessment provides an accurate and up to date record of assessment for the plan in its final stages before adoption. Any changes recommended by the Examining Inspector will need to undergo a final Habitats Regulations Assessment check before the plan is formally adopted.
- 3.9 At this current stage, the screening for likely significant effects has identified risks in terms of the housing allocations and the proposal for a tourism development and country park at Morden. These potential allocations pose a risk to European sites in terms of the additional recreation pressure they may bring to European sites sensitive to recreation pressure. These concerns are therefore assessed in further detail within the appropriate assessment sections of this report.

**Table 2: Screening the Options Document for likely significant effects ('LSE')**

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Plan period to 2033	An explanation of the option for a 15 year time period, aligning with neighbouring Poole plan period and adhering to the NPPF recommendation for 15 year plans	No LSE for all options	Any plan review throughout the period will require a new Habitats Regulations Assessment, irrespective of timescales	None. The extra housing provision provided for by the review is considered in specific checks below.
Meeting objectively assessed housing needs by meeting the shortfall of 3,080 houses over the plan period	The current PLP1 plans for 2,520 homes over the plan period. The immediate review relates to the shortfall of housing, currently assessed as 3,080. The new plan would therefore plan for 5,600 new houses up to 2033, 238 per annum.	LSE	The currently adopted plan provides European site mitigation based on the number of houses currently proposed. A higher figure does not yet have certainty of mitigation delivery.	Take to appropriate assessment for further analysis
Development strategy, directing development to the most sustainable locations. (Policy LD)	The settlement hierarchy option presented focuses growth towards larger towns of Swanage, Upton and Wareham, being the most sustainable option. This is followed by key service villages and local villages.	LSE	Potential impacts relate to specific locations and opportunities for mitigation, rather than the general settlement hierarchy.	Final policy on settlement hierarchy should have regard for the appropriate assessment recommendations on site specific housing options.
Potential Large Sites (could accommodate 200 houses or more)	Seven large sites were presented at Issues and Options stage, in light of consultation, two are not carried forward to this Options stage and a further two are the subject of additional considerations. Additional smaller sites would also be required to deliver all housing needs.	LSE	Consultation responses identified the need to be mindful of environmental constraints in selecting housing sites. This contributed to the rejection of two sites. However, options presented still have the potential to affect European sites in terms of recreational pressure and urbanisation impacts	Each of the five sites should be revisited as part of the Options appropriate assessment to re-check proposals and any additional information now available.
Infrastructure-led approach to allocating overall housing numbers to be delivered at each settlement.	Approximate number of new homes to be delivered by settlement, to demonstrate where additional housing requirements will be met.	LSE	Potential impacts relate to specific locations and opportunities for mitigation, rather than the general settlement hierarchy and overall numbers.	Final policy should have regard for the appropriate assessment recommendations on site specific housing options.
Wool housing sites –	Map and description of this allocation.	LSE	Potential for impacts on European sites in the	Check mitigation proposals as part

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Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
option for 1,000 homes	Confirmation of the SANG provision to be made.		absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	of appropriate assessment, in light of available information on this site and the measures to be applied.
Lychett Minster housing sites –option for 650 homes	Map and description of this allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Wareham Town housing sites –option for 500 homes	Map and description of this allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Moreton Station – option for 350 homes	Map and description of this allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
South Lychett Matravers – option for 330 homes	Map and description of this allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
North Wareham – option for 205 homes	Map and description of this allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Upton – option for 100 homes	Map and description of this allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Langton Matravers – option for 40 homes	Map and description of this allocation. Text concludes that SANG provision is not required at this site.	LSE	Potential for impacts on European sites in the absence of mitigation. Check whether any mitigation is required.	Check mitigation need as part of appropriate assessment, in light of available information.
Harmans Cross – option for 20 homes	Map and description of this allocation. Text concludes that SANG provision is not required at this site.	LSE	Potential for impacts on European sites in the absence of mitigation. Check whether any mitigation is required.	Check mitigation need as part of appropriate assessment, in light of available information.
Swanage text	Confirmation that there is currently	No LSE	No allocation proposed, but text recognises that	Revisit at submission draft to check

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Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
	nothing proposed in Swanage Swanage is the subject of its own town plan with allocations within.		there is the potential for an allocation. Swanage plan HRA provides mitigation for Swanage growth.	whether Swanage allocations have been added.
Moreton Alternative Option A – an alternative option for 600 homes	Map and description of this alternative allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Although this is an alternative option, there is the potential for its inclusion in the plan. Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Lytchett Matravers Alternative Option A – an alternative option (number unspecified)	Map and description of this alternative allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Although this is an alternative option, there is the potential for its inclusion in the plan. Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Lytchett Matravers Alternative Option B – an alternative option for 600 homes	Map and description of this alternative allocation. Confirmation of the SANG provision to be made.	LSE	Potential for impacts on European sites in the absence of mitigation. Mitigation proposed should be check to ensure it is fit for purpose.	Although this is an alternative option, there is the potential for its inclusion in the plan. Check mitigation proposals as part of appropriate assessment, in light of available information on this site and the measures to be applied.
Langton Matravers Alternative Option B – an alternative option (number unspecified)	Map and description of this alternative allocation. Text concludes that SANG provision is not required at this site.	LSE	Potential for impacts on European sites in the absence of mitigation. Check whether any mitigation is required.	Although this is an alternative option, there is the potential for its inclusion in the plan. Check mitigation need as part of appropriate assessment, in light of available information.
Possible additional options	Reference to further options that do not have the benefit of any further investigations by the Council	LSE	Potential for impacts on European sites in the absence of mitigation.	Further assessment would need to be made of any additional sites brought forward into the plan at a later date.

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Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Employment: Holton Heath	Expansion of Holton Heath Trading Park	LSE	Risk of contamination and fragmentation to heathland sites	Take to appropriate assessment for further analysis
Employment: Sandford Lane	Expansion of Sandford Lane Industrial Estate	LSE	Risk of contamination to Poole Harbour Ramsar and Dorset Heaths SAC/Ramsar	Take to appropriate assessment for further analysis
Employment: Corfe Castle Depot	Expansion of Corfe Castle Depot	No LSE	Well away from any European site	
Employment: Dorset Green	Amendment of safeguarded employment area	LSE	Adjacent to Dorset Heathland SPA/Ramsar and SAC, risks from loss of foraging habitat for birds, contamination, disturbance	Take to appropriate assessment for further analysis
Retail	Delivering the required 6000sqm of additional retail floor space required.	No LSE	There are no impact pathways arising from the delivery of additional retail	None, although project specific development should always be checked.
Heathland mitigation	Explanation of the current mitigation and restrictions to protect European sites as part of the strategic approach, and the option of continuing with this approach.	No LSE	Consultation responses indicate the majority support the current approach, but some referred to lack of flexibility and the need to explore other mitigation options in addition to SANGs. Additional commissioned work concludes that SANGs continue to be the achievable solution to allowing for growth whilst protecting European sites. With additional evidence to support the approach in place and a preference to continue, the European sites should be adequately protected, subject to site specific consideration of fit with the strategic approach.	Ensure any site specific considerations are informed by the continued strategic approach and undertake site specific (and then project specific) HRA as required.
Transport – Norden park and ride	Provision of a new park and ride facility.	No LSE	Policy could have a positive impact through reducing road traffic past Corfe Common.	There could be implications for access onto the heaths given the location and the availability at this location of bike hire facilities etc. Careful promotion of bike routes may be necessary.
Affordable housing delivery (Policy AH)	Requirements for development to deliver proportions of affordable housing	No LSE	Policy does not set any quantum or location for housing, but rather it requires particular housing types to be delivered.	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to



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Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
				be met through the overall strategic approach.
Rural Areas (Policy RES)	Criteria for rural housing	No LSE	Policy does not set any quantum or location for housing, but rather it requires particular housing types in rural areas to be delivered.	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to be met through the overall strategic approach.
Affordable housing tenure (Policy AHT)	Criteria for housing tenure	No LSE	Policy does not set any quantum or location for housing, but rather it requires particular tenure types.	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to be met through the overall strategic approach.
Self-built housing	Relates to the promotion of self-build within the new plan	No LSE	Each new home has the potential to contribute to impacts, irrespective of the type of accommodation	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to be met through the overall strategic approach.
Housing mix (Policy HM)	Criteria for housing types	No LSE	Policy does not set any quantum or location for housing, but rather it requires particular housing types.	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to be met through the overall strategic approach.
Bovington Middle School care home site	Map and text to support the re-use of the site for a 50+ bed care home.	No LSE	Conforms with established heathland mitigation approach of allowing particular development types within 400m of heaths where no effects are likely.	Re-check same development type at next plan stage
Keysworth Drive and Camp Farm care home site	Map and text to support the re-use of the site for a 50+ bed care home.	No LSE	Conforms with established heathland mitigation approach of allowing particular development types within 400m of heaths where no effects are likely.	Re-check same development type at next plan stage

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Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Gypsies, Travellers and Travelling Show People	Provision of identified need for 33 pitches. Without allocated sites there is the potential to use housing sites.	No LSE	Each new home has the potential to contribute to impacts, irrespective of the type of accommodation.	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to be met through the overall strategic approach.
Morden country park and tourist accommodation	Proposal for public open space and 80-100 holiday chalets. Reference made to potential options for mitigating effects on European sites.	LSE	Adjacent heathland sites – potential for disturbance to Annex I birds, increased fire incidence, trampling, dog fouling, water quality	The mitigation proposals require further consideration. Take to appropriate assessment for further analysis/evidence of suitability and effectiveness.
Other open space	Open space is delivery in new development	No LSE	No additional development, relates to open space delivery other than SANGs	None
Existing policies – checking PLP1 policies remain up to date	Amendments to PLP1 policies listed	No LSE	Amendments to PLP1 policies are minor in relation to HRA, will not lead to any additional risks to European sites	None – all development still required to adhere to strategic approaches to mitigating for European site risks.
Relocation of development from Coastal Change Management Area	Allowing new development to replace that threatened by coastal erosion	No LSE	Policy does not set any quantum or location for development, risks to European sites are not increased by this policy.	None – all development still required to adhere to strategic approaches to mitigating for European site risks.
Coastal Change Management Areas (Policy CCMA)	Sets criteria for new development within a CCMA	No LSE	Policy does not set any quantum or location for development, reference made to protecting natural environment and climate change adaptation.	None – all development still required to adhere to strategic approaches to mitigating for European site risks.
Occupational dwellings in the countryside (Policy OD)	Criteria for meeting the particular housing need for countryside/agricultural workers	No LSE	Policy does not set any quantum or location for housing, but rather it requires particular housing types.	Note that all housing will need to deliver required mitigation, and any mitigation shortfall as a result of particular housing types will need to be met through the overall strategic approach.
Sustainable Drainage (Policy SUDS)	Requirements for SUDs provision	No LSE	Does not promote development, an environmentally positive policy.	None

## 4. Appropriate Assessment – Impact of Additional Growth

- 4.1 An appropriate assessment is made of all aspects of the plan where there are uncertainties with regard to impacts on European sites. The appropriate assessment sections of this report provide a more detailed assessment of new development in the Purbeck District and potential impacts on European sites. The following sections consider each of the proposed development sites within the Options document, which will potentially deliver the additional residential, employment and tourism growth required by the partial review. This appropriate assessment section explains the potential effects that the additional growth may have on the European sites, and then subsequent appropriate assessment sections assess in turn the development sites that have been screened in to appropriate assessment; the housing sites, employment sites and then the tourism site.
- 4.2 Footprint Ecology holds data on housing numbers per postcode dating back to 2003. From the period 2003-2014 there was around an 8% growth in the number of houses, from 20,535 in 2003 to 22,127 dwellings in 2014; a level of development of around 150 dwelling per annum. The options document proposes an additional 3,080 new dwellings over the plan period up to 2033, which is on top of the current 2,520 new homes proposed in the existing PLP1. This is equivalent to a 27% increase in housing within Purbeck over the plan period, representing a marked step up in development. In this context, the potential for this growth to have adverse effects on the European sites is now assessed.

### Dorset Heathlands

- 4.3 For the Dorset Heathlands SPA and the Dorset Heaths SACs, Natural England considers that local authorities undertaking appropriate assessment will identify a significant adverse effect in combination with other proposals, for any developments that lie in the area between 400m and 5 km from the protected heath boundary.
- 4.4 Increased development can have a range of impacts on heathland and these are well documented (for reviews see Haskins 2000; Underhill-Day 2005; Liley et al. 2006). Such impacts that are relevant to the Dorset heathland sites around Purbeck include:
- Increased numbers of pet cats and increased predation of ground-nesting birds (Dorset Heathlands SPA) and other wildlife (Dorset Heaths SAC, Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC)
  - Increased fire risk (Dorset Heathlands SPA, Dorset Heaths SAC, Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC)
  - Increased levels of recreation, with the potential for disturbance impacts to ground-nesting birds (Dorset Heathlands SPA); trampling and damage to the SAC interest (Dorset Heaths SAC; Dorset Heaths (Purbeck and Wareham) and Studland Dunes); eutrophication from dog fouling (Dorset Heaths SAC; Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC).

- Anti-social behaviour and contamination through vandalism, fly tipping, littering and the introduction of alien plants and animals (Dorset Heaths SAC, Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC).

- 4.5 In light of the identified risks to heathlands from increased recreation, Dorset authorities worked together to develop an evidence base to inform a specific planning document to deliver a strategic approach to mitigating for recreation arising from new residential growth. The Dorset Heathlands Planning Framework (2015-2020) is the Heathland Mitigation Strategy for South East Dorset, adopted as a Supplementary Planning Document (SPD) by the planning authorities, and updated on a regular basis. It requires the planning authorities to work together to continually ensure the adequate implementation of the developer funded projects to mitigate for impacts to the heaths.
- 4.6 The SPD requires each local planning authority to have regard for any spatial planning requirements, including the allocation of SANGs to be developed as an alternative to undertaking recreation on the heaths and projects to deliver on-site access management. The SPD includes guidance on the nature and type of greenspace that should be created (or an existing greenspace enhanced) to provide a site that is likely to attract visitors away from the heaths by providing a similar recreational experience. The SPD also states that for larger developments (of approximately 50 or more dwellings), provision of SANGs should form part of the overall infrastructure provision of that site, particularly where urban extensions or development on greenfield sites are proposed.
- 4.7 Natural England advises in accordance with Dorset Heathlands Planning Framework; that avoidance or mitigation measures can allow development to be approved. Mitigation will encompass measures to divert recreational pressure away from heathland and access management measures.
- 4.8 Only around 3% (some 1500ha) of Purbeck District is beyond 5km from the Dorset Heathlands SPA or Dorset Heaths SACs, as such development within Purbeck will be almost entirely within 5km of a heathland site. The parts of the District that do fall outside the 5km are mostly along the coast, where other constraints on development occur. As such mitigation measures need to be set out in order for a detailed appropriate assessment.
- 4.9 Until recently, mitigation projects were approved by a Heathland Executive Group, consisting of a Councillor from each of the 6 local authorities together with representatives from Natural England, Home Builders Federation and the RSPB. The system has now changed in that each local authority has taken a greater role in delivering the mitigation within its own boundary. From 2014, the Urban Heaths Partnership has been restructured and reduced in size. Funding for the partnership has been agreed and set for the period 2014-2019, and 15% of heathland mitigation monies will be allocated towards the work of the partnership. The number of warden staff has been greatly reduced and now each local authority is responsible for the remaining 85% of the funds raised. One part-time warden with a heathland mitigation role is now

employed by Purbeck District Council, and this role is provided for Purbeck District Council by than the Urban Heaths Partnership.

- 4.10 Developer contributions for heathland mitigation were originally collected by Purbeck District Council through individual S106 agreements. With the introduction of the new Community Infrastructure Levy (CIL) a change in the way in which planning authorities obtain developer money was introduced, with any funding required to provide infrastructure collected through CIL, in accordance with tariffs set for each administrative area based on their infrastructure needs and viability of payments, i.e. tariffs are set at a level that is affordable and viable for the development of the local area. Planning authorities with European site mitigation schemes in place or in development are therefore able to use CIL to fund infrastructure related mitigation.
- 4.11 Since 4 June 2014, Purbeck's heathland mitigation has either been funded through CIL or by securing site specific mitigation through Section 106. Purbeck's CIL charging schedule<sup>5</sup> commits to heathland mitigation, and its draft update is currently being prepared alongside the Local Plan review. The new draft charging schedule refers to the need to fund strategic SANGs and a range of on-site management measures. CIL expenditure is not necessarily restricted to those projects on the charging schedule, and the strategic approach to heathland mitigation will require a continued update of proposed projects for funding.

#### **Levels of funding and types of mitigation project funded**

- 4.12 As of February 2014, the cumulative amount of gross contributions received by the relevant local authorities (Poole, Bournemouth, East Dorset, Purbeck & Christchurch) was £6,479,495. This money has been spent (predominantly outside Purbeck) on a wide range of projects, including:
- On-site wardening
  - Education programmes delivered by the Urban Heaths Partnership and Dorset Dogs
  - Improvements to existing sites outside the heaths which have the potential to absorb additional access (such as Delph Woods)
  - Creation of alternative sites away from heaths (including a BMX area in Christchurch and contribution towards a multi-use play area as well as new sites for more general recreation)
  - Purchase of land adjacent to heaths ('heath support areas') to provide increased space for recreation
  - Installation of fire-fighting infrastructure on the heaths (such as fire hydrants)
  - On-site management works, such as path work to minimise erosion
  - Monitoring, including purchase monitoring equipment and both bird and people monitoring.
- 4.13 A key component in the delivery of the mitigation has been the Urban Heaths Partnership, employed through Dorset County Council. The Urban Heaths Partnership

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<sup>5</sup> <https://www.dorsetforyou.com/purbeck-community-infrastructure-levy>

has involved a team of wardens who have undertaken the on-site wardening work, and much of the monitoring and education work. The team of wardens have worked across all local authority areas.

#### Success of mitigation to date in Purbeck

- 4.14 In later sections of this report consideration is given to how the specific large housing sites that may help deliver the additional new houses might be taken forward with SANGs delivery and on-site mitigation, including how wardening effort will be directed and what measures are possible. In order to consider future mitigation it is necessary to review how well existing mitigation is working.
- 4.15 Monitoring data have been collected by the Urban Heaths partnership and summarised in annual reports (e.g. Panter & Liley 2015), but no detailed analysis has yet been undertaken to systematically look at the levels of housing growth, changes in access and success of mitigation. Trends in the key bird numbers (Liley & Fearnley 2014) on the Dorset Heaths suggest key bird species are doing relatively well, but there have been some marked fluctuations. For nightjar there is evidence that trends have been different on the urban and rural heaths, with increases on the rural heathland sites not being matched on more urban sites.
- 4.16 With respect to SANGs, some data are available for two major SANGs sites in Purbeck: the Holme Lane SANG which was targeted to provide mitigation for the Westgate development in Wareham and Upton Country Park (the new 'SANGs car-park lies in Purbeck). Counts of parked cars at Holme Lane over the period 2015-2016<sup>6</sup> has recorded a total of 7 cars (from 16 visits spread over the period), indicating that the site is not drawing many visitors as yet. By contrast at Upton Country Park a total of 88 cars have been counted for the SANG car-park from a total of 10 visits, indicating a typical level of use of 8 cars.
- 4.17 The issues with the Holme Lane SANG are likely to relate to a lack of promotion, lack of maintenance (dog bins are currently overflowing), interpretation, signage and how the site has been landscaped. At present it is not clear that the site has been established to provide access and it is not clear when passing the car-park what it is there for. There are no signs directing potential visitors to the site from the Wareham by-pass and no maps or signs indicating where it is possible to walk once on the site. Large scale rhododendron clearance has taken place to open the woodland, but the fences and piles of woodchip are not necessarily welcoming. These issues relate to the SANG not being officially complete and works still to be done and the site finalised. It is our understanding that all homes at Westgate will receive information about the SANG through a letter drop and interpretation etc. is to be installed. Personal observation of the SANG suggests it is being used currently, at a low level but the site has not fulfilled it's potential yet. It is important that changes are made and lessons learnt regarding future SANG provision. It would seem prudent that further monitoring is undertaken to

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<sup>6</sup> Standard repeat counts made on fixed dates each year as part of the annual monitoring by the Urban Heaths Partnership.

ensure the improvement work and the SANG becomes well used. By contrast the SANG car-park at Upton (which has been widely promoted and subject to a ‘launch event’ with the local community) appears to be working well. It would therefore seem that there is some evidence of SANGs working in Purbeck, but there are some current concerns regarding the Holme Lane site.

#### Review of mitigation options and approaches to mitigation elsewhere

4.18 Purbeck District Council commissioned a report (Riley et al. 2016) to review options for heathland mitigation in the District, given the challenges of delivering the heathland mitigation. In particular the consultants were asked to focus on SANGs and whether there were other options for mitigation in Purbeck, given the District’s more rural feel. The consultants reviewed mitigation approaches at other European sites and considered the special case of Purbeck. Their conclusions were:

*“In conclusion, there appears to be no evidential basis on which to conclude that mitigation for a net increase in dwellings within Purbeck district over the Local Plan period is not required to avoid adverse effects on the Dorset Heathlands SPA, SAC and Ramsar site. There is also no evidential basis on which to move away from a 400m ‘no net new residences’ zone, given the high level of existing housing within very close proximity (400m) to the European sites and the likelihood that a similarly high level of net new housing would come forward without strategic controls. There is also no basis on which to exclude gypsy & traveller sites or previously-developed land from the prohibition on net new residential development within 400m.*

*SANG appear to be an achievable solution for much of the new housing expected in Purbeck district, particularly if this is focussed on large developments that will provide their own bespoke SANG. However, it is considered that in cases where strategic SANG cannot be achieved, such as may well be the case around Swanage, there is potential, given the small number of dwellings likely to be affected, to explore opportunities for improving strategic access to the wider countryside as an alternative to actual SANG. Individual proposals for this would require consideration on a case by case basis.”*

4.19 SANGs are a main element of heathland mitigation in the Thames Basin heaths area and there are now a large number (over 50), many of which have monitoring data extending back over a number of years. On the whole the data show the sites are well used by residents and the activities undertaken, lengths of visit, visitor origins etc. to the SANGs are broadly similar to the SPA (Liley, Panter & Rawlings 2015). As such there is reasonable evidence that the approach is in general a good one.

#### Plan review requirements for heathland sites

4.20 Each of the options for housing allocations needs to be assessed in term of their conformity with the Dorset Heathlands Framework and guidance in relation to SANGs provision. Section 5 of this report provides an appropriate assessment of specific housing development locations, considering each in turn. As identified in the screening table, the tourism accommodation/country park proposal at Morden was also identified as likely to have a significant effect, and that is therefore also assessed at section 7.

### Coastal SAC sites and recreation

- 4.21 The Habitats Regulations Assessment for the PLP1 (Liley & Tyldesley 2011) indicated that the new housing and potential for new tourist accommodation within the Core Strategy, if implemented without mitigation measures, could result in an adverse effect upon the integrity of the Dorset Heaths (Purbeck & Wareham) and Studland Dunes SAC, the Isle of Portland to Studland Cliffs SAC and the St Alban's Head to Durlston Head SAC. It is development in Swanage that is likely to have the greatest impact, but development within much of the district may contribute to the numbers of people visiting the coast (Liley, Sharp & Clarke 2008).
- 4.22 The impacts from increased housing are potentially 'diluted' in that the coastal sites are heavily visited by tourists, and receive many more visitors than, for example, the heaths. Given that some of the impacts (such as trampling and eutrophication) are similar for coastal habitats and heathland ones, the impact of new housing on coastal sites is potentially less. However, local people may visit different sites to tourists, and use coastal sites differently, for example local people may be more likely to walk with dogs.
- 4.23 The assessment indicated that, without mitigation measures, adverse effects would be likely as a result of the Core Strategy alone, either as single elements or as a combination of elements within the plan. However, mitigation measures, which would eliminate these effects, were considered feasible and were referenced within the Strategy document. In particular monitoring and early warning mechanisms were proposed. Data from such monitoring will be important in informing the potential for coastal sites to absorb additional recreation.

#### Plan review requirements for coastal sites

- 4.24 For development close to the coast it will be important to draw on monitoring data and the mitigation undertaken to date within the assessment, in order to rule out any adverse effects to coastal SAC sites.

### Poole Harbour and Recreation

- 4.25 Disturbance has been identified by Natural England as a generic issue across many European Marine Sites (see Coyle & Wiggins 2010), and can be an issue for a range of species.
- 4.26 Disturbance to wintering and passage waterfowl can result in:
- A reduction in the time spent feeding due to repeated flushing/increased vigilance (Fitzpatrick & Bouchez 1998; Stillman & Goss-Custard 2002; Bright *et al.* 2003; Thomas, Kvitek & Bretz 2003; Yasué 2005)
  - Increased energetic costs (Stock & Hofeditz 1997; Nolet *et al.* 2002)
  - Avoidance of areas of otherwise suitable habitat, potentially using poorer quality feeding/roosting sites instead (Cryer *et al.* 1987; Gill 1996; Burton *et al.* 2002; Burton, Rehfish & Clark 2002)



- Increased stress (Regel & Putz 1997; Weimerskirch *et al.* 2002; Walker, Dee Boersma & Wingfield 2006; Thiel *et al.* 2011).
- 4.27 Disturbance can have additional impacts for breeding birds and for breeding gulls and terns, impacts of recreation can include reduced breeding success (Robert & Ralph 1975; Sandvik H & Barrett 2001; Medeiros *et al.* 2007).
- 4.28 Since the Habitats Regulations Assessment of the PLP1, additional evidence of the impacts of disturbance to Poole Harbour SPA has become available. A detailed disturbance study of the SPA (Liley & Fearnley 2012), commissioned by Natural England, involved detailed observation work on the response of birds at 15 survey points and also included paired counts of birds at particular locations during the day and during the night, to determine whether areas with low numbers of birds during the day may be utilised by the birds more at night (when levels of disturbance from recreational activity are potentially less).
- 4.29 Liley & Fearnley’s report shows that disturbance had a significant, negative effect on the number of waders and the number of wildfowl present at the survey points, indicating that birds respond to disturbance levels and redistribute as a result of disturbance.
- 4.30 The Habitats Regulations Assessment for the PLP1 (Liley & Tyldesley 2011) recommended a range of mitigation measures necessary to mitigate for recreation at Poole Harbour (see 6.16-6.26).
- 4.31 The Poole Harbour Aquatic Management Plan<sup>7</sup> Provides the delivery mechanism for much of the mitigation being taken forward to alleviate the impact of recreation. The plan was most recently updated in 2011 (Drake 2011), and its production and implementation is overseen by the Poole Harbour Steering Group, which consists of Dorset County Council, Borough of Poole Council, Purbeck District Council, Natural England, the Environment Agency, Poole Harbour Commissioners, Southern Sea Fisheries District Committee and Wessex Water Services Ltd.
- 4.32 Whilst the Management Plan focuses primarily on managing recreational activities that may otherwise cause disturbance to SPA/Ramsar features, the plan also encompasses a range of other activities, such as dredging and the use of antifouling paints for boats.
- 4.33 Other relevant measures/changes that come into force recently (and are not directly set up as mitigation, but relevant to considering issues in the Harbour) include:
- There is a dedicated permit scheme now established, run by the Poole Harbour Commissioners and - for kite surfing at Studland - run by the National Trust with a dedicated zone created for kitesurfing. Reducing disturbance to birds is apparently one of the reasons the zone at Studland has been established.

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<sup>7</sup> <http://www.pooleharbouragmp.co.uk/>

- A recreation forum has been proposed for Poole Harbour<sup>8</sup>, providing a means for different user groups to communicate with each other. This could also have benefits in terms of reducing impacts from recreation, and a Purbeck-wide forum (which would therefore cover at least parts of Poole Harbour) was a recommendation made in visitor strategy work undertaken for the Purbeck Nature Improvement Area (Lake, Cruickshanks & Phillipson 2014).
- There is now a charity dedicated to the Birds of Poole Harbour. The Birds of Poole Harbour charity sees its role as the link to raising the profile of bird conservation and preservation in the harbour. It has been running a range of education events raising awareness about the bird interest of the Harbour.
- Bait harvesting has become more closely monitored and various measures<sup>9</sup> agreed with bait collectors

4.34 It seems there is also relatively little systematic monitoring data showing how access levels have changed over time. The need for strategic mitigation is evidenced by:

- Bramble Bush Bay is promoted as an area for Kite Surfing by Poole Harbour Commissioners in their recent kitesurfing leaflet<sup>10</sup>, which is aimed at reducing the impacts caused by Kitesurfing. Bramble Bush Bay is adjacent to some sensitive roost sites and this is an area where kitesurfing is likely to have a particular impact. This highlights the difficulty in ensuring relevant parties are aware of the issues and working together.
- Initial results of the VALMER study<sup>11</sup> of recreation in Poole Harbour provide evidence of conflict between users (kitesurfers, windsurfers etc) around Whitley Lake, highlighting increasing popularity of the area and potential for pressure to grow on other areas of the Harbour.
- Some new types of activity have appeared, for example paddleboarding is becoming increasingly common (Footprint Ecology, unpublished data) and a company doing events/tours with giant canoes has become established.
- The most recent WeBS alerts for Poole Harbour, published by the BTO<sup>12</sup> show that alerts (i.e. marked declines) have been triggered for eight of the 14 species which were assessed. For four species (shelduck, lapwing, curlew and redshank), comparison of site trend with broadscale trends suggests that the declines underpinning Alerts status may be driven by site-specific

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<sup>8</sup> <https://www.dorsetforyou.com/poole-harbour-surveys>

<sup>9</sup> See [http://www.southern-ifca.gov.uk/sitedata/files/MoA\\_PooleBaitDigging.pdf](http://www.southern-ifca.gov.uk/sitedata/files/MoA_PooleBaitDigging.pdf)

<sup>10</sup> <http://www.phc.co.uk/downloads/general/PHC-Kite-Surfing-Leaflet.pdf>

<sup>11</sup> See powerpoint download at <https://www.dorsetforyou.com/poole-harbour-surveys>

<sup>12</sup> <http://blx1.bto.org/webs-reporting/?tab=alerts>

pressures. The four species with site-specific declines feed on intertidal mud at low tide.

#### **Plan review requirements for Poole Harbour recreation**

- 4.35 The progression of measures to mitigate for recreational impacts on Poole Harbour were initially slow, and this is likely to be a consequence of the complexities of administration, particularly given the number of partners involved. It is understood that projects for additional wardening, awareness raising and monitoring have been commissioned, but to date these have been led and funded by developer contributions collected by Poole Borough. Additional studies such as the Poole Harbour Disturbance Study increase the evidence base and inform the need for mitigation. It is imperative that this progression continues with clear reference and commitment as part of policy. This will require Purbeck District Council and the Borough of Poole Council to continue to work together; drawing up priority actions to progress the mitigation to implementation.
- 4.36 As previous assessment work by both Purbeck and Poole Councils fully covers the issue of recreation pressure at Poole Harbour, this is not repeated here. Importantly however, the plan review will need to remain committed to delivering mitigation.
- 4.37 There are now mitigation schemes in place for other coastal sites where there are concerns relating to development and impacts on the wintering bird interest (for example on the Solent and the Exe) and Natural England is currently working nationally to review mitigation measures on coastal sites in order to ensure mitigation can be targeted effectively at a local level. There is therefore plenty of new material that Purbeck District Council and the Borough of Poole Council can draw upon.

#### **Poole Harbour and Nutrients**

- 4.38 There are existing issues relating to nutrient levels in treated waste water entering Poole Harbour. The issues were raised in the Local Plan Habitats Regulations Assessment (Liley & Tyldesley 2011).
- 4.39 Poole Harbour is classified as an SPA and listed as a Ramsar site for its bird interest, and the Ramsar listing also includes criteria relating to its estuarine habitats, coastal habitats and rare flora and invertebrates. Nutrient enrichment of the harbour causes a number of ecological concerns, but most notably it is the resultant algal mats that form on the mudflats, fed by the high levels of nutrients, that have detrimental effects on the availability of mudflat dwelling invertebrates for the waterfowl that form interest features of the SPA and Ramsar site. The algal mats affect the density and diversity of invertebrates, and reduced quality and quantity of food will in turn affect the rigor of the SPA birds and therefore potentially affect the ecological integrity of SPA populations.
- 4.40 The Environment Agency and Natural England prepared in 2013 a nutrient management plan entitled “Strategy for Managing Nitrogen in the Poole Harbour Catchment To 2035” (Bryan & Kite 2013). The Strategy proposes two approaches to meeting the target

of no net increase: firstly that the Environment Agency and Natural England work with the agriculture sector within the Poole Harbour catchment; and that the four councils within the catchment of Poole Harbour work together to create an Implementation Plan to mitigate the impact of additional development on Poole Harbour through additional nitrogen load. The aim of this Strategy is to ensure that the requirements of the Habitat Regulations are met such that overall a 25% reduction in Nitrogen entering Poole Harbour is achieved by 2035. This reduction will be achieved through land-use change in the agricultural area of the catchment. For development activity such as planned for Poole Borough, the Strategy aims to ensure that there is no net increase in Nitrogen load entering the Harbour from terrestrial sources.

- 4.41 In seeking a solution to the issue, Purbeck District council and the Borough of Poole Council have worked closely with Natural England and the Environment Agency to produce an a draft Nitrogen Neutrality SPD setting out a nitrogen neutrality approach to new growth. The SPD is essentially a strategy to ensure that new growth does not result in any increased discharge of nutrients into the harbour and demands nitrogen neutrality for every new development in order to achieve this. The SPD is currently in draft and will form part of the suite of planning policy documents for Purbeck.
- 4.42 The Nitrogen Neutrality concept is based on a recognition that nitrates entering the harbour have originated from a range of sources. According to Natural England and the Environment Agency research, waste water is a significant issue (15%), but run off from agricultural land is thought to be the biggest contributing factor (85%). Waste Water Treatment Works (WWTW) discharging into Poole Harbour are required to remove 75% of nitrate, under the Urban Wastewater Treatment Directive. In practice treatment removes all but 7mg/l of nitrate using a nitrate stripping facility. This process is already relatively expensive; and would require additional and permanent investment to address increases in volume of effluent entering the STW, resulting from new development. In attempting to mitigate for the nitrates entering the harbour from the waste water sources, another option is to prevent the impact by removing an equivalent level of nitrates from other sources – so called Nitrogen Offsetting. Securing mitigation for nutrient enrichment within Purbeck.
- 4.43 The emerging SPD sets out the required volume of nitrates for removal from the catchment, based on the predicted growth within the four local planning authority areas. It recognises that land will come out of agricultural production for a number of reasons over the plan period, and calculates the reduction in nitrates that will occur as a result. The remaining shortfall to offset predicted growth is therefore the volume that must be met with developer funding from housing developments. At present it is not clear how this mitigation will be achieved within Purbeck.

#### **Plan review requirements for Poole Harbour nutrients**

- 4.44 As previous assessment work by both Purbeck and Poole Councils fully covers the issue of nutrient enrichment at Poole Harbour, this is not repeated here. Importantly however, the plan review will need to remain committed to the nitrogen neutrality

strategy in place and be informed by actions to be progressed to secure the delivery of mitigation.

- 4.45 The SPD already notes an urgent need for significant areas of agricultural land to be taken out of production in order to mitigate for current growth. The Council will therefore need to progress the adoption and implementation of the SPD in advance of the local plan review in order to ensure that adequate mitigation is in place.
- 4.46 The new local plan needs to incorporate policy wording to cross-reference with the SPD once finalised, to ensure its effective and timely implementation alongside new growth and the SPD should therefore be progressed urgently in order to inform the plan review.

### The New Forest

- 4.47 The Habitats Regulations Assessment for the PLP1 (Liley & Tyldesley 2011) recognised that Purbeck was potentially just within a zone where new development might add to the recreational pressure within the New Forest SPA, SAC and Ramsar site. The New Forest National Park is a nationally promoted visitor attraction that draws day visitors and holiday makers from a wide radius. Visitor levels to the National Park are already high and additional development, was believed likely to result in increased visitor pressure. Given the draw of the National Park, visitors can travel from a wide radius. Mitigation measures, implemented strategically in conjunction with other local authorities, will eliminate any of the impacts. The previous HRA suggested that mitigation measures would likely be taken forward by the authorities in and immediately surrounding the National Park, and at the time that these are developed, the nature of any contribution necessary from the Purbeck District will become apparent.

#### Plan review requirements for the New Forest

- 4.48 Current checks suggest that a range of authorities (such as the Test Valley and New Forest Districts) have established such mitigation, and that they have been considering development within a 14km radius. Purbeck falls well beyond 14km from the National Park and it would therefore seem that, at this stage, no adverse effect on integrity can be assumed. Further checks as the plan is finalised should be undertaken but given that it is only development in the very east of Purbeck District that New Forest where issues may be relevant, this is not likely to be a concern for the final plan.

### Summary

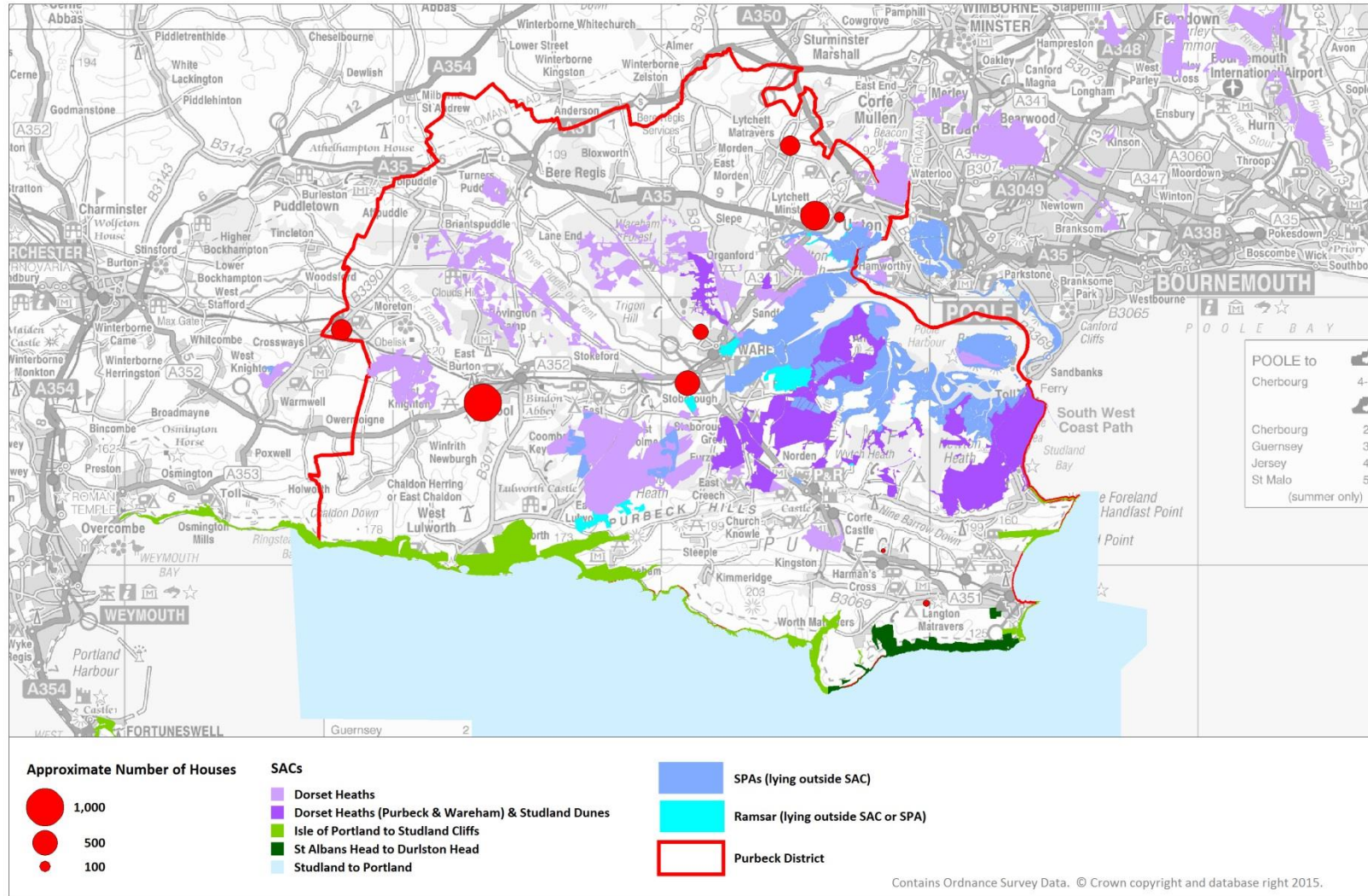
- 4.49 New housing has the potential to impact on a number of European sites, and for all of the issues above, there are mechanisms in place to mitigate for impacts as these are risks to European sites that have been understood and considered in Habitats Regulations Assessment work for some time. However, where mitigation approaches are in place, there is still a need for planning policy to remain committed to such schemes, and for implementation to be regularly checked. Mitigation should be reviewed and updated in light of monitoring, with changes made where necessary to ensure effective and timely delivery of mitigation.

- 4.50 All development promoted within the plan review will need to be in accordance with the mitigation measures, and for all the above measures, the plan review must seek to ensure both continued policy commitments and also that actions are being progressed. For some measures, this still needs to be demonstrated.
- 4.51 Impacts on heathland sites are particularly linked to the precise locations where development takes place and the scale of development in specific locations, as well as the suitability of SANGs being proposed. Whilst the heathlands mitigation framework is well established, housing allocations must check compliance and deliverability of mitigation, and it cannot be assumed that all housing allocations can deliver the required mitigation. More detailed consideration is therefore given to the large housing sites coming forward as options in relation to their conformity with the heathland mitigation framework and guidance on SANG suitability. The following section specifically provides an appropriate assessment of the options housing sites. Section 6 assesses employment sites and the tourist accommodation/country park at Morden is the subject of appropriate assessment at section 7. These are the development sites identified in the screening table as requiring further consideration.

## **5. Appropriate Assessment – Housing Allocations**

- 5.1 This section assesses the specific development locations identified in the Options Document that could not be screened out from likely significant effects on the European sites.
- 5.2 The previous iteration of this Habitats Regulations Assessment, undertaken at the issues and options for the plan review, considered seven housing locations and identified issues relating to European sites. That assessment identified particular constraints and issues with development at Sandford, around Wareham and at Lytchett Minster. The site originally proposed at Sandford has subsequently been dropped from the Review, due to the risk of adverse effects on the integrity of the Dorset Heathlands SPA and Dorset Heaths SAC.
- 5.3 The options document identifies some new housing locations, which not included in the earlier issues and options document. A total of eight locations for housing are now included as options to accommodate the additional housing growth required in Purbeck. Some of these are accompanied by detailed plans and maps while others are more vague. Natural England has been consulted by the Council directly and for some locations Natural England has met with developers and given detailed advice and feedback regarding constraints and mitigation requirements.
- 5.4 The eight locations are shown in Map 2 and are considered in detail below.

Map 2: Preferred Options: Development Spread





### South-west of Wool

- 5.1 The Council's option is for around 1000 homes to the south-west of Wool. Land is suggested to potentially accommodate a phased development of up to 1000 new homes. Land here is relatively far (for Purbeck) from heathland sites and the key nearby heathland is Winfrith Heath, Hethfelton Plantation is also readily accessible to the east of Wool, with parking on the A352.
- 5.2 Potential impacts of development at Wool relate to increased recreation at the nearby heathland sites. The proposed SANG, at Coombe Wood, is large (48ha) and has the potential to provide a visitor destination to rival Winfrith. The site is discussed in some detail within Liley *et al.* (2010). Coombe Wood is elevated, with expansive views and, with appropriate management could provide an appealing site for dog walking and other recreation. Opening the site up to give a more open feel will be important and the SANG is relatively narrow in parts so careful design and/or the inclusion of additional land will be necessary to ensure it does not feel constrained. It will need to be targeted towards local residents and there may need to be some consideration of ensuring easy access to the SANG from developed areas. The SANG is likely to function much more effectively for residents living south of the A352 rather than the north. A SANGs brochure produced by the Lulworth Estate and Savills explores how the SANG would be managed and enhanced for access, including a phased plan for improvements. Natural England has confirmed with Purbeck District Council that the SANG would provide adequate mitigation and as such it is possible to conclude no adverse effect on integrity for the Dorset Heathlands SPA/Ramsar or the two Dorset Heaths SACs.
- 5.3 The area mapped for development is within the River Frome catchment, and as such there would be likely significant effects relating to water quality issues and Poole Harbour SPA/Ramsar site. Any development in the area would have to ensure 'nitrogen neutrality' (see Bryan & Kite 2013).

### Lytchett Minster

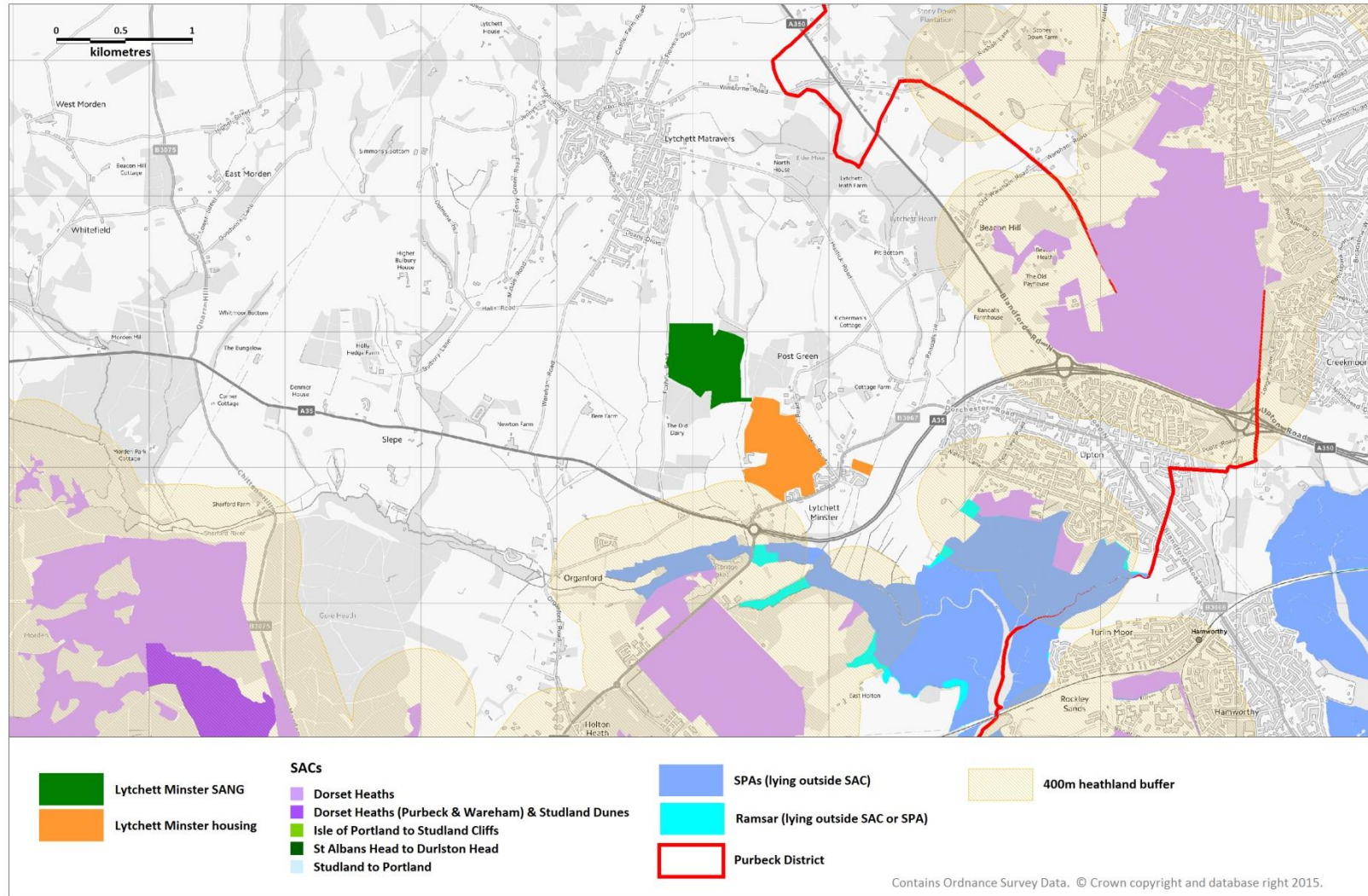
- 5.4 The land is suggested to accommodate around 650 or more new dwellings. The land proposed for development lies close to Upton Heath, Holton Heath and Sandford Heath (all part of the Dorset Heathlands SPA/Dorset Heaths SAC/Dorset Heaths Ramsar). Upton Heath and Sandford Heath both have open public access.
- 5.5 There are risks of 'urban effects', such as increased fire occurrence, at nearby heathland sites such as Upton Heath. There are potential impacts of disturbance to breeding Annex 1 birds to sites within a short journey, particularly Wareham Forest, Upton Heath and Ham Common (see Appendix 2 in White *et al.* 2008 for details of locations and travel times from Lytchett Minster). There are also potential for impacts from recreation to the SAC interest of the heaths at nearby sites with impacts such as trampling and dog fouling.
- 5.6 The areas proposed for development are likely to provide foraging habitat for nightjars, an interest feature of the Dorset Heathlands SPA (see White *et al.* 2008 for discussion).

- 5.7 The land lies close to Poole Harbour SPA/Ramsar, with access at sites such as Lytchett Bay and Ham Common. Lytchett Bay is particularly close and there is a risk of increased recreational disturbance to the SPA in the area around Policeman's Lane. There are also slipways providing access for watersports at Rockley, Baiter and Holes Bay, and the proposed development location may result in increased watersports use within Poole Harbour. SANGs provision in Upton may help absorb some recreational pressure at Lytchett Bay.
- 5.8 The lower lying parts of the area are already prone to flooding and lie close to Poole Harbour. The increased rapid run-off together with a corresponding loss in land currently available to soak up water, may mean that flooding risk is enhanced. This will have unknown effects on the Poole Harbour SPA and the lower part of Sherford River valley that is within the Dorset Heathlands SPA/Dorset Heaths SAC. There may also be an increased risk of water-borne pollution from road run-off.
- 5.9 A SANG is proposed separated from the development and lying towards the north-west (Map 3), and it is in the region of 25ha. It is comprised of pasture with two conifer belts and is currently modest and unremarkable farmland with a feeling of enclosure and tameness. Visitor surveys show visitors to the Purbeck Heaths travel from locations such as the western edge of Poole (see Map 9 in Cruickshanks & Lake 2014). Any SANG at Lytchett Minster would need to provide a realistic alternative to the wild and expansive character of the Purbeck Heaths and Wareham Forest. Natural England<sup>13</sup> have confirmed that the SANG is of a suitable size, quality and naturalness, and following their initial concerns the SANG link (for foot access) directly to the new development. Natural England also recommended that the small block of land proposed for development south-east of the main block (the small orange parcel in Map 3) should only contain a limited amount of housing.
- 5.10 If the Country Park at Morden is established, then this has the potential to function as a strategic SANG and draw access from residents at Lytchett Minster. There may be options for SANG at Lytchett Minster to complement the SANG at Morden (e.g. by providing slightly different opportunities for visitors). This may mean the SANG at Morden will need to be established and monitoring in place to show how well it works prior to any development at Lytchett Minster.
- 5.11 The area mapped for development is within the River Frome catchment, and as such there would be likely significant effects relating to water quality issues and Poole Harbour SPA/Ramsar site. Any development in the area would have to ensure 'nitrogen neutrality' (see Bryan & Kite 2013).

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<sup>13</sup> Letter from Nick Squirrell to Purbeck District Council dated 25<sup>th</sup> September 2015

Map 3: Lytchett Minster housing and SANG



### West of Wareham Town

- 5.12 Around 500 new dwellings have been suggested by developers for this location. The location is outside the Wareham bypass, to the west of Wareham (Map 4). Residents would have foot access to Worgret Heath which is within a kilometre, to the west (see Map 4) and the location (adjacent to Wareham bypass and the A352) would provide very easy road access to a wide range of sites, in particular Wareham Forest (including Great Ovens), Hethfelton, Stoborough Heath, Hartland Moor and Arne. Access to parts of Poole Harbour SPA is also possible nearby, on the eastern edge of Wareham.
- 5.13 There is a considerable area of green space mapped around the development, providing potential SANGs, however such green space is still unlikely to be able to absorb the likely increase in recreation pressure arising from the development. The greenspace as mapped (Map 4) includes areas within the floodplain and likely to be impassable at many times of year (not just winter as summer flooding can occur). The total area of SANG (and accessible land as mentioned in the Options) is therefore not the 94ha referenced in the plan review, but considerably less (Brookbank 2015 give a figure of 58ha that would be permanently accessible). In addition, the railway line cuts the drier SANGs area into different pieces and the dry part of the SANG is alongside two busy roads. With the new development alongside, the SANG are unlikely to be able to replicate the experience of visiting the heaths and will be urban in feel. As such the SANG may well draw residents in the new development for short walks and short dog circuits but there is a strong likelihood they will also use the nearby heathland sites. For these reasons, the SANG is unlikely to draw residents from Wareham, who would have to visit the SANG by car as it is a relatively long walk from Wareham town centre and the by-pass is difficult to cross on foot. Once in their vehicles, Wareham Forest or the open heathland around Hartland is likely to draw Wareham residents instead. As such net increase in recreation is likely on the heaths and possibly Poole Harbour.
- 5.14 In the report providing information on the site to support HRA, Brookbank (2015) compares noise levels at different locations within the proposed SANG and on heathland sites. The measurements from the SANG are of course prior to any development and presence of houses adjacent to the SANG. Measurements undertaken at the heathland sites include some points close to busy roads that are not representative and for those heathland locations away from busy roads, it would appear the heaths are quieter. The critical issue is that the heathland sites such as Hartland/Stoborough are large expansive areas of tranquil open countryside where access is from quiet lanes. The key areas for access are well away from any roads, housing or other noise sources and are very tranquil.
- 5.15 Brookbank (2015) also presents visit data collected from two locations in Wareham (Wareham Quay and Wareham Common). Wareham Common would be potentially similar to the SANG – it is very close, contains similar habitats and is alongside the Wareham bypass. The survey data showed regular local use of the common by dog walkers, who also visited the heaths – presumably for longer, more scenic walks. There is no evidence to suggest that the proposed SANG would not function in a similar way.

- 5.16 The location of the development is such that the risk of harm to European sites is much more here than the other sites for development, such as Wool. Given the risks there is a need for greater confidence with respect to the SANG and performance of the greenspace. Furthermore, given the relatively poor success of the East Holme SANG to date (see para 4.16), that confidence is lacking. While the plan review states that Natural England has confirmed that SANG could be delivered, correspondence from Natural England<sup>14</sup> states: *“Natural England can confirm that the size and naturalness of the SANG as well as other key criteria such as capacity are substantially delivered by the Masterplan layout (RG-M-AI01). There remain concerns about the deliverability and impacts on viability of key infrastructure requirements such as a railway bridge and access into Wareham. It is likely that the SANG will provide an attractive and effective avoidance measure for new residents but concerns remain about avoiding net increases in access by attracting existing users to the new SANG. This aspect remains to be examined in further detail.”*
- 5.17 Considerable on-site mitigation would need to be secured across the heathland sites mentioned above (alongside the SANG provision) in order to ensure no adverse effect on integrity, and given the varied ownership and management this is likely to prove difficult to secure in perpetuity. Visitor infrastructure, current management of recreation and issues for Wareham Forest and Arne/Hartland/Stoborough Heaths are summarised by Lake, Phillipson & Cruickshanks (2014).
- 5.18 The SANGs include areas of nature conservation interest in their own right, including the Frome Valley SSSI. The land proposed for development and the greenspace are adjacent (or in the case of the SANGs) within the floodplain. As such there is potential for impacts on the Poole Harbour SPA/Ramsar as this floodplain often holds important numbers of birds associated with Poole Harbour. In particular the wet grassland can occasionally hold large numbers of Black-tailed Godwit (interest feature of Poole Harbour SPA/Ramsar) and as such is functionally linked to the SPA (see Durell *et al.* 2006). In the report providing information on the site to support HRA, Brookbank (2015) presents winter bird survey data for the Frome and relatively few birds were recorded (from a limited number of visits). Use of the Frome by waterfowl and waders tends to be quite erratic but can involve large numbers of birds, for example Black-tailed Godwit may use the Frome Valley for only a few weeks each year but when present can be in flocks of over 1000 birds (*pers. obs.*) and supporting most if not all of the Poole Harbour population (Green 2004). The Frome Valley floodplain may only occasionally host key species, but when it does it is likely to playing an important role in supporting those birds. Additional discussion of the functional link between the valley and Poole Harbour SPA can be found in Liley, Caldow & Baker (2007).
- 5.19 Brookbank (2015) also uses flush distances to suggest that access and birds would be sufficiently separated for birds not to be flushed, with the network of paths being

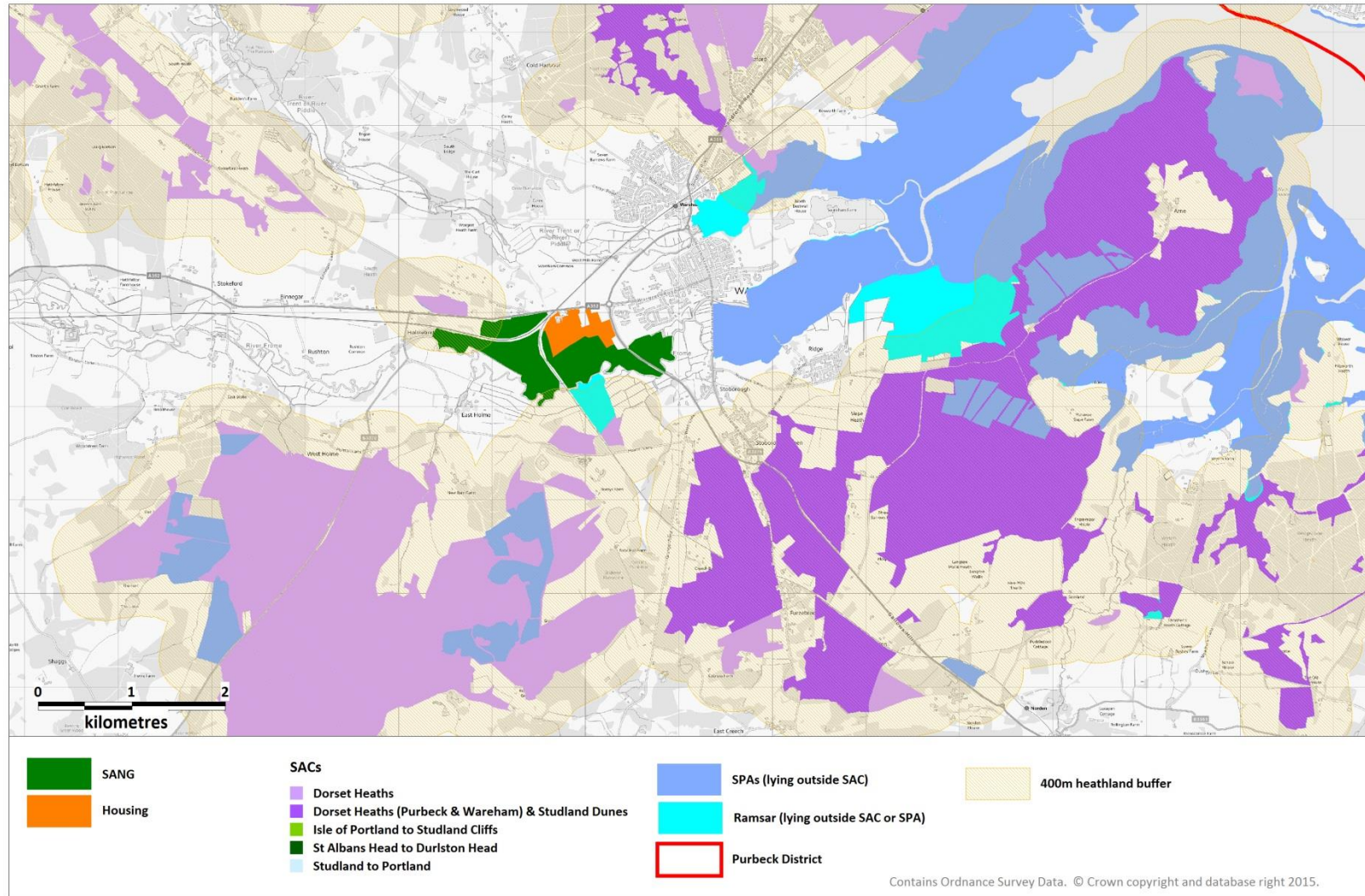
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<sup>14</sup> Letter from Nick Squirrell to Purbeck District Council dated 25<sup>th</sup> September 2015

designed to keep people back from the areas important for birds. This approach fails to recognise that birds may avoid an area entirely as a result of disturbance.

- 5.20 The area mapped for development is within the River Frome catchment, and as such there would be likely significant effects relating to water quality issues and Poole Harbour SPA/Ramsar site. Any development in the area would have to ensure 'nitrogen neutrality' (see Bryan & Kite 2013).
- 5.21 There are clearly risks for development in this location. In order for Purbeck District Council to have confidence that development here can take place without adverse effects on integrity of the European sites from recreation, further work is clearly necessary. This work needs to ascertain whether additional railway crossings can be incorporated into the proposal (concerns raised by Natural England). Visitor survey work is necessary to current issues with the Holme Lane SANG and longer term monitoring data from the Holme Lane SANG (once further improvements have been made to it) could be used to inform SANG design in the Wareham area.

Map 4: West of Wareham town housing and SANG



### Moreton Station

- 5.22 The land is suggested to potentially accommodate around 350 homes. The nearest heathlands are Warmwell Heath and Winfrith/Tadnoll Heath. There is roadside parking and direct access on to Tadnoll Heath to the south of the development location. Likely significant effects to the heathland SPA/SAC interest at Winfrith/Tadnoll and Warmwell relate to increased recreational use and include trampling, dog fouling, disturbance to ground nesting birds, increased fire risk and other urban effects.
- 5.23 Around 24ha of SANG have been proposed. The SANG is reasonably large but the challenge will be to create a suitable alternative to the heaths given that the site is an open pit. It may take many years before the SANG could fully develop it's potential into a suitable and appealing visitor destination, and the SANG would need to be functioning prior to development being occupied. Additional land, outside the pit, is likely to be necessary to ensure a functioning SANG can be delivered within a reasonable timescale. Natural England has been in discussion with the developer, Purbeck District Council and Dorset Wildlife Trust (who are responsible for the management of the heath at Winfrith/Tadnoll). The developer has proposed that a large field adjacent to the designated sites could be used to support visitor/habitat management and this would allow for the relocation of a car-park and disperse visitor pressure on the heaths. Advice from Natural England<sup>15</sup> is that there is a reasonable and robust chance to avoid additional pressure on the designated sites.
- 5.24 The area mapped for development is within the River Frome catchment, and as such there would be likely significant effects relating to water quality issues and Poole Harbour SPA/Ramsar site. Any development in the area would have to ensure 'nitrogen neutrality' (see Bryan & Kite 2013).

### Lytchett Matravers

- 5.25 The option is for around 90 homes in north east Lytchett Matravers and around 240 in the south, totalling 330 dwellings. Lytchett Matravers lies close to Upton Heath, Holton Heath and Sandford Heath (all part of the Dorset Heathlands SPA/Dorset Heaths SAC/Dorset Heaths Ramsar). Upton Heath and Sandford Heath both have open public access.
- 5.26 There are risks of 'urban effects', such as increased fire occurrence, at nearby heathland sites such as Upton Heath. There are potential impacts of disturbance to breeding Annex I birds to sites within a short journey, particularly Wareham Forest, Upton Heath and Ham Common (see Appendix 2 in White *et al.* 2008 for details of locations and travel times from Lytchett Minster). There are also potential for impacts from recreation to the SAC interest of the heaths at nearby sites with impacts such as trampling and dog fouling.

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<sup>15</sup> Letter from Nick Squirrell to Purbeck District Council dated 25<sup>th</sup> September 2015



- 5.27 Two sites to the north-east of the village (Flowers Drove and Blaneys Corner) are accompanied by open space (SANG) that Natural England has confirmed could be deliverable to mitigate impacts on nearby heathland. The main area of development is to the south of the village and at present no greenspace options have been proposed. Development here could however be mitigated through the SANG to the south (associated with Lytchett Minster) if additional capacity were available. It would be possible to monitor the effectiveness of this SANG and how well it draws residents from Lytchett Matravers prior to development taking place at the Lytchett Matravers sites.

### North Wareham

- 5.28 Around 205 dwellings are suggested for this location. The site is directly adjacent to Wareham Forest, with foot access points along the public right of way at Tantinoby Farm and parking in close proximity at the Sika Trail car-park and along Bere Road (see Map 3). Also within a short drive are access points on the B3075, providing access to Great Ovens and Morden Bog. Residents can potentially travel by car to other heathland areas near Wareham such as Stoborough Heath, Hartland and Arne. As such there are likely significant effects relating to increased recreational pressure on heathland. The site lies within the 5km zone and mitigation would need to target the above sites.
- 5.29 The landowner has identified around 26ha of greenspace directly linked to the development within which SANG could be provided. The details of the any SANG design are yet to be finalised, but Natural England have confirmed in principal that suitable SANGs could be delivered. The potential SANG is in some ways similar to the West of Wareham SANG in that it contains sloping land with views across the floodplain. Key issues will include:
- Ensuring an attractive visitor experience given proximity to the landfill site and to housing
  - Deflecting access away from Wareham Forest, particularly for houses in the north
- 5.30 Current recreational impacts, access provision, visitor management and opportunities for enhancing and better managing recreation within Wareham Forest (including the open heath areas, such as Great Ovens) are considered in detail within Lake, Phillipson and Cruickshanks (2014). They highlight that that the Forest offers significant opportunities for visitors, particularly dog-walkers, walkers, runners and cyclists, with miles of surfaced tracks, a choice of locations, and the opportunity to exercise dogs off the lead. The Forestry Commission has established informal working relationships with some user groups such as mountain bikers and has a functional permit system in place for other activities. However, recreational activities are likely to be currently impacting on wildlife, particularly disturbance to birds caused by dogs running off tracks, as the dogs under control requirement is often ignored, with dogs running off tracks and out of sight of dog walkers. Anecdotal evidence suggests there is also a degree of conflict between users (e.g. small children (and adults) troubled by out of control dogs, issues with cyclists); and that first time visitors struggle to find their way around. Key issues

with recreation management in the Forest are the comparative lack of information and the public perception of the site. It can be hard to find out about routes and what activities are permitted where. This is partly because some activities take place informally, but the freeholders are unwilling to designate permitted routes. Locally based visitors are likely to obtain information by word of mouth, but other sources are limited. There is also only very limited interpretation about why the site is important to wildlife, how visitors might experience it, and so visitors are not particularly motivated to change their preferred behaviour. The perception of Wareham Forest is thought to be of a robust woodland site where many activities are permitted (or at least tolerated).

- 5.31 Development on the outskirts of Wareham, towards Wareham Forest, would therefore need to secure mitigation to resolve the above, and solutions are likely to require significant on-site green space and access management measures within Wareham Forest. Looking further afield, on-site measures will also be necessary within the Arne/Hartland/Stoborough block of heathland (again see Lake, Phillipson, P. & Cruickshanks 2014 for detailed discussion).
- 5.32 The area mapped for development is within the River Frome catchment, and as such there would be likely significant effects relating to water quality issues and Poole Harbour SPA/Ramsar site. Any development in the area would have to ensure 'nitrogen neutrality' (see Bryan & Kite 2013).

### Upton

- 5.33 Around 100 homes are proposed at Upton on a wedge of land adjacent to land allocated through the PLP1 for 70 dwellings. The 100 homes will be adjacent to the A35 and also will have access to the SANG established for the 70 dwellings, for which there is likely to be additional capacity.
- 5.34 There are some potential problems with access to European sites in this area (considered in detail within the HRA for the PLP1), through urban effects on the heathland patches and disturbance from people and dogs along the lane down to the sewage works or potentially straying into the wetland areas. The SANG provides an opportunity to resolve these.
- 5.35 The development site is just beyond the 400m zone for the Dorset Heaths, lying within walking distance of two small fragments of heathland just to the south of Upton. Also nearby is Poole Harbour SPA/Ramsar. Natural England has recently proposed an extension to the SPA boundary<sup>16</sup> that would mean the edge of the SPA is within tens of metres of the proposed housing, encompassing an area known as 'Lytchett Fields'. The proposed extension includes recently inundated marshland and wet grassland and is managed by the RSPB. Recent counts of waterfowl show the area is supporting a large proportion of the wintering waterfowl associated with the SPA.

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<sup>16</sup> See <https://www.gov.uk/government/consultations/poole-harbour-special-protection-area-extension-comment-on-proposals>

- 5.36 There is easy access to the heathland areas and a lane/track (Watery Lane) provides public access along the edge of Lytchett Fields. The RSPB allow access on foot to a viewing area close to the key areas used by waterfowl, and access here is carefully reviewed and no dogs are allowed. The only parking is roadside parking.
- 5.37 There are risks from the new development in terms of:
- Increased access leading to disturbance of waterbirds at Lytchett Fields
  - Increased access resulting in disturbance to heathland birds and damage to heathland habitat on the heathland fragments
  - Increased urban effects for the heathland fragments (increased fire risk, cat predation etc)
- 5.38 The SANG will provide parking and will also be easily accessible on foot directly from the development. Natural England have confirmed that they believe the SANG will have additional capacity to absorb the additional 100 homes. Ideally the SANG would be established alongside the 70 dwellings in PLP1 and monitoring data used to check its effectiveness and additional capacity prior to the additional development.

### Langton Matravers

- 5.39 Around 40 dwellings are proposed at Langton Matravers. The development location is on the south side of the village. The site is over 3km from any heathland, with the nearest heathland patches being Corfe Common and Godlingston. It therefore falls within the 5km zone whereby contributions towards mitigation measures will be necessary to rule out any likely significant effects to the heathland sites, but given the scale of the development and location, SANGs provision to mitigate heathland impacts will not be necessary.
- 5.40 The site is close to the coast, with direct footpath access to the St Albans to Durlston Head SAC, around 1.2km to the south. As such impacts to this SAC are of greatest concern. Natural England has raised concerns<sup>17</sup> regarding localised nutrient enrichment where paths are heavily used by walkers and dogs. The site improvement plan cites evidence of a shift from calcareous to neutral grassland in some locations where calcareous grassland with Early Spider Orchid and the endemic Early Gentian are present. Actions proposed within the site improvement plan to resolve the issues include an action to “*Develop a clear understanding of the requirements of the Habitat Regulations and the current impacts of public access on N2K features*” and the need to “*develop a robust integrated protocol which aims to reconcile the aims and aspirations of different recreational and conservation sector stakeholders on both land and sea to secure use in accordance with the requirements of the Habitat Regulations*”.

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<sup>17</sup> See site improvement plan:

[http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwiP87TO\\_sXMAhXKI8AKHfRvCD8QFggkMAA&url=http%3A%2F%2Fpublications.naturalengland.org.uk%2Ffile%2F5037990040567808&usg=AFQjCNF3nl8l1pMx9KXQ5YNvQI3dz5gFkw](http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwiP87TO_sXMAhXKI8AKHfRvCD8QFggkMAA&url=http%3A%2F%2Fpublications.naturalengland.org.uk%2Ffile%2F5037990040567808&usg=AFQjCNF3nl8l1pMx9KXQ5YNvQI3dz5gFkw)

- 5.41 The area of the SAC directly south of the development is one of the key areas of the SAC for Early Spider Orchids and Early Gentian and is therefore potentially vulnerable to recreation pressure.
- 5.42 Within the HRA work undertaken for the PLP1 there was a recommendation for monitoring data to be collected regarding access to the coastal sites and impacts of recreation. The need for mitigation measures to address the impacts of increased local use of coastal sites was referenced within the core strategy within section 7.5.10 and the need for targeted monitoring of the SAC sites was also set out. These monitoring data will be necessary to provide the necessary checks and safeguards in order to rule out adverse effects on integrity on the St Albans to Durlston Head SAC. Mitigation measures, in terms of direct work with local dog walkers, promoting 'pick-up' and use of routes such as the Priest's Way (where impacts to the SAC would be avoided) could be explored.
- 5.43 The site is outside the Frome catchment and therefore impacts to Poole Harbour from nutrient enrichment are avoided.

### Harman's Cross

- 5.44 The option is for around 20 dwellings on the north-west of the village. Development here, although within the heathland 5km zone, is relatively far from the European sites, and the small scale of the development poses a relatively low risk.
- 5.45 For heathland sites, Corfe Common is the nearest location, with Godlingston also relatively close. Contribution to strategic on-site mitigation will be necessary to ensure no adverse effects on integrity to these locations.
- 5.46 The site may be within the Frome catchment, and as such any development may need to ensure it is 'nitrogen neutral'.

### Alternatives

- 5.47 The review also includes some alternative options. These largely redistribute housing numbers between the locations discussed above, and therefore the above considerations are all relevant.
- 5.48 Option 1 increases the number of dwellings at Moreton and reduces the number at Lytchett Matravers, by dropping the southern development locations, which currently have no SANG. This removes some of the uncertainty regarding the Lytchett Matravers. At Moreton the additional development would be close to the station and therefore would be slightly further from the European sites and also separated from the SANG.
- 5.49 Option 2 focuses additional development at Lytchett Matravers, potentially up to 600 dwellings. This option is dependent upon developers working together to holistically plan development and secure heathland mitigation.
- 5.50 A possible alternative site is also included at Lytchett Minster, where a landowner is promoting land for 650 homes to the west of Lytchett Minster and south of Lytchett

Matravers. The option would essentially be a new village but as yet has not been formally submitted to the Council through the SHLAA process.

5.51 The option include a block of SANG on farmland, north of the development. Issues with development here are similar to the impacts for the other locations near Lytchett and Langton Matravers, and given the scale of the development, the previous work by Footprint Ecology (White *et al.* 2008) provides useful background and context. Risks relate to recreational impacts to heathland sites, loss of nightjar foraging habitat, disturbance to birds (Poole Harbour SPA/Ramsar).

5.52 The Country Park at Morden, if functioning as a strategic SANG, could potentially play a role in mitigation. It may be that any SANG could compliment the Country Park ensuring a range of recreation opportunities. Purbeck District Council will need to seek Natural England's advice regarding development here and the cumulative impacts of development in this part of Purbeck.

### Summary

5.53 The options contain a number of sites with particular issues and constraints. Developments around Wareham and at Lytchett Minster pose the greatest risk. All the locations lie within the 5km zone around the heathlands. We summarise key points for each location below.

#### Wool (1000 homes)

- Key nearby heathland sites are Winfrith/Tadnoll and Hethfelton.
- A good SANG has been proposed, with existing woodland and open areas and attractive views. Some felling, landscaping and parking creation will be necessary, plus promotion of the SANG to ensure it is working effectively. Such measures will need to be tied to the development so as be effective prior to occupancy.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### Lytchett Minster (650 homes)

- Nearby heaths include Upton Heath, Sandford, Holton Heath and Wareham Forest. These should be the focus of any on-site mitigation.
- Checks re foraging nightjar are necessary.
- Checks re flooding/run-off issues and Poole Harbour SPA
- While less of a risk than those to the heaths, development here is relatively close to Poole Harbour and there are risks from recreation to Poole Harbour SPA/Ramsar.
- The SANG should link (for foot access) directly to the new development and that the small block of development to the south be dropped. The SANG is on open, flat farmland with little current interest for visitors; further consideration is therefore necessary to address the SANG design, including landscaping and planting etc.
- The Country Park at Morden could have potential to draw recreation from Lytchett Minster; as such there may be potential for the SANG at Lytchett Minster to be designed so as to complement the Country Park?

- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### Wareham Town (500 homes)

- There are risks with this location given the proximity of the development to important heathland areas (and Poole Harbour) and the ease of access to those sites from the Wareham bypass.
- The proposed SANG provides around 58ha of greenspace (outside flooded areas). Wording in the plan appears to exaggerate the area provided.
- Despite extensive work by developers, concerns remain that the SANG is bisected by the railway (main line and branch line) and adjacent to busy roads and with housing alongside. This presents a marked contrast to the open rural heaths within a short drive. Clarification is necessary on the potential for railway crossings to reduce the bisected nature of the SANG.
- SANG at Holme Lane associated with PLP1 (and development in close proximity to Worgret Manor) is not functioning well with few visitors arriving by car. Given lack of success with this site, there are concerns regarding the potential for SANGs to work well. Improvements need to be undertaken at the Holme Lane SANG and checks made to ensure this is functioning well prior to further development around the west of Wareham.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### Moreton Station (350 homes)

- SANG includes open pit (gravel extension) and concerns over timescale necessary for this to reach its potential
- Mitigation will include land adjacent to Tadnoll Heath to support existing visitor and habitat management. Natural England has approved this.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral.'

#### Lytchett Matravers (330 homes)

- Two sites to the north-east of the village (Flowers Drove and Blaneys Corner) are accompanied by open space (SANG) that Natural England has confirmed could be deliverable to mitigate impacts on nearby heathland.
- The main area of development is to the south of the village and at present no greenspace options have been proposed. Clarification of SANGs provision is necessary before adverse effects on integrity to the heaths can be ruled out. Development here could however be mitigated through the SANG to the south (associated with Lytchett Minster) if additional capacity were available. It could be possible to monitor the effectiveness of this SANG and how well it draws residents from Lytchett Matravers prior to development taking place at the Lytchett Matravers sites.

#### North Wareham (205 homes)

- The details of the any SANG design are yet to be finalised, but Natural England have confirmed in principal that suitable SANGs could be delivered (around 26ha of potential land have been identified).
- SANG is potentially close to the landfill site and to housing and there may be challenges to create suitable alternatives to the open space and wild feel of nearby heathland sites (such as Wareham Forest and Hartland/Stoborough).

- Development towards the north of the proposed housing block will have easy, direct foot access into Wareham Forest and this may be difficult to deflect.

**Upton (100 homes)**

- Development here is adjacent to Poole Harbour SPA (proposed SPA extension runs within a few metres of the proposed housing) and close to heathland fragments to the south of Upton.
- The SANG will be crucial mitigation and is not yet functional. Development may be best phased to allow the SANG (associated with development in PLP1) to become established and fully functional.

**Langton Matravers (40 homes)**

- This location has direct foot access to some important parts of the St Albans – Durlston Head SAC where Natural England has identified some concerns regarding recreation impacts. The need for mitigation measures (monitoring and early warning) to address the impacts of increased local use of coastal sites was identified within the PLP1 (section 7.5.10) and this needs following-up. Further information and evidence is necessary to rule out adverse effects on integrity.
- Additional mitigation measures, in terms of direct work with local dog walkers, promoting 'pick-up' and use of routes such as the Priest's Way (where impacts to the SAC would be avoided) may need to be explored.

**Harmans Cross (20 homes)**

- A relatively small quantum of development. Will require contributions towards strategic heathland measures.

## 6. Appropriate Assessment – Employment Allocations

- 6.1 The impacts of development relating to employment is in many ways easier to assess than for residential development. Natural England concluded that new businesses would not be required to make a contribution to offsetting nitrogen, as there was deemed to be no additional input over and above that already calculated for new residents. Employment land is unlikely to result in an increase in pet cats and recreation pressures are likely to be less than for residential development.
- 6.2 Quantifying the impacts of employment development has however still proved challenging on occasion. In the case of a proposal for employment development in Poole, on land south of Magna Road, Bearwood<sup>18</sup>, Natural England objected to the development and Poole Borough Council refused planning permission, partly on the basis on nature conservation impacts to the nearby heathlands. Following appeal, planning permission was granted and in the Inspector’s report (Pope 2014) he highlights the lack of published research or documented evidence to demonstrate specific adverse effects of business/employment development.
- 6.3 Employment development near heathlands could involve people commuting across heaths, using heathland areas in their breaks and the development itself may have implications in terms of fragmentation and loss of supporting habitats (for example nightjar foraging habitat).

### Expansion of Holton Heath Trading Park

- 6.4 The proposed employment development here is alongside Holton Heath and close to Blackhill and also to Sandford Heath. Blackhill is an isolated patch of heathland which is within the Natura 2000 network and contains important populations of herptiles. Nightjar occasionally breed. Concerns with employment development here relate to fragmentation and the increasing isolation of Blackhill.
- 6.5 Advice from Natural England<sup>19</sup> is that the proposal should come forward for consideration as the promoter has worked with Natural England to develop a proposal which provides a heathland link between the heathlands. Natural England has not however yet reached full agreement about the boundary of the allocation, particularly adjacent to Holton Heath and this needs to be agreed prior to submission of the Plan.
- 6.6 Management of any heathland link needs to be secured in the long term and in the area proposed for development there will need to be some further checks at application stage. While the orange area marked on the plan sets out a clear boundary, that boundary is directly adjacent to the SPA and development right to this boundary that may result in noise, light, dust or litter or other contamination into the SPA will need to be controlled.

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<sup>18</sup> Appeal Ref: App/Q1255/A/13/2204098

<sup>19</sup> Letter from Nick Squirrell to Purbeck District Council dated 25<sup>th</sup> September 2015



### Expansion of Sandford Lane Industrial Estate

- 6.7 The extension of Sandford Lane Industrial Estate would bring the Industrial Estate to the edge of the Poole Harbour Ramsar and to the Dorset Heathlands SAC. The terrain is wet and there is no public access, so impacts from recreation (e.g. during breaks or from commuting) are unlikely. Due to the proximity of the boundary there are however potential risks from contamination – from light, noise, dust etc. These will need to be carefully considered and addressed at the application stage, for example through screening, fencing and building design.

### Amendment of safeguarded employment area at Dorset Green

- 6.8 This location lies adjacent to heathland and the proposed changes to the safeguarded employment land bring the potential for development right to the edge of the heath. There are records of foraging nightjar and woodlark from inside the Dorset Green compound (*pers. obs.*) and intensification of land around the edge of the heath may lead to loss of foraging habitat. In addition there is the risk of increased access, leading to disturbance and other recreation impacts (during breaks etc.) and risk of contamination from noise, light etc.
- 6.9 These issues can be potentially resolved at application stage, but advice from Natural England at this stage would be beneficial and wording at submission will need to set out the issues and context for future development in order to be confident of no adverse effects on integrity to the European sites.

## 7. Appropriate Assessment – Morden Country Park/Tourism Allocation

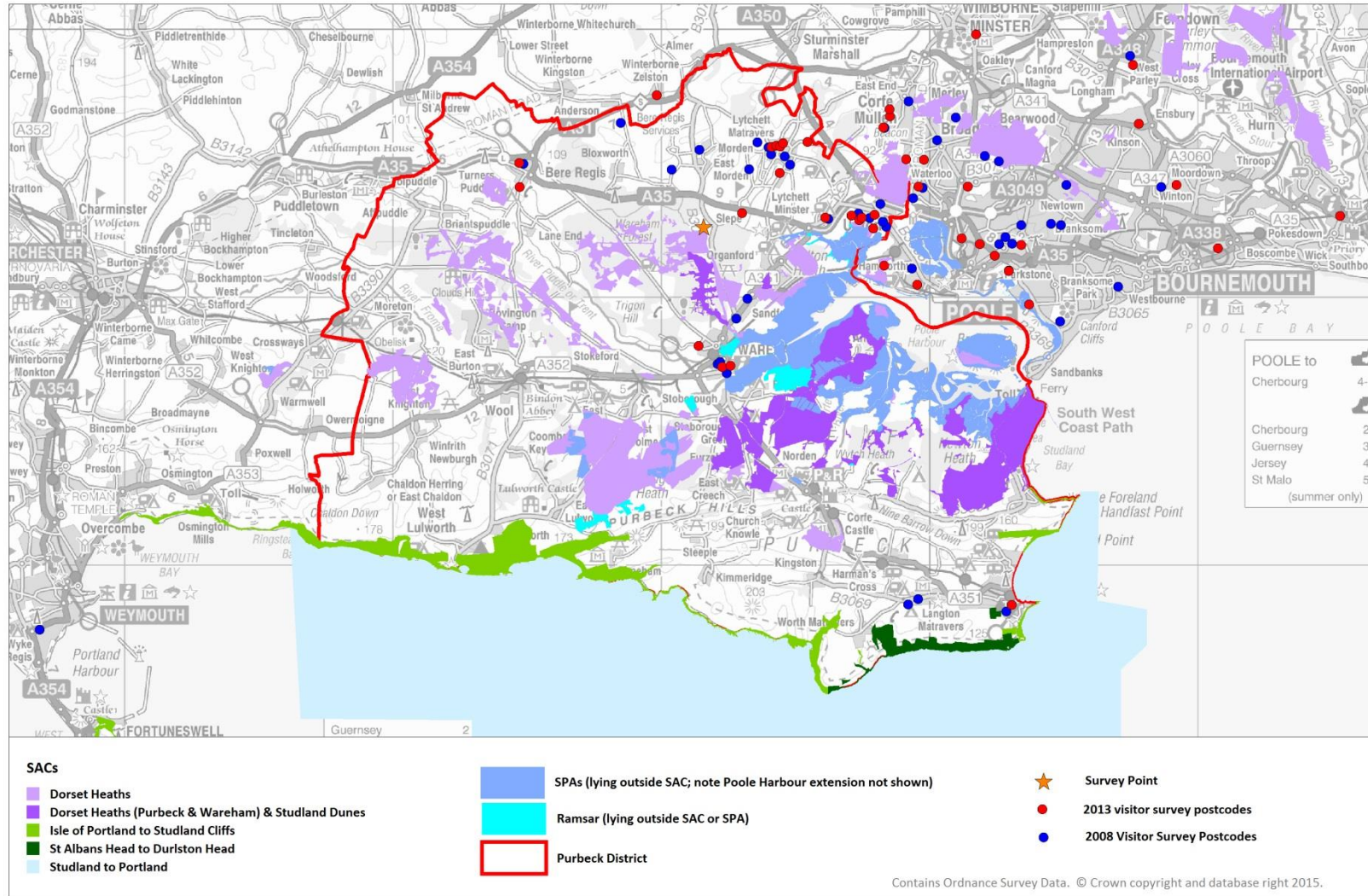
- 7.1 The options include land at Morden being developed to provide a large area of public open space and around 80-100 holiday chalets.
- 7.2 The location is sensitive as it is very close to the Dorset Heathlands SPA/Ramsar and the Dorset Heaths SAC. Previous HRA work at Issues and Options raised concern that holiday chalets were proposed within 400m of the European site boundary. Data on the distribution of key bird species were also plotted in relation to the proposed country park and chalets. Likely significant effects to the interest features of the designated sites would include disturbance to Annex I birds, increased fire incidence, trampling, dog fouling, water quality. The areas outside the designated site boundary are likely to be important for nightjar and woodlark, in terms of foraging and possibly even breeding sites, and therefore are functionally linked to the SPA and areas of Wareham Forest (outside the SPA) support internationally important numbers of both woodlark and nightjar in their own right (see para 1.20).
- 7.3 Careful, detailed design and discussion with Natural England will be essential to consider the constraints at this location and the whether the chalets and country park can be designed so as to have no adverse effects on the integrity of the European site. Possible design elements to minimise impacts to the European sites might include:
- The chalets being only on the eastern side of the lake, and therefore set back from the designated heathland and outside the 400m zone
  - Dedicated barbeque facilities and dog exercise areas provided for the chalets well away from the heathland (avoiding fire risk)
  - Ranger presence and no fires policy to limit fire risk
  - Careful management of the vegetation to minimise fire risk in the area around the chalet
  - Restrictions on dogs for visitors using the chalets
  - Routes within the country park focussing access away from the designated sites and focussing access along the eastern shore of the lake and the fields near the B3075.
  - Parking for the country park and focal point for visiting set close to the B3075, ensuring access is set well back from the heathland
  - Provision of extensive areas for dog walking well away from the heathland – ideally with areas that are fenced from the road, minimal grazing and safe for dogs to be off the lead.
  - Provision of access to draw visitors away from Sherford Bridge and from walking onto Morden Bog National Nature Reserve.
  - Access in the western part of the site carefully zoned to ensure access to the heathland is not promoted
  - Measures to ensure the site is ‘nitrogen neutral’ (see Bryan & Kite 2013)

**Potential for the Country Park to function as a SANG**

- 7.4 In Map 5 we show visitor postcodes from surveys undertaken at Sherford Bridge. Surveys were undertaken at the roadside parking area just by the bridge, at the south-east corner of the area proposed for green space (dark green on Map 9). The survey data originates from 2008 (see White *et al.* 2008 for details) and then more recently as part of the Wild Purbeck NIA visitor work (Cruickshanks & Lake 2014). The 2008 visitor surveys involved 16 hours of survey work and that was doubled in 2014, so the survey effort was different between years. By pooling the data in this way it is possible to see where visitors to the proposed open space may originate from. The current access at Sherford Bridge is much more informal than the country park might be, currently there is just some roadside parking (unsurfaced layby) and a popular local walk that provides access to the top of Morden Bog National Nature Reserve and into Wareham Forest. People do already walk to the lake, despite there being no formal right of access. It can be seen that the SANG could function well in terms of drawing residents from Upton, Lytchett Minster and the west of Poole in particular. How well it would work in the future would depend on the detailed design of the Country Park and how it is promoted. The chalets may not necessarily be compatible with the SANG, as residents using the chalets may wish for privacy and seclusion, and therefore the area for SANG is more constrained than appears at first. As residents of the chalets would clearly be likely to explore the full extent of Wareham Forest (which would be the draw to staying there), the Country Park would have to draw users who would otherwise be using the forest in order to function as a SANG. The capacity of the SANG may therefore be at least in part absorbed by the new chalets, and the potential for the SANG to mitigate development will need to be carefully assessed, bearing in mind the design of the chalet area.
- 7.5 The following design elements would be necessary for the site to function effectively as a SANG:
- Free parking
  - Good, easy and safe access to the car-park from the road
  - Careful design to provide safe, dog-friendly exercise areas that replicate the experience gained from walking within the main block of Wareham Forest and Morden Bog NNR.
  - Relatively wild, low key access provision, ensuring that the Country Park doesn't become an attraction in its own right, with the potential risk of drawing more visitors to the area who then deflect local dog walkers etc onto the more sensitive areas.
  - Careful promotion, targeting residents rather than tourists
- 7.6 Additional evidence gathering might include visitor surveys at similar chalets in other parts of the country, ideally within a similar forest setting, to determine what kind of activities are undertaken and how much they stay within the area adjacent to the chalets and how much they visit more widely.
- 7.7 At present it is concluded that it may be possible for the Country Park to function as a strategic SANG and in some ways the location is ideal. New facilities here could be

linked with management of roadside parking along the B3075 to better manage access across this part of Wareham Forest. As such there are some clear positive benefits for the European sites. Potential constraints relate to the chalet accommodation and how these can be made compatible with the SANGs delivery.

Map 5: Visitor Survey Postcodes from Sherford Bridge in 2013 and 2008



## **8. Summary of Appropriate Assessment Work and Next Steps**

- 8.1 The appropriate assessment sections above (sections 4, 5, 6 and 7) have assessed the implications of the development screened at likely to have a significant effect on European sites, in order to determine whether adverse effects on site integrity could be ruled out, or whether issues and information gaps remain. The appropriate assessment looked at the potential effects of development on each of the European sites in section 4, and then focussed in detail on the options for large housing sites at section 5, employment sites at section 6 and the proposal for a country park and tourist accommodation at Morden at section 7. Each section summarises the conclusions drawn and remaining issues to be resolved. The recommendations made within each of the appropriate assessment sections should assist the council in finalising site allocations
- 8.2 It is recommended that the remaining uncertainties and evidence gaps should be resolved as soon as possible in order to inform the next stage of plan making. A note should also be made of the recommendations made in section 4 in relation to the range of mitigation schemes already in place, in terms of appropriate wording in the plan review, compliance of specific allocations with those schemes, and demonstrating progression of actions in order to continue to rely on those mitigations measures. A check that the required monitoring is in place and adequately reporting is necessary.
- 8.3 This Habitats Regulations Assessment will continue to be updated alongside the plan review, as it proceeds to submission draft, submission and post Examination modifications before adoption. A check of all elements of the new plan, including those not amended, will be made as part of the Habitats Regulations Assessment, to provide a comprehensive and whole plan assessment.

## 9. References

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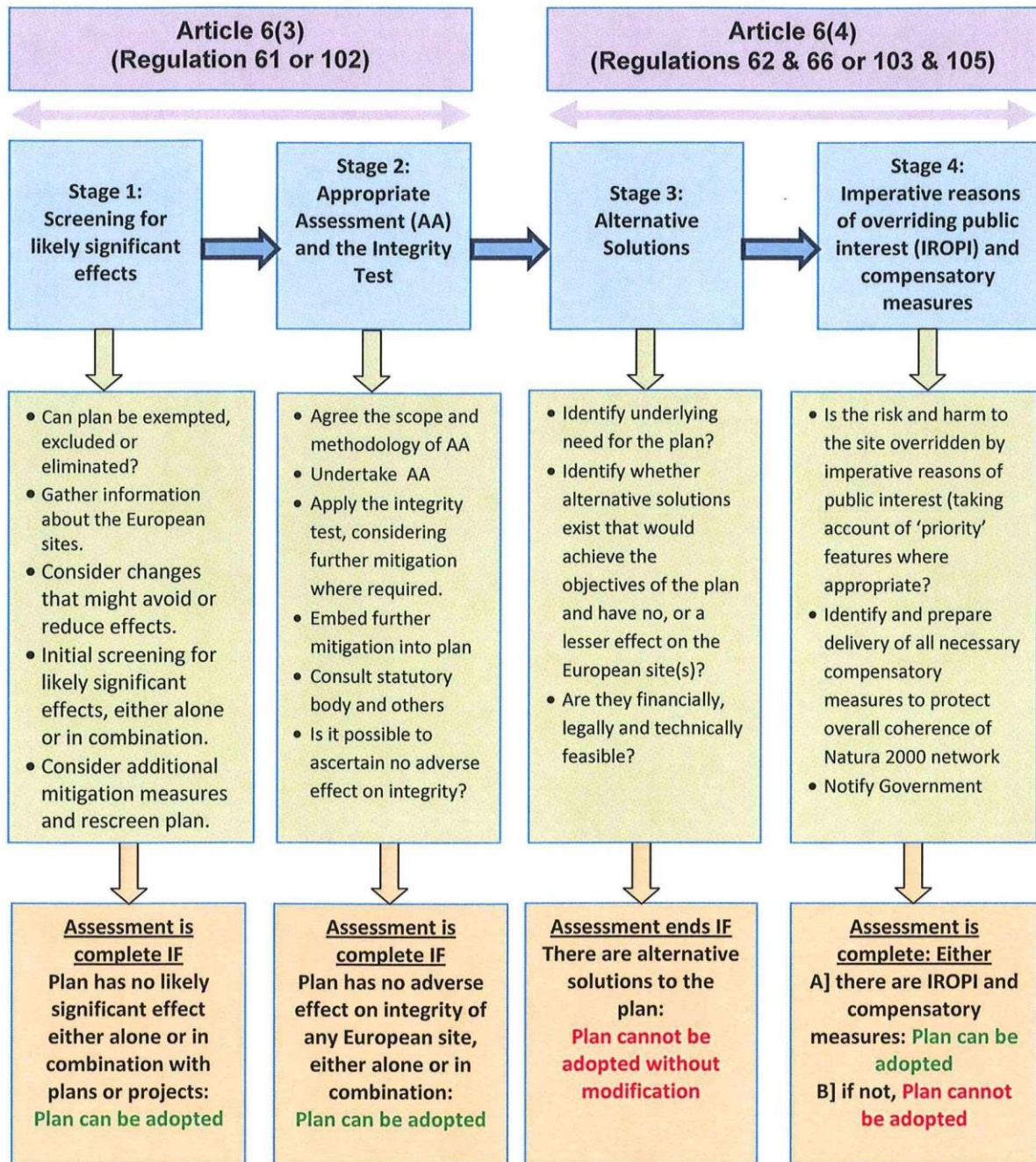
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## 11. Appendix 1: The Habitats Regulations Assessment Process

- 11.1 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2010, as amended, which are commonly referred to as the 'Habitats Regulations.' Recent amendments to the Habitats Regulations were made in 2012. The recent amendments do not substantially affect the principles of European site assessment as defined by the 2010 Regulations, the focus of this report or the previous Habitats Regulations Assessment work undertaken for the Purbeck Local Plan, upon which some of this Habitats Regulations Assessment relies.
- 11.2 The Habitats Regulations are in place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe. Although the Habitats Regulations transpose the European legislation into domestic legislation, the European legislation still directly applies, and in some instances it is better to look to the parent Directives to clarify particular duties and re-affirm the overarching purpose of the legislation.
- 11.3 European sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive. The suite of European sites includes those in the marine environment as well as terrestrial, freshwater and coastal sites. European sites have the benefit of the highest level of legislative protection for biodiversity. Member states have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted, with a precautionary approach embedded in the legislation, i.e. it is necessary to demonstrate that impacts will not occur, rather than they will. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. Where sites are not achieving their potential, the focus should be on restoration.
- 11.4 The UK is also a contracting party to the Ramsar Convention, which is a global convention to protect wetlands of international importance, especially those wetlands utilised as waterfowl habitat. In order to ensure compliance with the requirements of the Convention, the UK Government expects all competent authorities to treat listed Ramsar sites as if they are part of the suite of designated European sites, as a matter of government policy, as set out in Section 118 of the National Planning Policy Framework. Most Ramsar sites are also a SPA or SAC, but the Ramsar features and boundary lines may vary from those for which the site is designated as a SPA or SAC.

- 11.5 It should be noted that in addition to Ramsar sites, the National Planning Policy Framework also requires the legislation to be applied to potential SPAs and possible SACs, and areas identified or required for compensatory measures where previous plans or projects have not been able to rule out adverse effects on site integrity, yet their implementation needs meet the exceptional tests of Regulation 62 of the Habitats Regulations, as described below.
- 11.6 The step by step process of Habitats Regulations Assessment is summarised in Figure 1 and is as follows. Within the Habitats Regulations, local planning authorities, as public bodies, are given specific duties as ‘competent authorities’ with regard to the protection of sites designated or classified for their species and habitats of European importance. Competent authorities are any public body individual holding public office with a statutory remit and function, and the requirements of the legislation apply where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. Regulation 61 of the Habitats Regulations sets out the Habitats Regulations Assessment process for plans and projects, which includes development proposals for which planning permission is sought. Additionally Regulation 102 specifically sets out the process for assessing emerging land use plans.
- 11.7 The step by step approach to Habitats Regulations Assessment is the process by which a competent authority considers any potential impacts on European sites that may arise from a plan or project that they are either undertaking themselves, or permitting an applicant to undertake. The step by step process of assessment can be broken down into the following stages, which should be undertaken in sequence:
- Check that the plan or project is not directly connected with or necessary for the management of the European site
  - Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project alone
  - Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project in-combination with other plans or projects
  - Carry out an Appropriate Assessment
  - Ascertain whether an adverse effect on site integrity can be ruled out
- 11.8 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. For projects, the project proposer may identify potential issues and incorporate particular avoidance measures to the project, which then enables the competent authority to rule out the likely significant effects. A competent authority may however consider that there is a need to undertake further levels of evidence gathering and assessment in order to have certainty, and this is the Appropriate Assessment stage. At this point the competent authority may identify the need to add to or modify the project in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.

- 11.9 European case law continues to refine our understanding of how the European Directives should be interpreted and implemented. In defining what may constitute a likely significant effect, European case law confirms that the screening for likely significant effects is simply a check to see if there is a possible risk of an effect, and that low threshold then triggers the need for further investigation in an appropriate assessment. This interpretation was set out in the Judgment and accompanying Advocate General's Opinion for the 'Sweetman case' relating to potential loss of limestone pavement that formed part of an Irish SAC (C-258/11).
- 11.10 When preparing a plan, a competent authority may go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 11.11 After completing an assessment a competent authority should only approve a project or give effect to a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 11.12 Where adverse effects cannot be ruled out, there are further exceptional tests set out in Regulation 62 for plans and projects and in Regulation 103 specifically for land use plans. Exceptionally, a plan or project could be taken forward for imperative reasons of overriding public interest where adverse effects cannot be ruled out and there are no alternative solutions. It should be noted that meeting these tests is a rare occurrence and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 11.13 In such circumstances where a competent authority considers that a plan or project should proceed under Regulations 62 or 103, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed.



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Figure 1: Outline of the assessment of plans under the Habitat Regulations

## 12. Appendix 2: European Site Conservation Objectives

- 12.1 As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.
- 12.2 Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level Habitats Regulations Assessments in a consistent way. In 2012, Natural England issued now a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. These generic objectives are the first stage in the project to renew conservation objectives, and it is anticipated that the second stage, which is to provide more detailed and site specific information for each site to support the generic objectives, will follow shortly.
- 12.3 The new list of generic Conservation Objectives for each European site include an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives currently issued are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The second stage, provision of the more detailed site specific information to underpin these generic objectives, will provide much more site specific information, and this detail will play a fundamental role in informing Habitats Regulations Assessments, and importantly will give greater clarity to what might constitute an adverse effect on a site interest feature.
- 12.4 In the interim, Natural England advises that Habitats Regulations Assessments should use the generic objectives and apply them to the site specific situation. This should be supported by comprehensive and up to date background information relating to the site.
- 12.5 For SPAs the overarching objective is to:
- 12.6 'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'
- 12.7 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features.
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of the qualifying features.
- The distribution of the qualifying features within the site.

12.8 For SACs the overarching objective is to:

*'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'*

12.9 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- The populations of qualifying species.
- The distribution of qualifying species within the site.

12.10 Conservation objectives inform any Habitats Regulations Assessment of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives.



### 13. Appendix 3: Conservation Interest of European Sites

- Dorset Heathlands SPA
- Dorset Heaths SAC
- Dorset Heaths (Purbeck and Wareham) and Studland dunes SAC
- Dorset Heathlands Ramsar site
- Poole Harbour SPA
- Poole Harbour Ramsar site
- The New Forest SAC
- The New Forest SPA
- The New Forest Ramsar site

**Table 3 Reasons for designation of European sites within Purbeck District and 20km of the District boundary.**  
+ indicates a primary reason for designation as SAC, \* indicate a priority SAC feature.

Site	Reason for designation :		
	SAC	SPA	Ramsar
Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i><sup>+</sup>, temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i><sup>+</sup>, European dry heaths<sup>+</sup>, depressions on peat substrates of the <i>Rhynchosporion</i><sup>+</sup>, <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils, Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davalliana</i><sup>*</sup>, Alkaline fens, Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains</p> <p>Southern damselfly<sup>+</sup>; great crested newt.</p>	<p>Breeding nightjar, Dartford warbler, woodlark. Wintering hen harrier, merlin.</p>	<p>Ramsar criterion 1: Contains particularly good examples of (i) northern Atlantic wet heaths with cross-leaved heath <i>Erica tetralix</i> and (ii) acid mire with <i>Rhynchosporion</i>, largest example in Britain of southern Atlantic wet heaths with Dorset heath <i>Erica ciliaris</i> and cross-leaved heath <i>Erica tetralix</i>.</p> <p>Ramsar criterion 2: Supports 1 nationally rare and 13 nationally scarce wetland plant species, and at least 28 nationally rare wetland invertebrate species.</p> <p>Ramsar criterion 3: high species richness and ecological diversity of wetland habitat types and transitions;</p> <p>lies in one of the most biologically-rich wetland areas of lowland Britain.</p>
Dorset Heaths	<p>Embryonic shifting dunes<sup>+</sup>, shifting dunes along the shoreline</p>	<p>See above.</p>	<p>See above</p>

Site	Reason for designation :		
	SAC	SPA	Ramsar
<p>(Purbeck and Wareham) and Studland dunes SAC</p>	<p>with <i>Ammophila arenaria</i> (“white dunes”) <sup>+</sup>, Atlantic decalcified fixed dunes*, humid dunes slacks<sup>+</sup>, oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) <sup>+</sup>, Northern Atlantic wet heaths with <i>Erica tetralix</i> <sup>+</sup>, temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>*, European dry heaths <sup>+</sup>, depressions on peat substrates of the <i>Rhynchosporion</i> <sup>+</sup>, bog woodland*, <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils, Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>*, Alkaline fens, Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains.</p> <p>Southern damselfly<sup>+</sup>; great crested newt.</p>	<p>Little Sea and Eastern Lake located within this SAC fall within Poole Harbour SPA.</p>	
<p>Poole Harbour SPA and Ramsar</p>		<p>Breeding common tern, and Mediterranean gull.</p> <p>Passage aquatic warbler and little egret. Wintering avocet, little egret.</p> <p>Internationally important wintering populations of Icelandic population of black-tailed godwit and the North-western European population of wintering shelduck.</p> <p>A wetland of international importance by regularly supporting at</p>	<p>Ramsar criterion 1: best and largest example of a bar-built estuary with lagoonal characteristics in Britain.</p> <p>Ramsar criterion 2: 2 species of nationally rare plant, 1 nationally rare alga, at least 3 British Red data book invertebrate species.</p> <p>Ramsar criterion 3: Mediterranean and thermo Atlantic halophilous scrubs, dominated by shrubby seablite <i>Suaeda vera</i>; calcareous fens with great fen sedge <i>Cladium mariscus</i>; transitions from saltmarsh through to peatland mires. Nationally important populations of breeding waterfowl including common</p>

Site	Reason for designation :		
	SAC	SPA	Ramsar
		least 20,000 waterfowl.	tern, and Mediterranean gull, and of wintering. avocet.  Ramsar criterion 5: internationally important assemblages of waterfowl.  Ramsar criterion 6: Internationally important populations of common shelduck, black-tailed godwit..
The New Forest	Oligotrophic waters containing very few minerals of sandy plains ( <i>Littorelletalia uniflorae</i> ) <sup>+</sup> , Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i> <sup>+</sup> , Northern Atlantic wet heaths with <i>Erica tetralix</i> <sup>+</sup> , European dry heaths <sup>+</sup> , <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils ( <i>Molinion caeruleae</i> ) <sup>+</sup> , Depressions on peat substrates of the <i>Rhynchosporion</i> <sup>+</sup> , Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer ( <i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i> ) <sup>+</sup> , <i>Asperulo-Fagetum</i> beech forests <sup>+</sup> , Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains <sup>+</sup> , Bog woodland <sup>+</sup> , Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> ) <sup>+</sup> , Transition mires, quaking bogs and Alkaline fens.  Southern damselfly <i>Coenagrion mercuriale</i> <sup>+</sup> , Stag beetle <i>Lucanus cervus</i> <sup>+</sup> , Great crested newt <i>Triturus cristatus</i> .	Breeding Dartford warbler, nightjar, woodlark, honey buzzard, wood warbler <i>Phylloscopus sibilatrix</i> , hobby. Wintering hen harrier	Ramsar Criterion 1: Valley mires and wet heaths of outstanding scientific interest. The largest concentration of intact valley mires of their type in GB.  Ramsar Criterion 2: Supports a diverse assemblage of wetland plants and animals.  Ramsar Criterion 3: Mire habitats of high ecological quality and diversity. Invertebrate fauna important due to the concentration of rare and scarce wetland species. Whole site complex is essential to the genetic and ecological diversity of southern England.
St Alban's	Vegetated sea cliffs of the	N/A	N/A

Site	Reason for designation :		
	SAC	SPA	Ramsar
Head to Durlston SAC	<p>Atlantic and Baltic coasts, Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites)*.</p> <p>Early gentian <i>Gentianella anglica</i><sup>+</sup>, Greater horseshoe bat <i>Rhinolophus ferrumequinum</i></p>		
Portland to Studland Cliffs SAC	<p>Vegetated sea cliffs of the Atlantic and Baltic coasts<sup>+</sup>, Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia)<sup>+</sup>, annual vegetation of drift lines.</p> <p>Early gentian <i>Gentianella anglica</i><sup>+</sup></p>	N/A	N/A

## 14. Appendix 4: Screening for LSE at Issues and Options Stage

This table sets out the previous screening of the plan at the Issues and Options stage, which informed the development of Options for the plan

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
Issue 1 – plan period	An explanation of the various options for the time period of the plan, to either align with neighbouring authority plan periods or to adhere to the NPPF	No LSE for all options	Any plan review will require a new Habitats Regulations Assessment, irrespective of timescales	None
Issue 2 – Meeting objectively assessed housing needs	This issues deals with the overall quantum of housing for the district for the plan period	LSE, the two options below do not yet have exact figures stated	The currently adopted plan provides European site mitigation based on the number of houses currently proposed. A higher figure does not yet have mitigation assured.	Take to appropriate assessment for further analysis
Option 2a	Deliver around 2,244 additional homes between 2013 and 2031 (subject to additional testing, such as heathlands and highways)	LSE	No mitigation assured for the levels of housing proposed	Take to appropriate assessment for further analysis
Option 2b	Deliver more than an additional 2,244 homes between 2013 and 2031	LSE	No mitigation assured for the levels of housing proposed	Take to appropriate assessment for further analysis
Issue 3 – Where development could go	A range of options are presented with regard to the settlement hierarchy and whether it is appropriate to focus growth at the larger towns, or to allow growth at smaller settlements	LSE	Any of the general principles presented in the options would not automatically lead to LSE, rather there is the potential for impacts if a specific location for growth is chosen	Re-assess once the policy becomes more specific. Development of the policy should have regard for the initial assessment made of the site specific potential options.
Issue 4 – Potential Large Sites	Landowners have presented a number of sites for residential development to the Council. Where the possible site is presented with an ability to accommodate 200	LSE	All options presented have been initially screened and have the potential to affect European sites in terms of recreational pressure and urbanisation impacts	It is advised that the Council begins to refine the list of large scale housing site options in light of the initial assessment made in the appropriate Assessment section below.

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
	houses or more, these are listed			
Option 4a	Consider new development to the north and west of North Wareham	LSE	Potential to affect European sites in terms of recreational pressure and water quality	Take to appropriate assessment for further analysis
Option 4b	Consider new development to the west of Wareham	LSE	Potential to affect European sites in terms of recreational pressure, urbanisation and water quality	Take to appropriate assessment for further analysis
Option 4c	Consider new development to the south-east of Sandford	LSE	Potential to affect European sites in terms of recreational pressure, urbanisation and water quality	Take to appropriate assessment for further analysis
Option 4d	Consider new development around Lytchett Minster	LSE	Potential to affect European sites in terms of recreational pressure, urbanisation and water quality	Take to appropriate assessment for further analysis
Option 4e	Consider new development around Moreton	LSE	Potential to affect European sites in terms of recreational pressure, urbanisation and water quality	Take to appropriate assessment for further analysis
Option 4f	Consider new development west of Wool	LSE	Potential to affect European sites in terms of recreational pressure and water quality	Take to appropriate assessment for further analysis
Option 4g	Consider new development to the north of Langton Matravers	LSE	Potential to affect European sites in terms of recreational pressure.	Take to appropriate assessment for further analysis
Issue 5 – green belt	Options to make some amendments to green belt boundaries, with specific proposals listed.	No LSE	Options to change the green belt rather than any development. However, all locations mapped are within the 5km buffer for the heathlands and also within the Poole Harbour catchment.	Any future development at these locations will need to address impacts to European sites.
Issue 6 – Meeting employment needs	Considering the location and amount of employment land	LSE	Potential to affect European sites through fragmentation and disturbance	Take to appropriate assessment for further analysis
Option 6a: focus employment development at Dorset Green Technology Park (DGTP)	Site specific description	LSE	Adjacent to heathland at Winfrith	Take to appropriate assessment for further analysis
Option 6b: focus	Site specific	LSE	Adjacent to heathland	Take to appropriate

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
employment development at Holton Heath / Admiralty Park	description		around Holton Heath, BlackHill and Sandford Heaths	assessment for further analysis
Option 6c: focus employment development at Bovington Middle School.	Site specific description	LSE	Close to heathland	Take to appropriate assessment for further analysis
Option 6d: Provide around 3ha of additional employment land at Upton	Site specific description	LSE	Close to heathland and Poole Harbour	Take to appropriate assessment for further analysis
Option 6e: provide around 1ha of additional employment land at Sandford Lane in North Wareham	Site specific description	LSE	Close to Poole Harbour Ramsar, Dorset Heathlands SPA and Poole Harbour SPA	Take to appropriate assessment for further analysis
Option 6f: provide additional employment development at Sandford First School, Botany Bay Farm at Bloxworth and/or the the Dorset County Council-owned depot off the B3351 at Corfe Castle	Site specific description	LSE	Close to a range of European sites	Take to appropriate assessment for further analysis
Issue 7 – Meeting retail needs	Options for the amount of additional retail floor space required	No LSE	There are no impact pathways arising from the delivery of additional retail	None, although project specific development should always be checked.
Issue 8: Managing internationally protected heathlands	Questions relating to the current mitigation and restrictions to protect European sites	LSE	The current mitigation was deemed necessary by the Habitats Regulations Assessment of the current adopted plan. Any changes to the measures has the potential to weaken the protection of European sites and will need to be fully assessed.	Take to appropriate assessment for further analysis once consultations responses are received.
Issue 9 – Norden Park and ride	Discussion regarding whether to expand this park and ride or not	No LSE	Policy could have a positive impact through reducing road traffic past Corfe Common	None
Issue 10 - boundaries	Invites comments on boundary changes to settlements	No LSE	Changes to boundaries have not been seen as part of the assessment, but at this stage there is	Boundaries need checking at later stages

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
			no policy simply requests for comments and changes are understood to be slight	
Issue 11 – Wareham town centre	Slight changes to town centre boundary mapped	No LSE	Relates to retail areas and changes are very slight	None
Issue 12 – Local centres	Options for different approaches to local centres	No LSE	No additional development, a refinement of boundaries to be more accurate only	None
Issue 13 – Affordable housing delivery	Options to increase percentage of affordable housing or allocate more settlement extensions	No LSE	Each new home has the potential to contribute to impacts, irrespective of the type of accommodation	None, but ensure that all new housing is mitigated for, even if exempt from making a financial contribution
Issue 14 – self/custom build housing	Relates to the promotion of self-build within the new plan	No LSE	Each new home has the potential to contribute to impacts, irrespective of the type of accommodation	None, but ensure that all new housing is mitigated for, even if exempt from making a financial contribution
Issue 15 – Gypsies, Travellers and Travelling Showpeople	Relates to provision of settlement extensions or new sites.	No LSE	Each new home has the potential to contribute to impacts, irrespective of the type of accommodation.	None, but need to ensure that all new housing is mitigated for and should be considered as C3 development in terms of impacts.
Issue 16 – Morden country park and tourist accommodation	Proposal for public open space and holiday chalets	LSE	Adjacent heathland sites – potential for disturbance to Annex I birds, increased fire incidence, trampling, dog fouling, water quality	Take to appropriate assessment for further analysis
Issue 17 – Other open space	Questions relating to the way in which open space is delivered in new development	No LSE	No additional development, asking public opinion on open space	None
Issue 18 – Military needs	Provision of housing for military personnel and potential for MOD to provide housing for non-military personnel	No LSE	Each new home has the potential to contribute to impacts, irrespective of the type of accommodation	None, but ensure that all new housing is mitigated for, even if exempt from making a financial contribution
Issue 19 – policy amendments	Review of a number of planning policies within the current plan, in line with current planning	LSE	Proposed amendments not yet stated, therefore uncertainties	Rescreen once changes known, may not need to go to appropriate assessment



H R A o f P u r b e c k P l a n R e v i e w

<b>Policy or Plan Section</b>	<b>Description</b>	<b>LSE</b>	<b>Justification for LSE Conclusion</b>	<b>Further considerations</b>
	policy, legislation and evidence			
Issue 20 – additional policies	Asks whether any new policies should be included	No LSE	Nothing proposed or set out as an option	None
Issue 21 – any other issues	Inviting consultees to identify any other issues	No LSE	Does not promote development	None