

Questions to Knowlton Parish Council (CBPC) and Dorset Council (DC)

Dorset Council responded on the 24 October 2024.

Questions to Knowlton Parish Council and Dorset Council

Specific questions of clarification to each Council are listed below, but I would be happy to have comments from either Council about any of the questions asked and from KPC about any issues raised by DC in the Regulation 16 representations not considered below.

1. Date of submission to DC

- a. **Question to DC.** Please could the date of the submission of the Wimborne St Giles Neighbourhood Plan (WSGNP) to DC be confirmed?

Knowlton Parish Council submitted the final version of the Wimborne St Giles Neighbourhood Plan (2024) to Dorset Council for independent examination on the 29 May 2024. The supporting Habitats Regulation Assessment (HRA) was subsequently updated in July 2024 to reference potential impacts upon the Dorset Heathlands SPA / Ramsar and SAC and New Forest SPA / Ramsar and SAC.

2. Titles

- a. **Question to KPC.** Paragraph 1.3 of the Plan refers to Wimborne St Giles Parish as being within the group of parishes overseen by Knowlton Parish Council. Is the correct name for “Edmondsham Parish”, “Cranborne and Edmondsham Parish”?
- b. **Question to DC.** The Plan refers to the Cranborne Chase National Landscape. Is the correct name Cranborne Chase and West Wiltshire Downs National Landscape, or has the title been altered during the “rebranding” from its previous Areas of Outstanding Natural Beauty (AONB) nomenclature?

On 23rd November 2023 the Department for Environment Food and Rural Affairs changed the name Area of Outstanding Natural Beauty to National Landscape. However, the statutes, regulations, and government guidance have not been changed, so National Landscape and Area of Outstanding Natural Beauty should be seen as synonymous.

The Cranborne Chase and West Wiltshire Downs National Landscape is marketed as the Cranborne Chase National Landscape.

3. Habitats Regulations Assessment (HRA)

- a. **Question to KPC and DC.** The Basic Conditions Statement (BCS, page 18) refers to paragraphs 6.4, 6.6, 6.9 and 6.11 of the HRA and the recommendations therein on the issue of possible net new housing and windfall planning permissions for residential development in the Plan area. Furthermore, it identifies the need for mitigation against potential subsequent recreational pressure caused to nearby designated European sites.

Given that the issue would arise for many other locations and windfall development could be proposed anywhere in Dorset, not just within the area of this particular Plan, should the recommendations in the HRA be more appropriately considered strategically in the Dorset Local Plan?

Dorset Council is of the view that the recreational pressure on nearby designated European sites is a strategic issue. However previous advice from Natural England has stressed an expectation that Neighbourhood Development Plans should make specific policy reference to any known Habitat impacts and it is this advice that has informed the Habitats Regulation Assessment recommendation. It is also useful to note that in this instance, that although the Adopted Christchurch and East Dorset Core Strategy references the protection of the Dorset Heathlands (Policy ME2) there is currently no reference to New Forest Recreational Pressures. This work remains ongoing.

- b. **Question to KPC and DC.** If the recommendations are taken forward in the WSGNP, the BCS and HRA refer variously and, it seems to me, inconsistently, to the New Forest Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar. Are these terms or locations being used in the Plan synonymously? Map A.1 in Appendix A of the HRA indicates different boundaries in certain areas. However, so far as the Plan examination is concerned, were I to recommend modifications to Policy 9 or 12, how should I refer to the New Forest group of European/International sites?

The New Forest Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar are often referenced synonymously within the Habitats Regulation Assessment. These designations were however identified and designated on the grounds of their individual qualifying features and so their boundaries do not necessarily align. To ensure that the SAC, SPA and Ramsar designations are all protected, the ongoing catchment work has taken the greatest extent of the combined designations.

Dorset Councils preference is to refer to the New Forest group of designations as either the New Forest European Site or New Forest SAC / SPA / Ramsar site.

- c. Question to KPC and DC.** Map 1.A in Appendix 1 shows the boundary of the New Forest SAC/SPA/Ramsar. Given the irregularity of the boundary, what is the justification for consultation within such a precise area as defined by 13.8km?

Dorset Council is working with Natural England and local planning authorities within 13.8km of the New Forest European Site to establish a strategy to address the potential impacts upon the New Forest European site. Footprint Ecology has been commissioned to provide an evidence base to inform this strategy.

From the on-site survey in the New Forest the 75th percentile for all visitors was 21.4km and for those travelling from home it was 13.8km (Liley, Panter, et al., 2020). Based on these findings, local authorities around the New Forest have used a zone of influence of 13.8km to identify likely significant effects from recreation and the need for mitigation. This approach is supported by Natural England.

Further information: [New-Forest-zone-of-influence-report-2021.pdf](#)

- d. Question to KPC.** Please could I be supplied with a map of the Plan area on which the boundaries of 13.8km (or adjusted in answer to Q3c above) from the New Forest group of European/International sites and 5km from the Dorset Heathlands group of European/International sites are superimposed and which, if recommended as a modification to the Plan and subsequently incorporated into the made Plan, would then be suitable for the purposes of the development management process?

Please see [Appendix 1: New Forest Recreational Zone and Dorset Heathland buffers](#)

- e. Question to KPC.** Please may I have copy of the consultation response from Natural England about the latest version of the HRA?

Please see [Appendix 2: Natural England response to the Wimborne St Giles Neighbourhood Plan, 23 October 2024](#)

- f. Question to KPC.** The following policy modifications (to Policy 9 or Policy 12) are suggested by DC in the Regulation 16 representations:

“Site developers should be aware that net new windfall housing within the 5 km catchment of Dorset Heaths SAC/Dorset Heathlands SPA will require a separate report to inform HRA, for submission to the local planning authority In line with the Dorset Heathlands Planning Framework 2020- 2025: Supplementary Planning Document. Depending on the details, mitigation for recreational pressure impacts may also be required”.

“Site developers should be aware that net new housing (including windfall) within the 13.8km catchment of New Forest SAC/SPA will require a separate report to inform HRA, for submission to the local planning authority. Depending on the details, mitigation for recreational pressure impacts may also be required in line with the emerging New Forest Mitigation Strategy”.

Please may I have any comments from KPC?

Dorset Council would like to respond further.

Within their letter dated 23 October 2024, Natural England also advise that the recently adopted Purbeck Local Plan includes additional policy reference to tourist accommodation and equestrian-related developments and that this type of development should be referenced in the policy text.

Dorset Council agree, it is therefore proposed that the policy text relating to the Dorset Heathlands should be reworded as follows:

*The policy would then read “Site developers should be aware that net new windfall housing or **other uses such as tourist accommodation and equestrian-related development** within the **400m to 5 km** catchment of Dorset Heaths SAC/Dorset Heathlands SPA will require a separate report to inform HRA, for submission to the local planning authority In line with the Dorset Heathlands Planning Framework 2020- 2025: Supplementary Planning Document. Depending on the details, mitigation for recreational pressure impacts may also be required’*

4. Policy 2

- a. **Question to KPC and DC.** Policy 2 begins with the phrase: “In general, buildings should ...”, which I consider is too ambiguous for effective development management. Therefore, I suggest that the phrase is substituted by : “Unless otherwise justified, buildings should ...“. Do the Councils have any comments?

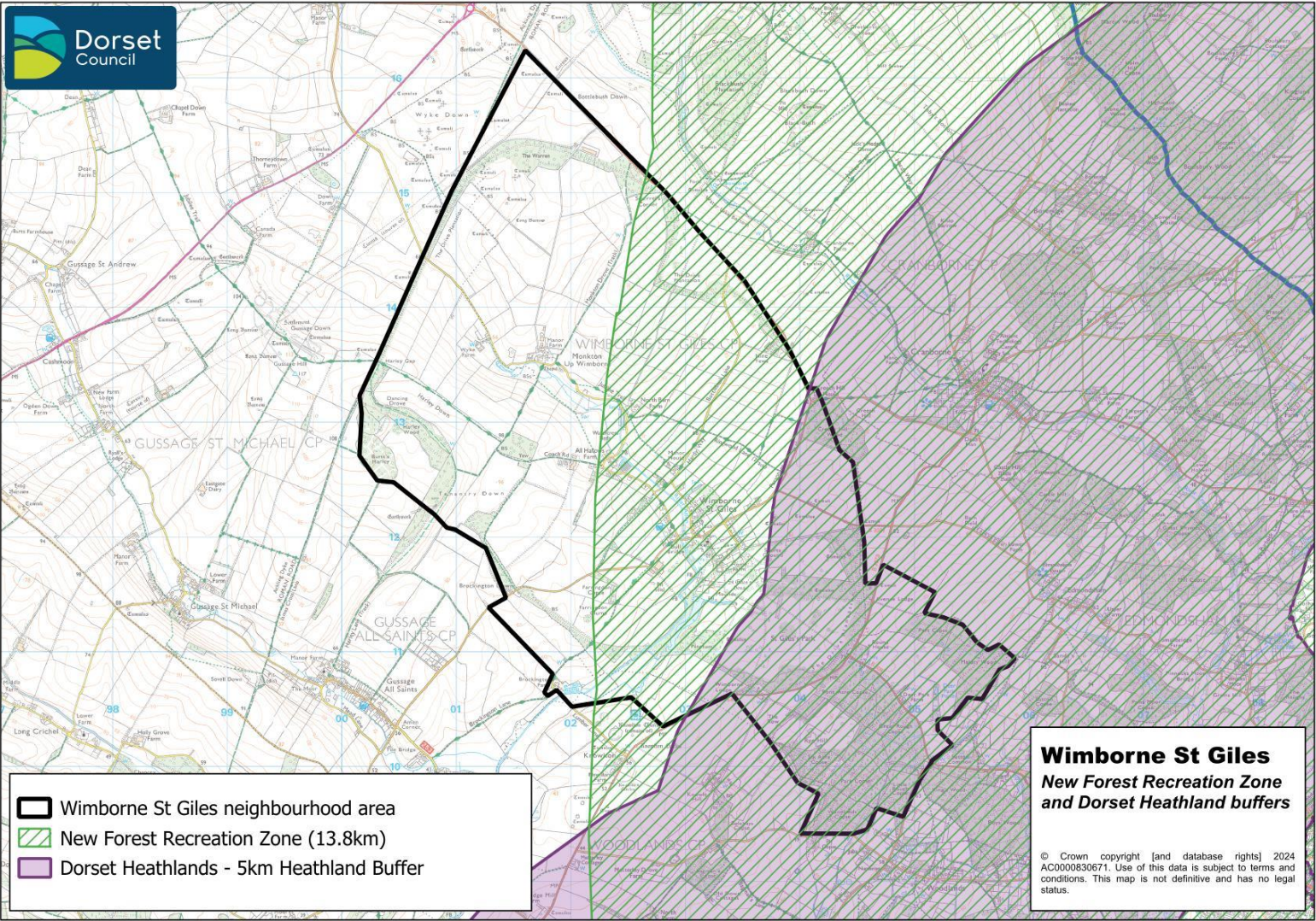
Dorset Council agree.

5. Residential allocations

- a. **Q to KPC.** The Table at paragraph 7.1 lists the location of potential sites with the appropriate Neighbourhood Plan Policy number. For example, the table shows the location “Continuation of Coach Road” as Policy 18. However, the text (page 43) shows it as Policy 21. There are other anomalies. Please could a corrected table be submitted?
- b. **Q to KPC.** The Regulation 16 representations from DC highlight reservations concerning Policy 15 (allocation for two dwellings on land east of Bottlebush Lane). Does the KPC have any response?

- c. **Q to KPC.** The Regulation 16 representations from DC raise concerns in relation to the detail of Policy 17 (allocation on land adjoining the Playing Fields) and suggest that the indicative drawings are omitted from the Plan. Does the KPC have any comments?

Appendix 1: New Forest Recreation Zone and Dorset Heathland buffers



Appendix 2: Natural England response to the Wimborne St Giles Neighbourhood Plan

Date: 23 October 2024
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BY EMAIL ONLY

Dear Mr Cardnell

Planning consultation: Wimborne St Giles Neighbourhood Plan

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.

Thank you for your consultation on the HRA for the above Neighbourhood Plan

Natural England advise that in accordance with the HRA dated July 2024 the modifications proposed as follows should be made to the Plan document in order for the plan to be fully compliant with the requirements of the Habitats Regulations 2017 as amended.

New Forest SPA/SAC and Ramsar

This text should be added to either policy 9 or 12:

'Site developers should be aware that net new housing (including windfall) within the 13.8km catchment of New Forest SAC/SPA will require a separate report to inform HRA, for submission to the local planning authority. Depending on the details, mitigation for recreational pressure impacts may also be required in line with the emerging New Forest Mitigation Strategy.'

Natural England also advise that the recently adopted Purbeck Local Plan includes additional policy reference to tourist accommodation and equestrian-related developments

Dorset Heathlands SAC, SPA and Ramsar

This text should be added to either policy 9 or 12:

'Site developers should be aware that net new windfall housing or other uses such as tourist accommodation and equestrian-related development within the 400m to 5 km catchment of Dorset Heaths SAC/Dorset Heathlands SPA will require a separate report to inform HRA, for submission to the local planning authority In line with the Dorset Heathlands Planning Framework 2020- 2025: Supplementary Planning Document. Depending on the details, mitigation for recreational pressure impacts may also be required'

This will bring the policy into accordance with the recently adopted Local Plan policy E8.

Yours sincerely

Nick Squirrell
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Dorset Team,
Wessex Area Team
Natural England