

Poole Harbour Recreation Supplementary Planning Document Summary of comments to the consultation draft – March 2019

The former Borough of Poole and Purbeck District Councils consulted upon the Draft Supplementary Planning Document (SPD) for 4 weeks from 4th February 2019 to 4th March 2019. Each Council contacted organisations and members of the public who have asked to be kept informed of planning policy matters. The consultation attracted 57 responses; 24 of these were from organisations and 33 were from members of the public. The responses are summarised in the tables below with an officer response:

Comments from Organisations:

Respondent	Comment	Officer comment and Action
Birds of Poole Harbour	Fully support and appreciate intent of proposals but raised concerns. Large amounts of money being allocated to co-ordinator and wardening roles (SAMMS) which covering a large area, could possible have little or no impact on mitigation against increased pressure. Physical infrastructure (PHIPS) to manage pressures is far more successful, allowing the public to benefit as well as enhancing bio-diversity. Allocation of £15,000 in PHIPS seems small amount compared with £1.3M allocated to SAMMS. Investing in wider range of PHIPS projects to tackle heart of disturbance issues is key to mitigating against future increased pressures. Birds have become habituated to people's behaviours in some areas such as Holes Bay so investing in projects along the northern/urban shorelines would be a waste of money. Planting could potentially increase disturbance due to shadows/shapes spooking the birds. True issue people leaving shoreline and accessing mud, saltmarsh or open water for bait digging, kayaking, dog walking and walking. Certain areas would benefit from restricted access such as Lytchett Bay where new fencing and ditches could be created. Infrastructure such as viewing platforms and interpretation for awareness could be provided at Holes Bay east; Baiter; Hamworthy Park; Poole Park and Whitely Lake which are areas where there are important birds and large visitor numbers. Signage can play an important part in raising awareness and Dorset Dogs do excellent job in bridging issue between conservationists and dog owners. Despite recognition of bird sensitive areas, it is not promoted, talked about or interpreted, and further clarity advice is needed. Signs on marker buoys across Brands Bay; Waytch Lake; Middlebere; Gold and Patchins Point would be effective and other designs to address bait digging; windsurfing and dog walking are needed. Inner Studland shoreline, especially Brands Bay needs more	Welcome the support. The PHIPS projects are examples and the whole budget for PHIPS are not determined by these projects. Further work such as the access management plan needs to be carried out to help determine what infrastructure projects would be most effective and how much is required for such projects. Dorset Dogs to continue as part of mitigation and rangers, website, social media etc. all to be used as measures to promote and provide further advice. The Councils plans to continue partnership working with bird groups and National Trust to develop the strategy and appropriate projects.

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	<p>strategic long term protection plan which National Trust are looking into. This is positive opportunity to help protect and interpret the harbour and birds but need to be clear that some areas must see reduction in disturbance so as to not decrease bird numbers (see example at Pilots Point, Studland Bay where no longer bird roosts).</p>	
<p>Bourne Leisure</p>	<p>Aspects of the SPD have not been sufficiently justified with regard to holiday accommodation.</p> <p>Pooling of contributions – concerned that pooling of more than 5 SAMMs payments would contravene Reg 123 of the CIL Regulations 2010 (as amended).</p> <p>Viability – Have the SAMMs been viability tested?</p> <p>Cost of SAMMs - Appendix E states total cost of SAMMs is £1.32 million and table 4 shows total costs can be covered by new dwellings so why are additional payments required to mitigate the impact of development?</p> <p>Tourist accommodation - Bourne Leisure endorse the general approach to addressing mitigation for large scale and small scale developments on a case by case proportionate basis but local authorities should not pre-determine that very large scale applications could deliver SANG. Also using the same dwelling rate for holiday accommodation is not fair having regard to pro rata occupation. SPD should more clearly explain approach for holiday accommodation where there is existing deduction to be taken into account.</p>	<p>In Poole the SAMMs aspect of the strategy is considered to fall outside of CIL as it is not defined as infrastructure hence the pooling restriction does not apply in this respect. Infrastructure projects will be funded through CIL and are not an additional obligation. Assumptions on planning obligations were included in viability testing of CIL. There is no pre-determination as the SPD outlines possible approaches to mitigation which could include the option of SANGs. SPD explains that there will be a deduction for tourist accommodation based on occupancy rates.</p>
<p>Campaign to Protect Rural England</p>	<p>Noted that normal consultation period is reduced from 6 weeks to 4 weeks. National Audit Office is concerned regard financial sustainability of Local Authorities (including high level borrowing) to the point that strategic planning and local discretion are at risk. Paper has not been prepared in conjunction with the Maritime Management Organisation (MMMO) which has considerable interest and powers over the harbour and environment. Planning Inspectorate did not consider this subject mater when dealing with targets for housing numbers in Poole but perhaps will when dealing with Local Plan for Purbeck. The adopted Local Plan for Poole will have to be adjusted to maximise the benefits of 'avoidance' since 'mitigation' was not envisaged. Disappointing that paper deals with mitigation rather than avoidance which should not be forgotten. Very special characteristics of the Dorset coast should continue to be reinforced by effective measures for controlling recreational facilities and enforced by MMO and Natural England, and the two new Local Authorities as they review</p>	<p>A 4 week consultation accords with both councils statements of community involvement and relevant planning laws. Notwithstanding Local Authority budgets, funds collected as part of the strategy are ring fenced towards mitigation measures for the strategy.</p> <p>The MMO are aware of the issue of recreational activities and impact upon birds and need to mitigate is highlighted in the Poole Harbour Aquatic Management Plan which was prepared with the MMO. Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach. It is acknowledged that visitors across Dorset may visit the harbour, the effectiveness of the strategy and the impacts of recreation on Poole Harbour will be monitored as part of the strategy in conjunction with both councils' local plans. Housing numbers in Appendix E are up-to-date and based upon</p>

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	<p>implementation of Local Plans. Natural or semi natural environment provide benefits for human health and well-being so adequate controls of human damage are welcome. Financing for wardening, education and monitoring are not substantial enough to be truly effective and its unrealistic to encourage housing so as to obtain insufficient CIL monies for funding relevant infrastructure challenges and reduce CIL monies by decanting a contribution for SAMM. A more effective method is needed. Effect of SANGs is not properly addressed and also have wildlife which could be impacted so are not the whole answer with the role of parks and playing fields needing to be strengthened. SANGs should be flower meadows to ensure insect life flourishes.</p> <p>Shared concern with Natural England about intensification of residential development in Poole and Purbeck with affordable housing not being met but not just Poole and Purbeck but 70,000 houses across Dorset who also visit. Also areas such as Holes Bay could be affected by surface water drains and other pollutants which could affect the birds. Many vacant houses suggest temporary occupants who are less aware of the need to respect wildlife.</p> <p>Concern over felling of trees and absence of replacement trees resulting in loss of roosting/nesting sites. Appendix E refers to obsolete household projections.</p>	<p>the adopted Poole Local Plan and Purbeck Local Plan submission draft.</p>
Dorset Bird Club	<p>Supports the principle of the SPD but concerns regarding lack of rigour and logic in the approach. Process should be based upon thorough and up-to-date assessment of specific impacts of recreational pressure upon Poole Harbour; identification and implementation of suitable measures to mitigate current impacts and assessment of effectiveness of those measures; assessment of how development will additionally affect the interest of the SPA; identification of further measures necessary to address additional impacts; and costing of mitigation measures and identification of sources of necessary funding. SPD appears to be ad hoc collection of potential projects with no demonstrable linkage to an evidence base of what is needed and what works in practice.</p>	<p>Support noted. The focus of the strategy is related recreational activities and the impact this has upon birds which live in/visit the harbour. The background paper provides a summary of the supporting research papers which evidence the councils' strategy presented in the SPD. The measures set out (which would be as paid for by developers) are aimed towards mitigating the impacts of future planned development. A different strategy will be needed for addressing existing impacts. The councils' strategy will provide a mechanism to allow for more surveys to be completed which will help to develop appropriate/effective forms of mitigation.</p>
Dorset Wildlife Trust	<p>SPD welcomed as pressures on harbour's wildlife from recreation area increasing and planned housing development will be significant additional factor. Heathlands SPD has worked well and Urban Heaths Partnership delivery model is tried and tested and useful template for delivery.</p> <p>SPD is critical document and main tool available to address harmful effects of recreational pressures upon harbour. Significant risk that putting too much reliance on SPD as a means of dealing with increased recreational pressures in</p>	<p>Support noted. Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach. Agree that collating of data and info from other groups would be useful in measuring impact and it is also recognised that there needs to be a process/mechanism for involving interested parties. A steering group may be appropriate in this respect and will be added to a</p>

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	<p>Harbour from housing allocations already determined. Developing the SPD should have been part of the planning process from outset and more consideration to avoidance. SPD needs to be measureable with scope for changes to be made if further action is required. Wording of policy E9 of Purbeck plan does not take into account some effects can/can't be predicted and it is difficult in retrospect to take remedial measures.</p> <p>SPD focuses on potential increase in land based recreation as main concern but water based are also likely to increase. Limited focus on subtidal biodiversity which could be revisited with reference to research by Dr. Peter Dyrnda. No. of marine conservation measures already in place which could be strengthened by SPD such as additional warden engagement and raising awareness of conservation sites for commercially important species and bait digging code of practice. Clarity required on whether development is required to pay for harbour recreation, nitrogen and heathland mitigation. Should the buffer be wider for harbour than heathlands as it is bigger attraction and other people visit from outside of Poole and Purbeck? Is there potential for widening boundary in Purbeck and to Bournemouth depending on monitoring? In Purbeck plan 933 houses designated for small sites and windfall - is a proportion of this included in the 850 total? Total housing numbers for Poole is far higher than Purbeck. Will money collected by each authority only be spent on mitigation in that area? Money should be distributed to projects according to need for mitigation measures whichever area that is regardless of where money is collected. 90% of monies is earmarked for SAMMS with 11% for infrastructure projects. SAMMS work is essential but would be good to see higher proportion of money for practical conservation work. Projects on indicative list seem reasonable although PHIPS are concentrated on land based mitigation. Hoped that proportion of SAMMS can be used for water based activities. Will there be a mechanism for including future projects by other parties like DWT and Lytchett Bay Nature Partnership? Concerns over the north shore of reserve on Brownsea Island as a result of increased jet skis, paddle boards, kayaks and small boats with marked decrease in breeding Oystercatchers. Although areas defined for recreational use, these are not effective without monitoring/wardening. Also more provision needed for information/education to stay away from sensitive areas. New warden could coordinate with volunteers of Harbour Watch to engage with users and develop/promote code of conduct. Also perhaps</p>	<p>governance section of the SPD. Agree that there needs to be scope for changes and review as necessary – this pilot strategy requires a lot of survey and monitoring work to be carried out initially which will in turn help to better inform effective measures. Developments will be required to provide mitigation for harbour and heathlands i.e. two separate contributions, which must be used towards their separate measures although there may be some overlap in terms of mitigation outcomes (but not double funding). Buffer areas are different for harbour and heathland and set having regard to evidence in visitor surveys. Yes a proportion of the small sites and windfall is included in the housing numbers envisaged in the buffer zone within Purbeck. The SPD provides a strategic cross boundary approach and spending will have to mitigate harm where it occurs. Noted regarding more concentration on water based activities although there is some overlap with the MMO, and organisations with responsibility for implementing the Poole Harbour Aquatic Management Plan. Further liaison and partnership working, which the coordinator and warden roles would help with, will help to ensure the effectiveness of mitigation measures. Action - Add a governance section regarding the need for a steering group.</p>

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	introducing no-fly zones.	
Environment Agency	Support mitigation measures outlined. An increase in population in the area is likely to cause greater disturbance to birds and habitats, which is likely to have a detrimental impact. National Planning Policy Framework (NPPF), requires local planning authorities to aim to conserve and enhance biodiversity when determining planning applications by minimising impacts on biodiversity and providing net gains in biodiversity where possible. NPPF states that opportunities to incorporate biodiversity in and around developments should be encouraged. Therefore, we would appreciate the opportunity to be consulted on future proposal, projects and mitigation measures that are delivered through this document. We feel that of particular importance is habitat creation, habitat enhancement and restriction / prevention of disturbance at certain sites, particularly in late winter when food is scarcer.	Support noted. Any proposed projects will be discussed with interested parties.
Friends of Hamworthy Park	Object to the project to fence an area in Hamworthy Park pending further information. This is access route to Poole Yacht Club for Hamworthy residents. Area popular for bait digging and dog walkers take their dogs for walks to avoid conflict with families. Support wildlife in park and wider harbour but have to balance with needs of park users. Many birds in park and foreshore between western end of park and Lake Road slipway provides safe place for birds to forage and feed with minimum disturbance away from busier areas.	The mitigation projects listed are examples only at this stage with the majority envisaged as raising awareness, educating and encouraging changes in behaviour as opposed to restricting access for users. Any proposed projects will be discussed with interested parties and would need to be balanced with the needs of the users of the park.
Highways England	No comment to make.	Noted.
Langton Matravers Parish Council	Mitigation criteria set out falls below the level of adequate protection demanded by the vulnerability of the Poole Harbour Area now, let alone with the additional 15,030 houses. One of major sources of bird disturbance is dog "walking". Research (see below) shows even dogs are on the lead considerable disturbance is caused to birds. According to Pet Food Manufacturers Associations' statistics, 26% of people in the country own a dog and addition of 15,000 houses suggests increase of 3,900 dog owners (Wareham/PDC proportion being 215). Evidence as below, and from own observations shows dogs are frequently allowed to run free, and high proportion of dog owners see nothing wrong with this. With regard to "Water Sports" and associated activities, rigid exclusion zones should be applied and rigorously enforced. Proposed mitigations are insufficient, do not comply with the appropriate assessment under the Birds or Habitats Directives, and that the presumption of in favour of	Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach.

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	<p>development does not apply. Without either a total ban on dogs in all areas adjacent to the harbour in winter months, and preventative measures to this end, the “protected” area will be drastically compromised, and put unacceptable disturbance to the flora and fauna of the harbour, but would also constitute an illegal act.</p>	
<p>Lytchett Minster & Upton Town Council</p>	<p>Fully endorse the proposals and would like to be kept informed and consulted on relating matters in future.</p>	<p>Support noted.</p>
<p>Studland Parish Council</p>	<p>General - Unclear why Poole and Purbeck have left consultation to final stages of their Local Plans. Reports from Raynsford review and National Audit Office plus local research has questioned validity of method for calculating housing numbers for Local Authorities.</p> <p>Issues - pressures on the southern side of Poole Harbour are growing due to more persons accessing the area, more dog walkers, and greater awareness of the area due to indirect and direct advertising of the area in particular by the National Trust and the RSPB. These pressures will impact on the nesting sites of over wintering and summer birds such as terns, and oyster catchers.</p> <p>The measures outlined in the SPD (use of wardens and signs) are not guarantees of mitigation and may/may not work. Effective mitigation measures may require limits to access and even measures to ban impacting activities.</p> <p>Local Plan development - Can it be proven that the proposed mitigation will fully mitigate the harm associated with the impact of more persons in the area due to more housing? If the Habitats Assessments and the consultation had been conducted earlier in the development of the Local Plans, a case could be made for lower housing numbers. Given primacy of place of the Habitats Regulations it is surprising Local Planning Authorities have not addressed the need for a consultation earlier.</p>	<p>Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach. The mitigation proposes measures mainly seeking to raise awareness rather than restrict access as this is seen to be a more effective approach.</p>
<p>Wareham Town Council</p>	<p>SPD focuses solely on mitigation factors resulting from increased recreational activities due to housing development and not other planning consideration and development control. Support the initiatives that ameliorate disturbance from recreation to these nationally and internationally important wildlife sites that occur due to proximity to current residential area and future proposed development. Noted and supported that funding of the strategy will be secured in-perpetuity. Surveys and monitoring outcomes need to be strengthened to include provision that should a serious negative impact trend from recreation be</p>	<p>Support noted. The purpose of the strategy is to provide mitigation to enable development. If the strategy and measures were not considered effective, the strategy would need to be reviewed.</p>

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	<p>identified, that further development permissions in the plan area will be suspended until this has been addressed effectively.</p>	
<p>Natural England</p>	<p>Remain of the view that the overall level of recreational impacts on Poole Harbour SPA/Ramsar and SSSI are such that the authorities can allow further residential developments to come forward over the plan period (as currently planned within the Purbeck (2012) and Borough of Poole (2018) Local Plans with the proposed mitigation strategy proposed in the SPD in place). Implicit in advice is position that increased access to the harbour and surrounds for recreation related activities will reach carrying capacity at some point where behavioural modifications and visitor management are no longer effective at avoiding harm. Welcome document as means to implement the mitigation required to offset the additional recreational pressure on Poole Harbour Special Protection Area (SPA) and Ramsar site from the planned increase in residential development in the area. As has been stated within documents, the HRAs for the Poole and Purbeck local plans require measures to offset recreational pressure to be implemented to ensure that there is no adverse effect on the integrity of Poole Harbour SPA and Ramsar site. These contributions will add to the payments collected by the authorities thus far to offset recreational pressure from new developments which are being spent on infrastructure projects. This long awaited document will provide mechanism by which appropriate contributions can be collected to monitor and mitigate for the effects of additional recreational pressure from housing growth.</p> <p>Support approach by the authority in defining the area around the Harbour from which the majority of visitor/recreational pressures are likely to arise. This is soundly based upon appropriate visitor use surveys. Whilst there is a minor anomaly in the Broadstone/Corfe Mullen area of East Dorset District this area is greatly constrained by Upton Heath in the south, the Green Belt and the effects of the authorities 400m area around designated heathland sites. More recent visitor survey confirms visitors from a wider area of Bournemouth and will need to be reviewed when the authorities are re-organised shortly. Welcome provision for infrastructure projects and advise additional wording. Authorities should seek to bring forward projects on land within their ownership in timely manner particularly focussing on areas of the Harbour already identified for adverse effects ie Holes Bay east. Unclear of the precise mechanism authorities will secure funding for PHIPs against other internal priorities. SPD should clearly</p>	<p>Support noted. Funding from CIL will continue to be top sliced for PHIPS. The pilot strategy requires a lot of survey and monitoring work to be carried out initially which will in turn help to better inform effective SAMMs and infrastructure projects and their costings.</p> <p>Local Authorities with advice from Natural England will need to agree management/process for projects, evaluation and monitoring. A proforma and evaluation template could be published on the websites inclusion in the SPD is not necessary. Also recognised that there needs to be a process/mechanism for involving interested parties such as RSPB - a steering group may be appropriate in this respect and will be added to the SPD section on governance. Acknowledge that pilot will need monitoring and review alongside the preparation of new local plans.</p> <p>Action - Add a governance section regarding the need for a steering group.</p>

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	<p>explain PHIPs list provides scope of types of projects PHIPs may cover rather than defined list. Following drafting of Access Management Plan and experience from operating SPD, review of the SPD should begin in about three years to ensure appropriate mitigation is put in place to offset recreational pressure in light of findings from the initial monitoring work and enable revision of document to be in place for the adoption of local plans prepared by the two new authorities. Suggest the addition of Appendix F to include a project proforma and evaluation template as reference.</p>	
NFU	<p>Recognise that scale of provision of new homes is very ambitious and thus mitigation required for recreation is high. Would expect synergies and holistic approach with other areas such as nutrient reductions and biodiversity net gain, not piecemeal approach. Farmers must be able to shape and control delivery on the ground. What is the role of the coordinator and warden which has two thirds of funding with only 11% towards projects on the ground? No costings or details for infrastructure projects and how they will be delivered. How will in-perpetuity be monitored after 2030? Are guarantees for delivery made by requisite covenants? NFU would like to be involved in process. How does the min/max administrative charge relate to the role of the coordinator? Who bears the cost of deeds and legal fees?</p>	<p>The £10,000 budget is for SAMMs projects, not infrastructure projects. There is a separate budget for infrastructure projects which is top sliced from CIL contributions. The pilot strategy requires a lot of survey and monitoring work to be carried out initially however, this will in turn help to better inform both SAMMs and infrastructure projects which will be most effective on the ground. Agree, it is important to work with farmers to effectively use their assets for benefit. Councils will monitor the effects planned development, and mitigation, through the process of preparing and updating local planning policy. Admin charge and their costs for deeds and legal fees would be borne by the developers (submitting the planning application). The admin charge is to process the obligation and does not relate to coordinator role.</p>
Pan Purbeck Action Campaign	<p>Protected sites in Poole Harbour will be damaged further by planned development in the Local Plans of both areas. Given the importance of the Habitats Regulations both Poole and Purbeck Councils are urged to review this SPD to take account of these issues:</p> <p>Housing numbers - the formula for the calculation of housing numbers is flawed and concerned residents have no meaningful say on the number of houses to be identified in Local Plans.</p> <p>Timing - Expected that consultation would have been earlier in the development cycle of Local Plans and consultation period would be at least 6 weeks rather than 4 weeks.</p> <p>Mitigation - measures outlined in the SPD are unlikely to be successful. Visitors can ignore signs and wardens only work part of the day.</p> <p>Prevention versus mitigation - case for prevention needs to be made in a strong and clear manner. Measures to limit access and reroute access deserve to be fully developed for a revised SPD.</p>	<p>The draft SPD takes account of housing needs assessments in Poole and Purbeck local plans. Interested parties have been given the opportunity to make responses on these assessment as part of the process of preparing these plans. Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach. 4 weeks consultation is consistent with both councils statement of community involvement and relevant planning laws. The mitigation proposes mainly measures to raising awareness, educate and encourage changes in behaviour rather than restrict access. The effectiveness of mitigation will be monitored and reviewed accordingly.</p>

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Poole Flag Trust	<p>How will scheme be implemented after formation of the new councils and there is no Poole Town Council? Tidal waters are no longer the responsibility of council but you must consult with the MMO particularly over the intertidal zone. We agree that birds need protection from predation particularly from dogs off their leash but we consider that an emphasis must be made on protecting their food chain. In order to maintain diversity of birds, a variety of habitats must be maintained for feeding, nestling and for roosting. As an example mudflats at low tide must be protected for waders to feed and also an area above high water level for nesting and to retire from the mudflats when covered by water. Some birds rely on fish for food so water must be free of pollutants. Wardens are necessary but to finance them from tax on new housing is unfair, the harbour attracts many people from outside the Poole and Purbeck Areas so is it possible to tax existing facilities and form a toll on visitors when they depart from Poole Quay or enter Upton Park?</p>	<p>The issue of recreation was identified in the Poole Harbour Aquatic Management Plan which was jointly produced by the Councils and the MMO. The SPD has been developed in response to this and the impact identified in the HRAs for the Local Plans. The majority of the measures proposed in the strategy are on land and any projects on the water/tidal areas will be prepared in liaison with the MMO. The mitigation measures delivered through the SPD will address the effects from disturbance connected with the residential development planned in the councils' local plans.</p>
Purbeck Society	<p>Concerns raised about affect on the environment of Purbeck - too many houses being imposed on the Dorset communities without residents having any say in the numbers. Local Plan developments - the SPD should be circulated at the start of the Local Plan process and subject to six week consultation period. Mitigation - should be mitigation rather than possible mitigation. Funding – CIL/Section106 monies do not supply mitigation in perpetuity as they both are time driven ideas.</p>	<p>The consultation and adoption of an SPD is a separate process to the Local Plan and residents are consulted on Local Plan housing numbers separately. The 4 week consultation period is in accordance with each councils' statement of community involvement and relevant planning laws.</p>
RSPB	<p>Welcomes the draft SPD which is timely with the Poole and Purbeck local plans and should address the existing strategic policy vacuum and avoid ad hoc decisions being made over the use of developer contributions. SPD succinctly summarised issues at play and background paper is up to date in terms of evidence and useful reference. Also demonstrates necessity of action to understand and address recreational impacts associated with new development. Support Natural England position regarding pressures of disturbance from recreation upon Poole Harbour SPA/Ramsar sites. Also support stance in background paper. Current draft SPD provides vehicle for delivering actions of Site Improvement Plan (2014) and sets out clear rationale and logical mechanism for collecting payments from development to fund mitigation and avoidance measures (SAMMs) and infrastructure projects (PHIPS). RSPB has been involved in early discussions with Councils to scope out qualifying projects.</p>	<p>Funding from CIL will continue to be top sliced for PHIPS. The pilot strategy requires a lot of survey and monitoring work to be carried out initially which will in turn help to better inform effective SAMMs and infrastructure projects and their costings. The Councils will need to agree the scope of the warden and coordinator roles and these will be monitored/reviewed for effectiveness. Councils will also need to agree management/process for projects etc. Also recognised that there needs to be a process/mechanism for involving interested parties such as RSPB. A steering group may be appropriate and will be added to the SPD section on governance. Action - Add a governance section regarding the need for a steering group.</p>

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	<p>There is necessity for funding to be secured in perpetuity to deliver all aspects which is noted in SPD. Vital that Councils continue to 'top slice' CIL to direct investment to PHIPS (and SAMMs in Purbeck). Annual monitoring will be necessary and support intention to monitor delivered measures as part of SPD to guide future investment decisions and provide evidence. Ongoing monitoring of bird populations in Poole Harbour is necessary to determine whether projects mitigate pressures. Generally supportive of measures in SPD but would welcome more info on coordinating and wardening roles as insufficient information presented on deliverables and whether its sufficient for scale of harbour. Also query governance arrangements for SPD and how interested parties can engage further which coordinator role may give structure to. Also require clarity on relative proportions of receipts split between SAMMs and PHIPs as this is not explicit in SPD.</p>	
Savills	<p>Promoting land at Wool for residential development. Mitigation for heathlands and nitrates will be addressed through SANGs. The SPD buffer zone does not extend westwards as far as Wool and no objection on this basis. Delivery of the SANG would nevertheless play important role in reducing recreational impacts around the harbour as it will be for heathlands. SPD text should more explicitly identify area in which it will apply (such as para 6.2). A single plan showing the area would be simpler and avoid confusion.</p>	<p>The zone within Purbeck excludes Wool. A plan is provided in the appendices, but a larger plan would clearly identify the affected area. Action – Use one map of the area in the appendices</p>
SGN	<p>Appreciative of notification to inform their strategic planning but no comments</p>	<p>Noted.</p>
Society for Poole	<p>Noted that normal consultation period is reduced from 6 weeks to 4 weeks. National Audit Office is concerned regard financial sustainability of Local Authorities (including high level borrowing) to the point that strategic planning and local discretion are at risk. Paper has not been prepared in conjunction with the Maritime Management Organisation (MMMO) which has considerable interest and powers over the harbour and environment. Planning Inspectorate did not consider this subject mater when dealing with targets for housing numbers in Poole but perhaps will when dealing with Local Plan for Purbeck. The adopted Local Plan for Poole will have to be adjusted to maximise the benefits of 'avoidance' since 'mitigation' was not envisaged. Disappointing that paper deals with mitigation rather than avoidance which should not be forgotten. Very special characteristics of the Dorset coast should continue to be reinforced by effective measures for controlling recreational facilities and enforced by MMO and Natural England, and the two new Local Authorities as they review</p>	<p>A 4 week consultation accords with both councils statements of community involvement and relevant planning laws. Notwithstanding Local Authority budgets, funds collected as part of the strategy are ring fenced towards mitigation measures for the strategy. The MMO are aware of the issue of recreational activities and impact upon birds and need to mitigate is highlighted in the Poole Harbour Aquatic Management Plan which was prepared with the MMO. Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach. It is acknowledged that visitors across Dorset may visit the harbour, the effectiveness of the strategy and the impacts of recreation on Poole Harbour will be monitored as part of the strategy in conjunction with both councils' local plans. Housing numbers in Appendix E are up-to-date and based upon</p>

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	<p>implementation of Local Plans. Natural or semi natural environment provide benefits for human health and well-being so adequate controls of human damage are welcome. Financing for wardening, education and monitoring are not substantial enough to be truly effective and its unrealistic to encourage housing so as to obtain insufficient CIL monies for funding relevant infrastructure challenges and reduce CIL monies by decanting a contribution for SAMM. A more effective method is needed. Effect of SANGs is not properly addressed and also have wildlife which could be impacted so are not the whole answer with the role of parks and playing fields needing to be strengthened. SANGs should be flower meadows to ensure insect life flourishes.</p> <p>Shared concern with Natural England about intensification of residential development in Poole and Purbeck with affordable housing not being met but not just Poole and Purbeck but 70,000 houses across Dorset who also visit. Also areas such as Holes Bay could be affected by surface water drains and other pollutants which could affect the birds. Many vacant houses suggest temporary occupants who are less aware of the need to respect wildlife.</p> <p>Concern over felling of trees and absence of replacement trees resulting in loss of roosting/nesting sites. Appendix E refers to obsolete household projections.</p>	<p>the adopted Poole Local Plan and Purbeck Local Plan submission draft.</p>
Sport England	<p>Disappointed that the emphasis is on wildlife protection and no recreation to improve health. Objects and will not support SPD due to concerns about projects listed in appendix F which need to be clarified. In particular Holes Bay re-alignment of cycle/footpath because due to potential for active travel route to the town centre and Hamworthy Park Access as area may be used by Poole YC and the Outdoor centre. Advise if to be considered by planning committee and outcome of SPD with copy of adoption notice.</p>	<p>Mitigation measures need to address the effect of disturbance arising from new residential development, but in some instances may provide the opportunity to address other planning objectives around health/wellbeing. PHIPS projects in appendix F are examples only. Going forward further work needs to undertaken to provide a more comprehensive list of infrastructure projects in liaison with any interested parties or consultees.</p>
The Seahorse Trust	<p>The SPD is adequate as part of a wider exercise to protect Poole Harbour but further consideration should be given to working with partners in Bournemouth and Christchurch to tackle harm caused by industrial activities as otherwise without this wider work, the recreation SPD would be undermined.</p>	<p>Comments are largely directly towards Wytch Farm and the temporary oil rig in Poole Bay. Licences and regulation for these types of developments are issued by central government bodies.</p>
Wessex Water	<p>1. Whilst issue of recreation is separate from other development impacts affecting the designated features of Poole Harbour, such as nutrient neutrality, issues are inevitably inextricably linked. Some value in having single SPD covering all potential impacts arising from housing development on the Poole Harbour SSSI/SAC/SPA to ensure multi-functional mitigation is considered and that various strands are made easily understandable to developers (i.e. you</p>	<p>The strategy is intended is to run alongside other existing strategies such as Nitrogen however, it is agreed that a more comprehensive/holistic review of all issues may be appropriate in the future and may provide opportunity for shared gain projects.</p> <p>Appendix D is aimed towards residential development however, some commercial development may also have an impact and the requirements of</p>

Respondent	Comment	Officer comment and Action
	<p>have to pay £x for recreation and £x for nutrients). Potential additional contributions for Heathland Mitigation and Biodiversity Strategy creates complicated requirements for developers, particularly when developing at a small scale. A multifunctional approach would be better aligned with Governments intentions to move towards net environmental gain and could ensure that solutions such as PHIPs consider and deliver multifunctional benefits, such as water quality improvements, sustainable drainage opportunities etc. Equally, schemes put forward through the nutrient neutrality SPD should consider recreation as an issue (although as noted, the primary recreational issues are centred on the Harbour itself, whilst nutrient neutrality is geographically factored in upstream). Biodiversity Net Gain and Conservation Covenant proposals currently being consulted upon by DEFRA could facilitate clearer, more straightforward process for developers and responsible bodies allocating funding for mitigation projects. In long term, SPDs should be integrated into a strategic planning package for biodiversity, nitrogen neutrality, clean water, carbon sequestration and other natural capital flows. Local partnerships are well placed to deliver projects that contribute these ambitions in collaborative, cost effective way. Would encourage approach working in partnership with other delivery organisations and where possible, pools available funding in order to achieve a much greater overall gain, rather than having small independent pots of money. If combination of SPDs is not possible, it would be beneficial for much stronger links or signposting to be made within the recreation SPD to the nutrient neutrality SPD and other related documents (and vice versa).</p> <p>2. As statutory undertaker granted Permitted Development Rights. Appendix D appears to be directed towards residential conversion (and not activities of statutory undertaker PD) however, this is not clear on what development types are covered and needs to be reviewed to ensure that the Permitted Development requirements and process are well defined and that the guidance is assessed against recent EU Court Judgements. In particular, the fifth paragraph, (referring to Regulation 75 of the Conservation of Habitats and Species Regulations 2017) appears to have no conclusion. The intention is to suggest that residential conversion Permitted Development Rights will require potential Appropriate Assessment under the Habitat Regulations (or screening opinion under the EIA Regulations) before proceeding (with the affect that permitted development rights are withdrawn) and this should be explicitly stated</p>	<p>appropriate assessment are not limited to residential development only. This is however, the requirements of the legislation and not the SPD. Noted regarding PHIPS but these are examples only</p>

Respondent	Comment	Officer comment and Action
	<p>to avoid confusion.</p> <p>3. Noted that SAMM proposals will employ project officer or warden, whilst there is also a proposal for a coordinator for the allocation of funding from the SPD for nitrogen neutrality. Consideration could be given as to whether existing partners in the catchment could provide this expert support from existing positions, ensuring that more developer contributions contribute directly to the protection of European sites. Comment relates to the co-ordinator role mentioned in the SAMM proposals, and not to Warden role.</p> <p>4. Two of the PHIPs projects (hide relocation on Coombe heath and the Lytchett Fields access) are being managed by the respective landowners. If these proposed projects are planned for delivery and require no funding then instead enhance Brand's Bay Buoy project across all bird sensitive areas (and other users). PHIPs should be linked into provision of Green Infrastructure, in single strategy for appropriate management of people to Dorset Heathland and Poole Harbour Natura 2000 sites. Could further information be provided on location and partners involved with PHIP projects – perhaps a live table maintained over the life of the SPD.</p>	

Comments from the Public:

Respondent	Comment	Officer comment and action
Allison, F	<p>ANY development within the Poole Harbour Special Protection Area Buffer Zone is bound “to have an adverse effect on the integrity of the site”. Most if not all wildlife is sensitive to any change or disturbance to areas they inhabit and mitigation simply will not eliminate this effect. Should planning be granted, wildlife will disappear and any amount of mitigation will not bring it back. How can authorities guarantee there will “no adverse impact upon the protected birds”? The bulk of planning document is concerned with organising and funding mitigation measures and not actually safeguarding a future for harbour wildlife. Developments or projects within the Buffer Zone should not be permitted unless proved to be otherwise unavoidable. The area that residents and visitors presently enjoy and love must be protected for future generations, both humans and wildlife.</p>	<p>Development is necessary to meet the housing need, however, the strategy provides a scheme to mitigate the impacts of development. Both Poole and Purbeck local plans deal with this issue as highlighted in the respective habitats regulations assessments – this SPD provides the implementation of the policy approach and is considered the most effective approach</p>
Carr, Richard	<p>Query that we (UK) will be out of the EU by the end of this.</p>	<p>This is currently unknown however, councils’ proceeding on the assumption that all EU legislation relating to protected habitats will be carried over as part of Brexit.</p>
Craig, H	<p>With reference to SAMMS projects, Appendix F, using education (leaflets, Dorset Dogs Pit Stops) as the sole method of mitigating disturbance by dogs does not go far enough as a mitigation strategy for the SPA. Given significant number of new homes planned for this area, the number of dogs living in the local area will increase. Given that the majority of the Twin Sails redevelopment area plans flats with balconies or limited private gardens, this will put further pressure onto closest open spaces such as Hamworthy Park, Poole Park, Ham Common and Baiter. Report references 2012 Disturbance Study in the Poole Harbour Background Paper and 40% of bird disturbance caused by dogs off leads. Education strategies proposed in SAMMS projects list at Appendix F could provide discrete, short term improvements to a limited number of local residents receptive to this type of education however, mitigation methods unlikely to deliver long term, sustainable protection for SPA. Before mass housing development starts within twin sails area, open spaces need looking at and whether more permanent measures could be put in place to protect the SPA ie whether public space protection orders could be raised for waterside parks within or adjacent to the SPA. Some sensitive sites could be dogs on leads only, and dogs off leads reserved for alternative sites which have a lesser impact on</p>	<p>Noted. Suitable projects will be considered as part of the implementation strategy.</p>

Respondent	Comment	Officer comment and action
	<p>wildlife ie Upton dog area or Hamworthy rec ground could be special areas for dogs off leads. Other areas such as Barking and Dagenham raised public space protection orders on their local parks, and made it a requirement for dogs to be registered before walking them in parks. Whilst this was on the basis of reducing dog poo in parks - the article linked evidenced that scheme achieved significant change in behaviour in short time and cut dog fouling in their public parks in half within 3 months. Perhaps, a combination of DNA registering (through something like StreetKleen) could be combined with attending short training on the SPA. This could be prerequisite for dog walking in parks within/adjacent to the SPA.</p>	
Fisher, Liam	<p>Query as to whether the chargeable area applies to specific areas of Poole or the whole.</p>	<p>The SPD covers the entirety of the area covered by the Poole Local Plan.</p>
Bell, J	<p>Supports the SPD however raised concerns over the degradation of the harbour by harbour authorities where the port was expanded and other berths expanded which are invading the harbour. Harbour authorities may join SPD but have separate objective to increase harbour activity and revenue. Concern regarding increased ferry traffic and cruise lines as these pollute the air and harbour. Reference to dog faeces but consider wider issue over regulation of harbour by harbour authorities to be greater.</p>	<p>The focus of the strategy is related recreational activities and the impact this has upon birds around the harbour. The wider issues regarding the regulation of the harbour by the harbour authorities are noted.</p>
Brady, C	<p>Concerned about wild birds in Poole Harbour and aware that dogs flush the birds, and especially dogs that swim. As a dog walker, dogs only flush seagulls but feels that dog walking should be limited to and restricted to certain areas. Suggests requirement for dogs on leads to protect birds and 2 mile buffer preventing development around the harbour shoreline. Seagulls are considered nuisance and prevent garden birds from nesting. Considers jet skiing to pose more to wild birds than canoeing and suggests restrictions in areas. Suggests cycling at Baiter to be banned. Suggests fines/bans to feeding wild birds as its not necessary.</p>	<p>The possible mitigation includes measures that will raise awareness, educate and encourage changes in behaviour rather than to place additional restrictions or prevent all recreation in/around the harbour. With regard to suggestion of restricting development around the harbour, this is not necessary as the effects from development can be mitigated and further housing is needed to meet local needs.</p>
Budd, K	<p>Requests that no further areas are restricted for dog walkers to access and suggests instead using budget for countryside/dog wardens to police errant dog owners who need education or prosecuting for unacceptable behaviour.</p>	<p>The possible mitigation focuses on measures to raise awareness rather than to place additional restrictions or prevent recreation in/around the harbour. A warden is proposed to help educate dog owners as well as investing in a project aimed at educating dog owners.</p>
Dion, Xena Cllr	<p>Agrees with measures proposed but suggests restriction/clause on cats due to their impact upon wildlife. Litter picking is easily done by volunteers but would be reasonable to be guided by professional or trained volunteer who is knowledgeable about nesting sites and birds. CCTV may deter or make people</p>	<p>The focus of the strategy is related recreational activities and the impact this has upon birds around the harbour. As cats aren't considered as recreational activity although in any case, it is not be very practical/enforceable to place such restrictions/clauses hence the approach in protecting heathlands</p>

Respondent	Comment	Officer comment and action
	<p>more mindful of activities adversely impacting on birds and cost is outweighed by protection of habitats. Agree with increased signage warning people to keep dogs on leads, canoeists to keep their distance and walkers to keep to paths. Many are not aware of the damage they are causing.</p>	<p>whereby a buffer is used instead. CCTV could be considered for some areas but would not likely be practical in all areas of the harbour. Raising awareness is a key part of the strategy as it is considered to be most effective.</p>
<p>Dobbs, N</p>	<p>There is recognition of the importance of protecting the area's Natural Capital but gaps existing in terms of assurances to protect wildlife and natural habitats versus politically motivated economic growth which is increasing concern. Current population trend upwards continues and brings additional human footfall and associated recreation activities on area's protected reserves. Owners should legally keep dogs on leads where potential for disturbance and council should consider specially designated area for off lead (model at Stanpit Marshes, Christchurch as good example). Education and signage at key locations essential including legal obligations to remove dog mess and dispose in bins. Issue with litter at Holes Bay particularly from neighbouring large businesses which should be considered when given planning permission. No mention of new bins in budget and 6 monthly clean ups not sufficient or acceptable (reference to examples at Turbary Common and Talbot Heath SSSI nature reserves where Bournemouth do not provide bins and Poole do). Co-ordinator and warden welcomed but roles need to be scrutinised in terms of wider BCP priorities in natural environment teams and if there are staff cuts which has been issues with Natural England. Warden should be aimed at engaging and educating but also enforcement where needed which needs strengthening of by-laws. Queries how impartial mitigation is in consideration of planning applications and recommends to considering an independent panel to scrutinise tender selection and appointment of developer's ecology agency with panel. Note error on hyperlinks on page 31.</p>	<p>The SPD provides a strategy for addressing the adverse effects of disturbance from new development around the harbour. The possible mitigation focuses on measures to raise awareness as this is seen to be more effective approach but where necessary enforcement tools and on/off lead designated areas could be considered. Provision of additional bins where required could be considered as part of a litter project. Budget and scope of the warden and co-ordinator roles would be safeguarded/ring-fenced to the priorities of the strategy. Hyperlinks to be checked. A steering group may be appropriate and will be added to the SPD section on governance. Action - Add a governance section regarding the need for a steering group.</p>
<p>Edward, P</p>	<p>Queries several quotes in the SPD around affect and mitigation. To have no effect the SPD should not aim to mitigate impact but eliminate it. Designations on harbour are worthless if allowed to be downgraded or ignored. Intensive development around the harbour will have an adverse effect therefore developments around harbour should be restricted to low density family houses to reduce intensity. Unreasonable to invite 15,030 households to live in high intensive units of edge of harbour and use SANG for recreation when car ownership is discouraged. Impossible to envisage any mitigation measures could come close to addressing scale of the problem and £1,321,850 is inadequate</p>	<p>Councils' local plans seek to deliver sustainable development – including planning to meet peoples housing needs as well as recognising the importance of the environment. Evidence indicates that adverse effects of disturbance arising from development can be mitigated. The proposed measures are aimed towards mitigating future development which is required to meet the housing need. The mitigation proposes mainly measures to raise awareness, educate and encourage changes in behaviour.</p>

Respondent	Comment	Officer comment and action
	and gesture in exchange for unacceptable developments. SAMMs list of projects feeble and not likely to have much impact. Potential for vast numbers to be using vulnerable sites and even a small percentage with less reasonable attitude would be disastrous.	
Gilmour, J	Concerned with the proposal for Studland around Brands Bay as creation of new more visible path may encourage visitors and be tempted towards the water and dogs exploring away from the path. Existing path is not well known or used. Proposed development at Arne will attract more tourists/residents and disturb wildlife.	Concern noted. The projects listed in the SPD are only possible mitigation and the Councils' will take advice on the effectiveness of mitigation from Natural England and partner organisations before committing funding.
Green, R	Huge consideration to fellow creatures living around harbour but not on human species and recreational needs such as cycling or walking. Agree to rangers and education with low enforcement but don't spend large amounts of money on creating haven for fellow creatures at detriment to our freedom. Compliance with European rules will not be important in a few weeks time.	The possible mitigation focuses on measures to raise awareness and to ensure sustainable management of visitors and their recreational activities and is not aimed at preventing or restricting visitors. Focus on recreation and open spaces within Poole and Purbeck is considered separated to the strategy which is aimed environmentally towards protecting designated sites. Despite this mitigation measures may also contribute to other planning objectives. Councils' have assumed that the majority of European and International designations will continue to be safeguarded post Brexit and therefore will remain relevant.
Handley MacMath, T	Please explain how the elaborate plans to raise money from new housing developments can be as effective in protecting wildlife as not permitting housing developments?	The councils' approach supports the delivery of sustainable development through their respective local plans – this recognises the need for development and the requirement to mitigate adverse effects on European sites.
Hewing, P	Issue over jetties and other constructions built along the harbour at Lake Road, Hamworthy and Hamworthy Park which have obstructed a footpath which previously went along the shoreline. Would like to see jetties removed and restricted.	The strategy is aimed environmentally towards protecting designated sites however, jetties have been considered to impact upon the habitats of important birds within Poole Harbour. A new policy was introduced in the Poole Local Plan which restricts jetties in certain areas around the harbour including Lake Road, Hamworthy. Otherwise the effects of development will need to be considered on a case by case basis through planning applications.
Jesty, N	Fascinated that there is a conflict between birds, cyclists and dog walkers when these activities are encouraged at RSPB reserve at Arne. Seems left hand doesn't know what the right hand is doing.	The strategy and mitigation is aimed at managing visitors and their recreational activities around the harbour which mainly focuses on raising awareness. It is not necessarily aimed at preventing visitor access or recreational activities and there is no conflict with the aspirations of RSPB at Arne.
Johns, T	Support the SPD.	Support noted.
Kettlewell, M	Understand the need for more housing, nationwide, and contribution to	Comments noted.

Respondent	Comment	Officer comment and action
	<p>affordable housing for young people in particular but sad if this leads to a reduction in recreational options. Birds use flight as an instant response to perceived danger, returning very soon to the area they want to be in, to feed. Many bird species are very intelligent and become habituated to roads or other places where there is contained activity. Walkers along the foreshore are unlikely to contribute to a loss of the bird inhabitants and visitors around the harbour, however, dogs off leads and noisy boats, with their more random movements could scare our visiting birds away more permanently. An increase in people looking for recreational activities around the harbour, education about keeping to public rights of way and keeping dogs on leads in any area where they could chase wildlife will become increasingly important.</p>	
Lambert, C	<p>Walked their dog(s) around the harbour for 40 years. Commented that the path and area (around Turks Lane to the public boat slip) has no detrimental effect on bird life as the tidal rise/fall is such that no birds nest in the area and nest on Brownsea or in Poole Park instead. Considers there to be no harm to wildlife by continued dog walking or cycling along harbourside path.</p>	<p>Comments noted although evidence indicates that in addition to consideration of impact upon nesting areas, there is an issue of birds being flushed when resting/feeding in areas around the harbour (often in tidal areas). In any case, however the strategy and mitigation is aimed at managing visitors and their recreational activities around the harbour and mainly focuses on raising awareness. It is not necessarily aimed at preventing visitor access or recreational activities.</p>
Langley, A	<p>1 General Comment - The Poole Harbour Recreation Background Paper (2019) makes it clear that some recreational activities are having an adverse effect upon the behaviour of birds within Poole Harbour. As such, an urgent programme of mitigation should already be in place to deal with this current problem, irrespective of the effects of additional development. Where is this plan? Necessary mitigation for Poole and Purbeck's Local Plans should have been identified and evidenced during the HRA AA, considering all sources of LSE and other plans and projects (see section 6). In fact, there is very little detail about mitigation for recreation. The recreation SPD is not an implementation plan. The Executive Summary talks about an implementation and monitoring plan, but there is no date for its completion. A comprehensive mitigation implementation and monitoring plan covering all LSEs on the SPA is essential to support any conclusions that LSEs will be avoided or mitigated.</p> <p>2 HRA & AA - Poole's HRA contains no details on the required mitigation. Purbeck's HRA refers to the commitment to mitigation, but does not detail what that entails. The impacts from all sources, recreation or otherwise, have to be considered in any mitigation plan for the SPA.</p>	<p>In consultation with Natural England both councils have made provision to secure mitigation for development permitted in advance of adopting the SPD. Mitigating the effects of recreational activities is also in part addressed by joint work between organisations on the implementation of The Poole Harbour Aquatic Management Plan (amended 2011). The management plan includes objectives to maintain habitats in Poole Harbour in a favourable condition and manage activity within the harbour to mitigate adverse effects. Strategic HRAs of the councils' local plans take these measures into consideration. The local plans include measures relating to implementing and monitoring the effectiveness of planning policies relating to Poole Harbour SPA. As part of the SPD councils have estimated costs for delivering mitigation that is necessary to address the effects associated from development in the recreation zones identified in Appendix B of the SPD. In those cases where development is likely to have significant effects on heathland and Poole Harbour, and SANGs are put forward as mitigation, councils will assess whether these measures mitigate adverse effects on both habitats.</p> <p>As with the Dorset Heathlands Planning Framework the SPD outlines possible</p>

Respondent	Comment	Officer comment and action
	<p>3 Scope of Charging – Para 6.2 is incompatible with the principle in Policy E9 of the Purbeck LP examination draft. The Purbeck Buffer zone in Appendix B (and referenced in Policy E9) is incompatible with the CIL charging zones defined by Purbeck District Council.</p> <p>4 SANGs Provision (Para 6.5) - How and where is the decision on use of SANGs evidenced?</p> <p>5 Security of Funding (para 7.3) - How have the Councils' commitments to indefinite funding of mitigation been delivered and recorded? Clearly, costs of mitigation will run well beyond the income from S106 or CIL associated with the current development and will be a long-term burden on Councils' resources.</p> <p>6 Funding, Delivery, Monitoring and Contingency - As drafted, the SPD is a justification for funding the SAMM component of mitigation rather than a detailed description of all required mitigation. For example, infrastructure projects are only "provisional" and would be funded differently. Full details of the total mitigation package are required by the Poole Local Plan HRA and EU guidance on AA. To assess mitigation measures, the following tasks must be completed: 1. list each of the measures to be introduced; 2. explain how the measures will avoid the adverse impacts on the site; 3. explain how the measures will reduce the adverse impacts on the site. Then, for each of the listed mitigation measures: 1. provide evidence of how they will be secured and implemented and by whom; 2. provide evidence of the degree of confidence in their likely success; 3. provide a timescale, relative to the project or plan, when they will be implemented; 4. provide evidence of how the measures will be monitored, and, should mitigation failure be identified, how that failure will be rectified.</p> <p>7. Para 8.3 - The 2012 SNPP is well out of date. The 2016-based SNPP is the most recent, and relevant, population projection.</p> <p>8. Typo in Appendix E. table 2 "2018-3034" (sic). Typo in Appendix E. last entry in table 3 "87,133" should be "88,123".</p>	<p>mitigation measures. Mitigation measures will be agreed by the councils' in consultation with Natural England and implementation of the policies in local plans will be monitored.</p>
Lees, C	<p>Commented on the success of two projects run by the Lees estate in partnership with RSPB and Livability - firstly the SANG at Policeman's Lane, Upton and secondly the paths allowing safe access into the farmed countryside at Holton Lee. Saddened to see large sums allocated to wages and wardens as opposed to setting up, building or creating something. Suggests money would be better spent on making boardwalks, safe visiting paths and view points, cycle paths, planting scheme, bird hides and other ideas. Organisations such as Lytchett</p>	<p>Comments noted. The SAMMS contributions cannot be used for infrastructure however there is scope to fund infrastructure projects through CIL and this is set out in the strategy. The provision of SANGs as mitigation will also be used as part of the strategy (in conjunction with heathland requirements). The Councils will work with partners, including landowners to identify and deliver appropriate projects.</p>

Respondent	Comment	Officer comment and action
	<p>Bay Nature Partnership and private landowners should be remembered as safe and trusted delivery partners and can work with councils to continue delivering these types of projects.</p>	
<p>Loader, J and D</p>	<p>How can mitigation persuade birds feeding and breeding in the Harbour to go elsewhere to feed and nest? Wildlife does not take kindly to habitat disturbance and will disappear, or starve to death. Decision to be made whether to protect and keep special wildlife that Poole Harbour is renowned for, or concrete over their habitat, build up edges of Harbour and 'run the wildlife out of town'. The environmental protections should, and probably does, far outweigh Local Authority misguided plans to develop at all costs. Very little middle ground because as the draft document rightly states 'research indicates that human activity can disturb the Harbour's animals and plants', and 'that it causes birds to expend unnecessary energy, feed less and become stressed'. This is not an indication, but absolutely the case. None of which can be mitigated against in Poole Harbour other than putting in place, and stringently adhering to, the noted extended buffer zone -map on Page 21, which would try to take the daily effects from constant development further away from Poole Harbour. Appendix 1 Point 3.1 (Page 8) – Little Egret may have been non-breeding in 1999 but certainly is a breeding species in the Harbour now and uses the agricultural fringes of the Poole Harbour SPA for supplementary winter-feeding grounds, along with the red listed Lapwing -fortuitously some of these feeding fields are within your extended buffer zone which makes the implementation of this zone all the more important. How do the Local Authorities intend to create new habitats in over populated Harbour fringes? You will not be able to stop people who live around the Harbour, or incoming visitors, from using the shoreline and the Harbour for recreation no matter how much advisory signage is put up, how many walkways are changed, or wardens employed. Document acknowledges there is no comparable area in the rest of Poole for certain recreational activities, so how are you going to achieve any form of mitigation? There is no mention of what avoidance measures/mitigation could possibly be, apart from calculating a SAMM contribution to mitigate the adverse effects of recreation related pressures. Unfortunately, logic seems to be build the houses to get the CIL contributions for the SAMM, then develop an Access Management Plan for wildlife that will be long gone, and very unlikely to return, when it sees an avoidance sign go up.</p>	<p>The strategy provides a scheme of mitigation of impacts of development on Poole Harbour SPA. The strategy and measures proposed (as set out in chapter 6) and explored further in the background paper are considered to provide an effective framework for delivering mitigation measures and are not dissimilar to other strategies being carried out across the country. Little Egret is no longer a bird included in SPA designation.</p>

Respondent	Comment	Officer comment and action
Loretto, P	<p>Raised concerns that document states 100 years and in effect perpetuity but measures only cover 5-15 years. Commitment for funding beyond this period can only be as good as the economic political climate at the time, hence unlikely to always be at the level being discussed. Environmental protection measures that do not depend so much on continuing funding levels should be prioritised. Document recommends active measures such as wardens and education - these have an ongoing cost and permanent passive measures preferred. Distance from development and physical barriers are important to consider. Wardens and education do not address all issues - criminal actions such as antisocial behaviour, fly tipping and pollution are sadly an ongoing problem despite education. Damage done by these activities expensive to resolve and have long term impacts. Increasing the number of people living near the area will increase likelihood of such events. No recognition of this in the financial estimates included in report. Measures proposed are limited in effectiveness and too dependent on ongoing funding and charge per property towards protection is inadequate. Would welcome estimate of resulting likelihood of the impact of criminal activities and accidental environmental damage and costs likely to be incurred to address these.</p>	<p>Mitigation measures are proposed in perpetuity but period is due to Local Plan and projected housing numbers which will be reviewed. The mitigation mainly proposes measures to raise awareness, educate and encourage changes in behaviour however, there is potential for enforcement measures where required.</p>
Lyle, J	<p>It should be noted that according to global warming date the sea level in Poole harbour is expected to rise by 1.2 metres over the next 50 years meaning much of the harbour and properties adjacent will be underwater.</p>	<p>Comments noted, Councils have taken account of climate change in their strategic flood risks assessments and when preparing their housing strategies.</p>
Meachin, T	<p>The SPD is jargon and abbreviation heavy. Suggest a more accessible summary document to bring about more effective consultation process if this has not already been done. Personal interest in proposed changes to cycle route around Holes Bay.</p>	<p>Comments noted. An executive summary is provided at the start of the document but there is perhaps opportunity to summarise further on the website if the strategy is adopted.</p>
Noden, P	<p>A keen windsurfer and regular walker. The study doesn't mention different food base various locations such as at Whitely Lake, Holes Bay and Arne Bay which attract different species of birds to feed. It could be misleading to link different species numbers and numbers of birds entirely to disturbance levels. Windsurfing and kite surfing such as at Whitely Lake is dependant on tides so still allows for wading birds to feed when the tide drops below a certain level. Sailing at Studland can be dependent on wind direction and can be less popular in winter. At Hamworthy Park in winter, most stick closer to the park side of the harbour. Only birds seen are cormorants and gulls and occasionally at Knoll Beach, migrant geese. Walking along Holes Bay observed disturbance to</p>	<p>Whilst wind/kite surfers can cause disturbance to birds, there are other activities which also cause disturbance and potentially cause greater disturbance (such as dog walking) and as a result, a lot of the mitigation measures are proposed to address these other activities. There are no measures proposed which would deter wind/kite surfing activities (although the Poole Harbour Aquatic Management plan does include a management framework to regulate activity in the harbour). The mitigation mainly proposes measures to raise awareness as this is seen to be more effective approach. Surveys and evidence are largely from around 2004 and the strategy will enable further and more detailed survey work to be carried out.</p>

Respondent	Comment	Officer comment and action
	wigeons and egrets but not much so putting shrubbery might help. Dramatic decline in windsurfers in last 10 years and queried whether bird survey had been done since 1980s. Provided maps of commonly used areas for wind/kite surfing and bird sensitive areas around the harbour.	
Oehring, A	Issues are dog fouling and litter around the Quay/Baiter; discarded boats; litter around Fisherman's Quay; irresponsible cycling; and commercial bins around the Quay. Inner harbour developments are high rise apartments which are not attractive and exploitative by developers. There is clear evidence people do not live in the developments so do little for the local economy/community in longer run. Why not build houses that people live in and the Council could play a significant part in development a more sustainable attractive harbour side community.	Comments noted although the focus of the strategy is related recreational activities and the impact this has upon birds around the harbour.
Pipe, B Cllr	Comment by Lees, C is an excellent resume of the efforts put in by the Lees Estate into local environmental preservation & enhancement.	Comment noted.
Pope, M Cllr	Natural England are right to be concerned at increased proposed development which will have an adverse impact upon Poole Harbour and expressed same concerns regarding habitats of protected species on Canford Heath SSSI. Central Government drives housing need parameters and pays lip service to re-using brownfield sites first. SPD is heavily reliant on SAMMS to mitigate new development and education (posters, leaflets etc) are not effective in practice. Noted that in Poole CIL will pay for PHIPS and charge is controlled by central government with new rate reduced in north of Poole. No evidence base for this and provides incentive to build on what was Green Belt land. Conservatives concerned with profit margins and there is no profit for protecting the environment. Only way to stop causing damage to internationally protected sites is to stop building houses on or close to them.	Noted with regard to restricting development around protected areas however as per Local Plan, development around the harbour is necessary to meet housing need.
Redshaw, P	Report is clear in articulating regulatory and legal responsibility of Local Authorities with regard to avoidance of additional disturbance to protected sites from new development and implications if additional pressures cannot be avoided they must be mitigated. The mitigation measures proposed sound eminently sensible however have key concern that resources devoted to wardening and monitoring are not backed by adequate resources for infrastructure protections which will also be required. Budget allocated to infrastructure projects equates to 11% and just under £10,000 per annum which is far less than monitoring. No costs are given for example projects but would	The £10,000 budget is for SAMMs projects, not infrastructure projects. There is a separate budget for infrastructure projects which is top sliced from CIL contributions. The pilot strategy requires a lot of survey and monitoring work to be carried out initially however, this will in turn help to better inform both SAMMs and infrastructure projects which will be most effective.

Respondent	Comment	Officer comment and action
	<p>cost more than £10,000 per annum. The basic management strategy proposed is sensible but the plans fails to convince that the Local Authorities will be able to carry out their duties because the financial resourcing is inadequate and unrealistic.</p>	
Tilley, A	<p>Concerned about proposals to restrict access to walkers around Bramble Bush bay. Slow increase in walkers and water users effecting wildlife. National Trust promoting Studland and recreation in the area for cow cash from car parks becoming overcrowded. When car parks are full at Studland village visitors look for alternative recreational areas and use harbour which suspect also happens at Sandbanks and Poole. Stop promoting Studland and Poole as recreational areas; stop encouraging visitors to area by winterwatch (development and visitor centre planned at Arne); stop promoting Purbeck and Poole for second homes; development around harbour should not be aimed to attract people wanting to use the harbour for recreation (ie social not market); only way to solve problem is to reduce number of visitors, second home owners and residents.</p>	<p>The mitigation proposes measures mainly to raise awareness and manage visitors rather than to place additional restrictions or prevent recreation in and around the harbour. With regard to suggestion of reducing visitor numbers and development, this is not a realistic approach, taking into account forecast projections for Poole and Purbeck with development is necessary to meet the housing need as per Local Plan.</p>
Wiggins, T	<p>You cannot allow further development, especially residential, around the harbour knowing that wading birds and other wildlife will be adversely affected and think that a pay off by the developer , enabling the employment of some Warden or similar, will change in any way the outcome of yet more human activity on the harbour edge. We will lose the waders and ground nesting birds and that is a fact. They cannot live in tandem with humans and dogs. The only way to protect them is to refuse more development.</p>	<p>The strategy provides a scheme of mitigation of impacts of development. The strategy and measures proposed provide a framework for delivering effective mitigation and are not dissimilar to other strategies being carried out across the country.</p>
Watts, M	<p>Generally support proposals to monitor impacts of increased dog walking and cycling on bird life in harbour.</p>	<p>Support noted.</p>
Williams, E	<p>Glad subject of impact on the environment for Poole is being discussed. Regular walker to most of the areas mentioned it is obvious to me the biggest impact is caused by dogs. Not only to wildlife but people as well. No public space is free of dogs. Bizarre that RSPB allow dogs at all at Arne. Likewise the National Trust or English Nature. Would favour restricting dogs to certain areas only and propose shoreline up to a mile inland is made national park.</p>	<p>Dogs are recognised as one of the key issues to address although the mitigation proposes mainly soft measures to raise awareness and manage visitors rather than to place additional restrictions or prevent recreation of the harbour.</p>