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Habitats Regulations Assessment of Revised Housing Options for the Purbeck Local Plan Review

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Summary

This report provides the Habitats Regulations Assessment (HRA) of the plan review of the Purbeck Local Plan, being undertaken by Purbeck District Council. This HRA report is an update at the Revised Housing Options stage. Previous iterations of the HRA report were prepared at the Issues and Options in 2015, and Options in 2016. The current stage of plan making is an additional public consultation stage, specifically on the proposed housing allocations for the Local Plan Review, in light of new evidence relating to housing needs.

HRA 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. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection. The Purbeck District is potentially unique in the extent, range and number of different protected sites, with 20% of the Local Plan area being internationally designated site.

The current Purbeck Local Plan has a range of mitigation measures embedded within policy, which protect the European sites. A number of strategic level mitigation schemes have been developed, providing a robust mechanism to ensure that development does not adversely affect the European sites, primarily focussed on the Dorset Heathlands and Poole Harbour.

This HRA has screened all allocations proposed in the Revised Housing Options as likely to have a significant effect on European sites due to their proximity to the sites and the need for effective mitigation in line with the established strategic approaches for the heaths and Poole Harbour. For most sites, it is anticipated that adherence to the strategic mitigation approaches will provide adequate protection for the European sites, but it will be important for site specific considerations to be taken in to account for each mitigation package. The identified uncertainties and evidence gaps highlighted within this report should be resolved before the Revised Housing Allocations are finalised after consultation, and for inclusion at Publication stage.

For some sites, it is understood that there are active discussions and consideration of mitigation of options, including with Natural England, and progress will be reviewed again as part of the next iteration of this HRA at Publication stage.

There are serious remaining concerns in relation to the allocation at Sandford, for which it is advised it may be impossible to mitigate for.

A number of suggestions are made in relation to the development and finalisation of policy wording for Publication stage, in relation to the strategic mitigation approaches.

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Our thanks also to Sue Burton, Andrew Nicholson and Nick Squirrell (all at Natural England) for useful discussion, advice and comment.

The HRA work for the Local Plan draws 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 (HRA) of the plan review of the Purbeck Local Plan, being undertaken by Purbeck District Council. The HRA is being updated alongside the emerging new Local Plan, with an update to the report being prepared at each public consultation stage for the Local Plan. This HRA report is an update at the Revised Housing Options stage. Previous iterations of the HRA report were prepared at the Issues and Options in 2015, and Options in 2016. The current stage of plan making is an additional public consultation stage, specifically on the proposed housing allocations for the Local Plan Review. Additional housing needs evidence has identified that an update the housing quantum and allocations is required, and that this change needs to be the subject of a new public consultation before the Publication version of the plan is produced for submission to the Planning Inspectorate for Examination.
- 1.2 The current Local Plan (PLP1) was adopted in November 2012. The current PLP1 is the overarching planning document, steering development management in the District. There are also several other planning documents, including a specific plan for Swanage, a number of neighbourhood plans and supplementary planning documents. The Government requires local planning documents to be 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. At the time of adoption, PLP1 followed a precautionary approach in planning for less housing than the housing need evidence base at the time suggested was required for the plan period. The Planning Inspector who examined the PLP1 concluded that the plan was sound, and Purbeck District 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.
- 1.3 The precautionary approach for PLP1 was taken because when 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. The Purbeck District has exceptional nature conservation and landscape value, with much of the district covered by national or international environmental designations. This HRA report considers the implications of the revised housing elements of the new Local Plan for the European wildlife sites within, and in close proximity to, the Purbeck District. The European sites, as discussed in more detail below, host a range of habitats and species of European importance and the Purbeck District is particularly important for its heathland habitats and the rare heathland birds it supports.

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- 1.4 The HRA reports at the previous plan making stages have focussed on the potential impact of higher residential development in the District on the European sites, and the potential options for measures to avoid or mitigate any identified impact, to enable the delivery of higher housing growth. This HRA report now assesses the implications of the new Local Plan in terms of its housing growth now proposed in light of up to date information. In addition to evidence relating to growth needs, this report draws together all available evidence relating to European site impacts and possible opportunities to prevent those impacts from occurring, to enable the Council to consider how the levels of grow required for the Purbeck District could potentially be accommodated without adverse effects on European sites.
- 1.5 A range of national policy, local level evidence and strategies, and plans and evidence provided by external partners and statutory bodies will all inform the development of the new Purbeck Local Plan. The published Corporate Priorities for Purbeck District Council include strong protection for Purbeck's unique natural environment at their heart. The Local Plan must seek to deliver sustainable development that meets all of the Corporate Priorities, and it is therefore necessary to seek solutions to protect European sites that are also compatible with meeting housing, employment, infrastructure and community needs wherever possible.
- 1.6 In terms of the information informing the level and location of housing growth, relevant evidence includes the Purbeck Greenbelt Review and the Purbeck Strategic Housing Land Availability Assessment (SHLAA). The SHLAA previously informed the Options stage of plan making, identifying a shortfall of 3,080 homes for the District, in addition to the 2,520 provided for within the adopted PLP1. At Options stage the plan consulted on the proposal for a total of 5,600 new homes in total over the plan period 2006 to 2033.
- 1.7 A new methodology for calculating housing need has recently been published by central Government, as part of a consultation document. The recent consultation on 'Planning for Homes in the Right Places' sets out new approaches to assessing housing need, undertaking viability assessments, improving cross boundary working to meet housing need and a standard method for calculating housing need within each individual local planning authority area, bringing more consistency nationally.
- 1.8 Purbeck District Council has used this new approach to revisit their housing data, and with the influence of updated economic projections, the assessed housing need for the District over the plan period from 2016 to 2033 is now 2,890 new homes. This is notably less than previously predicted at the Options stage, and is therefore a significant change in the emerging Local Plan. Sites that

were previously options as housing allocations have been revisited and an additional consultation on housing allocations is taking place with the revised options for housing sites presented. This will then ensure that the content of the plan has been appropriately consulted on before the Council prepares the Publication version. The Local Plan evidence base and housing needs is discussed in further detail in section 2 of this report.

- 1.9 The housing allocations have reduced overall, informed by the lower housing need. Some allocations have been removed, some modified in size, and a small number of additional sites have been added. This HRA must therefore reconsider all the allocations put forward in the consultation document, assessing their individual and combined risk to the European sites.

Habitats Regulations Assessment process

- 1.10 HRA 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 1992¹ and the Wild Birds Directive 2009², which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017. These Regulations are normally referred to as the 'Habitats Regulations.' The most recent version of the Regulations is a consolidation of the previous Regulations and amendments, and corrects a number of previous errors. The requirements of the 2017 Regulations in terms of assessing a Local Plan remain the same, although Regulation numbers have changed from the previous version.
- 1.12 The legislation sets out a clear step by step approach for decision makers considering any plan or project that may have implications for a European site. In England, those duties are also supplemented by national planning policy through the 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

¹ Council Directive 92/43/EEC

² Council Directive 2009/147/EC

sites, and those providing formal compensation for losses to European sites, are also given the same protection.

- 1.13 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 HRA is provided in this report at Appendix 1.
- 1.14 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.
- 1.15 The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and a HRA 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

- 1.16 There are a range of European sites within or near Purbeck District, as shown on Maps 1, 2 and 3 below. As noted above, 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).
- 1.17 Natural England has recently confirmed an extension to the SPA, which brings in additional land in Purbeck, towards Lytchett Minster/Upton. The extension covers important foraging areas for a number of seabirds and both foraging and roosting areas for waders. The SPA now also includes three new bird species;

Little Egret, Eurasian Spoonbill and Sandwich Tern. The consultation documents advised that no new management measures are required for these additional species, as their requirements are the same as those species already included in the SPA citation. The extension area and additional species should now be considered in any HRA. The extensive marine area classified as part of Poole Harbour SPA is unlikely to be affected by the housing sites being assessed within this HRA. New housing does not generate any impact pathway that could lead to marine effects.

- 1.18 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 Ministry of Defence, have public access.
- 1.19 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).
- 1.20 The relevant European sites for this assessment are those considered in earlier iterations of the HRA of the emerging Local Plan, and previously for the HRA of PLP1 (see Liley & Tyldesley 2011; the HRA contains much detailed background relevant to this report), and are:

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- 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
- Isle of Portland to Studland Cliffs SAC

- 1.21 Relevant information on the European site designations and their interest features are provided in Appendix 3.
- 1.22 There are also a number of forestry sites that are not designated or classified as European sites but that hold very high numbers of Annex I bird species³, particularly Nightjar and Woodlark. Areas holding significant populations of birds outside SPAs still need to be considered for three reasons; their role as functionally linked land, the Birds Directive requirements for Annex 1 species outside the site network, and the future potential for becoming part of the site network. Each of these is explained below.
- 1.23 Forest blocks are often contiguous with the Dorset Heathlands SPA and as such are deemed to be functionally linked to the SPA i.e. they provide an important supporting function. Impacts on functionally linked land can be significant for European site interest features, and are therefore included in a HRA.
- 1.24 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
- 1.25 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 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 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

³ Birds listed on Annex 1 of the Birds Directive are those for which SPAs should be classified.

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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 or classification.

1.26 In considering areas of forestry, this HRA therefore has regard for a number of forest blocks that could be described as functionally linked land, provide notable habitat for Annex 1 species, and that also have the potential to be considered as part of the Dorset Heathlands SPA in future,

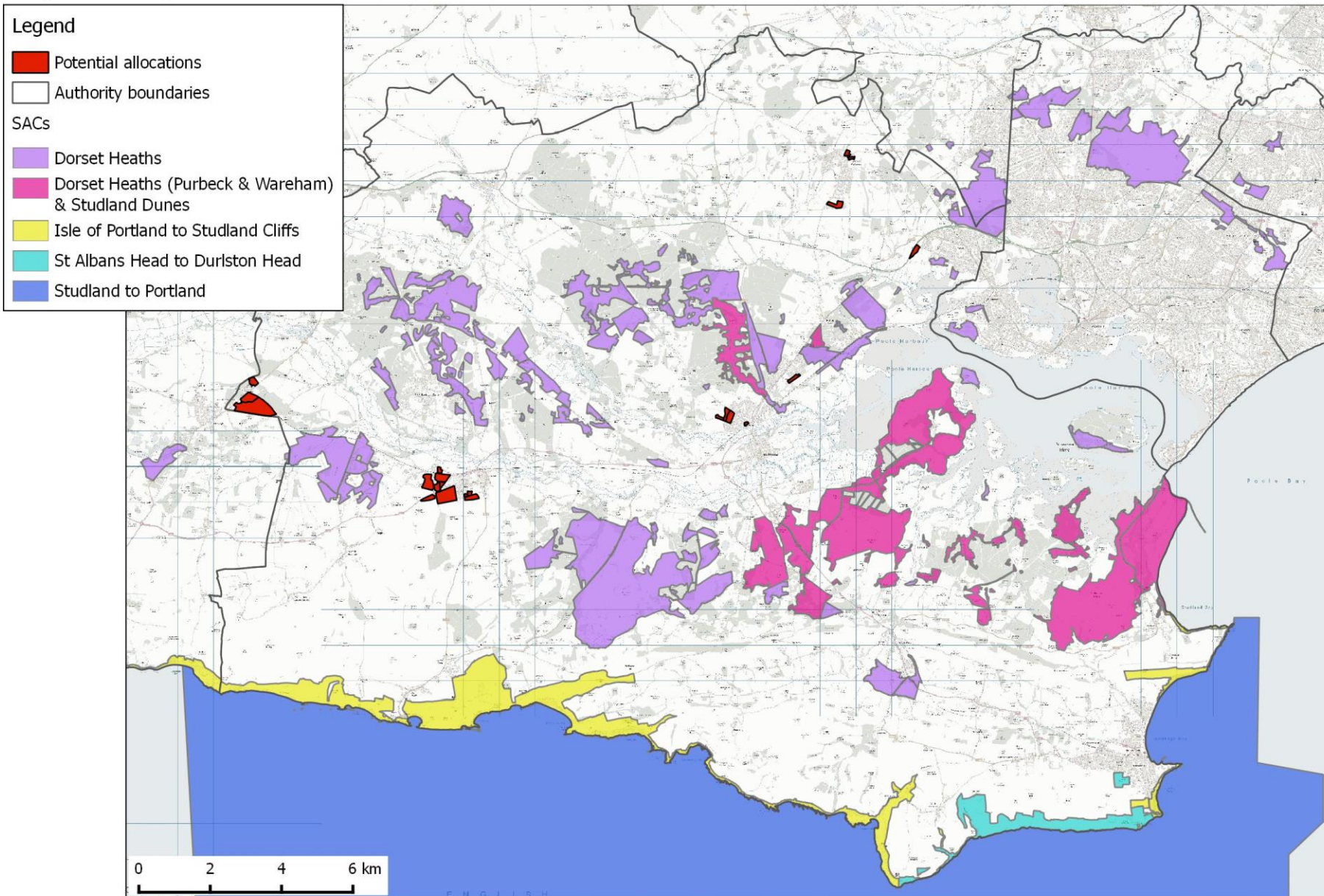
1.27 Key forest blocks in Purbeck include:

- Wareham Forest
- Rempstone
- Hethfelton
- Moreton
- Puddletown

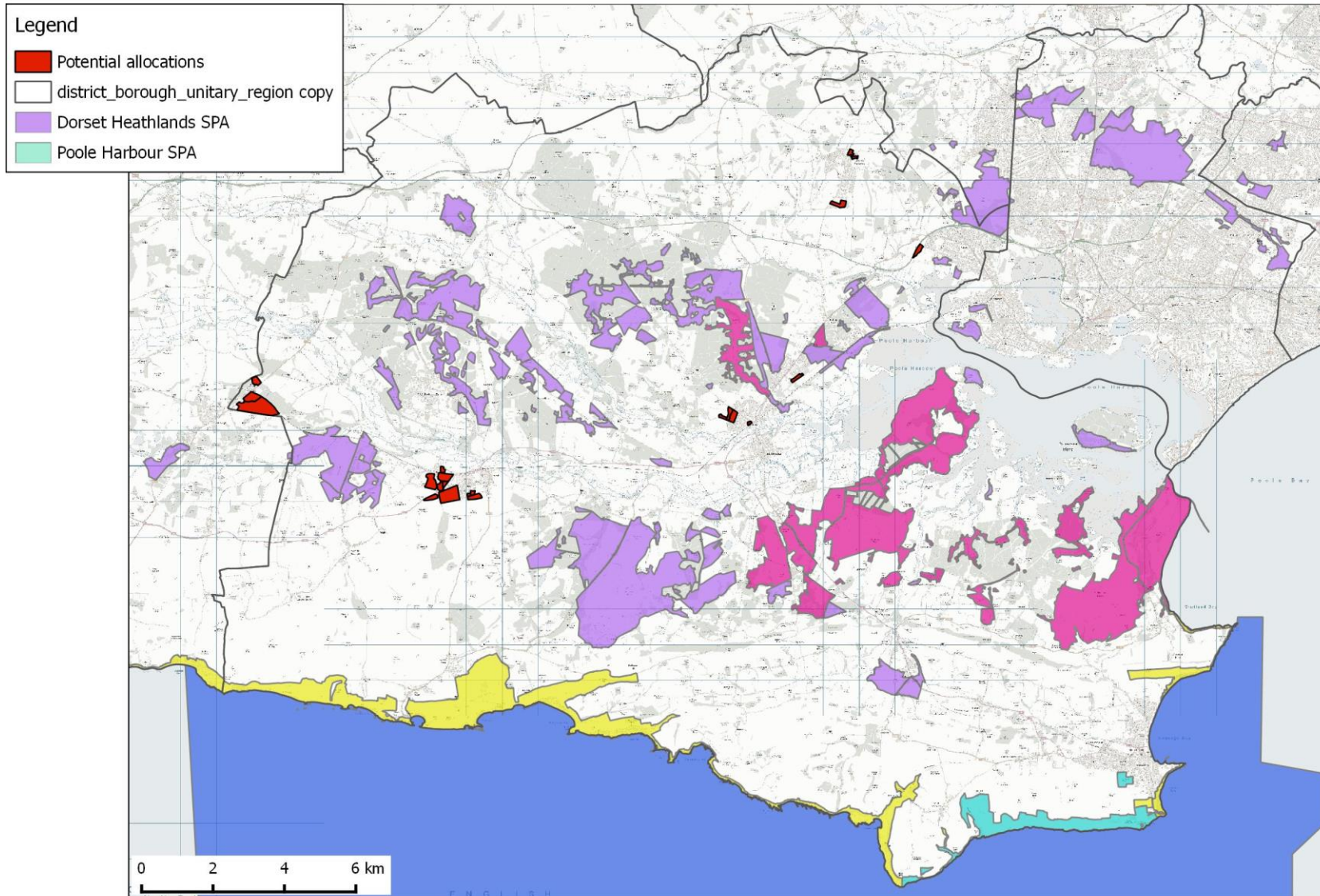
1.28 Functionally linked habitat within Wareham Forest is particularly relevant to this HRA, given the potential allocations in close proximity. National survey data (Conway *et al.* 2007) indicates the presence of Nightjar and Woodlark in Wareham Forest is spread throughout the forest; in both the SPA and wider forest areas. The SPA includes areas that are permanent open habitat. However, all of Wareham Forest is potentially suitable for Nightjar and Woodlark at differing times in forest management, with areas managed on rotation and therefore providing a range of clear fell and replanted areas used by the birds.

1.29 Maps 1, 2, and 3 show the SAC, SPA and Ramsar sites within or in close proximity to the Purbeck District. The maps also include the sites from the Revised Housing Allocations document, identified as 'potential allocations.'

Map 1: Development sites in relation to SAC sites.

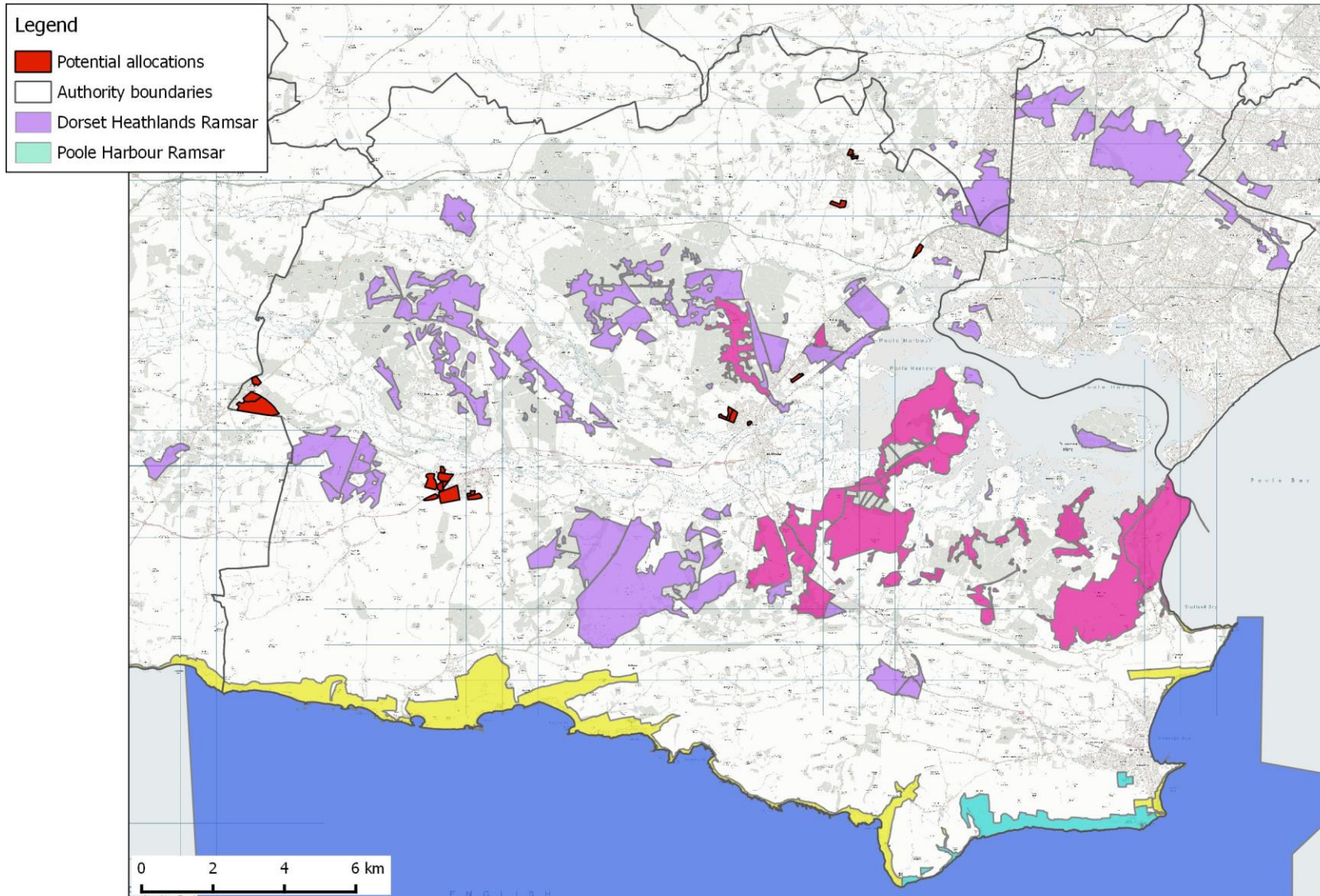


Map 2: Development sites in relation to SPA sites.



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Map 3: Development sites in relation to RAMSAR sites.



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2. Housing growth proposals for Purbeck and HRA work to date

2.1 The European sites described in the previous section and in detail in Appendix 3 have been the subject of considerable HRA work in recent years, both specifically within the Purbeck District for the preparation and adoption of PLP1 and then the new HRA for the emerging Purbeck Local Plan, which runs from 2016 to 2033, 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, which are reviewed in section 4 of this report. This section provides background information on the HRA considerations to date.

HRA for PLP1

2.2 Purbeck District Council adopted 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 being drawn upon to inform this HRA report each time it is updated alongside the stages of plan making for 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 south east Dorset (Liley *et al.* 2007) 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 HRA supporting the PLP1 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 that Purbeck District 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 plan review is therefore to investigate the possibility for heathland mitigation measures that will enable the potential delivery of higher housing growth. As explained in the previous section, the earlier iteration of this HRA report considered a higher housing growth figure based on housing need projections at the time. These have now been reduced to 2,890 new homes over the plan period 2016 to 2033. This is still an increase from the currently adopted PLP1 housing figure.
- 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. Purbeck District Council has been proactive in implementing this approach.

- 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 HRA 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 HRA work informs the HRA of the emerging Local Plan, which is the subject of this report, in terms of the same sites and issues, as summarised in Table 1.

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Table 1: Summary table highlighting issues and European 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	European sites					Mitigation / Notes
		Dorset Heaths ⁴	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).

⁴ 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

HRA to date for the plan review

- 2.11 A HRA has been undertaken for each of the two previous plan making stages as part of the Local Plan Review. Initially the Issues and Options stage was supported by a HRA report that advised on the key risks from the emerging issues and options for the District. At this early stage in plan making, the site allocations were not fully developed, but identified some potential areas for housing delivery. The following conclusions were drawn in relation to issues and options for housing growth.
- 2.12 All large housing sites require further detailed assessment. The site proposed at Sandford has particular constraints and, at this stage in the assessment, is not considered possible to develop without adverse effects on the integrity of the Dorset Heathlands SPA and Dorset Heaths SAC. Of the remaining sites, those around Wareham and Lytchett Minster have particular challenges, mitigation will be difficult to secure, and it may not be possible to rule out adverse effects on the integrity on nearby European sites. At Lytchett Minster the SANG options are not clear at this stage and to some extent the scale of green space provision there and effectiveness will depend on the proposal for a Country Park at Morden.
- 2.13 The Options consultation provided a set of preferred allocations for development, including housing. As noted earlier, the housing allocations were seeking to provide enough sites to cover a large shortfall from the adopted PLP1. The HRA screened all preferred housing site allocations as having a likely significant effect. It concluded that for some allocations, adherence to the Dorset Heathlands strategic mitigation approach could potentially be achieved, and that there were options for delivering SANGs of adequate quality and quantity. For other allocations, there were notable concerns due to the constraints posed by the site in terms of SANGs delivery, and in terms of proximity to the heathlands European sites. The most serious concerns raised in the Options HRA related to impacts at North Wareham due to proximity, and some concerns in relation to SANGs delivery at a number of sites, including Lytchett Matravers and Moreton. It should be noted that at Options stage, a housing allocation at Sandford was not proposed in the final consultation because of serious concerns relating to proximity to the European heathland sites and lack of mitigation options.

Revised Housing Options

- 2.14 The Revised Housing Options document sets out the currently predicted housing needs, based on the most recent evidence and recently commissioned assessments, as detailed below. It includes a number of allocations, and also provides three options for how the objectively assessed growth predictions

could be realised within the District over the plan period. Each option provides for the same total number of houses, but the spread of housing across settlements differs between options.

- 2.15 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 Revised Housing Options document proposes a total of 2,890 new dwellings will be provided over the plan period 2016 to 2033. This is based on a housing need for 170 new homes per annum, which is an increase from the current target of 120 new homes per annum (over the period 2006 to 2027) in the existing PLP1.

Housing needs evidence base

- 2.16 Purbeck District Council commissioned GL Hearn to prepare an updated Objectively Assessed Housing Need for the Purbeck District. This was undertaken using currently available guidance and best practice in objectively assessing housing need, including the NPPF and NPPG, the Housing White Paper of February 2017 and Government announcements on the need to standardise methodologies. The report was finalised just before the Government published the consultation on 'Planning for Homes in the Right Places,' referred to in Section 1 of this report and which includes standard approaches to assessing housing need. With this publication released for consultation, Purbeck District Council then commissioned Intelligent Plans and Examinations Ltd to review the recent study by GL Hearn in light of the proposed standardised methodology.
- 2.17 The Intelligent Plans and Examinations (IPE) review concludes that the Council can be confident that the housing need target in the GL Hearn report is broadly correct, and that there is a clear need to boost housing delivery in the Purbeck District over the next 2 to 3 years. The IPE Review suggests that the Council should consider the early release of sites where there are no overriding infrastructure requirements. This latter point is important for this HRA, as a boost over the next few years could only be taken forward if the necessary European site mitigation measures are provided in time with development.

The new housing options

- 2.18 The Revised Housing Options document sets out a summary of the current situation in relation to housing delivery, and explains the need for additional new homes for the Purbeck District. Table 2 below, shows the total housing need of 2,890 homes identified by the Objectively Assessed Housing Need work, and the requirement to deliver a remaining 1,700 homes after various housing

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delivery sources already secured are taken into account, amounting to around 1,200 homes.

2.19 Purbeck District Council has identified differing scenarios for delivering the 1,700 homes. The Revised Housing Options document sets out the following:

- Proposed delivery of 105 new homes through the Neighbourhood Plan for Bere Regis, which is subject to a separate plan level HRA.
- Proposed delivery of 200 new homes in Wareham, which will form part of a yet to be finalised Neighbourhood Plan, and therefore does not yet have the benefit of plan level HRA.
- Delivery of the remaining housing need (totalling 1,400 homes) via three options; A, B and C, which are summarised in Table 3 below.

2.20 The housing options have been replicated in this HRA report on the maps below, in order to illustrate proximity to the European sites and any potential constraints. These constraints are discussed in more detail in the following section of this report. Maps 4, 5 and 6 show the proposed housing allocations from the Revised Housing Options document. Their proximity to the European sites, and the 400m buffer zone for the Dorset Heathlands is indicated on each map.

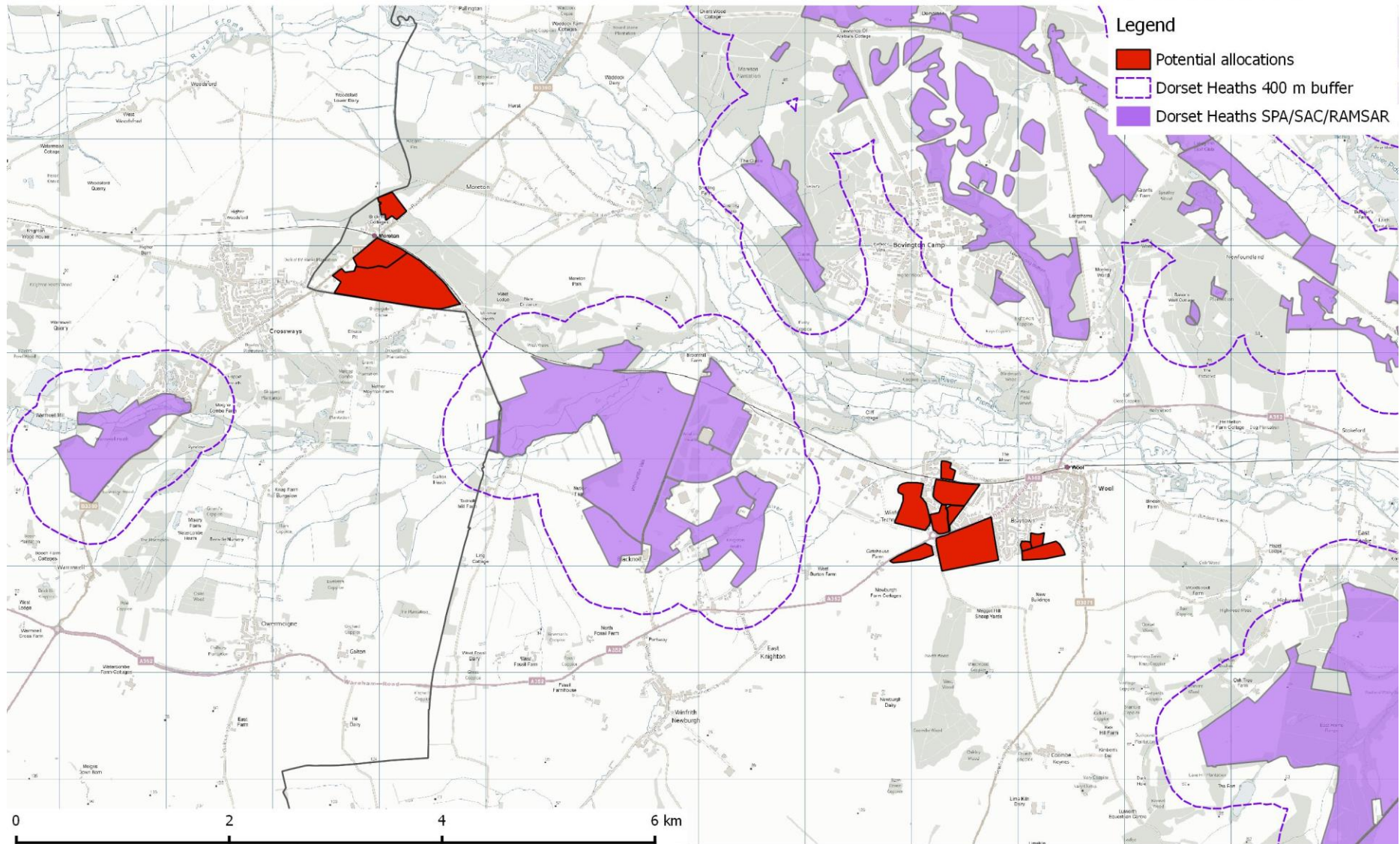
Table 2: Summary of housing provision through the new Local Plan

Total housing need (2016 to 2033) at 170 homes per year	2,890 homes
Completions (April 2016 to March 2017)	89 homes
Outstanding planning permissions (at April 2017)	370 homes
Outstanding Local Plan allocations (Lytchett Matravers 50, Swanage 148)	198 homes
Windfall allowance (50 homes per year, 2024 to 2033)	450 homes
Additional sites identified on Brownfield Land Register	52 homes
Remainder to plan for through the Local Plan Review	1,700 homes

Table 3: The three proposed options for meeting growth needs in Purbeck (in addition to around 300 homes anticipated through the Wareham and Bere Regis Neighbourhood Plans)

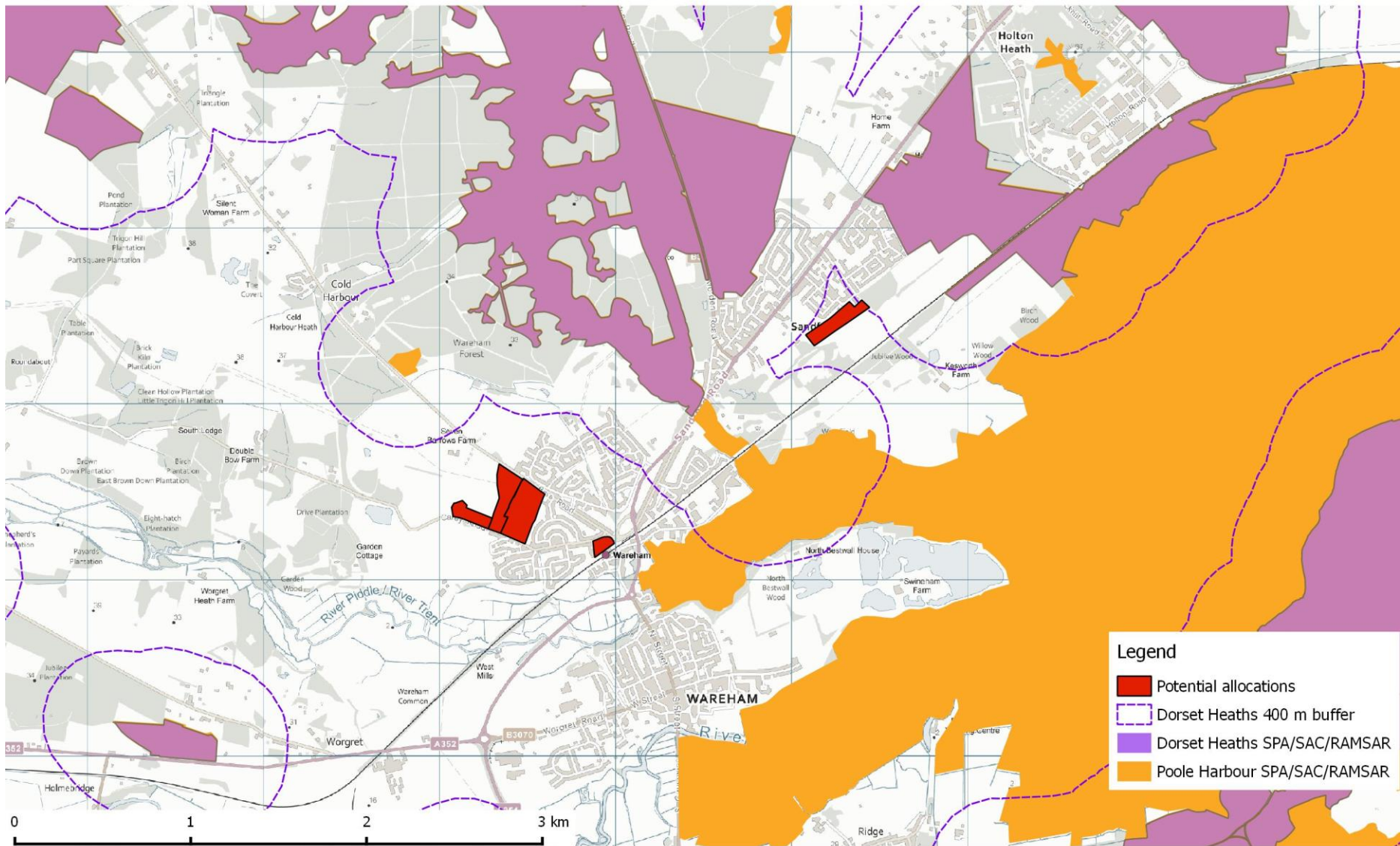
Option	Wool	Redbridge Pit/ Moreton Station	Upton	Sandford	Lytchett Matravers	Smaller sites
A	470	440	90	30	150	220
B	650	500		30		220
C	800	600				

Map 4: Development sites at Wool and Moreton in relation to a 400m buffer around the Dorset Heathland SPA/ SAC /RAMSAR.



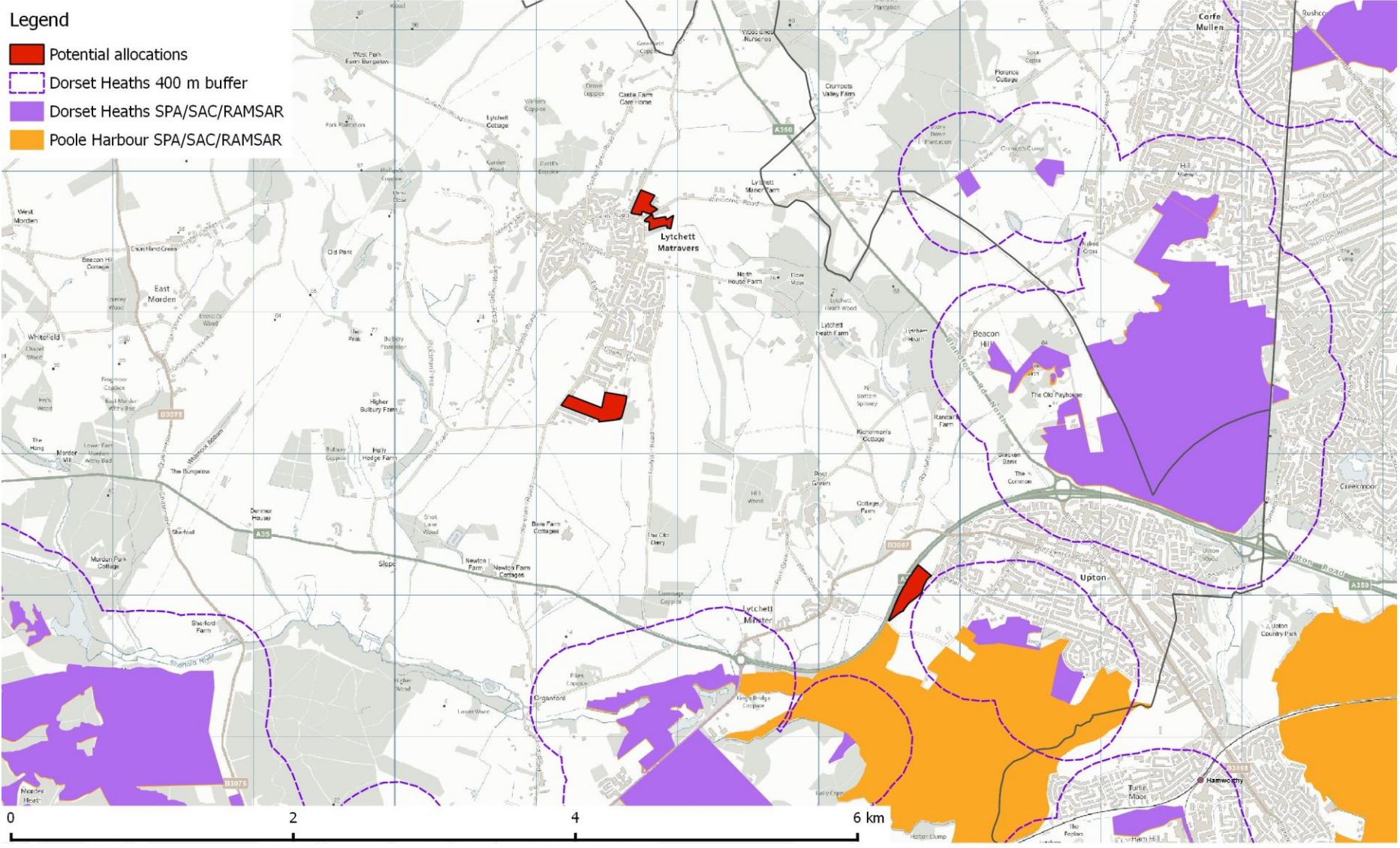
Contains Ordnance Survey data © Crown copyright and Database Right 2016. Contains map data © OpenStreetMap contributors. Terms: www.openstreetmap.org/copyright

Map 5: Development sites at Wareham and Sandford in relation to a 400m buffer around the Dorset Heathland SPA/ SAC /RAMSAR.



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Map 6: Development sites at Lytchett Matravers in relation to a 400m buffer around the Dorset Heathland SPA/ SAC /RAMSAR.



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3. Checking the Revised Housing 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 HRA needs to be undertaken for the plan review, because the reviewed plan will be the new Purbeck Local Plan, in place to guide the sustainable growth Purbeck for the proposed plan period of 2016 to 2033. This section documents the screening stage of HRA, where the plan is screened for likely significant effects.
- 3.2 This HRA report for the new Local Plan was first prepared in 2015 for the Issues and Options consultation and then in 2016 for the Options consultation. This report, now updated for the additional Revised Housing Options consultation, includes the previous screening assessments of the Issues and Options document at Appendix 4 and the Preferred Options stage at Appendix 5, for reference.
- 3.3 The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment stage of HRA, as documented in the subsequent sections of this report. The screening of the Revised Housing Options is based on an internal draft of the housing options provided by Purbeck District Council in early November 2017.
- 3.4 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.
- 3.5 The Revised Housing Options is being published for public consultation, to inform the Publication stage of plan making. This HRA report will also be made available as part of the consultation on the Revised Housing Options.

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- 3.6 It should be noted that the earlier screening assessment of the Options document, as detailed in Appendix 5, assessed each emerging policy area and allocation. This HRA report is now focussing specifically on the Revised Housing Options, which are only part of the new Local Plan. The consultation document also includes proposals for new policies in relation to second homes, small sites and affordable housing tenure, which are included in the screening below. At the next stage, which is Publication, this HRA report will again be considering the full set of planning policies and allocations.
- 3.7 The screening will be repeated at Publication stage 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 HRA 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 may also need to undergo a final HRA check before the plan is formally adopted
- 3.8 Table 4 provides the screening assessment for the Revised Housing Options. It covers the three options set out within the document, as described in Section 2. Where risks are highlighted and there is a possibility of significant effects on European sites, further and more detailed assessment is required. Inevitably there will be precaution in screening elements of the plan, as the purpose of screening for likely significant effects is to identify where there is either no possibility of an effect, or where there are uncertainties. A lack of detail presents uncertainties and 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.
- 3.9 As documented in Table 4, the screening of the Revised Housing Options for likely significant effects has identified a number of risks in terms of the additional recreation pressure the proposed housing allocations may bring to European sites sensitive to such pressure. Because of the extent of European site designations within the Purbeck District, it is difficult to rule out any risk to the European sites in the absence of measures to avoid or mitigate for potential impacts. Concerns are raised in relation to all proposed allocations, and assessed in further detail within the appropriate assessment section of this HRA report.

Table 4: Screening the Revised Housing Options for likely significant effects ('LSE')

Revised Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Wool Option A – 470 homes	Previously included in Preferred Options, but with one small additional site (20 homes)	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision needs to be checked to ensure it is fit for purpose.	Previously assessed as potential to rule out adverse effects if mitigation appropriate.
Wool Option B – 650 homes	As above	LSE	As above	As above
Wool Option C – 800 homes	As above	LSE	As above	As above
Redbridge Pit/Moreton Station Option A – 440 homes	Previously included in Preferred Options, but with additional inclusion of caravan park (to be relocated)	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision needs to be checked to ensure it is fit for purpose.	Previously assessed as potential to rule out adverse effects if mitigation appropriate.
Redbridge Pit/Moreton Station Option B – 500 homes	As above	LSE	As above	As above
Redbridge Pit/Moreton Station Option C – 600 homes	As above	LSE	As above	As above
Upton Option A – 90 homes	Previously included in Preferred Options	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision needs to be checked to ensure it is fit for purpose.	Previously assessed as potential to rule out adverse effects if mitigation appropriate.

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Revised Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Sandford Option A – 30 homes	Previously included in Issues and Options, but not Preferred Options due to adverse effects	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision is considered difficult to provide.	Further consideration of SANGs provision, direct access to heaths, functionally linked land required.
Sandford Option B – 30 homes	As above	LSE	As above	As above
Lychett Matravers – Option A - 150 homes	Previously included in Preferred Options	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision needs to be developed.	Previously assessed as potential to rule out adverse effects if mitigation appropriate.
North Wareham 200 homes	Previously included in Preferred Options, but with an additional site to the north west of Wareham	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision is considered difficult to provide.	Further consideration of SANGs provision, access to Wareham Forest, functionally linked land required.
Bere Regis 105 homes	Recently assessed in Neighbourhood Plan HRA	LSE	Potential for impacts on European sites in the absence of mitigation due to proximity to European sites (within 5km mitigation zone). Mitigation, including SANGs provision needs to be developed.	Neighbourhood Plan HRA sets out specific mitigation measures to be applied.
Small housing sites policy, which could result in the delivery of approximately 220 homes	Proposal to include a new criteria based policy to cover sites of 30 houses or less, anticipated to deliver 220 houses over the plan period.	LSE	Potential for impacts on European sites, as with any other allocation or net increase of 1+ dwellings. Will need to adhere to strategic mitigation, and project level HRA may conclude some locations cannot be mitigated for.	Policy will need to include requirements for adhering to European site mitigation

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Revised Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Second homes policy	Proposal to include a new policy to restrict proliferation of second homes in new development	No LSE	The policy does not alter the number or location of new housing coming forward. Mitigation for new housing will need to be provided for on the assumption that all new houses are primary residences	N/A
Affordable homes policy	Proposal to include an updated policy on affordable homes provision, to include stipulations on the types and percentages of affordable homes in new developments.	No LSE	The policy does not alter the number or location of new housing coming forward. Mitigation for new housing will need to be provided for all new houses, of any type.	The local plan will need to make clear that all housing types are subject to European site mitigation requirements.

4. Review of Strategic Mitigation in Place

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 undertaken on the Revised Housing Options explains the potential effects that the additional residential growth may have on the European sites. This section sets the scene for the appropriate assessment by reviewing the strategic mitigation approaches that are currently in place and align with the findings of the HRA for the PLP1.

Dorset Heathlands

4.2 For the Dorset Heathlands SPA and the Dorset Heaths SACs, Natural England has worked with local authorities to agree early appropriate assessment work after identifying a likely significant effect in combination, for any residential developments that lie in the area between 400m and 5 km from the protected heath boundary. That early appropriate assessment work then informed a strategic, multi-authority approach.

4.3 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).

4.4 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.

- 4.5 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.
- 4.6 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.
- 4.7 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.
- 4.8 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 the Urban Heaths Partnership on Purbeck District Council's behalf.
- 4.9 Developer contributions for heathland mitigation were originally collected by Purbeck District Council through individual Section 106 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.

- 4.10 Since 4 June 2014, Purbeck's heathland mitigation has either been funded through CIL or by securing site specific and bespoke mitigation through Section 106. Purbeck's CIL charging schedule⁵ commits to heathland mitigation. The charging schedule refers to the need to fund strategic off-site measures 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

- 4.11 Monitoring has shown that 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.
- 4.12 A key component in the delivery of the mitigation has been the Urban Heaths Partnership, employed through Dorset County Council. The Urban Heaths Partnership 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.

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

Success of mitigation to date in Purbeck

- 4.13 Large housing sites are taken forward with appropriate levels of SANGs delivery and on-site mitigation. Monitoring data have been collected by the Urban Heaths partnership and summarised in annual reports (e.g. Panter & Liley 2016), 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.
- 4.14 With respect to SANGs, some monitoring 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 2015-2016⁶ 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.
- 4.15 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.
- 4.16 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 its 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 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.

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

- 4.17 It would therefore seem that there is evidence of SANGs working in Purbeck, but there are some issues that require resolution. The SANGs monitoring data should be used to inform the SANGs provision being developed alongside the housing allocations for inclusion at Publication stage.

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 The revised 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. As discussed in the following section, this HRA is constrained by the fact that SANGs provision is currently not included in the Revised Housing Allocations

document. This was previously included at Options, and the assessment therefore relies on earlier HRA conclusions until the SANGs provision is provided.

Coastal SAC sites and recreation

- 4.21 The HRA for the PLP1 (Liley & Tyldesley 2011) indicated that the new housing and new tourist accommodation, 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 PLP1, 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 PLP1. 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 The new Local Plan will need to be implemented alongside analysis of monitoring data and a review of the mitigation undertaken to date in the coast, in order to rule out any adverse effects to coastal SAC sites. The housing allocations are inland and therefore unlikely to alter the spread of visits to the coast, but may well add to the overall quantum of visits. Measures set out in the HRA for PLP1 will be re-checked at Publication stage to inform the final HRA report.

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, Kvittek & 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 HRA 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 HRA 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 Plan⁷ Provides the delivery mechanism for much of the mitigation being taken forward to alleviate the impact of recreation. The plan was 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.

⁷ <http://www.pooleharbouraqmp.co.uk/>

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.
- A recreation forum has been proposed for Poole Harbour⁸, 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 measures⁹ agreed with bait collectors

4.34 It seems there is also relatively little systematic monitoring data showing how access levels have changed over time.

- Initial results of the VALMER study¹⁰ 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 BTO¹¹ show that alerts (i.e. marked declines) have been triggered for eight of the

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

⁹ See http://www.southern-ifca.gov.uk/sitedata/files/MoA_PooleBaitDigging.pdf

¹⁰ See powerpoint download at <https://www.dorsetforyou.com/poole-harbour-surveys>

¹¹ <http://blx1.bto.org/webs-reporting/?tab=alerts>

14 species which were assessed. For four species (shelduck, lapwing, curlew and redshank), comparison of site trend with broad scale trends suggests that the declines underpinning Alerts status may be driven by site-specific 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 new Purbeck Local Plan 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 have worked closely with Natural England and the Environment Agency to produce an SPD setting out a nitrogen neutrality approach to new growth. The Nitrogen Reduction in Poole Harbour SPD¹² was recently adopted in 2017. It is a mechanism 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 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

¹² [https://www.dorsetforyou.gov.uk/media/221531/Nitrogen-Reduction-in-Poole-Harbour-SPD-Adopted/pdf/Nitrogen Reduction in Poole Harbour-SPD-adopted.pdf](https://www.dorsetforyou.gov.uk/media/221531/Nitrogen-Reduction-in-Poole-Harbour-SPD-Adopted/pdf/Nitrogen%20Reduction%20in%20Poole%20Harbour-SPD-adopted.pdf)

from the waste water sources, another option is to prevent the impact by removing an equivalent level of nitrates from other sources, i.e. Nitrogen Offsetting.

Securing mitigation for nutrient enrichment within Purbeck.

4.43 The Nitrogen Reduction in Poole Harbour 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.

Plan review requirements for Poole Harbour nutrients

4.44 As previous HRA 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 new Purbeck Local Plan 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 options as part of the local plan review in order to ensure that adequate mitigation is in place in time for development coming forward.

4.46 The new Purbeck Local Plan needs to incorporate policy wording to cross-reference with the SPD, to ensure its effective and timely implementation alongside new growth. It is advised that Purbeck District Council should look at the SPD requirements in a more strategic way across the District, alongside finalisation of housing allocations. Early engagement with landowners to identify potential land that could be taken out of intensive agricultural production to meet the District wide mitigation need could prevent delays in the development management process.

The New Forest

4.47 The HRA 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 PLP1 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 liaison or input necessary from Purbeck District Council 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 should 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 have impacts 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 HRA 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. These requirements are established and underway.

4.50 All development promoted within the new Purbeck Local Plan will need to be in accordance with the mitigation measures, and for all the above measures, the Local Plan must seek to ensure both continued policy commitments and also that actions are being progressed in time with development coming forward.

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 Dorset Heathlands Mitigation Framework is well established, housing allocations must be checked for compliance and deliverability of mitigation, and it cannot be assumed that all housing allocations can deliver the required mitigation.

4.52 More detailed consideration is therefore given in the following section to the housing allocations coming forward as revised housing options, to check their conformity with the heathland mitigation framework and guidance on SANG suitability. As noted earlier however, this assessment is currently constrained by the lack of SANG information alongside the Revised Housing Allocations document.

5. Appropriate Assessment – Housing Allocations

- 5.1 This section is an update to the appropriate assessment section of the previous HRA report at Options, where the previously proposed suite of housing allocations was assessed. As previously noted, and as illustrated on Maps 4, 5, and 6, the Revised Housing Allocations include some sites previously part of the Options, some that have been reduced in extent to provide a smaller allocation, and some new sites.
- 5.2 The HRA undertaken at Issues and Options considered seven housing locations and identified particular constraints and issues with development at Sandford, around Wareham and at Lytchett Minster. The site originally proposed at Sandford was subsequently dropped at Options stage, due to the risk of adverse effects on the integrity of the Dorset Heathlands SPA and Dorset Heaths SAC. The Options identified some new housing locations, which were not included in the earlier Issues and Options document, and consulted on eight locations for housing to accommodate the previously calculated housing need.
- 5.3 Importantly, the Options document included proposals for SANGs where these had been progressed through discussions with prospective developers and landowners, and Natural England. The full suite of SANGs necessary to accommodate the proposed growth in the Options had not been fully provided in the Options document, but where SANGs proposals were included the HRA was able to make preliminary assessment of their suitability.
- 5.4 For the Revised Housing Allocations document, SANGs provision is not included. This assessment must therefore be made based on previous understanding of SANGs provision for some of the allocations. The assessment is necessarily precautionary in the absence of and SANGs information. It is however understood that Natural England has continued to work closely with Purbeck District Council since the Options consultation to refine the SANGs proposals where possible, and identify outstanding issues and risks.
- 5.5 The site allocations now proposed in the Revised Housing Allocations document are assessed below, updating the previous appropriate assessment to accord with the currently proposed housing allocations. The assumptions made in relation to the SANGs will need to be checked by the Council.

Wool

- 5.1 The Revised Housing Allocations document proposes 470 homes at Wool for option A, 650 for option B and 800 for option C. The allocations to accommodate these options are 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. The allocations are as previously proposed at Options, with the exception of a small additional area to provide for approximately 20 homes. This does not increase the overall number of 1000 homes previously proposed at Options.

- 5.2 Potential impacts of development at Wool relate to increased recreation at the nearby heathland sites. The SANG proposed at Options stage, 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.
- 5.3 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 previously 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.
- 5.4 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) and adhere to the Nitrogen Reduction in Poole Harbour SPD.

Summary of issues to address at Wool

- 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 to be effective prior to occupancy.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral' and in accordance with the Nitrogen Reduction in Poole Harbour SPD.

Redbridge Pit/Moreton Station

- 5.5 The Revised Housing Allocations document proposes 440 homes at Redbridge Pit/Moreton Station for Option A, 500 for Option B and 600 for Option C. The allocations now include the addition of the caravan park, which would then be relocated. 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.
- 5.6 Around 24ha of SANG have been proposed as part of the previous Options consultation. 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 its 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. Previous advice from Natural England¹³ is that there is a reasonable and robust chance to avoid additional pressure on the designated sites.
- 5.7 The revised allocations include the proposal to include the caravan park site for housing and relocate the caravan park under options A and B. The implications of relocating the caravan park will need to be factored in to the SANG considerations for these allocations.
- 5.8 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) and adhere to the Nitrogen Reduction in Poole Harbour SPD.

¹³ Letter from Nick Squirrell to Purbeck District Council dated 25th September 2015

Summary of key issues to address at Redbridge Pit/Moreton Station

- 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' and in accordance with the Nitrogen Reduction in Poole Harbour SPD.

North Wareham

- 5.9 The consultation document includes an allocation to the north-west of Wareham for 200 homes. The area mapped for potential development is primarily on the outskirts of the town, just to the south of Bere Road and includes some previously developed land. There is also a small parcel of previously developed land adjacent to Wareham Station. The allocations are in close proximity to Wareham Forest, with parking in close proximity at the Sika Trail car-park along Bere Road. 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.
- 5.10 For the Options stage, the landowner 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 and there will be a need to carefully design an attractive visitor experience given proximity to the landfill site and to housing.
- 5.11 The Forest has a mosaic of designated and undesignated areas, with the designated parts corresponding with open areas. However, as noted in Section 1, Wareham Forest provides extensive supporting habitat for the Annex 1 species of the Dorset Heathlands SPA. Even the allocation sites themselves could potentially offer foraging habitat for Nightjar. The allocations should be supported by further assessment of the role of the functionally linked land, and available bird survey data. It is possible that new survey data may need to be collected.
- 5.12 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.

- 5.13 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, however this have may been resolved with the new interpretation/waymarking that has recently been established. The perception of Wareham Forest is thought to be of a robust woodland site where many activities are permitted (or at least tolerated).
- 5.14 Development on the northern outskirts of Wareham, towards Wareham Forest, would therefore need to secure a comprehensive and detailed mitigation package 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).
- 5.15 The areas mapped for development are 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) and be in accordance with the Nitrogen Reduction in Poole Harbour SPD.

Summary of key issues to address at North Wareham

- A mitigation package will need to be a comprehensive mix of on and offsite measures.
- The details of the any SANG design are yet to be finalised. Any SANG could be 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)
- The allocations will need to be supported by further analysis of bird survey data to consider impacts on functionally linked land within Wareham Forest.
- Within the Frome catchment and therefore development therefore needs to be 'nitrogen neutral' and in accordance with the Nitrogen Reduction in Poole Harbour SPD.

Sandford

- 5.16 A larger housing allocation was initially considered by Purbeck District Council earlier at Issues and Options stage. This was not included in the Options consultation as the earlier HRA work could not rule out adverse effects on site integrity. For the Revised Housing Allocations, a much smaller site to accommodate 30 houses is proposed, for both Options A and B. However, this site still has all the same issues as those identified at the Issues and Options stage, and whilst the potential impact is reduced by the reduction in housing numbers, adverse effects on site integrity cannot be ruled out.
- 5.17 The site has direct footpath links to Sandford Heath SSSI (within the Dorset Heathlands SPA/Dorset Heaths SAC). Great Ovens and other sites along the B3075 are easily accessible by car to the north. It will therefore be very difficult to direct recreational use away from local heathland sites. Urban effects such as increased fire incidence are possible impacts on the adjacent heaths such as Sandford Heath.
- 5.18 Other constraints are that the land proposed for development is functionally linked to the SPA. The site and its immediate surroundings are predominantly acid grassland, with records of foraging nightjar (pers. obs.) and the potential to support woodlark. The acid grassland proposed for development may itself support a range of notable species and be of wider biodiversity value that is important for the ecological functioning of the designated heaths.
- 5.19 The previously larger proposal included SANGs provision, but as documented in the Issues and Options HRA, this had a number of serious concerns regarding its ability to effectively function as a SANG. This much reduced site does not have a SANGs proposal.
- 5.20 Even at its reduced size, the constraints associated with this site are considerable. Further detailed ecological assessment would need to be undertaken to support the allocation, but at this stage it is thought likely adverse effects on the Dorset Heathlands SPA and Dorset Heaths SAC will not be ruled out.
- 5.21 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) and be in accordance with the Nitrogen Reduction in Poole Harbour SPD.

Summary of key issues to address at Sandford

- An effective mitigation package to alleviate recreation pressure on the designated sites is going to be very difficult to demonstrate, and would be needed at the plan level.

- Further ecological assessment will be needed to support the application, particularly to consider the impacts on supporting habitat functionally linked to the designated sites.

Lytchett Matravers

- 5.22 The housing proposed for Lytchett Matravers is for around 55 homes in north east Lytchett Matravers and around 95 in the south, totalling 150 dwellings. This is similar, but smaller than the previous proposal at Preferred Options. 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.
- 5.23 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.
- 5.24 There have been discussions with the developer/landowner and Natural England in relation to the three housing sites, two to the north-east of the village (30 and 25 units), and one to the east of Wareham Road (95 units). The option for SANG provision is now supported by Natural England for these sites, and discussions have also included the way in which greenspace within the development and routes to the SANG through the village can be designed and promoted. These discussions are now progressing positively, but progress should be further checked for the final HRA.

Summary of key issues to address at Lytchett Matravers

- SANGs provision discussions have progressed well between Natural England and the developer/landowner for the three sites.
- Progression of discussions between Natural England, Purbeck District Council, developers and land owners will be checked again for the next iteration of the HRA.

Upton

- 5.25 The housing proposed for Upton as part of Option A is for 90 homes on the eastern edge of Upton, next to the A35. Permission has already been granted for 70 houses close to the proposed allocation, and development of these is now underway. The

initial 70 house development was mitigated for by the provision of a SANG. It will be necessary to check the capacity of this SANG to determine whether it can also provide the mitigation necessary to accommodate the new allocation. At Publication stage, the SANGs provision, and analysis of any available monitoring data from the mitigation package for the initial 70 houses, should be analysed.

Summary of key issues to address at Upton

- SANGs provision needs to be resolved for the allocation.
- The capacity of the recently provided SANG needs to be checked
- Available monitoring data from the initial development will need to be reviewed to inform the necessary mitigation package for the new allocation.

Small housing sites

5.26 Options A and B include 220 homes provided for through small housing sites across the District. The Revised Housing Allocations document does not provide any further information on location, but rather it proposes a new criteria based policy to cover such development proposals. There will be a need to include reference to European site mitigation as part of this new policy, and it should also recognise that project level HRA will be required, and some locations may not be able to rule out adverse effects on European sites.

Discussions with Natural England

5.27 As part of this HRA, Footprint Ecology has discussed the revised housing allocations and the appropriate assessment findings with Natural England to check that the local Natural England staff concur with the findings and recommendations. We found that Natural England concurs with the assessment made and conclusions drawn. It is also understood from our discussions that Natural England has been working closely with Purbeck District Council, particularly in relation to the SANGs options to support the allocations and the development of these since the Options consultation. We also understand that Natural England and the Council, and where relevant with developers/landowners have held detailed discussions in relation to concerns and possible solutions.

6. Conclusions, Recommendations and Next Steps

- 6.1 This HRA has assessed the implications of the Revised Housing Allocations document at appropriate assessment stage, having screened all allocations as likely to have a significant effect on European sites due to their proximity to the sites and the need for effective mitigation in line with the established strategic approaches for the heaths and Poole Harbour. The identified uncertainties and evidence gaps should be resolved before the Revised Housing Allocations are finalised after consultation. The recommendations should assist Purbeck District Council in finalising housing site allocations for the Publication version of the plan.
- 6.2 Of particular relevance within the HRA findings in this report is the need to ensure that mitigation [packages for each allocation fit with the local site circumstances and risks. For example, development on the northern outskirts of Wareham, towards Wareham Forest, solutions are likely to require significant on-site green space and access management measures within Wareham Forest and on-site measures will also be necessary within the Arne/Hartland/Stoborough block of heathland.
- 6.3 SANGs provision information is yet to be included, and this HRA has currently relied on information available in relation to SANGs at the Options stage. It is understood that Natural England has been advising the Council since those proposals were published in 2016, and it will be necessary to understand the current SANGs situation to revise this HRA at Publication stage.
- 6.4 There are serious concerns in relation to the allocation at Sandford, for which it is advised it may be impossible to mitigate for.
- 6.5 The Revised Housing Allocations document does not provide any detail on where small housing sites may provide 220 homes for Options A and B. Rather the consultation document proposes a new small sites policy to set out criteria for small housing site proposals to adhere to. This policy will need to include criteria relating to European site mitigation, and the need for project level HRA, as some locations may not be able to mitigate for potential impacts.
- 6.6 Recommendations are made in section 4 relation to the range of mitigation schemes already in place, in terms of appropriate wording in the Local Plan, 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, and should inform the Publication version of this HRA.
- 6.7 It is advised that Purbeck District Council should look at the Nitrogen Reduction in Poole Harbour SPD requirements in a more strategic way across the District, alongside finalisation of housing allocations. Early engagement with landowners to identify

potential land that could be taken out of intensive agricultural production to meet the District wide mitigation need could prevent delays in the development management process. These requirements should be considered alongside the development of SANGs provision.

- 6.8 The Intelligent Plans and Examinations (IPE) review undertaken for the Council, referred to in section 2 of this report, advises that there is a clear need to boost housing delivery in the Purbeck District over the next 2 to 3 years. The IPE Review suggests that the Council should consider the early release of sites where there are no overriding infrastructure requirements. If this is to be realised, the Council needs to plan early and have mitigation measures agreed in time with development timeframes.

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8. Appendix 1: The Habitats Regulations Assessment Process

- 8.1 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, which are commonly referred to as the 'Habitats Regulations.' A recent consolidation of the Habitats Regulations has been undertaken in 2017. This does not affect the principles of European site assessment as defined by the previous Regulations, and requirements remain the same. Regulation numbers have however changed, with the relevant requirements for plans and projects now at Regulation 63 and for Land Use Plans at Regulation 105.
- 8.2 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.
- 8.3 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.
- 8.4 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

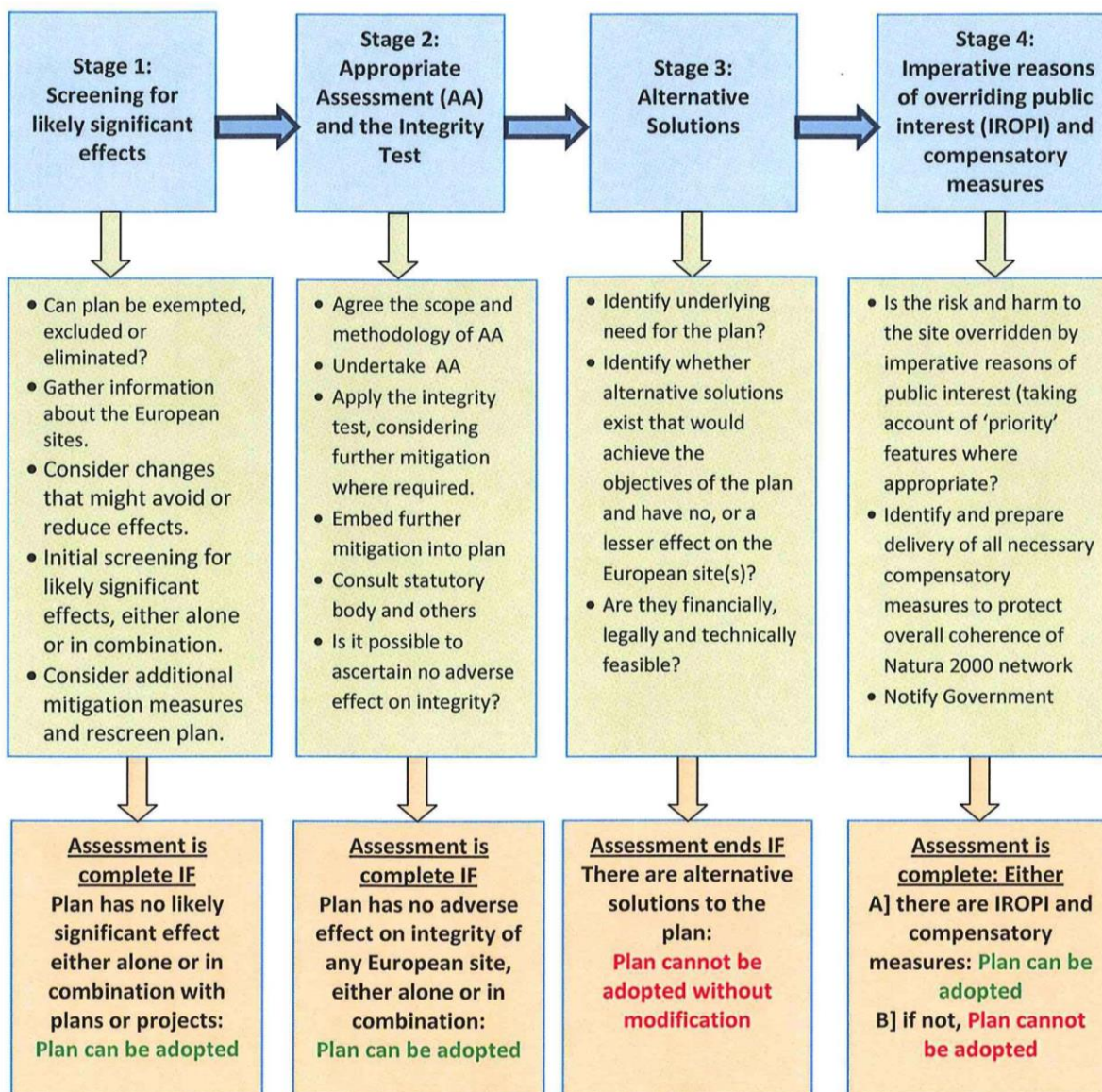
Ramsar sites as if they are part of the suite of designated European sites, as a matter of government policy, as set out in Section 118 of the NPPF. Most Ramsar sites are also a SPA or SAC, but the Ramsar features and boundary lines may vary from those for which the site is designated as a SPA or SAC.

- 8.5 It should be noted that in addition to Ramsar sites, the NPPF 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 64 and 107 of the Habitats Regulations, as described below.
- 8.6 The step by step process of HRA 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 63 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 105 specifically sets out the process for assessing emerging land use plans.
- 8.7 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
- 8.8 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.

- 8.9 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).
- 8.10 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.
- 8.11 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.
- 8.12 Where adverse effects cannot be ruled out, there are further exceptional tests set out in Regulation 64 for plans and projects and in Regulation 107 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.
- 8.13 In such circumstances where a competent authority considers that a plan or project should proceed under Regulations 64 or 107, 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

9. Appendix 2: European Site Conservation Objectives

- 9.1 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.
- 9.2 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 the second stage is to provide more detailed and site-specific information for each site to support the generic objectives, known as supplementary advice. This has been published for some European sites, but not for the Dorset Heathlands. Conservation advice for marine sites such as Poole Harbour is available but is applied at marine area level.
- 9.3 The new list of generic Conservation Objectives for each European site includes 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 HRA, and importantly will give greater clarity to what might constitute an adverse effect on a site interest feature.
- 9.4 In the interim, Natural England advises that HRA should use the generic objectives and apply them to the site-specific situation using locally relevant evidence. This should be supported by comprehensive and up to date background information relating to the site.
- 9.5 For SPAs the overarching objective is to:

9.6 *'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.'*

9.7 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.

9.8 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.'

9.9 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.

9.10 Conservation objectives inform any HRA 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.

10. 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 5 Reasons for designation of European sites within Purbeck District and 20km of the District boundary. + indicates a primary reason for designation as SAC, * indicates a priority SAC feature.

Site	Reason for designation:		
	SAC	SPA	Ramsar
Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar	Northern Atlantic wet heaths with <i>Erica tetralix</i> ⁺ , temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i> ⁺ , European dry heaths ⁺ , depressions on peat substrates of the <i>Rhynchosporion</i> ⁺ , <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 Southern damselfly ⁺ ; great crested newt.	Breeding nightjar, Dartford warbler, woodlark. Wintering hen harrier, merlin.	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> . Ramsar criterion 2: Supports 1 nationally rare and 13 nationally scarce wetland plant species, and at least 28 nationally rare wetland invertebrate species. Ramsar criterion 3: high species richness and

Site	Reason for designation:		
	SAC	SPA	Ramsar
			<p>ecological diversity of wetland habitat types and transitions;</p> <p>lies in one of the most biologically-rich wetland areas of lowland Britain.</p>
<p>Dorset Heaths (Purbeck and Wareham) and Studland dunes SAC</p>	<p>Embryonic shifting dunes⁺, shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")⁺, Atlantic decalcified fixed dunes[*], humid dunes slacks⁺, oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>)⁺, Northern Atlantic wet heaths with <i>Erica tetralix</i>⁺, temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>[*], European dry heaths⁺, depressions on peat substrates of the <i>Rhynchosporion</i>⁺, 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⁺; great crested newt.</p>	<p>See above.</p> <p>Little Sea and Eastern Lake located within this SAC fall within Poole Harbour SPA.</p>	<p>See above</p>
<p>Poole Harbour SPA and Ramsar</p>		<p>Breeding common tern, and Mediterranean gull.</p> <p>Passage aquatic warbler and little</p>	<p>Ramsar criterion 1: best and largest example of a bar-built estuary with lagoonal characteristics in Britain.</p>

Site	Reason for designation:		
	SAC	SPA	Ramsar
		<p>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 least 20,000 waterfowl.</p> <p>SPA additional breeding and overwintering features recently added:</p> <p>Little egret, Eurasian spoonbill, sandwich tern</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 tern, and Mediterranean gull, and of wintering. avocet.</p> <p>Ramsar criterion 5: internationally important assemblages of waterfowl.</p> <p>Ramsar criterion 6: Internationally important populations of common shelduck, black-tailed godwit.</p>
The New Forest	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) ⁺ , Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i> ⁺ , Northern Atlantic wet heaths with <i>Erica tetralix</i> ⁺ , European dry heaths ⁺ ,	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

Site	Reason for designation:		
	SAC	SPA	Ramsar
	<p><i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)⁺, Depressions on peat substrates of the <i>Rhynchosporion</i>⁺, 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>Illici-Fagenion</i>)⁺, <i>Asperulo-Fagetum</i> beech forests⁺, Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains⁺, Bog woodland⁺, Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)⁺, Transition mires, quaking bogs and Alkaline fens.</p> <p>Southern damselfly <i>Coenagrion mercuriale</i>⁺, Stag beetle <i>Lucanus cervus</i>⁺, Great crested newt <i>Triturus cristatus</i>.</p>		<p>assemblage of wetland plants and animals.</p> <p>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.</p>
St Alban's Head to Durlston SAC	<p>Vegetated sea cliffs of the 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>⁺, Greater horseshoe bat <i>Rhinolophus ferrumequinum</i></p>	N/A	N/A

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

11. 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 Preferred 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 issue 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	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	Re-assess once the policy becomes more specific. Development of the policy should have regard for the initial assessment made

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
	the larger towns, or to allow growth at smaller settlements		location for growth is chosen	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 houses or more, these are listed	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.
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

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
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 employment development at Holton Heath / Admiralty Park	Site specific description	LSE	Adjacent to heathland around Holton Heath, BlackHill and Sandford Heaths	Take to appropriate 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	Site specific description	LSE	Close to a range of European sites	Take to appropriate assessment for further analysis

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
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				
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 no policy simply requests for comments and changes are understood to be slight	Boundaries need checking at later stages
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	No LSE	No additional development, a refinement of	None

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
	approaches to local centres		boundaries to be more accurate only	
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	LSE	Proposed amendments not yet stated, therefore uncertainties	Rescreen once changes known, may not need to go to appropriate assessment

Policy or Plan Section	Description	LSE	Justification for LSE Conclusion	Further considerations
	current planning 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

12. Appendix 5: Screening for LSE at Preferred Options Stage

This table sets out the previous screening of the plan at the Preferred Options stage

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	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.

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
			European sites in terms of recreational pressure and urbanisation impacts	
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 –option for 1,000 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 checked 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.
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 checked 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 checked 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	Check mitigation proposals as part of appropriate assessment, in light of available information on this

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
			proposed should be checked to ensure it is fit for purpose.	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 checked 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 checked 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 checked 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.

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
Swanage text	Confirmation that there is currently nothing proposed in Swanage. Swanage is the subject of its own town plan with allocations within.	No LSE	No allocation proposed, but text recognises that there is the potential for an allocation. Swanage plan HRA provides mitigation for Swanage growth.	Revisit at submission draft to check 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 checked 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 checked 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	Although this is an alternative option, there is the potential for its inclusion in the plan. Check mitigation proposals as part of

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
			checked to ensure it is fit for purpose.	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.
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	No LSE	There are no impact pathways arising	None, although project specific development

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
	retail floor space required.		from the delivery of additional retail	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	<p>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.</p> <p>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.</p>	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.

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
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 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	Note that all housing will need to deliver required mitigation, and any

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
			it requires particular housing types.	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
Keyworth 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
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.

Emerging Policy or Allocation	Description	LSE	Justification for LSE Conclusion	Further considerations
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