

## Appendix 1 – Natural England’s letter of 26 July 2019



26 July 2019

## **SANG advice to Dorset Council**

Natural England confirm that the findings of the PLP1 HRA and PLP Partial Review HRA which identified and subsequently re-confirmed the need for a strategic SANG in the north of the area is a robust and necessary measure for the Purbeck Local Plan delivery. It is important to note that not every new dwelling requires mitigation to be delivered directly via a SANG. SANGs are part of a package of measures which are encompassed in Heathland Infrastructure Projects (HIPs) and include off road bicycle facilities, dog training areas, new and improved parking and access facilities etc.

Natural England advise the authority that the alternative option sites identified at Lytchett Minster and Bere Farm have not been designed to, and are not likely to be able to perform the strategic functions of intercepting visitor pressure from the Morden Bog/Wareham Forest area with sufficient certainty. The nature of the SANG land available at these locations is not currently of high quality and will not be established countryside for some years in comparison with the attractiveness of the established landscapes at Morden Bog/Wareham Forest.

The strategic SANG at Morden Bog/Wareham Forest will be required to operate in a different way compared to SANGs linked directly to allocation sites. This is in part because of a requirement under the Habitats Regulations to implement measures to bring sites into favourable conservation status where they are not, in this case by reducing existing adverse effects as well as avoiding new effects from plans and projects. Because of its location the proposed SANG is well located to intercept and divert pressure arising from a large part of the Local Plan area (see Map 5 HRA of the Partial review of the Purbeck Local Plan Part 1: options 2016 below) well beyond the development related 5km catchment area. The authority should note that it unlikely to function in a way directly linked to specific developments across this area rather in a way which intercepts residents who are attracted by the wider appeal of the combined natural area of Morden Bog/Wareham Forest. It is also likely to intercept additional recreational pressure from existing and new residents in the BPC area.

If the Morden SANG was related to a specific development proposal its 37 ha would perform in a similar way to the one proposed at Lytchett Minster eg in the region of 650 units if not more. However in the case of the Morden SANG, which is located in a sensitive position close to designated sites, its main function will be in intercepting existing residents using the c.52 car park spaces along the Morden Bog/Wareham Forest B3075 access points. In this regard Natural England advise that the SANG would have capacity to provide mitigation if required for the holiday accommodation proposed within the Park, if required and an additional level of recreational access

usage equivalent to that arising from 250-300 unallocated homes within the Purbeck area. Because of the location of the SANG, the duration over which is required and changing recreational patterns of access Natural England would require a robust monitoring arrangement to be in place. This will ensure that daily levels of access on the SANG remain well under those anticipated for SANGs linked directly to developments, eg at a level more similar to that currently on the designated sites. It is likely that as other SANGs become available patterns and frequency of use may well change. The SANG should only be promoted to users of the existing car parks with specific information to new home owners a priority.

Natural England is not aware of any other strategic SANG locations being identified in a suitable location to meet these requirements.

Nick Squirrell  
Conservation and Planning Lead Advisor  
Dorset and Hampshire Team

## **Background to alternative sites not brought forward by Purbeck**

Natural England was consulted by a promoter about two urban extensions near to Lytchett Minster and is familiar with the two areas first hand.

Lytchett Minster, three options 650 - 1200 c. 40ha SANG  
Bere Farm 1000 units SANG size c. 56ha

These sites were identified in the PDC Options consultation in June 2016.

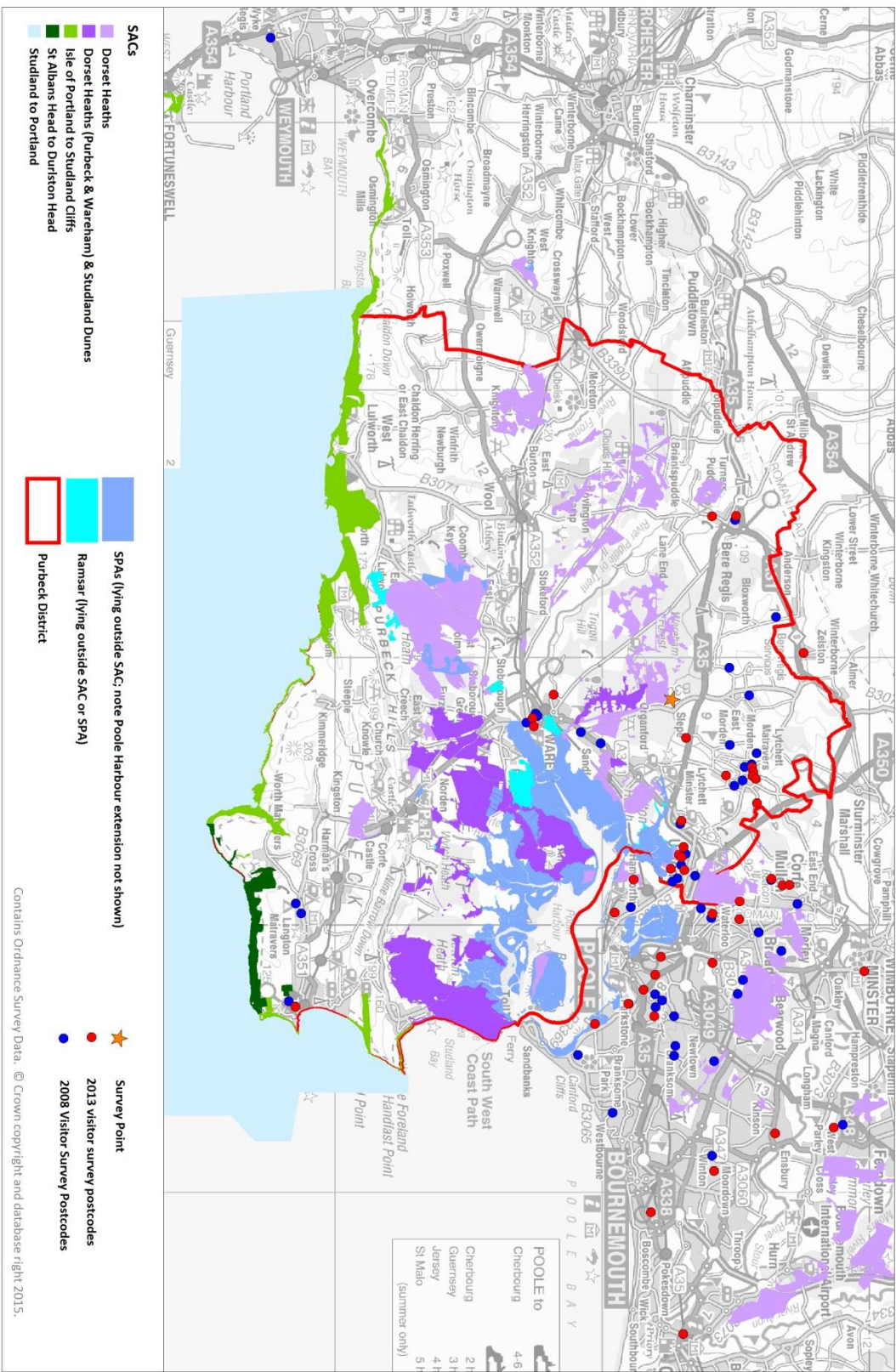
Natural England discussed a number of matters relating to the proposed sites. Of three options at Lytchett Minster (Site 2) and advised that only the smallest option for upto 650 could reliably deliver a SANG given the existing constraints. This SANG area was located to the north, west and south of the proposal and because of considerations such as establishment on agricultural land the size of the area is precautionary. It was specifically laid out to be used by new residents of that particular development rather than intercepting other residents from new developments.

At a very late stage Bere Farm (Site 14) was proposed. Natural England expressed serious concerns (17 Aug 2016) to the authority about the effectiveness of SANG mitigation due to the quality of the landscape and closer proximity to Morden Bog NNR, SSSI, SPA, SAC and Ramsar. Natural England discussed refinements to the SANG layout which may make it more effective. However the SANG was not considered or designed to be a likely interceptor site for the Morden Bog/Wareham Forest carparks.

Natural England has advised the proposer that ideally, the Lytchett Minster site would come forward first to demonstrate the efficacy of the SANG and allow for suitable adjustments to the functional layout. This would provide a degree of comfort and certainty about a development of this scale and allow for a detailed working up of the Bere Farm site for later consideration. The sites were subsequently excluded and further consideration has not been undertaken.

Natural England has consistently emphasised that the provision of the strategic SANG at Morden Bog/Wareham Forest is an important factor in our consideration of the risk of adverse effects because of the clear draw of the area ( Map 5 HRA of the Partial review of the Purbeck Local Plan Part 1: options 2016 below). The strategic SANG proposed at Morden would serve both existing and new unallocated developments as well as being ideally located as a diversion site for visitors drawn to Morden Bog/Wareham Forest.

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



Date: 07 August 2016  
Our ref: [Click here to enter text.](#)  
Your ref: [Click here to enter text.](#)



## BY EMAIL ONLY

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T [REDACTED]

Dear Mrs Lee

### Planning consultation: Purbeck Partial Review Preferred Options

Thank you for your consultation dated 9 June 2017 on the above review.

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

#### Purbeck Partial Review Preferred Options

Natural England comments are provided below:

Preferred Option 2: Natural England has no specific advice relating to this option which would seem to be supported by the evidence for objectively assessed housing need.

Issue 1 - Impact of Second Homes: Natural England has no advice to offer in respect of this issue. In relation to adverse effects on European, internationally and nationally designated sites there are no clear sources of evidence to indicate that these should be considered in any way differently to dwellings occupied by residents in respect of avoidance and mitigation requirements.

Preferred Option 3 - Development Strategy: Natural England has provided advice to the promoting parties and the authority about the acceptability of this option and whilst there remain details to be resolved, in some cases significant issues remain, overall Natural England has no objection to the proposed balance of residential development locations at this stage in the review.

#### Site 1 – Wool

Natural England is concerned about the landscape impacts of allocation proposed to the south west of the Dorset Green roundabout which requires further consideration. Natural England has confirmed that the extent of the SANG is appropriate but require further confirmation with the landowner about the direct on-foot links from the main development area as well as the required nutrient neutrality relating to Poole Harbour SPA/Ramsar. This may usefully provide multiple benefits around the location of the SAMM site.

#### Site 2 - Lytchett Minster

Natural England's advice is reflected in the text however further information is required from the promoter to ensure the correct functioning/location of the SANG as well as to confirm the location for nutrient neutrality to be secured.

### Site 3 - West Wareham

Natural England has highlighted to the promoter the need for further consideration and justification for the direct loss of land within the AONB as well as the moderation proposed to reduce wider landscape impacts in order to ensure that a proper assessment can be carried out by the authority with advice from Natural England and the AONB Team. In addition Natural England has highlighted to the promoter that they have reduced the connectivity within the SANG by reducing infrastructure proposed. Natural England consider this placed the functionality of the SANG in some doubt as noted in the HRA.

### Site 4 - Moreton Station

Natural England has worked with the promoter to ensure that the development of a SANG on a restored minerals site can be brought forward avoiding risks to the nearby designated sites through good design/restoration principles as well as through the provision of a Heathland Support Area which will also function to provide nutrient neutrality for the site. Natural England has discussed the potential for additional dwellings which are generally compatible with the SANG capacity. Natural England has not reached any conclusion with the promoter or authority about possible residential development north of Crossways at this point.

### Site 5 - Lytchett Matravers

Natural England has provided advice to the promoter for the North East residential proposals which have an acceptable and linked SANG solution. The proposals to the south have no SANG provision and are views as having an in-combination effects such that they will require a SANG in order for the allocations to be considered further in the review. The North East residential proposals may need to secure nitrogen neutrality whilst the southern proposals will definatly requires such an assessment before progressing.

### Site 6 - North Wareham

Natural England objects to the proposed eastern extent of the allocation as it extends into the Allotment site. Natural England has previously agreed with the promoter that the area east of the Bere Road will not extend this far because of the risk of access into Wareham Forest which will be both closer and more accessible than the SANG. This requires further resolution if the Site is to come forward in an acceptable form. The location, size and functionality of the SANG require further details to be agreed. At this time no nutrient neutrality assessment has been made but this is likely to be delivered by the promoter.

### Site 7 – Upton

Natural England has provided advise to the promoter which indicates that this site can come forward with further details to be agreed regarding the SANG and nutrient neutrality arrangements.

### Site 8 - Langton Matravers

Natural England will need to consider the need for avoidance/mitigation in this location in relation to both the SANG requirement as well as impacts on the coastal designated sites with the authority.

### Site 9 - Harmans Cross

The comments reflect Natural Englands views on this site.

### Alternative Option 2 - Maximise housing in south west Purbeck

Natural England has provided advice in relation to the specific sites concerned in this proposed alternative.

### Site 10 - Alternative Option 2: Moreton

Natural England comments are provided at Site 4 above.

### Site 11 - Alternative Option 2: Lytchett Matravers

Natural England comments are provided at Site 5 above.

#### Site 12 - Alternative Option 3: Lytchett Matravers

Natural England advises that there is as yet no evidence that the parties involved could reach a suitable agreement to deliver the necessary SANG and nutrient neutrality to secure the required avoidance and mitigation measures to achieve Alternative Option 3 within the time scale.

#### Site 13 - Alternative Option 3: Langton Matravers

Natural England advise that a SANG per se would not be required for this number of dwellings in this location. However avoidance/mitigation may need to be secured in respect of the SAC habitats to the south which are potentially impacted by the proposal.

#### Site 14 - Possible Alternative Site

Natural England advises that this possible alternative site is substantially closer to designated sites at Morden, from a preliminary assessment the location and extent of the land indicated as SANG are not likely to provide the necessary certainty that the SANG would be both of sufficient size or in a suitable location to attract users. Natural England advise that this location was the subject of previous consideration during the preparation of the SW Regional Spatial Strategy where it was rejected for a number of reasons which are equally applicable currently eg transportation requirements. These include likely effects from additional transportation generated. Natural England is concerned that this proposal has arisen without adequate time for due consideration and as such there has been no opportunity for iterative adjustments to allow for avoidance and mitigation options to be tested, neither has there been an early public consultation on this option. Natural England is doubtful whether a site in this location will be able to provide sufficient detailed information to demonstrate its acceptability within the timescale. In addition this site clearly offers the potential for substantial further expansion eastwards towards Lytchett Minster.

#### Site 15 - Expansion of Holton Heath Trading Park

Natural England has provided detailed advice to the promoter and anticipates an agreed package of biodiversity gains to come forward with the site at the EIP.

#### Site 16 - Expansion of Sandford Lane Industrial Estate

Natural England has provided advice to the promoter and anticipates a number of agreed measures to come forward with the site at EIP.

#### Site 18 - Amendment of safeguarded employment area at Dorset Green

Natural England has worked closely with the authority and the Homes and Communities Agency, the current proposal does not take into account recent botanical survey and Natural England advise that some further work is required in order to reach an agreement about the habitat restoration works proposed in NDA area as well as the biodiversity requirements for the priority present habitats within the Enterprise Zone.

#### Possible Additional Option - Bovington Middle School

This use would be consistent with the Dorset Heaths SPD advice.

#### Preferred Option 6 - Heathland Mitigation

Natural England support this option

#### Preferred Option 7 - Norden Park and Ride

Natural England have no comment on this proposal however the proximity of the site to the castle and Purbeck Ridge are likely to make it highly visible in the AONB as well as a loss of area, further work should be considered in order to assess if this option is actually achievable given the context.

#### Site 19 - Bovington Middle School

See Natural England comments above



Site 20 - Land at Keyworth Drive and Camp Farm, Sandford  
This proposal would be consistent with heathland avoidance/mitigation policies.

Preferred Option 10 - Gypsies, Travellers and Travelling Show people  
Natural England advise that no sites should be brought forward within the 400m Consultation Area around heathlands.

Preferred Option 11 - Morden Country Park  
Natural England has provided advice to the promoter and authority and subject to agreeing the details of the SANG design and maintenance as well as habitat restoration objectives within the park is generally supportive of the proposal and text as set out.

Policy CCMA - Coastal Change Management Areas  
Natural England has no advice on this policy, but may wish to comment on locations shown within the proposals map as these become available.

Policy OD - Occupational Dwellings in the Countryside  
Natural England would wish to see wording in the supporting text referencing the need to protect the Dorset heathlands against residential development so that this policy cannot be misinterpreted as over-riding the Local Plan policy and SPD.

Policy SUDS - Sustainable Drainage Systems  
Natural England has no comment on this policy.

HRA of the Partial Review May 2016  
Natural England is in general agreement with the thrust of the HRA, there remain some areas which need further consideration such as a number of the site allocations where details are currently emerging and there is insufficient detail to allow adequate consideration.

Additional considerations:  
The authority needs to bring forward proper policy consideration for the Poole Harbour Nutrient Neutrality SPD as well as for the Poole Harbour Recreation avoidance strategy. Both these matters have been discussed at length with Natural England and partner authorities and a clear and consistent policy approach needs to be set out for applicants to work within to avoid unnecessary delay.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Nick Squirrell. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED].

Yours sincerely

Nick Squirrell  
Conservation and Planning Lead Advisor  
Dorset and Hampshire Team  
Dorset, Hampshire and Isle of Wight Area Team  
Natural England  
Mob: [REDACTED]  
Email [REDACTED]