

Matters and Issues 10

2. Does Policy ME2 provide a robust basis for the protection of the Dorset Heathlands?

Part of Plan that is unsound: ME2

Soundness criterion that it fails: Effectiveness uncertain: does not comply with NPPF109.

Why it fails - key parts of original representation:

CSPS: ME2, ME3

Changes: ME2, ME3

We reserved our position subject to adequate evidence being provided that there will be no harm to the designated heathlands. As is summarised below, we still do not have that evidence.

The analysis of responses to the consultation on the Heathland DPD Preferred Options is not yet available. The key points we raised were:

Vision Supported preferred option 1

Objective 1 Amend to ensure the heaths are extended and that there is sympathetic land use on and around heaths.

Delivery of long term strategy.

Objective 1 :

- Support for UHP.
- Request that they should be responsible for review and change of practice where monitoring shows results are not achieving what is needed.
- Must recognise that delivery of mitigation projects cannot depend on input of volunteers/charities.
- Lack of fall back position. Should work from outer limits of 400m-5km zone to test the strength of the policy particularly with more accessible heaths.
- Quality monitoring and feedback on effectiveness of SANGs . Potential for alternative/additional mitigation.

Objective 2:

- Need for policy framework to be sufficiently flexible to recognise and respond to different threats/opportunities of each heathland.
- Cross boundary co-operation and funding to ensure freedom of opportunity for all and strategic level approach to mitigation projects. Need for in-perpetuity management funding to be secured.
- Details of long term requirements for management and education of users of heathlands and SANGs.
- Risks from employment land near or adjacent to designated heathland – diffuse and direct water pollution, light pollution, increased visitor pressure, loss of land that could have been restored to heathland.

Objective 3:

- First SANG only recently completed. Success untested. Need monitoring evidence to guide any changes to development policy.
- Other comments on SANGs in line with Core Strategy response.
- Raised concern that DPD primary focus is on SANGs and has not addressed heathland expansion and linkage and allocation of Heathland Support Areas (HSAs)

Draft Policy DH4

- Any changes to SANGs should not permit loss of biodiversity

(the full text of our response to the DPD consultation is appended as **Matters 10 Appendix 1**)

Appendix B duplicates Appendix 5 of the Core Strategy. Please see comments under Matters & Issues 10.7 below

How it can be made sound

i) Ecological survey data should be provided and reviewed. Then and only then will it be possible to quantify risk and identify mitigation and what biodiversity gain will be achieved.

ii) The final sentence of ME2 implies a degree of certainty that is unproven. At present, the SANG approach clearly provides the best option we have if we are to accommodate much needed housing, particularly affordable homes. But more than this may well be needed: we firmly believe it will be.

iii) Policy should ensure that there is a fall-back position for those development sites that risk most adverse impact on heathlands if SANG and Heathland SPD/DPD are inadequate and for evidence based changes to DPD.

Precise wording sought

Amend final sentence to read:

.....set out above are designed to function as an effective package.....

.....

6. Is ME8 consistent with ME1 re impacts on biodiversity & ecological impact?

Part of Plan that is unsound: ME8

Soundness criterion that it fails: Does not comply with NPPF109

Why it fails - key parts of original representation:

360302 Changes ME8

The present wording of bullet point 2 incorrectly refers to integrity of species and is out of date in its reference only to protected habitats and species. It does not comply with NPPF and wording is inconsistent with ME1.

“Imperative reasons of over-riding public interest “ applies to many of the policies in the Core Strategy and there appears to be no logical reason for singling out this one. The DCLG Guidance (July2013) clarifies the point that environmental protections should not automatically be over-ridden by need for renewable or low carbon energy.

The DCLG guidance is welcome as it highlights criteria that should be included in Local Plans. There is a requirement for biodiversity and community gain: several additional landscape issues are raised. However, it focuses on wind and solar power. We suggest that the Local Plan policy should be generic to allow for any new technologies that may be developed in the lifetime of the Plan.

The Councils’ RE Strategy highlights the need for a robust planning process to ensure good quality decision making including the adoption of landscape sensitivity analysis methodology and a method to understand issues of cumulative impact. We understand that a consultant has just been appointed to work on the methodology. Bournemouth, Dorset & Poole have produced an Informal Guidance Note on the Development of Large Scale Solar Photovoltaic arrays.

How it can be made sound

As a minimum, it is essential is **to protect the viability of local populations of priority species and to protect and enhance the integrity of priority habitats.** It is important that **Assessment of Cumulative Impact** is applied to biodiversity as well as landscape.

We would hope the Councils across Dorset will introduce recording RE planning applications across the area very soon so that we have the data to review issues of cumulative impact (**ED1**. Bournemouth, Dorset & Poole Renewable Energy Strategy p31 para. 4) as well as a mechanism for assessing progress in meeting targets.

We note that recent planning applications for large scale photovoltaics in East Dorset are including proposals that are in line with the DCLG guidance.

Precise modification/wording sought

Amend Bullet point 2: ***It would not have an adverse impact on the viability of local populations of priority species or the integrity of priority habitats and that proposals include biodiversity improvement.***

.....

7. Do the SANG Guidelines:

- *Provide clear and adequate guidance re the location and accessibility of SANG?*
- *Provide clarity re the quality and characteristics of SANG?*
- *Provide sufficient flexibility to allow for site specific circumstances?*

Part of Plan that is unsound: Appendix 5

Soundness criterion that it fails: Not effective. Does not comply with NPPF109, 117

Why it fails - key parts of original representation

360302: CSPS: ME3 + site specific comments on WMC3, WEMC5, WMC6, CM1, FWP3, FWP6, FWP7

360302 Changes: FWP6, FWP7, VTSW7, ME3/New Appendix5

522117 CSPS: VTSW4

Location and accessibility

Where SANGs are relatively close to heathland (eg less than 1 km) and do not have a major effective barrier to deflect people away from the heaths (eg a major road such as at West Parley), development should start as far from the 400m boundary as possible and work inwards to allow for monitoring and review of the effectiveness of policy. To reduce the risk of additional visitors to the heaths there should be no car parks close to these SANGs.

Development	Nearest SSSI Heathland	Distance km (approx)
WMC3	Upton Heath	5
	Holt Heath	6
WMC4	Upton Heath	5.5
	Holt Heath	6.5
WMC5	Holt Heath	5
WMC6	Holt Heath	4.5
CM1	Upton Heath	2
FWP3	Ferndown Common	0.75
FWP4	Ferndown Common	1.5
	Parley Common	2.25
FWP6	Parley Common	0.5
FWP7	Parley Common	1
VTSW4 East of Edmondsham Road	Stephens Castle	0.4
VTSW4 West of Edmondsham Road	Dewlands Common North	0.5
	Stephens Castle	0.6
VTSW7	St Leonards & St Ives Heath	1.2
	Parley Common	0.9

The heathlands near VTSW4 and VTSW7 are at particular risk to because they do not involve crossing major roads to access them from the developments. VTSW4 East is on the limit of what is being deemed acceptable in terms of proximity to SSSI heathland (the 400m zone borders it). VTSW4 West is within easy reach of both Dewlands Common and Stephens Castle. Given that

- i) SANGs to support new developments in East Dorset are not tried and tested, and
- ii) as far as we are aware, we have no baseline data or mechanism for monitoring and review in place,

any large scale development this close to designated heathland should only proceed with utmost caution until the efficacy of the mitigation measures in East Dorset is proven.

Quality of SANGs

Appropriate ownership and management of the SANG is critical. It is essential that this is undertaken by those with proven expertise in biodiversity and management of wildlife sites accessible to the public. The key to their success will be the transfer of land ownership to the Local Planning Authority or other appropriate body so that management is appropriate to wider ecological needs and can be adapted as climate change impact dictates. It is crucial that this is not left to landowners or developers who do not have the relevant skills, resources or financial interest in getting it right. Financial provision should be made for resources including the staffing required for their long term management.

The East Dorset Countryside Management Services (EDCMS) team are ideally placed to do this: they have an excellent track record of working with voluntary organisations and local communities and have access to local farmers who have an understanding of what is required in terms of appropriate breeds, stock management (including safety of people and dogs), grazing levels and habitats. Viability of the extensive farming approach that is needed depends on the farmers having access to a range of sites so that livestock can be moved between them at short notice. We totally oppose any suggestion that ownership and responsibility for SANG management should remain with the developer or landowner.

To achieve the minimum walking distance offered, we understand that some SANG proposals coming forward rely on perimeter walks which will destroy existing edge habitat and preclude the development of ecotones. Footpaths must lead to somewhere interesting and not follow the boundary for the sake of fitting in that fixed minimum distance.

It is essential that hard surfaced pathways (which create an urban park approach) and equipment used for their construction are kept away from trees to protect root zones. It is not generally appreciated how extensive an area the root system of field grown trees is. Any damage to this area including compaction from walking or cycling could compromise the health of our important landscape trees and make them more susceptible to disease and insect attack. Threat to our native species exacerbated by the impact of climate change is of widespread concern.

Flexibility and Site Specific Circumstances

There is as yet no provision or agreed methodology (either in the Core Strategy or Heathlands SPD) for monitoring and review of the use and condition of the heathlands or the SANGs.

While accepting that protection of the heaths depends on using a number of measures, the focus of the SPD is the provision of SANG. They undoubtedly have a major role to play but their effectiveness must be evidence based and quantified: a fall-back position should be in place in the event that the approach has limited success in this area and falls short of the requirement to ensure no harm to the heathlands. .

Inadequate attention has been paid to a landscape scale ecosystem approach and how SANGs will contribute to resilient ecological networks (NPPF109, 117). Lack of survey has precluded consideration of areas of high biodiversity in or adjacent to new neighbourhoods and the contribution they can make to pollination services and other essential ecosystem services.

Drainage

The Masterplan reports identified the water attenuation required for each proposed new neighbourhood but have not allowed for increased frequency or intensity of rainfall associated with climate change. The details they provided for those with potential SANGs near the Rivers Stour, Allen and Crane are tabulated below. [Please note that the land areas of the identified sites and corresponding water attenuation requirements for FWP sites appear to be incorrect – ED62 p117]

Development		Water attenuation required (cu m)		Area needing protection
		[BroadwayMalyan Masterplan reports ED62 & ED63]		
WMC3 - Cuthbury		1346		SANG adjacent to R Stour
WMC4 – Stone Lane		163		R Allen – BAP chalk stream
WMC5 – N Wimborne		5113		R Allen – BAP chalk stream
WMC6 – Leigh Road		17,298		SANG adjacent to R Stour
FWP3- Holmwood	Area 4	5963	Data for FWP3,4,6 &7 appear to have been transposed	SANG adjacent to development
FWP4 - Coppins	Area 3	10,668	“ “	SANG not required
FWP6- West Parley (E)	Area 1	2383	“ “	
FWP7 – WestParley - W	Area 2	1252	“ “	Part of SANG adjacent to R Stour FD5 indicates a possible shortfall in land available (April 2013).
VTSW4 – NW Verwood West Section		3371		R Crane SSSI. Romford Bridge Copse SNCI. Wet grassland area of SANG adjacent to disused railway line.
East Section		821		R Crane SSSI and tributary

NB: While some changes have been made to the total developable area of some sites, the data provide an indication of the extent of the drainage issues that must be addressed, particularly where water will affect existing areas of important biodiversity eg R Allen, R Crane SSSI and the SNCI woodland adjacent to VTSW 4

There is significant potential for ecological damage through soil compaction and loss of soil structure and damage to natural vegetation through trampling by grazing livestock on wet ground and by those people and dogs who are prepared to walk over wet ground.

Unless specifically adapted to grow in wet conditions most plants (including our trees) depend on oxygen in soils which is lacking if they are wet or compacted. Anaerobic conditions lead to loss of vigour, disease and death and such soils will not support seed germination.

Alternative and additional areas will be required for periods when, because of high rainfall, the areas are inaccessible or unsuitable for informal recreation. With climate change, it is unsafe to assume that land will only be too wet to access during the winter months when additional visits to N2K heathland will not affect the breeding success of SPA qualifying birds or our reptiles. Drainage of wet grassland that supports BAP species should be avoided.

It must also be recognised that any additional trampling of heathland vegetation will cause damage irrespective of what time of year it occurs.

Precise modification/wording sought

- 1. Acknowledge that because SANGs in East Dorset are as yet untested, development should proceed with caution from the outer limits of the 5km zone and plans should be subject to early review.**
- 2. There should be no car parks for SANGs that are close to heathlands**
- 3. Ownership and management of SANGs should be transferred to the East Dorset Countryside Management Service or other appropriate body with adequate funding for creation and maintenance.**
- 4. SANGs should be capable of extension if they prove too small for example because of soil conditions or people are attracted to them and visitor numbers to nearby heaths increase.**

Matters 10 Appendix 1 ETAG response to Dorset Heathlands DPD Preferred Options Consultation
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Q1 Vision

We fully support the Preferred Option, “Vision1”.

In no way should the importance of the Dorset Heaths appear to be diluted by incorporating the wider aspects of Green Infrastructure Strategy. The GI Strategy should complement the DPD.

Q2 Objectives

Objective 1 We agree in principle subject to Bullet Point 3 being changed to read

*Reducing the effects of fragmentation and isolation by **extending**, linking and securing sympathetic land use **on and around the heaths**.*

The sympathetic land use should include heathland restoration where possible eg on former heathland where current land use is improved pasture/low grade arable or alien coniferous plantation with poor yield (or diseased and dying eg *Pinus nigra* suffering from Red Band Needle Blight).

Objective 2 “Avoid” should come before “mitigate” so that the Objective reads : *To avoid and mitigate the impacts ...* but otherwise we agree.

Objective 3 We agree though it would be helpful to include clarification of what this means in practice both in the section on Delivery and in the more detailed SPD.

Delivery of Long Term Strategy

Objective 1 – Draft Policy DH1 Protection of the Dorset Heaths

- ETAG strongly supports **Option 1**. However the wording should be amended slightly to ensure that it is clear the partnership would not be managing the heathland sites: this would continue to fall to the present Land Managers. We recommend it should read:

*To maintain an overall body to co-ordinate **access management** and education of the Dorset heaths and an educational programme to teach people how to look after these areas.*

- At present, **DH1** does not carry forward into policy either the wording or intention of **Option 1**. It should be strengthened to ensure that agreed policy supports the formal partnership that UHP provides as a strategic and single focused body responsible for access management and educational activities. This affords an unrivalled vehicle for sharing knowledge and expertise and co-ordinating responses to change due to eg climate, plant pathogens, behaviour of people, central Government policy. Support for this Option is evidenced by the Sustainability Appraisal. We do not consider Options 2 and 3 would provide the desired outcomes.
- Currently the UHP Terms of Reference do not appear to include responsibility for review and change of practice where monitoring shows that mitigation projects and activities are less than satisfactory and are not achieving the anticipated and required results. If UHP do not take on responsibility for this, which body will? It is fundamental to the whole of the work to conserve the Dorset Heaths. Whatever the changes to “future circumstances” (para 8.8), it is essential that the work of the UHP is

not diluted/ diminished in any way and that funding for its member organisations' contribution to meeting the DPD objectives is secured. Within East Dorset, the outstanding work of EDCMS (including land management and community engagement) is widely respected and valued.

- Effective community engagement is a crucial aspect of this Policy but delivery of mitigation projects cannot depend on the input of volunteers or charity organisations.
- It is essential that environmental limits to growth are recognised and that the wording of the Policy does not imply that all development can be accommodated. The DPD and SPD are demanding an enormous leap of faith that the combined measures will indeed ensure no further degradation of the heaths. There appears to be no fall back position or any suggestion of working from the outer limits of the 5km – 400m inwards to test the strength of the policy. ETAG members have very genuine fears that we are still risking far too much, particularly with the more accessible heaths (including those near proposed new neighbourhoods).
- Quality monitoring and feedback of SANGs is of paramount importance. There should be a fall back position if the site does not perform within the proposed scope. Alternative/additional mitigation might be needed.

Objective 2 – Draft Policy DH2 – Development within the Plan Area
Draft Policy DH3 – Prioritising funding for infrastructure and mitigation
required by European legislation

To avoid repetition, ETAG's comments on these 2 policies and supporting text have been combined as there is considerable overlap.

The DPD clearly has to set a policy framework that addresses the need to protect both those areas of heathland that are already surrounded by high density development (eg the more urban areas of Bournemouth and Poole) and those in the more rural Districts (eg Purbeck and East Dorset) that are likely to have increased pressure due to urban extensions. However, it must be sufficiently flexible to recognise and respond to the different threats and opportunities of each and every designated heathland.

For example, Footprint Ecology research has shown that beaches are used as an alternative to the heaths as natural “greenspace”. However, most beaches in Bournemouth may not be used for exercising dogs off lead in the tourist season (1 May to 30 September) so dog owners require other areas for this. This period coincides with the time that reptiles are most active and the breeding season for heathland birds.

It must not be assumed that people will only visit their nearest heath or SANG. Surveys (eg Footprint Ecology/UHP heathland visitor surveys, Verwood Town Plan) have demonstrated that we all like variety and choice (and so do our dogs and horses) so cross boundary co-operation and funding is essential to ensure this freedom of opportunity for all. This will be enhanced further by other GI measures such as the restoration/construction of trailways and bridleways. To ensure the strategic level approach to mitigation projects continues (para 8.16) the DPD should commit to maintaining the current practice of pooling money (from SPD s106 funds) when CIL is introduced, or indeed from any other infrastructure funding mechanism that may be introduced in future. Provision should be made for the in-perpetuity management funding to cover the eventuality of the developer going out of business.

As identified in the SA of the Options, the case for adopting **Option 4** (funding from CIL across SE Dorset) is sound and fully supported by ETAG. We do not support Options 5 and 6.

The long term management of SANGs and education of users of both heathlands and SANGs are key to the success of the DPD. This should include:

- Informal engagement with visitors by UHP and countryside management/wildlife organisations staff with visitors.
- Educational events in schools, on the SANGs and heaths that result in real engagement of people of all ages and abilities with the natural world.
- Funding of appropriate management of livestock and grazing regimes. The nutritional value of Heathland and SANGs is poor. To support and enhance biodiversity, grazing pressure needs to be lower than on good quality pasture that is regularly harrowed and fertilised. Consequently, stock will have to be at a low density and moved more frequently than if on fertile grassland. Additional time is required to check animals if they are widely dispersed across several sites. The costs to a grazier will need to be factored in when identifying the “in perpetuity” funding requirements.
- Management of users and alternative recreational areas are likely to be required when hay is being harvested and when grazing is taking place.

The draft Christchurch and East Dorset Local Plan has identified employment land near or adjacent to designated heathland. The potential threats to heathland posed by such development include diffuse and direct water pollution, light pollution and increased visitor pressure from those engaged in informal recreation during breaks in their working day in addition to the loss of land that would have been available for heathland restoration identified in the RSPB Heathland Extent and Potential Mapping. “Traditional” non-native planting of greenspace within such sites (cheap non-native and, in some cases, invasive evergreen shrubs and mass produced summer bedding) should be actively discouraged in favour of retaining or creating functional natural habitat that buffers the impact of development. The DPD should include policy provision for these threats to be acknowledged in site specific proposals and appropriate mitigation measures put in place.

Objective 3 – Draft Policy DH4 – SANGs

The new concept of SANGs is welcome. However, given that the first SANG (at BytheWay, Colehill) is only just nearing completion, its success is untested and it will take time for adequate monitoring evidence to be collected and used to guide any changes to development policy. Development that is dependent on the success of any given SANG should proceed with caution and plans be subject to regular review.

Land identified for a SANG must be secured through a legal agreement to assure in perpetuity public access, SANG creation, management and absolutely no risk of it being sold or used for other purposes.

SANG should normally be new land and not land to which the public already have access. To ensure compliance with the Natural Environment White Paper’s commitment to ***Reconnecting people with nature***, use of land to which the public already has access should be applicable only in exceptional circumstances and where substantial new land or facilities are also to be provided and there is proven biodiversity gain.

Selection of land for a SANG and its linkages with existing open space, rights of way and development must be forward thinking and not just look at the life of the current Local Plans. Adjacent land should be safeguarded to allow for its extension at a further date

- if it becomes so popular that some users revert to using the heaths to get away from the crowds or large numbers of dogs;
- to create specialist additional informal recreation for young people [the current popular requirement is for skate parks and BMX tracks – a decade on this may well be different];
- if population increases (or additional development comes forward in the next round of Local Plans); or
- if the strategy for any particular development is found to be unsuccessful in mitigating impact on the heaths.

BytheWay is a good example of how the new area of open space has linked to the LNR at Leigh Common and, in time, will afford walkers the additional choice of the proposed riverside SANG to the South.

SANGs should be located well away from the Heaths to ensure that they do not attract more people onto the land which they are intended to protect.

We are concerned that the DPD's primary focus is on SANGs. It is essential that it also addresses heathland expansion and linkage and allocation of HSAs: the East Dorset heaths cannot take much more. Please also see our more detailed comments on this in the response to **Q5** below.

It is essential that scoping for developments includes the prerequisite of the SANG being identified and all financial support agreed through a firm legally binding commitment **before** development is finally approved.

Draft Policy DH4, para B Safeguarding should also ensure that any changes to SANGs do not permit loss of biodiversity.

Appendix B In general, ETAG supports the guidelines but recommend the following are also taken into consideration:

Paths, tracks & infrastructure

We support the proposal for most pathways to be unsurfaced. Any hard surfaced pathways (to ensure DDA compliance) should be laid on Terram (or similar material) so that it can be removed without damage to the underlying soil if necessary at some future point: such hard surfacing should be porous. Where possible SANGs should include links to nearby footpaths, trailways and bridleways.

While the requirement for a circular walk of 2.3-2.5km may help provide developers with an idea of the area required, circular walks on smaller sites could destroy important habitat at the edges of SANGs or, to be achievable, cut through and damage existing important habitat such as ponds, ditches or hedgerows. They can become repetitive and boring for the walkers. This criterion fails to recognise the value of SANGs that include linear areas such as that proposed in the Allen valley to the west of Cranborne Road.

Disability Discrimination Act (DDA) compliance with accessible entrances for wheelchairs and children's buggies will encourage these users and enable this aspect of the Equalities Issues SA Matrix to score positively.

Landscape and vegetation

One of the key functions is to recreate the heathland type experience of wide open spaces that have significant wildlife and landscape interest. Rather than working to a set formula each SANG should be bespoke, capitalising on and enhancing its existing biodiversity and the management that is necessary to achieve an identifiable contribution to coherent and resilient ecological networks. It is essential that we do not end up with SANGs that are created to a set pattern that would resemble city parks and have as much individuality as a modern High Street. To do so would reduce biodiversity and the choice of experience that will be sought by users if they are not to revert to the Heaths for their recreation. Each SANG must be individual and special.

Existing natural features such as boundary banks, ditches, copses, ponds, wet grassland or woodland should be retained and enhanced. Some additional tree cover may be appropriate if the SANG links to and buffers existing woodland: with higher summer temperatures there may well be a need for shade on some walks.

New planting should have a specified function and not compromise existing habitat (particularly unimproved/semi-improved grassland), the vital open ambience of the SANG or management of the SANG.

Where any SANG is liable to flood the total area provided should allow for this. It should not be assumed that traditional weather patterns will prevail: allowance must be made for wet weather in summer which could encourage visitors to the free draining soils of the heaths.

While it is essential that dogs are catered for to protect the heaths, it must be recognised (as indeed it is on Bournemouth beaches) that there are times when a dog's freedom to roam across the whole SANG may not be appropriate. This might include restricting access to natural ponds where they can cause damage, disturbance of skylarks and other sensitive wildlife, disturbance of grazing animals, ensuring they avoid areas where active habitat management (eg tree work, haymaking) is underway. Bespoke management plans for each SANG should include provision for such considerations.

Advertising – making people aware of the SANG

Education and awareness of where the SANGs are, what they have to offer to people of all ages and abilities and understanding and responsible use of the countryside will be a key component of this work. Comprehensive mapping showing what is available across the whole area will provide the choice and variety of experience that residents and tourists alike require and ensure freedom of opportunity for all. It should include details of footpaths, trailways and bridleways and links to all other GI projects and areas of public open space. Imaginative publicity using apps, leaflets, on-site information panels, websites with links to those of other organisations, guides to what can be seen at different times of year may require specialist input. There should be a mechanism for regular updating.

Q5 Other issues that require a policy response

i) Heathland Support Areas (HSAs)

The DPD should also cover the other important means of protecting heathland from adverse impacts of urban development, namely the Heathland Support Area. HSA land will be located close to or adjoining existing heathlands and should have the function of diverting/managing existing users of that heathland but NOT attracting new users. Access management will be essential as discussed in DPD para 4.9 (p7). HSAs may also provide opportunity for some heathland expansion and linkage and protection of related habitats such as acid grassland, scrub or woodland. (In contrast, SANGs should be located well away from the heaths and be designed specifically to attract visitors who might otherwise go to the heaths.)

ii) Re-establishing Heathland. The document does not provide any framework for the expansion and linkage of heathlands which, in itself, is absolutely essential to making those heaths biologically more robust and better able to withstand the adverse impacts of urban development. This matter is being almost entirely left to charitable conservation bodies to attempt to achieve or what the Forestry Commission might or might not choose to offer. This is inadequate. It must be actively promoted through this document.

As drafted, the document focuses almost entirely on SANGs. However, the provision of SANGs is only one approach. Heathland expansion and linkage are also essential. Allocation of HSAs is additionally important. The DPD should address all three issues.

Scoping Report - comments

Appendix 1 – Please note typo (Biodiversity Guidance for planning & development sectors in the SW - Column 3 *halt and reserve* should read *halt and reverse*)

Appendix 2 Key Baseline Information.

Section 2.5 Should Moors Valley be included?

5.2 The rationale for emphasis on Grades I and II agricultural land to protect AONBs and AGLVs when the DPD is looking to enhance biodiversity is unclear.

6.1 Is the number of renewable energy projects a meaningful measure of reduction in carbon emissions? What counts as a project – a single domestic solar panel installation?

Hilary R Chittenden

Chairman, Environment Theme Action Group (ETAG), East Dorset Community Partnership
24 March 2013

[File: HeathlandDPD ETAGresponseFINAL]