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15<sup>th</sup> March 2021

By email to: [planningpolicy@dorsetcouncil.gov.uk](mailto:planningpolicy@dorsetcouncil.gov.uk)

Dear Sir/Madam

### **Dorset Council Local Plan Consultation January 2021**

Thank you for consulting Dorset Wildlife Trust (DWT) on the draft Local Plan. Our detailed comments are attached to this letter.

The scale of potential development in Dorset over the next decade represents a real and significant threat to the abundance and diversity of wildlife in the county at a time when much of our flora and fauna is already under serious threat. There is a real opportunity for Dorset to be a national exemplar of sustainable and biodiversity-friendly development and this should not be missed.

The Plan rightly refers to Dorset Council's Climate and Ecological Strategy (July 2020) and this is welcomed. However we believe further work is urgent to ensure that the Local Plan is fully integrated with the action needed to address the climate and ecological emergency. Inclusion of policies on actions such as broadband and electric vehicle charging are welcomed, however a carbon budget for the plan needs to be examined, looking at the balance between policies that allocate land for 30,000 new homes and those that will reduce emissions and enable land use change that captures carbon long-term. Within this, for example, the plan could look at issues such as second homes in a climate context as well as social and community -

It is a huge challenge to achieve the level of change planned without leaving it impossible to meet climate change targets or reverse the decline in wildlife and inevitable that Dorset will become less special. If the Local Plan is not up front about the scale of this challenge and does not set very ambitious goals around this area then these problems will be locked in for years to come leaving future generations with an even bigger crisis which today's decision makers will not be thanked for. This problem cannot be under-estimated and major changes are needed to the plan as a result.

The way we live and work is likely to change even more quickly in the next few years as a result of climate change, the Covid-19 pandemic, Brexit and rapid changes in government policy and funding. The Local Plan will need to enable Dorset to adapt in the best way to take advantage, for example, of opportunities presented by land-use change that may result from agricultural and funding change enabling more 'nature-based' business models. We are not convinced that the Plan is set up to be fleet of foot in this way.

There are a number of issues which we have raised in the detail for individual areas and allocations, but apply throughout:

- The plan still uses the old language of the environment being a constraint rather than an opportunity and this needs to be turned around if we are to capitalise on Dorset's environment as a fundamental driver of the local economy.



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- Equally there are still in a couple of places nods to old school high carbon developments such as road building instead of moving to low carbon economic solutions.
- Sites appear to have been allocated for development without knowledge of existing biodiversity habitats. Lack of a designation does not mean that there is no biodiversity value to a site, it just means there is a lack of data. Some of these sites have known biodiversity value based on local knowledge. We do not feel that any site should be allocated for development without basic knowledge of the environmental conditions on site, and that includes wildlife.
- There is a lack of consistency when referring for the need for SANGs or other greenspace, or to the need for mitigation for nature conservation reasons. Sites that require SANGs should not be allocated for development until an appropriate SANG area has been identified and is known to be deliverable.
- We would find it helpful if required greenspace, SANGs and other areas like Heathland Support Areas could be shown as such on the proposals maps.

An integrated strategic approach to environmental protection and enhancement needs to be taken from the outset. Protected sites and other areas of priority habitat, rare and protected species are all vitally important, and we welcome the environment policies (with some suggested tweaks), but so is our everyday wildlife and this is what most people come into contact with on a daily basis, so we need a plan which allows wildlife abundance and diversity to both recover. Imaginative and large-scale solutions are required and the scale of emerging development gives us the opportunity to deliver these within the right framework.

I hope you find our comments helpful, please do not hesitate to contact me if you would like to discuss them further.

Yours sincerely,

**Conservation Director – Nature-based Solutions**

## Our Comments in Detail

Within our suggested changes to text, new text is in **bold black**, deleted text is ~~struck through~~.

### Volume I: Strategy and topics I The Dorset Council Local Plan

#### 1.1 Introduction **Agree if amended**

In order to address the climate and ecological emergencies (as well as the links to human health and wellbeing) paragraph 1.1.12 needs to be strengthened:

In managing growth, there is a need to protect **and enhance** the high quality environment of the plan area. Chapter 3 includes a number of policies to minimise the impact of development on the environment **and increase its value further, addressing** ~~including policies to help tackle~~ climate change **and supporting health and wellbeing**.

#### 1.3 Issues and challenges facing Dorset

References to Dorset Council's Climate and Ecological Strategy (July 2020) are welcomed but should be part of an integrated development plan for Dorset rather than a separate document. The Climate and Ecological Emergency Strategy prioritises ecological and climate sequestration in the design of the built environment and the mainstreaming of climate resilience in future strategies and policies. It also rightly recognises the ecological emergency and the danger of complacency in a seemingly wildlife-rich county like Dorset. It also highlights that, despite the conservation work done over the past 50 years, much of Dorset's wildlife has still declined significantly in that period and there is a need for a major initiative to offset these losses.

In contrast, much of the Local Plan document is about the status quo - keeping what we've got rather than an exciting new vision for the future. Whatever the causes of the decline in biodiversity, the direct and indirect effects of increased development are likely to be an important factor. There are currently around 175,100 residential properties within the Dorset Council area. 30,481 homes – as set out in the plan – would be an increase of around 17%. This is significant and important context as it is a huge challenge to achieve that level of growth without leaving it impossible to meet climate change targets or reverse the decline in wildlife and inevitable that Dorset will become less special. If the Local Plan is not up front about the scale of this challenge and does not set very ambitious goals around this area then these problems will be locked in for years to come leaving future generations with an even bigger crisis which today's decision makers will not be thanked for. This problem cannot be underestimated and major changes are needed to the plan as a result.

The direct and indirect effects of development, on the scale outlined in the Plan, will have a major impact on Dorset's environment and biodiversity. The Plan needs to be much more closely aligned with other relevant strategies including the Climate and Ecological Emergency Strategy. There is a real opportunity for Dorset to be a national exemplar of sustainable and biodiversity-friendly development and this should not be missed.

#### Climate Change

In this section a summary of the climate change impacts of the local plan needs to be included. Including increased emissions predicted from constructing over 30,000 new homes, plus associated developments, alongside predicted benefits from policies (which we argue should be strengthened) to require low carbon development, encourage renewable energy and require more sustainable land use (such as nutrient-neutral development or biodiversity enhancement, which will include land use change that reduces loss of soil carbon).

## 2. The strategy for sustainable growth

### 2.1 Introduction

#### Vision Disagree unless strengthened

The vision should state firmly that the natural environment will be enhanced, not that it 'seeks to' enhance and use the term 'recover' as set out in the 25 Year Environment Plan. We also recommend that the carbon reduction is strengthened by linking to the Paris Agreement. The sentence should therefore read:

We will reduce our carbon footprint **in line with the Paris Agreement** and ~~seek to~~ **we will** enhance **and recover** our natural environment.'

The later sentences around biodiversity should also be altered to be more positive about all environmental assets and proactive rather than passive:

The area's rich heritage, hedgerows, trees, **other habitats** and the character of the landscape will be ~~respected~~ **valued and retained** where development takes place. ~~The large areas of significance for Biodiversity will be protected~~ **and enhanced throughout the area** and where opportunities **will be actively pursued to ensure that** ~~arise, real enhancements to~~ the natural environment **in 2038 supports more wildlife and that in all areas of Dorset accessible natural greenspace is within easy reach.** ~~will be realised.~~

#### Strategic Priorities

##### Climate and ecological emergency: Agree if amended

This priority needs to be strengthened.

- The Local Plan should take action to reduce emissions and enable adaptation, not just minimise the impact of climate change.
- The biodiversity sentence should be amended to protect existing assets, avoid harm to them and also require net gain. Also the reference to 'protected' habitats and species should be removed – nature is in decline across the board and action is needed before species and habitats get to such a reduced status that they need protection. Abundant nature is needed as well as conservation of what is currently the rarest.

We will ensure that all new development **protects natural habitats, avoids harmful impacts and** incorporates **wildlife enhancement and** ecological net gain to help deliver the aspiration to reverse the current **ecological emergency.** ~~decline in protected species and habitats.~~

##### How the Local Plan will meet this priority:

We suggest the following changes:

Through managing where and how development takes place, the Local Plan ~~can~~ **will** minimise the distance travelled and focus travel onto active travel and public transport options. **Emissions will be reduced by requiring the highest standards of energy efficiency, reduction in non-renewable resource use in development and through renewable energy generation.**

Measures will be required to **avoid, reduce and** mitigate any impact on **biodiversity and to create and enhance more than is lost (net gain).** **Major strategic biodiversity and green infrastructure sites will be created.** ~~important ecological sites.~~ The impacts of climate change can be reduced by avoiding areas at risk of flooding, **reducing water consumption** and building green infrastructure (including space for biodiversity) into developments **to benefit health and wellbeing as well as providing natural shading, flood amelioration and helping maintain local air and water quality.**

### Unique environment:

Though we welcome the references here to Dorset's unique biodiversity assets, we would have expected a section headed 'unique environment' to also make broader reference to a range of assets including Dorset's coast and marine environment, landscapes and heritage.

### 2.4. The need to create a sustainable pattern of growth

This section refers to brownfield sites in a number of places. It is important to remember that some so-called 'brownfield' sites can support high biodiversity interest. This is referred to in the footnote to paragraph 117 of the NPPF, though we would note that often brownfield sites are not designated for nature conservation, but can nevertheless support rare or protected species, for example invertebrates, reptiles and rare annual plants and can constitute the priority habitat 'open mosaic on previously developed land'<sup>1</sup>.

We would suggest that the bullet in paragraph in paragraph 2.4.11 is amended to read:

- the need to protect environmental areas and assets of particular importance, **including sites of wildlife importance on previously developed land**, and the need to ensure that development is sympathetic to local character and history, including the surrounding built environment and landscape setting (as discussed in the landscape and heritage studies for Dorset).

### Development outside local plan and neighbourhood plan development boundaries in rural Dorset

Dorset is increasingly seeing interest in alternative land management models which move away from intensive agriculture and towards nature-based enterprise and delivery of public goods. These will often be outside settlements by their very nature. Examples such as the Knepp Estate in Sussex have shown how this can work on a large scale, but smaller scale examples are also available. These enterprises are likely to be beneficial for biodiversity and carbon capture, and will need flexibility on, for example, re-purposing or replacement of redundant agricultural buildings, both to manage the land in different ways and enable income generation, for example from tourism.

Of course not all proposals will be desirable for other reasons, but we suggest that the positive wording in policy ENV3 to support in principle "Proposals where the primary purpose is to conserve or enhance biodiversity and deliver a net gain "where this accords with other policies in the Local Plan" should be backed up either by encouraging wording in policies such as DEV7, DEV8, HOUS7 (recognising that 'rural workers' can include those working on nature-based enterprises), paragraphs such as 2.6.23 or a bespoke policy on the matter. Paragraph 2.6.32 is helpful at pointing out the tourism benefits of re-use of buildings to enable people to enjoy wildlife.

Paragraphs 5.11.12 and 5.11.14 could be re-worded to better reflect the breadth of diversification opportunities that these nature-based opportunities present.

Whilst we understand the intent of paragraphs 6.2.33-37 to avoid loss of historic or traditional buildings and do not suggest that is weakened at all, sometimes buildings in agricultural settings are not of similar merit.

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<sup>1</sup> [Open mosaic habitats on previously developed land \(UK BAP Priority Habitat description\) \(jncc.gov.uk\)](https://www.jncc.gov.uk/information-and-services/our-work-programs/nature-conservation-programme/priority-habitats/open-mosaic-habitats-on-previously-developed-land)

## 3 Environment and Climate Change

### What else could the Local Plan do to mitigate climate change and help people adapt to its effects?

The Plan should be taking a much more integrated and robust approach to the emergency. The Local Plan should take action to reduce emissions and enable adaptation, not just minimise the impact of climate change. Key elements of the Dorset Local Nature Partnership Vision and Strategy (2014) and forthcoming Local Nature Recovery Strategy should be incorporated into an overall Dorset Plan, ensuring the integration of natural value policy and decision making.

Many other organisations have developed strategies which are equally relevant to the Plan. For example DWT's own strategy highlights the importance Nature Recovery Networks, restoring, reconnecting and recreating wildlife habitats in Dorset as well as delivering an increase in wildlife abundance and diversity through nature-based solutions.

### 3.2 Green Infrastructure strategic approach

There has been a large increase in access to nature sites and demand for natural greenspace in recent years. This is to be welcomed and encouraged, but without sufficient greenspace created or made accessible close to where people live this will bring harmful impacts on sensitive sites and increase use of private cars to access sites further afield. Even with SANGS, the additional housing will undoubtedly lead to much greater pressure on key habitats and this should be recognised. It is essential that SANGS, other green space provision and mitigation projects are developed from the outset as an integral part of the plan not as an afterthought once housing allocations have been agreed. We have reflected this point in our responses to individual allocations, but it applies throughout.

#### Table 3.2 Agree subject to amendment

We support paragraph 3.2.5 which stresses the need for multifunctional green spaces, and to get more out of spaces for the climate and ecological emergency. It should be stressed though that all types of green space listed in Figure 3.2 should make a contribution, whether they are primarily sports pitches, parks or green corridors.

The description column in table 3.2 is incomplete or incorrect. "Natural and semi-natural green spaces" are listed as designated wildlife sites – though there is no reason a green space cannot be designated for wildlife (and many are, there are also many designated sites that are not green spaces and not accessible so this is confusing. It is therefore unclear whether table 3.2 is supposed to list green infrastructure AND nature conservation designations, or just the former.

#### Paragraph 3.2.6 Agree subject to amendment

DWT is pleased to see inclusion of Nature Parks within the list of strategic projects. We would suggest that the following are also included:

- **Gillingham Royal Forest - situated between Gillingham and Shaftesbury, the former deer park offers improved wildlife, landscape and recreational opportunities**
- **Corfe Barrows Nature Park - situated to the north-east of Corfe Mullen with areas of woodland, heathland and meadows offering recreational opportunities.**
- **Wild Purbeck Nature Improvement Area – one of 12 original NIAs recognised by Defra, the initiative brings together landowners and partners to deliver large scale initiatives to improve ecological connectivity and biodiversity.**

There are though many other potential large-scale projects such as in the Frome Valley, which have huge potential for both biodiversity gain and green infrastructure.

Brownfield sites are often more biodiverse than 'greenfield' sites (esp for bees and other invertebrates) and shouldn't be dismissed as easy opportunities for development.

## Policy ENVI - Agree

### 3.3 Habitats and Species

#### Figure 3.4 Agree subject to amendment

The numbers of marine international sites should be corrected, there are 3 SACs (Chesil and The Fleet, Lyme Bay and Torbay and Studland to Portland) and 3 SPAs (Chesil Beach and The Fleet), Poole Harbour and Solent and Dorset Coast).

The Local Sites section needs correcting.

Sites of Nature Conservation Interest (SNCl)s. Non-statutory wildlife sites of local importance designated **selected using guidelines by a Panel chaired** by Dorset Wildlife Trust.

SNCl)s are important in a county context and selected in accordance with guidelines published by **Dorset Environmental Records Centre** ~~the Dorset Wildlife Trust~~. SNCl)s provide important protection for locally valuable habitats and species which would otherwise be unprotected. They also form a key part of the wider ecological network, helping to link International, European and National sites by functioning as stepping stones. There are 1,245 SNCl)s in the Plan area.

In addition to SNCl)s and Local Nature Reserves, Local Geological Sites (Regionally Important Geological Sites) should be listed under Local Sites.

#### Paragraph 3.3.14 Agree subject to amendment

DWT supports the addition of further guidance nutrient management in relation to internationally protected sites. However we suggest that recreational pressure is also examined as well at this time. In particular Fontmell and Melbury Downs Special Area of Conservation (SAC). The popularity of this site for recreational use is already clear and further housing development in the vicinity (particularly in Shaftesbury) will exacerbate the challenges of managing public access on this site. DWT manages a nature reserve at Fontmell Down where there are regular problems with, in particular, dogs walked off leads and conflicts between dog walkers and grazing management. Responsible public access is welcomed at this site, however some uses do at times conflict with the conservation objectives; we are aware that the National Trust have similar issues at Melbury Beacon. It may be that a strategic solution for addressing recreational pressure on the SAC is needed, given the proximity of planned development at Shaftesbury.

We would also suggest an examination of recreational impacts on the Isle of Portland to Studland Cliffs is needed, to complement the Chesil and The Fleet guidance referred to in 3.3.12-13.

#### Local Sites Agree subject to amendments

We suggest that this section is titled Local Wildlife Sites. Otherwise paragraph 3.3.17 should also refer to Local Geological Sites (Regionally Important Geological Sites) which are another strand of Local Site. We have no objection to RIGS being included here as well as under ENV6, but suggest the current wording is confusing. It is also confusing to include other priority habitat within the same sentence. The term Local Wildlife Site is a recognised one within Defra and, strictly, would refer just to SNCl)s in Dorset's case.

The paragraph briefly refers to areas of otherwise undesignated priority and Biodiversity Action Plan habitats – this reference is welcomed however it is not followed up with any further information, nor does the wording in ENV 2 refer to these other habitats. Our suggestions regarding Irreplaceable and Priority Habitats (3.3.30-31) and ENV 2 would address this and for this reason we suggest removing this reference from this paragraph. This is provided though that adequate protection is given for these habitats in other sections and policy ENV2.

As with table 3.4, the wording regarding SNCIs needs to be corrected:

3.3.17. Local **Wildlife Sites** ~~include~~ **are** Sites of Nature Conservation Interest (SNCI) and Local Nature Reserves (LNR) ~~as well as those areas of otherwise undesignated priority and Biodiversity Action Plan habitats.~~ SNCIs are a non-statutory designation ~~recognised~~ **designated** locally. **The SNCI programme is co-ordinated** by Dorset Wildlife Trust, with the aim of **recording, protecting and providing management support for** our most valuable local assets. LNRs are designated for their wildlife interest but also for their opportunities for education and the enjoyment of nature, themes which are of increasing importance as part of the council's health and wellbeing remit. There are 1245 SNCIs and 28 LNRs in Dorset, covering nearly 5% of the total plan area. The amount of habitat, **features** (and associated rare and threatened species) protected at a local level is therefore considerable.

3.3.19. DWT would suggest that this paragraph is reworded to reflect more of a hierarchical approach to considering proposals and to reflect the challenges in providing compensation for harmful proposals:

3.3.19. For this reason, their protection is important. Development likely to **adversely** affect a local **wildlife** site will be refused unless **there is no alternative location or layout that avoids the harmful impacts.** Adequate mitigation ~~can~~ **will be required to avoid impacts** ~~provided or,~~ **where this is not possible, residual impacts should be addressed through adequate compensation measures.** As a last resort, ~~compensation in the form of a suitable~~ **a replacement** alternative site alongside funding towards its **long term** management **might prove possible but the timescale needed to create new habitats means that such sites would be likely to need to be many times larger than the area of habitat lost.** Dorset Council encourages and welcomes development which enhances and expands the network of local sites.

#### **Protected Species** **Agree subject to amendment**

We suggest that the title of this section is amended to **Protected and Priority Species.**

In addition we would suggest mentioning that a great crested newt Licencing Scheme is now being delivered by Dorset Council and development will be required to work with that scheme and contribute to securing the conservation status of great crested newt across Dorset, enhancing existing metapopulations and extending their range.

#### **Ancient Woodland, Trees and Hedges** **Disagree pending amendment**

We suggest that the title of this section is amended to **Irreplaceable and Priority Habitats.**

3.3.30-31 – these paragraphs refers to irreplaceable habitats – in the context of trees and ancient woodland. We suggest that further text on this subject is needed that is clearly not only referring to the ancient woodland and veteran trees and that text on priority habitats is also needed. We welcome the suggestion of better defining irreplaceable habitats relevant to Dorset and suggest that this piece of work is undertaken urgently and then those habitats listed in full in the plan. At the same time the plan should refer to priority habitats (as listed under Section 41 of the Natural Environment and Rural



Communities Act) and ensure that there is conservation of and net gain in these habitats to assist in addressing the ecological emergency.

New paragraph:

**Habitats (and species) listed in Section 41 of the Natural Environment and Rural Communities Act 2006 are a material consideration in planning, whether or not they are designated. Where initial assessment and further survey shows that there will be impacts on these habitats, the developer must follow the mitigation hierarchy to avoid, mitigate and if necessary provide compensation, as well as providing net gain as stipulated in the emerging Environment Bill (see Policy ENV3).**

## **ENV2 Agree subject to amendments**

DWT supports this policy, however we would suggest that the text is amended in a number of places:

II. Where specific impacts have been identified in relation to particular sites, mitigation measures for these sites will include **the following; other impacts are being assessed and may be adopted as policy during the course of the plan:**

National sites (SSSI and NNR)

III. Alter the second bullet, as suggested by the RSPB, to read:

- Where adverse impacts cannot be adequately fully mitigated, compensation **measures will be required to offset the residual impacts on the affected special features of the national site** ~~will result in the maintenance or enhancement of biodiversity.~~

Local **wildlife** sites (SNCl, LNRs)

IV. Local sites will be safeguarded from development through use of the mitigation hierarchy with avoidance as the preferred approach. This is in recognition of their intrinsic value for rare and threatened habitats and species, and their role in the wider ecological network where they function as wildlife corridors and stepping stones. Where impact is unavoidable, developers must provide mitigation or, as a last resort, compensation in the form of replacement habitat/**features of at least equivalent value** in a suitable alternative location to ensure there is no net loss of biodiversity **or function of the site**, as set out in Policy ENV23. Where this last option is used, funding will be secured to enable management of the replacement site for at least 30 years.

Protected **and priority** species

New criteria:

**Harm to priority species and species of local concern must be avoided, or otherwise mitigated and if necessary provide compensation, as well as providing net gain as stipulated in Policy ENV3.**

~~Ancient woodland, ancient and veteran trees, and hedges~~ **Irreplaceable and priority habitats**

VII. Development resulting in the loss or deterioration of ancient woodland, ancient or veteran trees ~~(or and other irreplaceable habitats)~~ will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

VIII. Proposals that would result in the loss of individual ancient or veteran trees located outside ancient woodlands will be refused on the same grounds. The removal of large mature tree species and their replacement with smaller shorter lived species will be resisted.

IX. Important hedgerows will be given consideration as set out in the Hedgerow Regulations, 1997, and development affecting an important hedge will be expected to avoid impacts in the first instance. If this is not possible then mitigation must be provided, or as a last resort compensation to include funding for management for at least 30 years.

**X. Priority habitats will be safeguarded from development. If this is not possible then mitigation must be provided, or as a last resort compensation to include funding for management for at least 30 years.**

### 3.4 Biodiversity and Net Gain      Agree subject to amendments

3.4.3 DWT strongly supports the Dorset Biodiversity Appraisal Protocol. We also strongly support it becoming a Supplementary Planning Document, which would make absolutely clear the requirement to use this process, which has been demonstrated to both speed up the planning journey and be better able to protect and enhance biodiversity than previous methods.

3.4.5 DWT strongly supports the requirement to involve Dorset Environmental Records Centre, through data searches and submission of records which will then inform future decisions.

3.4.8 DWT supports the requirement for net gain. We would suggest that this paragraph refers to thresholds that determine the size or type of development this requirement refers to. This could be set out within the DBAP.

We have seen examples where the Defra net gain metrics appear to have been manipulated to show net gain where we believe there is a loss. We suggest that the Local Planning Authority (via the Natural Environment Team) would be best placed to judge whether the net gain presented by developers is appropriate and sufficient. Therefore it would be helpful to amend the wording to:

3.4.8. Biodiversity net gain is an approach to development that leaves the natural environment in a measurably better state than beforehand. **The Dorset Biodiversity Appraisal Protocol will set out requirements in detail.** Developers will be required to produce a baseline assessment of the biodiversity currently present on site and then estimate how proposed designs will increase that biodiversity, either on or off-site. Calculation of pre- and post-construction biodiversity levels will be based on Defra's Biodiversity Metric (as set out in the Environment Bill) which creates an indicative biodiversity quality score pre- and post-construction **and must be checked and validated by the Planning Authority.** Developers must monitor and maintain habitat creation or other net gain measures for a minimum of 30 years, and this must be set out clearly as part of a planning application. Where long-term land use change is required as part of offsite net gain (and/or habitat compensation) provision, the use of conservation covenants is encouraged. These are voluntary but legally binding agreements which continue even after a landowner has parted with the land, to ensure that the conservation value of the land is protected.

3.4.9 We suggest that this section is amended to stress that habitats and species lost need to be replaced like for like (so new woodland cannot compensate for lost grassland, for example, though it could be considered net gain in addition to grassland compensation).

3.4.9. In seeking to secure biodiversity net gain (or provision of compensatory habitat under the mitigation hierarchy) developers will be expected to consider the restoration and re-creation of priority and locally important habitats, the protection and recovery of priority species and measures to enhance the existing and potential Ecological Network. **Where compensatory habitat or species**

**conservation is required, this should be directly linked to ensuring no net loss of the habitats or species affected.**

3.4.10 DWT supports this requirement, however we suggest amending the wording to make it clearer that net gain is additional to no net loss and requirement for a wildlife-friendly built environment. Bird boxes and other similar features, though necessary, cannot constitute net gain where other habitat has been lost.

3.4.10. Developers will be required to deliver a minimum 10% net gain from all relevant development. **This will be in addition to any mitigation and compensation required under Policy ENV2. Net gain will usually be in the form of habitat enhancement rather than solely biodiversity features.** In addition to 10% net gain, developments they will be expected to incorporate biodiversity enhancements in and around the built environment where there are suitable opportunities. These can include bird boxes, bat boxes, reptile hibernacula, bee houses, and other features which will contribute to the wider green infrastructure of the development.

### Nature Recovery Network and Ecological Networks

3.4.14 Agree

### Local Nature Recovery Strategy

3.4.15 Agree

### ENV3 Agree subject to amendment

We support this policy but would suggest an addition to point III:

Wildlife enhancements will be secured where appropriate within the built environment for all scales of development. **For the avoidance of doubt these enhancements will usually be in addition to the requirement for 10% net gain.**

### Geodiversity

#### ENV6 Agree subject to amendment

DWT supports this policy but believes it should go further. As with access to nature there are often opportunities to enhance understanding of and access to geological features and these should be taken where possible through planning enhancements. We suggest a third criteria of:

**III. Opportunities to enhance understanding of or access to geological features through retaining, enhancing, creating or interpreting them should be taken through planning agreements.**

### 3.8. Achieving high quality and sustainability in design Agree subject to amendment

3.8.2 We suggest that the following change is made to the last bullet and a further bullet is added to the list:

- **reduce resource and energy use and** are resilient to climate change.
- **enables nature-friendly development and access to nature for all.**

### 3.10. High standards of environmental performance Agree subject to amendment

We welcome reference to higher environmental standards in buildings. However in order to address the climate and ecological emergency, tougher requirements will be required more quickly. At the very least we suggest the text and policy ENV9 is brought up to speed with the latest government announcements requiring change from 2021.

[Rigorous new targets for green building revolution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/rigorous-new-targets-for-green-building-revolution)

**Policy ENVI3: Flood risk**    **Agree subject to amendment**

We are concerned that criteria VI “Unless agreed with the Environment Agency, development will not be permitted within an 8 metre buffer around an existing flood alleviation scheme or main river” could mean that river restoration and other nature-based projects could fall foul of this policy. This could be clarified by “Unless agreed with the Environment Agency, development **that is not primarily for flood alleviation or biodiversity enhancement** will not be permitted within an 8 metre buffer around an existing flood alleviation scheme or main river

**Policy ENVI4: Sustainable drainage systems (SuDs)**    **Agree**

DWT supports this policy and in particular the reference to biodiversity enhancement.

## 4 Housing and 5 Economy

The majority of our comments in relation to these sections are in respect of specific site allocations and made under the area sections.

### **HOUS12 Gypsy, Travellers and Travelling Showpeople site allocations** **Agree subject to amendment**

To tie in with the requirements of the employment site at Blunt's Farm (FERN8) we would like to see similar policy requirements for that site if taken forward to the draft Local Plan i.e to ensure no harm to the Moors River System SSSI, protect the Site of Nature Conservation Interest and retain significant landscape buffers within the northern and eastern parts of the site, including against the SNCI.

We also suggest amendment of the first bullet of Policy HOUS12 V to 'any impact resulting from the proposal on the character and value of the landscape, **priority habitats** ~~or~~ **and** the settlements adjacent to the site can be avoided or adequately mitigated; and'.

## 6. Community Infrastructure

### 6.8 Low carbon, decentralised and renewable energy schemes

#### **Q: Low carbon and renewable energy development**

##### **1: Do you agree with the suggested approach and what it is trying to achieve?**

In principle, yes, however care is needed to avoid inadvertently supporting harmful and counter-productive developments. DWT has been in the position of sadly having to oppose developments (for example for solar power) which is proposed in inappropriate locations where priority habitat would be harmed. It is not acceptable to play one environmental benefit off against another.

##### **2: Do you agree with the suggested wording? No**

Paragraph 6.8.7 refers to energy crops. There is growing evidence that energy crops can lead to harmful environmental change by driving conversion of land to growing energy crops and some of these can have detrimental ecological impacts. For example a number of important neutral grassland habitats have been lost to conversion to maize crops for energy in recent years. Maize is also a crop which tends, unless very well mitigated, to lead to run-off of soil, nutrients and pesticides, affecting water quality and further reducing biodiversity (and leading to loss of soil carbon, ironically). We would suggest that it is not appropriate for development to fund this type of potentially damaging energy crop, and that climate change contributions from development would be much better targeted at permanent land use change that captures carbon, such as wetlands or native woodlands.

##### **3: How could the paragraph / policy / section / chapter be amended to reflect your concerns?**

The reference to energy crops in 6.7.8 should be deleted.

Policy COM10 fails to properly reflect the full avoid, reduce, mitigate, compensate hierarchy and neither does it seek net biodiversity gain and therefore it should be re-worded:

- adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are **avoided, residual impacts** satisfactorily mitigated **and net gain for biodiversity achieved as with all developments.**

## 6.9 Wind energy development

### Wind turbines **Disagree, requires amendment and deletion of maps**

COM11 covers small scale wind development but there is no policy covering major wind farm development, which is confusing. A policy should set out the necessary requirements for large scale wind development.

Maps 6.5 and 6.6 are not helpful because they appear to favour wind turbine development in certain locations whilst the text notes “further detailed work would be necessary to support their allocation”. Showing the locations on a map is not appropriate prior to this further work which should include biodiversity assessment against on-site ecology, ecological restoration opportunities that could either be realised alongside wind development and conversely that could be lost, as well as proximity to important flyways and bird foraging, nesting and migration areas. Several locations identified as sites of ‘medium ecological risk’, are on heathland and former heathland sites (with extant heathland soils), including Wareham Forest and we support the RSPB’s concerns about these sites.

We would suggest that the maps are deleted from the plan, that Policy COM11 is amended to cover all wind development and that the criteria are amended to cover all wind development including, as with COM10, re-wording the biodiversity criteria to better reflect the mitigation hierarchy:

COM11. ~~Small-scale~~ wind energy development

- adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are **avoided, residual impacts** satisfactorily mitigated **and net gain for biodiversity achieved as with all developments.**

## Volume 2 Spatial areas and appendices

As a general point we note that the environment in each area is described in terms of “Environmental Constraints”. We would suggest that this should be less negatively worded; in all areas opportunities to address the climate and ecological emergency should be sought and therefore framing the environment as a negative barrier to development is unhelpful. The more neutral “Environmental Context” would be better.

We would suggest, looking for example at the Central Dorset chapter, that the ‘Environmental Constraints’ paragraph 22.1.3 and Figure 22.2 are merged as a summary of the environmental situation. The use of a table suggests completeness and this is by no means the case.

### South East Dorset Functional Area

#### 7.3. Housing and employment allocations in the South Eastern Dorset Functional Area

##### **Holton Heath Trading Park (7.3.5 & Fig 7.3) Disagree unless changes are made**

We support the RSPB’s response regarding the need for a policy covering this employment park as an allocation of 5.7 ha of employment land is referred to in the Plan and share RSPB concerns over the importance of protecting the sensitive wildlife of this site.

### 8. Corfe Mullen

##### **CORM2 Land north of Corfe Mullen Disagree unless changes are made to policy**

Policy for CORM2 requires reference to the requirement of SANG and this should be included in policy for consistency with other policies in the Local Plan.

##### **CORM 3 Land West of Pardy’s Hill Disagree**

###### Setting

CORM3 sits within a shallow valley with a patchwork of fields with hedgerows and broadleaved woodland and small watercourses. This ecological corridor includes a group of fields to the south and west of CORM3 that form the Corfe Mullen Pastures SSSI and several Sites of Nature Conservation Interest including the nearby Knoll Farm (SY99/035) and Spur & Atwells Copses (SY99/056) that include deciduous woodland and neutral grassland.

###### Biodiversity interest of CORM3 site

With regards to the area of the CORM3 proposed allocation, we believe that the fields have not been intensively farmed, include habitats and species of significant biodiversity interest and, with Pardy’s Copse, form an important part of the ecological network connecting with the SNCI to the west. Further information has been supplied by the East Dorset Environment Partnership and The Erica Trust which suggests that there is priority neutral grassland habitat on this site. We have also been made aware of wildlife, including protected species, present in this area by many members of the local community. Although the Existing Ecological Network and Higher Potential Ecological Network areas mapped on the Local Plan consultation map are helpful in identifying areas of known and potential biodiversity interest it is not fully comprehensive in that it does not cover sites such as these grasslands that have not been previously surveyed.

Thus, we consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence of any priority habitats (NERC Act Section 41) at an appropriate time of year (spring/summer), ideally with a relaxation of

grazing. This would establish the level and location of biodiversity interest of this site before any decision is made on its suitability for development. Without this we believe there will remain a degree of uncertainty over the deliverability of this allocation.

With the recognition of the climate and ecological emergency, we consider the forthcoming Local Plan must align and avoid damage to existing biodiversity interest at the outset.

#### Requirement for SANG

A development of 50 new homes would require provision of a SANG to comply with the Dorset Heathlands Planning Framework SPD to mitigate adverse impacts upon internationally important heathlands. This is referenced in the overall vision for Corfe Mullen (8.3.3) but not in this section on CORM3 and therefore leaves uncertainty of feasibility of SANG provision for this allocation.

To conclude, Dorset Wildlife Trust strongly objects to this allocation on the following grounds:

1. Lack of information on the biodiversity quality of the allocation site which has known botanical interest and protected species, is within an area where other grasslands and woodlands are of high biodiversity value and forms an important corridor of connecting habitat. This information is required to ensure the protection of biodiversity and to inform the certainty of development. We consider this is a requirement of NPPF (31 and 170).
2. Lack of reference to the need to mitigate any adverse effects upon internationally designated heathlands within the CORM 3 policy and certainty of the ability to provide a SANG for this allocation.

If the Council is minded to take this allocation forward, we recommend the following changes to policy:

1. Protection to all areas of priority habitat and watercourses as well as existing trees and hedges.
2. Information regarding the requirements and location of a SANG and other green infrastructure based on ecological considerations and a strategic approach to all Corfe Mullen allocations.

#### **CORM 4 Land to the east of Haywards Lane Disagree**

##### Setting

CORM4 sits within a shallow valley with a patchwork of fields with hedgerows and broadleaved woodland and small watercourses. This ecological corridor includes a group of fields to the south and west of CORM4 that form the Corfe Mullen Pastures SSSI and several Sites of Nature Conservation Interest including the nearby Knoll Farm (SY99/035) and Spur & Atwells Copses (SY99/056) that include deciduous woodland and neutral grassland.

##### Biodiversity interest of CORM4 site

With regards to the area of the CORM4 proposed allocation, we believe that the fields have not been intensively farmed, include habitats and species of significant biodiversity interest and, with Joiner's Cope and small watercourses/wet flush, form an important part of the ecological network that needs to retain its connection with rural land beyond. Further information has been supplied by the East Dorset Environment Partnership and The Erica Trust which suggests that there is significant priority neutral grassland habitat on this site. We have also been made aware of wildlife, including protected species, present in this area by many members of the local community. Although the Existing Ecological Network and Higher Potential Ecological Network areas mapped on the Local Plan consultation map are helpful in identifying areas of known and potential biodiversity interest it is not fully comprehensive in that it does not cover sites such as these grasslands that have not been previously surveyed.



Thus, we consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence of any priority habitats (NERC Act Section 41) at an appropriate time of year (spring/summer), ideally with a relaxation of grazing. This would establish the level and location of biodiversity interest of this site before any decision is made on its suitability for development. Without this we believe there will remain a degree of uncertainty over the deliverability of this allocation.

With the recognition of the climate and ecological emergency, we consider the forthcoming Local Plan must align and avoid damage to existing biodiversity interest at the outset.

#### Requirement for SANG

A development of 150 new homes would require provision of a SANG to comply with the Dorset Heathlands Planning Framework SPD to mitigate adverse impacts upon internationally important heathlands. This is referenced in the overall vision for Corfe Mullen (8.3.3) but not in this section on CORM3 and therefore leaves uncertainty of feasibility of SANG provision for this allocation.

To conclude, Dorset Wildlife Trust strongly objects to this allocation on the following grounds:

1. Lack of information on the biodiversity quality of the allocation site which has known botanical interest and protected species, is within an area where other grasslands and woodlands are of high biodiversity value and forms an important corridor of connecting habitat. This information is required to ensure the protection of biodiversity and to inform the certainty of development and positioning of the SANG. We consider this is a requirement of NPPF (31 and 170).
2. Lack of reference to the need to mitigate any adverse effects upon internationally designated heathlands within the CORM4 policy and certainty of the ability to provide a SANG for this allocation.

If the Council is minded to take this allocation forward, we recommend the following changes to policy:

3. Protection to any areas of priority habitat and watercourses as well as existing trees and hedges.
4. Information regarding the requirements and location of a SANG and other green infrastructure based on ecological considerations and a strategic approach to all Corfe Mullen allocations.

#### **CORM 5 Land to the west of Haywards Lane      Disagree**

##### Setting

CORM 5 sits within a shallow valley with a patchwork of fields with hedgerows and broadleaved woodland and small watercourses. This ecological corridor includes a group of fields to the south and west of CORM5 that form the Corfe Mullen Pastures SSSI and several Sites of Nature Conservation Interest including the nearby Knoll Farm (SY99/035) and Spur & Atwells Copses (SY99/056) that include deciduous woodland and neutral grassland.

##### Biodiversity interest of CORM5 site

With regards to the area of the CORM 5 proposed allocation, we believe that the fields have not been intensively farmed, include habitats and species of significant biodiversity interest and form an important part of the ecological network. Further information has been supplied by the East Dorset Environment Partnership and The Erica Trust which suggests that there is priority neutral grassland habitat on this site. We have also been made aware of wildlife, including protected species, present in this area by many members of the local community and records held by Dorset Environmental Records Centre

show the presence of enough Dorset Notable Species for this site to be of special interest. Although the Existing Ecological Network and Higher Potential Ecological Network areas mapped on the Local Plan consultation map are helpful in identifying areas of known and potential biodiversity interest it is not fully comprehensive in that it does not cover sites such as these grasslands that have not been previously surveyed.

Thus, we consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence of any priority habitats (NERC Act Section 41) at an appropriate time of year (spring/summer), ideally with a relaxation of grazing. This would establish the level and location of biodiversity interest of this site before any decision is made on its suitability for development. Without this we believe there will remain a degree of uncertainty over the deliverability of this allocation.

With the recognition of the climate and ecological emergency, we consider the forthcoming Local Plan must align and avoid damage to existing biodiversity interest at the outset.

#### Dorset Wildlife Trust Nature Reserve

Of particular concern is the impact of this proposed allocation on the Dorset Wildlife Trust Corfe Mullen Meadows Nature Reserve which forms part of the Corfe Mullen Pastures SSSI (SY99/009). This nature reserve is managed as a traditional hay meadow and is known for its good population of green winged orchids. The reserve is already under recreational pressure, which has increased during the Covid-19 pandemic, and is showing evidence of trampling of the fragile vegetation and frequent reports of dogs off leads. Whilst Dorset Wildlife Trust wishes to see people enjoy contact with nature and the benefits this brings to wellbeing, we consider that this should not be to the detriment of the biodiversity nature reserves seek to protect. Despite the proposed provision of a SANG for this development, we consider that an increase of population so close to this fragile site would cause an unacceptable increase in footfall and consequent disturbance likely to damage the site to an unacceptable level.

The Sustainability Appraisal Fig 8.8 p 78 states (our emphasis in *italics*):

“The site is within the 400m to 5km buffer surrounding the Dorset Heaths European Site. A SANG will be provided as part of the development between Brook Lane and Chapel Lane, in accordance with the Dorset Heaths Framework 2020-25. The purpose of the SANG is to reduce the number of people visiting the Dorset Heathlands European site, approximately 400m to the east of the site, by providing an alternative area which is more convenient and attractive for people to use for recreational activities. This will reduce the recreational pressure on the Dorset Heathlands European Site. The proposed location of the SANG is adjacent to the Corfe Mullen Pastures SSSI, an area of unimproved grassland and mire habitats which are of national importance to wildlife. *Whilst the SANG is likely to reduce recreational pressure on the Dorset Heaths European Site, providing an area of SANG adjacent to the Corfe Mullen Pastures SSSI may substantially increase the number of people visiting SSSI site. This additional recreational pressure is likely to significantly affect the unimproved grassland and mire habitats and the species which it supports. In order to prevent significant impacts upon the Corfe Mullen Pastures SSSI as a result of increased recreational pressure, it is proposed that the policy is amended to restrict access to the Corfe Mullen Pastures SSSI, perhaps through fencing, and enhance the management of this habitat.*”

Whilst Dorset Wildlife Trusts objects to this allocation, should it be taken to the next stage, we would wish to see amendment to the policy to reflect this need to protect and enhance the adjacent Corfe Mullen Pastures SSSI as suggested in the Sustainability Appraisal. As identified in the LUC guidance, we would also wish to ensure any opportunities were taken to retain and enhance habitat connectivity in association with new development, and to respect and seek to conserve the rural character, landscape and high levels of relative tranquillity that is a feature of the area in which the reserve is located.

### SANG and development layout

As stated above, we believe the area of CORM5 has significant biodiversity interest and that, without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain, the possible position/design/size of the SANG and any housing, and the consequent viability of a development cannot be determined.

Should the Council be minded to take the Corfe Mullen allocations forward, we also consider that the position of the CORM5 SANG and other green infrastructure should be considered in relation to the other Corfe Mullen allocations as referenced in the Corfe Mullen vision 8.3.3 to gain maximum advantage for recreational access and biodiversity. It would be helpful to show more detailed maps showing possible layout of development for assessment. If this development is taken to the next stage then we would wish to see more detail provided on the requirements for the SANG and protection of existing biodiversity including priority habitats within the policy wording.

To conclude, Dorset Wildlife Trust strongly objects to this allocation on the following grounds:

1. Likely increased recreational pressure and loss of landscape scale ecological connectivity on the Corfe Mullen Meadows Nature Reserve (SSSI) and inadequate protection in policy.
2. Lack of information on the biodiversity quality of the allocation site which has known botanical interest and protected species, is within an area where other grasslands and woodlands are of high biodiversity value and forms an important corridor of connecting habitat. This information is required to ensure the protection of biodiversity and to inform the certainty of development and positioning of the SANG. We consider this is a requirement of NPPF (31 and 170).

If the Council is minded to take this forward, we recommend the following changes to policy:

1. Measures that give protection to the Corfe Mullen Meadows Nature Reserve and ensure habitat connectivity.
2. Protection to any areas of priority habitat as well as existing trees and hedges.
3. Further information regarding the requirements and location of the SANG and other green infrastructure based on ecological considerations and a more strategic approach to all Corfe Mullen allocations.

### **9. Upton**

#### **UPTNI: Land at French's Farm, Policeman's Lane      Disagree unless changes are made**

We welcome the recognition of requirements for nitrogen neutrality and SANGS, with a coordinated approach to greenspaces between developers, Dorset Council and Natural England. Although the SANG is already in place, we consider that for consistency across the Local plan requirements for SANG and nitrogen neutrality should be included in the policy.

### **10. Blandford**

All development in Blandford lies within 5km of the Bryanston SSSI, important for Greater Horseshoe Bats. A comprehensive enhancement and mitigation strategy for the bats is required. Residential development in the area should be accompanied by a large new area of natural accessible greenspace which also meets biodiversity net gain criteria. This could include enhancement measures for the Barberry Carpet moth which is recorded nearby: <https://www.dorsetbutterflies.com/2019/11/help-us-protect-the-barberry-carpet-moth/>.

### **BLAN7: Land north-east of Blandford Forum**      **Disagree unless changes are made**

10.5.28 states the green infrastructure strategy for the site will need to show how existing environmental assets will be protected and enhanced. As well as hedgerows and tree belts we recommend inclusion of the river corridor of the Pimperne Brook which forms the site's south-eastern boundary. Alternatively inclusion of a need to protect and enhance the ecological corridor of the river and use of natural flood management strategies could be included in 10.5.30 as part of the text on attenuation of flows.

Dorset Wildlife Trust recommends an amendment to policy to reflect the need to protect and enhance the natural heritage features on site including trees, hedgerows and the river corridor.

### **11. Ferndown and West Parley**

#### **FERN 3 Green Worlds**      **Disagree unless changes are made**

11.3.6 sets out the need to provide sufficient informal recreation land through the provision of a strategic network of SANGs for housing developments in Ferndown and West Parley. This is welcomed.

We consider that the requirements for a SANG should be set out in the FERN3 text and policy.

#### **FERN6 Land at Dudsbury Golf Course**      **Disagree unless changes are made**

The requirements for formal and informal open space including SANG provision, landscape and biodiversity mitigation measures as set out in 11.5.15 and 11.5.19 are welcome. However, as this site lies adjacent to the River Stour we consider it should be acknowledged as a key feature of the site. Opportunity should be taken to protect and enhance the ecological value of the river corridor as part of the green infrastructure proposals.

As the site includes water features, trees and shrubs and rough grassland as well as the river corridor we consider that ecological survey is essential to inform the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of development and open space/SANG to determine the viability of this allocation.

If the Council is minded to take this forward we welcome the need for wildlife corridors and would recommend policy is amended to include a need to protect any priority habitats and water courses and enhance the ecological value of the River Stour corridor.

#### **FERN7 Land off Angel Lane/north of Ham Lane**      **Disagree**

As set out in 11.5.22 FERN7, at its northern extent, lies less than 400m from the internationally important heathland site Ferndown Common and is a proposal for 400 homes. Ferndown Common is already under intense pressure from surrounding housing on all but its south and south-westerly sides, is heavily used for recreation and subject to frequent fires. We have considerable concerns over adding yet more development very near to this isolated site. Additionally, FERN7 lies near to Big Copse (SZ09/016) SNCI, a deciduous woodland with a heath clearing which could come under increased recreational pressure.

The allocation site has records of protected species including reptiles and bats and features including trees, hedgerows and grassland.

11.5.22 states that a detailed biodiversity assessment and mitigation strategy, including SANG layout will be required. We consider that this is essential prior to any decision on whether to take this allocation

forward. Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of housing and infrastructure such as the SANG on site cannot be assessed.

As rights of way and a permissive path already link to the Common from FERN7 and this allocation site is so close to the heathland, we have concerns over the ability to prevent increased recreational pressure on the Common as required under Policy FERN7 IV. We consider that the ability to create an effective SANG and prevent easy access to the Common via footpaths from the development should be determined prior to taking this allocation further forward.

To conclude, Dorset Wildlife Trust **strongly objects** to this allocation due to

1. Lack of ecological survey is at appropriate times of year to determine the scope for avoidance /mitigation of priority habitats and protected species on site, opportunities for net biodiversity gain and possible development layout.
2. Evidence that an effective SANG and other measures are possible to be certain that this development will not have an adverse impact on Ferndown Common and other heathland sites within 5km of the development.

#### **FERN8: Blunts Farm employment allocation      Disagree unless changes are made**

Dorset Wildlife Trust welcomes recognition of the need to retain, protect and enhance the SNCI and the need for significant landscape buffers as worded in the policy. We would wish to see a buffer of habitat between development and the SNCI. Although this may be provided by the landscape buffers proposed we would like this clarified with amended wording to

‘retention of significant landscape buffers within the northern and western parts of the site **and against the SNCI.**’

As this site is now proposed as a Gypsy and Traveller site as well as employment land, we recommend prior ecological survey and assessment to inform the whole allocation and an assessment on impacts on the rights of way on site and any consequent potential changes to recreational pressures on nearby heathland sites.

## **12. St Leonards and St Ives**

#### **STSL1 Matchams Stadium and House      Agree**

Dorset Wildlife Trust support the vision that in 2038 St Leonards and St Ives (12.2) will sit within an area of important biodiversity where the surrounding environmental; designations are maintained at high quality;

We welcome acknowledgement that redevelopment of the Matchams Stadium site could offer opportunity for environmental and ecological improvements including heathland restoration (12.5.2) and policy STSL1 that includes ‘alternative use or redevelopment would be subject to prior submission of plans for the restoration and management of the heathland, prepared in conjunction with Natural England and other appropriate bodies’.

## **13. Swanage**

#### **SWAN3 Land to the west of Prospect Allotments      Disagree unless changes are made**

We consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence and location of any priority habitats (NERC Act Section 41) and protected species. Surveys should be carried out at various and appropriate times of year for the habitat type (spring/summer) to reflect seasonal changes in wildlife interest and reflect the potential indirect as well as direct effects of this development.

Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of development and the SANG cannot be assessed, or the viability of the development determined.

Dorset Wildlife Trust therefore objects to this allocation until such reassurance is available.

Should the Council be minded to take this forward we would recommend including a need to protect and enhance existing hedgerows, trees and (if found to be present on site) any priority habitats.

#### **14. Verwood**

##### **VER3 Land south of Manor Road                      Disagree**

The south-east corner of VER 3 lies within 400 metres of West Moors and Holt Heath SSSI, SPA, SAC and Ramsar. It should be indicated in the text for this allocation that residential development within the 400m Dorset Heathlands buffer will not be permitted, and mapped as such. The allocation borders the Moors River System SSSI (SZ19/002) and this should also be acknowledged in the text.

VER3 lies on the opposite side of Manor Road to the Potterne Hill SNCI (SU00/062) which has dry heath habitat. Both the West Moors and Holt Heath SSSI and Potterne Hill SNCI are already impacted by recreational pressure.

In addition to bordering the Moors River System SSSI, VER3 includes substantial areas of trees and hedgerows, watercourses and water features and permanent grassland. We therefore consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence and location of any priority habitats (NERC Act Section 41) and protected species. Surveys should be carried out at various and appropriate times of year for the habitat type (spring/summer) to reflect seasonal changes in wildlife interest, and reflect the potential indirect as well as direct effects of this development.

Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of development and the SANG cannot be assessed, or the viability of the development determined.

We also feel uncertainty is given by the suggestion that improvements to Potterne Park can be used as an alternative to providing a SANG – this should be assessed prior to inclusion as a proposal in the allocation.

Dorset Wildlife Trust therefore strongly objects to this allocation due to the lack of ecological information available to ensure the protection of biodiversity on and immediately adjacent to the site and the lack of certainty over the delivery of mitigation measures to avoid adverse impacts on the nearby heathland.

If the Council is minded to take this allocation forward, in addition to the suggested changes to text and mapping above, we recommend the policy is amended to include:

1. Protection of the Moors River System SSSI
2. Protection of the Potterne Hill SNCI
3. Protection of any areas of priority habitat and watercourses, water features, hedgerows and trees on site.
4. Information regarding the requirements and location of a SANG and other green infrastructure based on ecological considerations on site and continued functional links with surrounding parts of the ecological network.

## 15. Wareham

We welcome reference to the proximity of Wareham to heathland sites and its position within the Poole Harbour hydrological catchment and support the need for SANG and financial contribution towards Heathland Infrastructure Provision (HIP) in 15.3.3.

However, there are concerns regarding the proximity of the 400m heathland buffer zone and insufficient information given on the proposed location of the SANG extension, HIP or other green infrastructure to assess this allocation with respect to impacts on biodiversity. There is also no requirement in policy for measures to address adverse impacts on heathland, Poole Harbour or other features of biodiversity interest including the rivers and priority habitats in the area.

There are opportunities for significant biodiversity gain particularly in the Frome Valley west of the town.

As with other sites, before main development opportunities are progressed further, a full ecological survey and evaluation should be undertaken for the proposed sites and potential extension to the SANG. These should be done at various times of the year to reflect seasonal changes in wildlife interest, and reflect the potential indirect as well as direct effects of this major development – particularly on SSSIs and SNCIs in the area.

## 16. West Moors

### WM01 Land north of Azalea Roundabout Disagree

Dorset Wildlife Trust support the recognition of the sensitive nature of this site and the need to incorporate significant biodiversity mitigation including:

- a significant wide buffer to the Moors River SSSI in the eastern part of the site;
- a buffer to the West Moors Plantation SNCI to the north-east of the site;
- the provision of Suitable Alternative Natural Green Space in accordance with Policy ENV2

The Moors River SSSI should be amended to Moors River **System** SSSI. Provision of a buffer is not the only requirement to protect the sensitive habitats and we therefore suggest an additional amendment to policy wording to follow the LUC guidance to '*Ensure development does not negatively influence the nature conservation value of the adjacent Moors River System SSSI and the West Moors conifer plantation SNCI*'.

Given the adjacent sites of high biodiversity value, presence of significant trees, boundary bank and hedgerows and a watercourse on site and mapping of much of this site within the Existing and High Potential Ecological Network, we consider that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence and location

of any priority habitats (NERC Act Section 41) and protected species. Surveys should be carried out at an appropriate time of year for the habitat type (spring/summer).

Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of development and the SANG cannot be assessed, or the viability of the development determined. Without this, we believe there will remain a degree of uncertainty over the deliverability of this allocation and therefore currently object to this allocation.

If the Council is minded to take this forward we would wish amendment to policy to include:

1. Protection and enhancement of the SSSI and SNCI (suggested text indicated above), and please also see response prepared by East Dorset Environment Partnership.
2. Protection of any areas of priority habitat, watercourses, trees and hedgerows on site.

## **17. Wimborne Minster and Colehill**

### **WMCI Wimborne Minster town centre Agree subject to amendments**

In line with the Vision 17.1, this policy requires recognition of the need to protect and enhance the natural environment of the town centre, which includes the River Allen, a chalk stream that is important for its biodiversity and part of the Existing Ecological Network.

### **WM6 Land at Leigh Farm Disagree**

#### Setting

WM6 lies within an area with a high level of mapped Existing Ecological Network and Higher Potential Ecological Network, giving a strong indication of the ecological importance of this area although not all areas have been surveyed and assessed. The area includes three SNClS -Woodland House Meadow (SU00/105), important for its rich semi-improved neutral grassland and rush pasture, Northleigh House (SU00/088), important for its relict neutral grassland and Leigh Common (SU00/078) which has semi-improved neutral grassland and secondary woodland, part of which is designated as a Local Nature Reserve and is linked to the allocation site via the old railway. As a whole, the area has a network of small fields, hedgerows, woodland and watercourses and provides an ecological corridor between the River Stour and the rural land to the north of Wimborne and Colehill.

#### Biodiversity

Historical records from a former SNCl survey show grassland within WM6 has ecological value, and in addition to the SNCl grasslands, the Byetheway field has known neutral grassland of moderate interest. Overall, the grasslands in this area are not believed to have had intensive use and are likely to have retained some ecological value, which combined with watercourses, wet flushes, hedgerow and wooded areas creates a rural landscape within which biodiversity can thrive. Many members of the local community have reported the presence of wildlife in this area including protected species. Further information is given in the responses by the East Dorset Environment Partnership and the Erica Trust.

Thus, we consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence and location of any priority habitats (NERC Act Section 41) and protected species. Surveys should be carried out at an appropriate time of year for the habitat type (spring/summer), ideally with a relaxation of grazing.



Paragraph 17.5.12 indicates areas suitable for development and for the location of open space to help deliver SANG to mitigate impact on nearby heathland sites. Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of development and the SANG cannot be assessed, or the viability of the development determined. Without this, we believe there will remain a degree of uncertainty over the deliverability of this allocation.

With the recognition of the climate and ecological emergency, we consider the forthcoming Local Plan must align and avoid damage to existing biodiversity interest at the outset. It is stated in the Vision for Wimborne and Colehill *'to protect biodiversity in the area and continue to have strong links with the countryside'* (17.2.1) and this should be given due consideration.

Should the Council be minded to take this allocation forward, it would be helpful to show more detailed maps showing possible layout for assessment and we would wish to see more detail provided on the requirements for the SANG and protection of existing biodiversity including priority habitats within the policy wording.

To conclude, Dorset Wildlife Trust strongly objects to this allocation due to the lack of information on the biodiversity quality of the allocation site which is within an area where other grasslands and woodlands are of high biodiversity value and forms an important corridor of connecting habitat. This information is required to ensure the protection of biodiversity and to inform the certainty of development. We consider this is a requirement of NPPF (31 and 170).

If the Council is minded to take this forward, we recommend the following changes to policy:

1. Protection of any areas of priority habitat and watercourses as well as existing hedgerows and trees.
2. Information regarding the requirements and location of a SANG and other green infrastructure based on ecological considerations on site and continued functional links with surrounding parts of the ecological network including the Leigh Common SNCI.

## **WMC 7 Land at Northleigh Lane**                      **Disagree**

### Setting

WM7 lies within an area with a high level of mapped Existing Ecological Network and Higher Potential Ecological Network, giving a strong indication of the ecological importance of this area although not all areas have been surveyed and assessed. The area includes three SNCIs to the south and west - Woodland House Meadow (SU00/105), important for its rich semi-improved neutral grassland and rush pasture, Northleigh House (SU00/088), important for its relict neutral grassland and Leigh Common (SU00/078) which has semi-improved neutral grassland and secondary woodland, part of which is designated as a Local Nature Reserve and is adjacent to the Bytheway Field SANG. As a whole, the area has a network of small fields, hedgerows, woodland and watercourses and provides an ecological corridor between the River Stour and the rural land to the north of Wimborne and Colehill. Furthermore, a network of public footpaths combined with the Bytheway SANG, as described in 17.5.13, make this an attractive area for local people to access and enjoy.

### Biodiversity

As well as the SNCI grassland interest, historical records from a former SNCI survey show grassland within nearby proposed WM6 has ecological value, and the Bytheway Field SANG has known neutral grassland of moderate interest. Overall, the grasslands in this area are not believed to have had

intensive use and are likely to have retained some ecological value which combined with watercourses, wet flushes, hedgerow and wooded areas creates a rural landscape within which biodiversity can thrive. Many members of the local community have reported the presence of wildlife in this area including protected species. Further information is given in the responses by the East Dorset Environment Partnership and the Erica Trust.

Thus, we consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence and location of any priority habitats (NERC Act Section 41) and protected species. Surveys should be carried out at an appropriate time of year for the habitat type (spring/summer), ideally with a relaxation of grazing.

Policy for WMC7 states the need for a SANG and informal open space and 17.5.14 states that the built form should be restricted to the northern parts of the site. Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of housing and infrastructure such as the SANG cannot be assessed, or the viability of the development determined. Without this, we believe there will remain a degree of uncertainty over the deliverability of this allocation.

With the recognition of the climate and ecological emergency, we consider the forthcoming Local Plan must align and avoid damage to existing biodiversity interest at the outset. It is stated in the Vision for Wimborne and Colehill '*to protect biodiversity in the area and continue to have strong links with the countryside*' (17.2.1) and this should be given due consideration.

Should the Council be minded to take this allocation forward, it would be helpful to show more detailed maps showing possible layout for assessment and we would wish to see more detail provided on the requirements for the SANG and protection of existing biodiversity including priority habitats within the policy wording.

#### Summary

To conclude, Dorset Wildlife Trust **strongly objects** to this allocation due to the lack of information on the biodiversity quality of the allocation site which is within an area where other grasslands and woodlands are of high biodiversity value and forms an important corridor of connecting habitat. This information is required to ensure the protection of biodiversity and to inform the certainty of development. We consider this is a requirement of NPPF (31 and 170).

If the Council is minded to take this forward, we recommend the following changes to policy:

1. Protection of any areas of priority habitat and watercourses as well as existing hedgerows and trees.
2. Information regarding the requirements and location of the development, SANG and green infrastructure based on ecological considerations on site and continued functional links with surrounding parts of the ecological network including the Leigh Common SNCI, Bytheway Field SANG and any greenspace in adjacent developments.

#### **WMC 8 Land North of Wimborne Road**

**Disagree**

#### Setting

This site lies immediately adjacent to Bytheway Field SANG and within an area with a high level of mapped Existing Ecological Network and Higher Potential Ecological Network, giving a strong indication of the ecological importance of this area although not all areas have been surveyed and assessed. The

area includes three SNCIs to the south and west -Woodland House Meadow (SU00/105), important for its rich semi-improved neutral grassland and rush pasture, Northleigh House (SU00/088), important for its relict neutral grassland and Leigh Common (SU00/078) which has semi-improved neutral grassland and secondary woodland, part of which is designated as a Local Nature Reserve and is adjacent to the Byetheway Field SANG. As a whole, the area has a network of small fields, hedgerows, woodland and watercourses and provides an ecological corridor between the River Stour and the rural land to the north of Wimborne and Colehill. Furthermore, a network of public footpaths combined with the Byetheway SANG, as described in 17.5.13, make this an attractive area for local people to access and enjoy.

### Biodiversity

The site includes a network of small watercourses, hedgerows and trees and the LUC landscape assessment identifies the presence of priority habitat purple moor grass and rush pasture on site. As well as the SNCI grasslands, historical records from a former SNCI survey show grassland within nearby proposed WM6 has ecological value, and the Byetheway Field SANG has known neutral grassland of moderate interest. Overall, the grasslands in this area are not believed to have had intensive use and are likely to have retained some ecological value which combined with watercourses, wet flushes, hedgerow and wooded areas creates a rural landscape within which biodiversity can thrive. Many members of the local community have reported the presence of wildlife in this area including protected species. Further information is given in the responses by the East Dorset Environment Partnership and the Erica Trust.

Thus, we consider that it is essential that, prior to deciding whether to proceed with the allocation, an ecological survey of this site should be carried out to establish the presence and location of any priority habitats (NERC Act Section 41) and protected species. Surveys should be carried out at an appropriate time of year for the habitat type (spring/summer), ideally with a relaxation of grazing.

The text and policy for this site does not mention the level of proposed development. 140 houses are shown in Figure 7.3 and this level of housing would require provision of a SANG to mitigate adverse impacts on heathland sites and comply with the Dorset Heathlands Planning Framework SPD. This is not stated. Policy for WMC8 states which part of the allocation is suitable for development and for the location of open space. Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity, opportunities for net biodiversity gain on site, and the possible position/design/size of development and open space/SANG cannot be assessed, or the viability of the development determined. Without this, we believe there will remain a degree of uncertainty over the deliverability of this allocation.

With the recognition of the climate and ecological emergency, we consider the forthcoming Local Plan must align and avoid damage to existing biodiversity interest at the outset. It is stated in the Vision for Wimborne and Colehill '*to protect biodiversity in the area and continue to have strong links with the countryside*' (17.2.1) and this should be given due consideration.

Should the Council be minded to take this allocation forward, it would be helpful to show more detailed maps showing possible layout for assessment and we would wish to see more detail provided on the requirements for the SANG and protection of existing biodiversity including priority habitats within the policy wording. We would also wish to see consideration of the impact of additional housing on the rural attractiveness of the Byetheway SANG.

Should the Council be minded to take this allocation forward, it would be helpful to show more detailed maps showing possible layout for assessment and we would wish to see more detail provided on the

requirements for the SANG and protection of existing biodiversity including priority habitats within the policy wording.

### Summary

To conclude, Dorset Wildlife Trust strongly objects to this allocation due to

1. The lack of information on the biodiversity quality of the allocation site which is within an area where other grasslands and woodlands are of high biodiversity value and forms an important corridor of connecting habitat. This information is required to ensure the protection of biodiversity and to inform the certainty of development. We consider this is a requirement of NPPF (31 and 170).
2. The lack of reference to the need to provide a SANG to mitigate adverse impacts on nearby heathlands.

If the Council is minded to take this forward, we recommend the following changes to policy:

1. Protection of any areas of priority habitat and watercourses as well as existing hedgerows and trees.
2. Information regarding the requirements and location of the development, SANG and green infrastructure based on ecological considerations on site and continued functional links with surrounding parts of the ecological network and Byetheway Field SANG.

### **WMC9 Land South of Wimborne Road West**

### **Disagree**

This site is an allocation for 190 new homes and as such would require provision of a SANG to mitigate adverse impacts on heathland sites and comply with the Dorset Heathlands Planning Framework SPD

The site includes a watercourse to the Stour and should be protected, enhanced for its ecological interest and buffered. The LUC assessment identified areas of hay meadows, which could be of ecological interest and the site has hedgerows and trees on its boundaries which should be retained.

Dorset Wildlife Trust objects to this allocation and considers that this site should not be brought forward without an assessment of its ecological interest, the ability to provide a SANG in a suitable location and opportunities for net biodiversity gain as part of its assessment for viability.

We would expect the Policy to require protection of any priority habitats, and protection, enhancement and buffering of the watercourse and provision of green infrastructure that complements the neighbouring development.

## **18. Alderholt**

### **Alderholt options**

Regarding the level of small scale growth and major expansion that should take place at Alderholt, we would refer Option 1 to Option 2 i.e. we prefer small scale expansion on land north of Ringwood Road to meet identified local needs, but only if it is possible to identify an area of SANG that will avoid adverse impacts on heathland, avoid impacts on the River Avon SAC, avoid/mitigate impacts on priority habitats and protected species and provide net biodiversity gain.

We consider it essential to undertake ecological survey/assessment to inform decisions on the viability of proposals. Draft ALDI omits the need for a SANG, avoidance of impacts on the River Avon SAC and would need reference to the need to retain and protect any key features identified by ecological survey including hedgerows and trees.

We have the following concerns regarding factors that may inhibit the deliverability of significant expansion of Alderholt:

- (i) Ability to make this expansion sustainable.
- (ii) Ability to identify areas suitable for SANG provision.
- (iii) Potential impacts on the Ecological Network including the following SNCIs:
  - Bonfire Hill (SU11/015), identified as dry heath and known to support protected reptile species. This would be completely enclosed by Option 2 north eastern area, losing its connectivity to surrounding countryside and additional urban pressures. Footpaths border two sides of this triangular shaped SNCI, likely increasing recreational pressures on the fringes of this SNCI from any new development. Survey for planning application PA3/21/0046/FUL has shown the land adjacent to the SNCI is important for reptiles and foraging/commuting bats.
  - Strouds Firs Meadows (SU11/019), identified as semi-improved neutral grassland. This lies immediately to the north of Option 2 northern extent and surrounded by the allocation on two sides. A footpath crosses the SNCI from the Option 2 area and this would likely result in increased recreational pressure as well as other urban impacts.
  - Highwood (SU11/011), identified as deciduous woodland with grassland/scrub. This lies to the north of the Option 2 northern area.
  - Draggons Road (SU11/016), identified as damp mixed woodland on acid soil, wet heath and surrounding scrub. Option 2 includes this SNCI which is already been impacted a major development. Footpaths cross/border the SNCI from the Option 2 area and this would likely result in increased recreational pressure as well as other urban impacts. Development of this area could remove connectivity between this SNCI and surrounding countryside to the north and east including Alderholt Heath SNCI (SU11/013).
  - Alderholt Heath (SU11/013), identified as wet heath with a pond containing pillwort. This lies immediately adjacent to the western area of Option 2. A footpath crosses/border the SNCI connecting to the Option 2 area and this would likely result in increased recreational pressure as well as other urban impacts. Development of this area could remove connectivity between this SNCI and surrounding countryside to the north and east including Draggons Road SNCI (SU11/016).
  - Sleepbrook Farm (SU11/021), identified as unimproved marshy grassland with a small area of carr woodland. This lies within approximately 300m of the Option 2 western area. Development here could lose ecological connectivity through wooded areas to the north including Alderholt Heath (SU11/013).

The potential impacts on Sites of Nature Conservation Interest needs reference within the text along with the internationally important habitats in 18.3.6.

Almost the whole area proposed for major expansion is identified as Higher Potential Ecological Network and thus the impacts on the whole natural environment need to be fully assessed to inform such a major proposed expansion.

## **19. Lytchett Matravers and Lytchett Minster**

### **LYMTI-7**

The proposed area of development in Lytchett Matravers appears to be considerably larger than in the emerging Purbeck Plan.

We welcome the recognition of the presence of internationally protected heathland and the need to provide SANGs through a co-ordinated master planning approach between developers, Dorset Council and Natural England (19.3.4). We also welcome recognition that this area lies within the Poole Harbour catchment and the requirement for development to be nitrogen neutral (19.3.5). However, we consider these requirements should be set out in each of policies LYMT1-7 to be consistent with policies elsewhere in the Local Plan.

Although no green space or SANGS provision is shown on the plans, there were concerns regarding the size, position and inaccessibility of the previously suggested SANGs. Although not within the 400m heathland buffer zone, access to Wareham Forest and related heathland is relatively easy from this location.

There are 9 SNCIs in the immediate area including 4 significant blocks of woodland and coppice close to the north-west area of development and the potential impact on these areas and the wider environment needs to be assessed further.

Information is available that parts of LYMT6 include acid grassland (a priority habitat), whilst all sites have trees and hedgerows and watercourse cross some sites. Before the proposed developments are progressed further a full ecological survey and evaluation should be undertaken for the proposed sites LYMT5-7 and potential SANGs. These should be done at various times of the year to reflect seasonal changes in wildlife interest.

Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity on site and within the wider environment, opportunities for net biodiversity gain on site, and the possible position/design/size of development and open space/SANG cannot be assessed, or the viability of the development determined. Without this, we believe there will remain a degree of uncertainty over the deliverability of these allocations.

All the proposed allocations at Lytchett Matravers/Lytchett Minster lie within the Poole Harbour Recreation Zone. There should be a reference to this in the text and each allocation policy, setting out the need to secure contributions.

If the Council is minded to bring these sites forward we recommend inclusion of the requirement for SANGs, nitrogen neutrality and contributions to the Poole Harbour Recreation Zone, and the retention and protection of priority habitats and watercourses along with trees and hedgerows in policy.

## **20. Sturminster Marshall**

### **Sturminster Marshall STMR2-4**

We welcome the recognition of the presence of internationally protected heathland and the need to provide SANGs through a co-ordinated master planning approach between developers, Dorset Council and Natural England (20.3.5). However, we consider this should be written into policies STMR2-4, in line with other policies within the draft Local Plan.

We recommend prior ecological survey and assessment of development sites and areas for proposed SANG. Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity on site and within the wider environment, opportunities for net biodiversity gain on site, and the possible position/design/size of development and open space/SANG cannot be assessed, or the viability of the development determined.

## **21. Wool**

### **WOOL1: New housing at Wool**

We welcome the recognition of the presence of internationally protected heathland and the need to provide SANGs through a co-ordinated master planning approach between developers, Dorset Council and Natural England (21.3.3) and inclusion of detail regarding the requirements of the SANG in policy WOOL1.

### **WOOL2 Land to the west of East Burton**

We recommend prior ecological survey and assessment of proposed allocation WOOL2 and the area for proposed SANG associated with this site. Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity on site and within the wider environment, opportunities for net biodiversity gain on site, and the possible position/design/size of development and open space/SANG cannot be assessed, or the viability of the development determined. A statement should be included in policy WOOL2 regarding the need to provide SANGs through a co-ordinated master planning approach between developers, Dorset Council and Natural England (21.3.3) and inclusion of detail regarding the requirements of the SANG in line with other policies within the draft Local Plan.

### **Optional additional site: Land to the south of Hillside Road**

DWT has no direct concerns relating to our reserves or SNClS in this area, although there are Conservation Verges that need to be carefully considered. Part of the site is mapped as Existing and Higher Potential Ecological Network, but grasslands do not appear to have been surveyed. There is a record for barn owl in the adjacent area. Before the proposed development is progressed further, a full ecological survey and evaluation should be undertaken for the proposed site and potential SANG, including the potential effects of this development on the biodiversity of designated sites within the wider area and River Frome catchment. This should be done at various times of the year to reflect seasonal changes in wildlife interest.

Without sufficient ecological information on the presence of priority habitats and protected species, the scope for avoidance/mitigation to protect biodiversity on site and within the wider environment, opportunities for net biodiversity gain on site, and the possible position/design/size of development and open space/SANG cannot be assessed, or the viability of the development determined.

## 22. Central Dorset Functional Area

'Environmental Constraints' paragraph 22.1.3 and Figure 22.2 should be re-termed **Environmental Context** and merged as a summary of the environmental situation. The use of a table suggests completeness and this is by no means the case. In this particular case, environmental assets not mentioned include:

- Dorchester town and surrounds contains a number of a wildlife sites.
- The River Frome is a Site of Special Scientific Interest (not the River Piddle).
- The Lorton Valley Nature Park provides a large area of nature-rich habitat and green infrastructure on the edge of Weymouth.
- There are important marine conservation sites off the Weymouth and Portland coast.
- Crookhill Brickpits SAC lies within Chickerell.
- Old quarries on Portland have a very high nature conservation value and the Portland Quarries Nature Park provides a focal point for access to nature on Portland.

## 23. Dorchester

### **DOR10 Land south of Castle Park**

**Agree subject to amendment**

We welcome the reference to nutrient neutrality in paragraph 23.6.23, but this requirement is not reflected in the policy wording. The site should also contribute towards natural greenspace provision or management in the area, which should be designed so as to also meet the requirements for biodiversity net gain. Residents of this development would be extremely likely to use Maiden Castle as a place for recreation and dog walking. Maiden Castle is an SNCI (our ref SY68/01 I) as well as being a historic site and measures to manage public access might be required.

This is not adequately reflected in Policy DOR10 which should be amended as follows:

Land south of Castle Park, as shown on the policies map, is allocated for housing. Development of the site will need to incorporate:

- provision of cycle and pedestrian access onto Weymouth Avenue, linking in with existing cycle routes;
- **appropriate natural greenspace to ensure avoidance of increased recreational pressure on Maiden Castle;**
- **measures, on or off site, to ensure nutrient neutrality**
- appropriate noise assessment and mitigation related to the nearby A35(T);
- mitigation of surface water and ground water drainage issues in the area through a strategic approach to delivering flood risk mitigation; and
- appropriate screening to minimise any impact on both landscapes and on Maiden Castle.

### **DOR13 Land to the North of Dorchester**

**Disagree as currently worded**

A proposal of this scale presents a significant opportunity for the developers, planning authority and consultees to work together to achieve an exemplar development and demonstrate the value of early collaboration. This development is highly significant within the context of the Dorset Council area and by far the biggest in recent years. If it goes ahead, it should therefore showcase sustainable development and creating natural green spaces and habitats that mean the place will have significantly better biodiversity enhancement and access to nature than has been the norm in recent years.

Dorset Wildlife Trust has major concerns about the wording of the text and policy for this proposed allocation. We do not feel that they have adequately reflected either the existing interests on site or



the scale of green infrastructure and biodiversity protection and enhancement which would be needed for it to be this exemplar site. On this basis we would object to any development proposals not meeting this necessarily high standard.

#### Figure 23.4 Vision for the north of Dorchester

Placemaking overview – The third paragraph covers the water meadows. Whilst increased access and links with the historic context are welcomed, it should be stressed that the wetland and wildlife function of this area should be the primary considerations. This must include areas where access is managed to ensure disturbance to wildlife, especially birds, is minimised (so for example this might be by allowing visual access but routing footpaths around key areas not across them, restricting access by dogs and making use of screens and hides to avoid disturbance). It is important that roads, pedestrian and cycle routes are planned so as not to fragment natural habitat in a way that prevents it meeting its potential ecological value.

Environmental performance - This section should also include natural environmental enhancements including natural greenspace, nature reserves and wildlife features within the built environment.

Integrating North of Dorchester into the landscape – This section should refer to natural habitats as well as tree and woodland planting.

26.3.31 – the list of requirements must also include major green infrastructure and natural environment conservation and enhancements.

26.3.33 - It is important that roads, pedestrian and cycle routes are planned so as not to fragment natural habitat and in particular the water meadows in a way that prevents it meeting its potential ecological value. Existing valuable habitat must not be split and enhancements to create a large wildlife area should be considered alongside how people access and pass through it.

26.3.38 – Green infrastructure should be included on the list of required infrastructure. We are aware the list is not meant to be complete but inclusion of green infrastructure clearly indicates the requirement to make this is major part of the development.

#### Biodiversity considerations

This section does not in our view fully express either the value of the wildlife within the boundary of the site (such as the water meadows which include a Site of Nature Conservation Interest), the river itself (upstream of the SSSI which is equally valuable chalk stream habitat), the risks to both these and the downstream habitats if the mitigation measures are not right nor the opportunities for enhancement to create a major area of wildlife habitat.

We would also suggest the section is titled **Biodiversity** (“considerations” implies this is optional).

23.6.56 – Though the farmland of the existing site is intensively managed, there are populations of farmland birds on site; many of these species (such as yellowhammer, corn bunting and barn owl) have suffered significant declines and are priority species. The reference to “a range of farmland birds” downplays their importance and we suggest the word “priority” is added. Parts of the site are significant for winter visiting bird populations.

23.6.57 – The River Frome is species rich (“considered to be” is inappropriate wording). We agree that there is potential to impact on the SSSI but the river upstream is also species rich and equally vulnerable.

23.6.59 – The Frome Meadows SNCI lies within the allocated site and this should be stated in this paragraph along with a clear commitment to protect and enhance it (not just “where possible”).

23.6.60 – A greater degree of ambition towards biodiversity enhancement should be set out within this paragraph. 3,500 houses, along with the other infrastructure required, gives a considerable scale of development and the scale of biodiversity enhancement should equal that. We would suggest that for a development of this size it is not helpful to pin the requirement to a 10% net gain for biodiversity. We do not suggest that there should be a lower requirement, but that 10% is likely not to prove a noticeable gain at this scale and that is what will be needed to meet the ‘garden community’ principles around environmental enhancement. It is also completely inappropriate to describe retention of existing features as net gain. Elements of wilding should be considered with an emphasis on creating habitat that is sustainable to manage in the long-run.

Suggested changes:

23.6.60. With appropriate design and provision for ongoing management there is the potential to achieve substantive biodiversity benefits at North of Dorchester and development will be expected to deliver a demonstrable **and substantial** net biodiversity gain **in addition to**. ~~The minimum of 10% biodiversity net gain could be achieved through the retention of mature trees, and hedgerows,~~ **wetlands, water meadows and other existing wildlife habitat** within the development. **Net gain will be required to include** ~~through~~ the creation of wild flower rich chalk downland, **new native woodlands** and ~~through~~ the creation of **additional** wetlands (**which should also function** for nutrient stripping) and wildlife areas associated with the water meadows ~~should be incorporated within the development.~~ **Biodiversity enhancement should be on-site to enable it where appropriate to also form part of a network of major new green infrastructure which will be required as part of this development.**

Green Infrastructure

This section is worded better in respect of the scale of ambition than the Biodiversity section. The word “generous” in relation to greenspace provision is often used in definitions of garden communities and this needs to be clearly incorporated in the requirements of this development.

### Policy DOR13 Land north of Dorchester

Should the Local Authority be minded to take forward this allocation, we recommend the following amendments to the policy wording:

X Areas at risk of flooding from all sources will be avoided. The development will deliver a flood mitigation strategy which makes best use of the opportunities on the site, **including habitats that provide natural flood management**, with a viable and deliverable flood mitigation strategy being implemented.

XI Proposals will be accompanied by a hydrogeological risk assessment to demonstrate that development will not compromise groundwater quality or its abstraction. The development should be at least nitrogen neutral. **The existing biodiversity assets on the site must be maintained and in addition** opportunities for biodiversity enhancement on the site ~~should~~ **must** be considered at the earliest stage and used to form the structure of the development in order to deliver ~~the minimum 10%~~ **significant net gain for biodiversity** required.

XII A local nature reserve ~~should~~ **of significant size will be provided required** at the water meadows as a key part of the green infrastructure network for the development. This ~~should~~ **must lead to a significant enhancement for biodiversity and wetlands and also** incorporate improved recreational access, opportunities for greater appreciation of the areas rich heritage and for heritage-led tourism, ~~biodiversity enhancement and wetland features~~. **Generous green infrastructure away from the flood plain will also be required.**

#### **DOR 14 Land to the west of Charminster**

**Disagree as currently worded**

Natural greenspace which also meets requirements for biodiversity net gain will be required. The potential allocation includes an area of the existing Ecological Network (neutral grassland). The ecological value of this grassland should be ascertained before the extent of any allocation is determined - if it is of high ecological value it should be retained. The functionality of ecological connections should be retained and enhanced in any scenario.

All Dorchester sites lie within the Poole Harbour catchment and therefore development will be required to demonstrate nutrient neutrality and this is not reflected in the text or policy.

Further criteria should be added to Policy DOR14:

- **appropriate natural greenspace and biodiversity enhancement;**
- **measures, on or off site, to ensure nutrient neutrality.**

## **24. Weymouth**

#### **WEY9 Lodmoor gateway and country park area**

**Disagree in its current form**

We support the comments made by the RSPB in respect of this policy. Further tourism development at Lodmoor would increase pressure on the RSPB reserve, which has suffered from the impacts of surrounding development and may require further resources to maintain site condition for wildlife and visitors.

#### **WEY14 Land south of Wey valley**

**Agree subject to policy wording change**

The site lies within easy walking and driving distance (1.2km at closest point) of the Lorton Valley Nature Park and DWT's Lorton Valley Nature Reserve. Contributions towards facilities and visitor management of the Nature Park would be appropriate.

The site also lies within 5km of Chesil Beach and the Fleet international sites. It is within easy driving distance and it is likely that residents of the new development will make use of the international site for recreation. Therefore contributions towards visitor management of that site should be required.

The site lies close to the River Wey and it will be essential to protect and enhance the river corridor. There are otter (a protected species) records on the river at this location.

We would therefore suggest that a further bullet is added to the list in the policy:

- **Adverse impacts on biodiversity are avoided and enhancements secured. These should include enhancement of the river corridor and of natural greenspace. Mitigation for recreational pressure on Chesil and The Fleet will be required.**

#### **WEY15 Land west of Southill**

**Agree subject to policy wording change**

The site lies close to Radipole Lake SSSI, an important wetland site. It will be vital to ensure that any increase in visitor pressure is not harmful to the SSSI so we welcome the reference to on site open

space. Biodiversity net gain should be secured through this development and this should be guided by how enhancements can support the ecology of Radipole lake and increase the functionality of any wildlife corridor from Radipole Lake into the countryside.

The site also lies within 2km of Chesil Beach and the Fleet international sites. It is within easy driving distance and it is likely that residents of the new development will make use of the international site for recreation. Therefore contributions towards visitor management of that site should be required and this is not mentioned in the policy.

#### **WEY16 Land at Markham and Little Francis**      **Agree subject to wording & map changes**

The area shown on Figure 24.1 as 'major development site' includes the Little Francis Site of Nature Conservation Interest, as well as areas that are required to be retained as green infrastructure. These areas should be distinguished on the map as such, to avoid any unintended inference that they can be developed.

Paragraph 24.6.35 refers to 'ideally' transferring this land to Dorset Wildlife Trust and it must be stressed that this has not been agreed as yet. It is vital that long-term management of this area by a suitable body is agreed and adequately funded.

This site lies within 5 km of Chesil and the Fleet and a requirement for adequate measures to mitigate the impacts of increased recreational pressure on Chesil and the Fleet should be included in the policy.

#### **WEY19 Lorton Valley Nature Park**      **Agree subject to policy wording change**

Dorset Wildlife Trust strongly supports this policy and the extension of the Nature Park. The Nature Park has been in existence for some years and was included in the previous Local Plan for the area. It should therefore not be referred to as a proposal.

It would be appropriate for the policy wording to refer to the need to secure contributions towards management of the nature park, visitor management to ensure that the special nature of the area for quiet recreation is maintained and appropriate and secure tenure and long term management by a public or nature conservation body of the extension land.

Policy WEY19:

Land between Preston Beach Road, Southdown Ridge and Wyke Oliver Hill, as shown on the policies map, is allocated as part of the Lorton Valley Nature Park to **create and maintain a strategic area of natural habitat and accessible greenspace in the urban area. Contributions from nearby development will be allocated to enable management of the area for wildlife and public access. The Nature Park will** promote sustainable tourism, ~~management of~~ **enhance** conservation and heritage interest, ~~enhancement of~~ public access and open spaces and **provide** opportunities for volunteer and community involvement.

#### **Weymouth to Portland relief road**      **Agree**

We welcome the rationale set out in paragraphs 24.6.48-51. A road scheme in this location presents significant environmental challenges, not least the climate change impacts of building new roads, as well as the impact on international, national and local wildlife sites, and the Dorset AONB. The Local Plan's emphasis should be on public transport, active travel, technological improvements such as broadband and mobile technology to reduce road traffic and thus the need for new road building.

## 26. Portland

We support paragraph 26.1.3 and 26.1.5 setting out the nature conservation assets in the area; it would be appropriate to also refer in the introduction to Portland Quarries Nature Park and to marine biodiversity assets in this location, including Portland Harbour, which is of known nature conservation importance, and Chesil and Stennis Ledges Marine Conservation Zone. The high quality marine and terrestrial environment provides a significant element of the local economy including dive operators, water sports, art and heritage as well as nature-based tourism. These should be framed in a positive way providing opportunities for a nature-based economy that is in harmony with the local environment.

26.2 Vision for Portland should include reference to the natural environment and specifically to Portland Quarries Nature Park.

26.3.5 We welcome the reference to sustainable tourism, it would be appropriate here though to again mention impacts on Chesil and The Fleet international site from recreational use and the need for development (including tourism development) to contribute to the mitigation strategy to manage visitor pressure.

26.5.5. This paragraph should be amended to make it clear that there are nature conservation interests throughout the Port estate (including in the marine environment). In particular some of the areas of employment land towards the south of the site have significant undesignated wildlife interest. The presence of Sites of Nature Conservation Interest should also be specifically mentioned as these lie in close proximity to existing employment allocations and are thus extremely vulnerable to damage and disturbance:

**Three Sites of Nature Conservation Interest are present as well as other areas with priority habitat and species as well as local nature, heritage and landscape designations also exist and there are areas subject to land instability. T**

### **Portland Quarries Nature Park** **Agree**

Dorset Wildlife Trust strongly supports Policy PORT3 and paragraphs 26.5.12-15.

## 27. Crossways/Moreton Station

Crossways developments lie close to Winfrith and Tadnoll DWT reserve therefore we have a particular concern about any additional recreational pressure on that site from development. The reserve already suffers significantly from problems related to public access, particularly disturbance of birds by dogs. We support paragraph 27.3.4 requiring a co-ordinated approach with regard to mitigation for impacts on international nature conservation sites.

Although there is currently no public access, it should be noted that the Warmwell Viridor site (shown on the plan as Tip Closed) has exceptional biodiversity interest and it is likely that The Warmwell Airfield Quarry is also a site of high biodiversity interest.

### **CRSI: Land south of Warmwell Road** **Disagree as currently worded**

The allocation lies close to Skippet Heath Site of Nature Conservation Interest (SY78/037), a site of mixed woodland and heathland. It is important that the allocation of housing in this area supports management of the SNCI and does not cause harm through inappropriate recreational use. It is important therefore to mention the SNCI in the text and policy to ensure its safeguarding in the same way as the scheduled monument has been safeguarded. Paragraph 27.5.2 should be amended accordingly.

Criteria II of Policy CRSI should be amended to read:

II. The development will be required to mitigate any adverse effects upon internationally **and locally** designated heathlands.

#### **CRS2 Moreton Station/Redbridge Pit Disagree as currently worded and mapped**

The site contains Redbridge Site of Nature Conservation Interest (SNCI, our ref: SY78/027). Although a significant part of the Redbridge SNCI is currently an active mineral extraction site, there is remaining heathland and wetland interest and agreement in minerals planning that this area will be restored to the appropriate wildlife habitat when the period of extraction operations is completed. The SNCI interest should be retained, buffered and enhanced through any allocation for development.

The Policy mentions the need for a SANG and a Heathland Support Area. These are however not shown on the proposals map (despite the policy saying that they are), though it is helpful to have the minimum sizes stated. We assume they are intended to be as currently shown on the Purbeck Local Plan Moreton inset map. As the Redbridge site is still currently an SNCI, any SANG area should be of sufficient scale and quality to fully compensate for any habitat loss and loss of opportunity for post-minerals restoration, and biodiversity enhancements should be a key priority as well as public access.

The maps should be amended, and a further criteria added to V in the policy:

- **Enhancement of on-site biodiversity including areas of SNCI, including of existing heathland and other supporting habitats as well as enhancement leading to net gain for biodiversity.**

Criteria III from CRSI is also required in the policy:

- **The development will be required to incorporate measures to secure effective avoidance and mitigation of any potential adverse effect of additional nutrient loading upon the Poole Harbour internationally designated sites.**

#### **CRS4 Land to the west of Frome Valley Road Agree subject to policy wording and mapping changes**

The policy wording states that this site is shown on the proposals map but it is not on the linked Dorset Explorer layer, and the map in the consultation document does not label CRS4. The SANG for this site should also be shown on the map, particularly as the CRS5 allocation relies on it.

Criteria III from CRSI is also required in the policy:

- **The development will be required to incorporate measures to secure effective avoidance and mitigation of any potential adverse effect of additional nutrient loading upon the Poole Harbour internationally designated sites.**

#### **CRS5 Land at Woodsford Fields Agree subject to wording change in the policy**

The site lies within 5km of the Dorset Heaths/Heathlands international sites, including Dorset Wildlife Trust's Winfrith and Tadnoll Nature Reserve. Therefore a SANG on site will be essential, as well as provision for management of improved ability to manage public access to the nature reserve (such as a heathland support area).

Criteria III from CRSI is also required in the policy:

- **The development will be required to incorporate measures to secure effective avoidance and mitigation of any potential adverse effect of additional nutrient loading upon the Poole Harbour internationally designated sites.**

**CRS6 Land to the west of Crossways**      **Agree subject to wording change in policy**

The site lies within 1km of the Dorset Heaths/Heathlands international sites (Warmwell Heath), and within 5km of Dorset Wildlife Trust's Winfrith and Tadnoll Nature Reserve, also internationally designated. Therefore a SANG on site will be essential, as well as provision for management of improved ability to manage public access to the nature reserve (such as a heathland support area). The site also lies within the Poole Harbour catchment and this is not covered in the text or policy.

Criteria III from CRSI is required in the policy:

- **The development will be required to incorporate measures to secure effective avoidance and mitigation of any potential adverse effect of additional nutrient loading upon the Poole Harbour internationally designated sites.**

**CRS7: Land adjacent to Deer Leap House**      **Disagree without further information**

The allocated land currently consists of broadleaved and coniferous woodland. These are likely to have some existing biodiversity interest and the site should be subject to further survey prior to allocation. Removal of existing semi-natural habitat is likely to mean the bar to achieve net biodiversity gain could be very high, making the allocation unviable, as well as being challenging in climate change terms. Both issues require further investigation.

Should the allocation be pursued, we would expect to see reference to retention and enhancement of biodiversity features in the text and policy. The policy should also refer to the need for nutrient neutrality in the Poole Harbour catchment

## Northern Dorset Functional Area

### 29. Gillingham

We welcome the need to deliver good quality green infrastructure – for the environment and for residents’ quality of life in the Vision for Gillingham 29.2.1. We support the need for schemes to help improve the network of green spaces, connect to the three rivers that run through the town, and help deliver the aspirations of the Gillingham Royal Forest project. Contributions could be made to enhancements nearby in the Gillingham Royal Forest area, for great crested newts and for catchment management.

#### GILL2 Gillingham Southern Extension

**Agree subject to wording change in policy**

We support the requirement to conserve and enhance the natural and historic environment and provide green infrastructure as set out in Policy GILL2 but would also recommend a link in policy to delivering the aspirations of the Gillingham Royal Forest Project as stated in 29.2.1. An additional bullet under criteria III would be appropriate to **contribute to biodiversity enhancement on site and within the Gillingham Royal Forest project.**

We also recommend adding the need for retention and enhancement of river corridors and watercourses, ponds and other natural features within public open spaces and publicly accessible greenways, as already specified for important trees, groups of trees, and hedgerows in VIII bullet 4.

#### GILL3 Land at Common Mead Lane

We recommend that the aspiration to provide improved public access to the countryside stated in 29.5.8 should be included in policy along with a requirement for some informal green infrastructure.

#### Optional Urban Extension

We welcome the need to successfully integrate/retain and enhance existing landscape and ecological assets including river corridors and watercourses, important trees and hedgerows, ponds and other natural habitats within a network of Green Infrastructure as specified in Appendix 5, Design Principles for Gillingham Strategic Site Allocation 1.2.2. We would wish to see opportunities for green space and to create nature recovery networks and nature-based solutions maximised on a more strategic basis rather than on an individual site by site basis, including protecting and enhancing the River Stour corridor for biodiversity and public access.

### 30. Shaftesbury

Paragraphs 30.3.5 and 30.5.7 reference the feasibility of a north – south transport route between the Dorset coast and the M4. We note that this is still being evaluated, however it is hard to see how this route could be achieved between Shaftesbury and Blandford without significant harm to internationally designated chalk downland at Fontmell and Melbury Downs SAC. We therefore suggest that this study is of limited relevance to the area and that funding for local infrastructure should be sought from local developments where needed. We suggest that paragraph 30.5.7 should be deleted.

Development in the Shaftesbury area has the potential to impact on Fontmell and Melbury Downs SAC in a number of ways. Firstly through increased emissions (transport and other sources) affecting deposition of nitrogen and secondly from increasing recreational pressure on this site. These should be mentioned in section 30.1 The popularity of this site for recreational use is already clear and further housing development in the vicinity (particularly in Shaftesbury) will exacerbate the challenges of managing public access on this site. DWT manages a nature reserve at Fontmell Down where there are regular problems with, in particular, dogs walked off leads and conflicts between dog walkers and grazing management. Responsible public access is welcomed at this site, however some uses do at times



conflict with the conservation objectives; we are aware that the National Trust have similar issues at Melbury Beacon. It may be that a strategic solution for addressing recreational pressure on the SAC is needed, given the proximity of planned development at Shaftesbury.

### 31. Sherborne

We welcome master planning of the developments as stated in 31.3.3 and would wish to see opportunities for green space and to create nature recovery networks and nature-based solutions maximised on a more strategic basis rather than on an individual site by site basis.

Residential development should be accompanied by a large new area of natural accessible greenspace which also meets biodiversity net gain criteria.

### SHER4 Barton Farm Extension

The Castleton SNCI ST61/028 lies to the north of the proposed allocation site and is a large area of neutral grassland. There could be opportunities to enhance the SNCI, both by creating habitats that buffer and link the site into a wider ecological network, and by ensuring appropriate management of the SNCI.

### 32. Stalbridge

#### STAL3 Land to the south of Station Road

As stated in 32.5.5 the south-western edge of the site is positioned directly adjacent to a Site of Nature Conservation Interest. (SNCI) Stalbridge SNCI (ST71/053) is a mosaic of habitats including unimproved neutral grassland, dense scrub, semi-natural woodland, hedgerows and areas of Phragmites. We welcome recognition of the potential impacts on the Rooksmoor SAC and the SNCI in 32.5.5 and 32.5.6 and the need for these to be assessed. The disused railway along the edges of the allocation is included within the SNCI.

We support the need for the development to have appositive impact on the SNCI and to deliver net gains for biodiversity in the area generally. There is a record of barn owl within the proposed allocation. We also support the recognition of the watercourses on site and the risk of flooding requiring a sustainable drainage system in 32.5.8, and the need to retain trees and hedgerows in 32.5.9.

A footpath crosses the site (RoW N51/34) and this should be acknowledged in 32.5.7. Potential for increased footfall within the SNCI from this footpath and the connecting bridleway (RoW N51/74) will need consideration as part of the impacts on the SNCI.

We support the policies in STAL3 as follows:

- must not adversely affect the integrity of Rooksmoor Special Area of Conservation (SAC);
- should have a positive impact on the adjacent Site of Nature Conservation Interest and deliver a net gain to biodiversity in the area;

To achieve this, we consider considerable natural green infrastructure would be required adjacent to the full length of the SNCI and mitigation for potential increased recreational pressure. Without seeing a more detailed mapping showing the proposed area of development within the allocation it is difficult for us to assess this allocation and we whilst we welcome the policy protection, remain concerned that the SNCI could lose its ecological connectivity and therefore **object** until more information is available.

#### STAL5 Land to the south of Lower Road

We support inclusion within policy II that STAL5 must not adversely affect the integrity of Rooksmoor Special Area of Conservation (SAC).

## Western Dorset Functional Area

### 35. Beaminster

#### **BEAM1 Land to the north of Broadwindsor Road**

We welcome the recognition of the value of the wooded river channel as a linear wildlife habitat and the need for its protection including a green buffer zone and support its protection in policy BEAM1 III.

#### **BEAM2 Land at Lane End Farm**

We welcome the recognition of the biodiversity interest of the site in 3.5.7 and the need for its protection in policy BEAM2 II.

#### **BEAM3 Land to the west of Tunnel Road**

We welcome the need to seek the retention of existing hedgerows to reflect existing boundaries and maximise biodiversity opportunities in 35.5.11 and consider this should be reflected fully in policy BEAM3. However, we consider this site should be subject to an ecological survey to identify any key features and priority habitats that may need protection within policy before allocation. Part of the site falls within the Higher Potential Ecological Network, there are records for dormice in the area, a watercourse and part appears to be permanent grassland from aerial photographs. Should the Planning Authority be minded to pursue the site, the layout should include informal natural green space, as well as any formal open spaces required. This could include green corridors, community woodland, orchard or other community nature reserve.

### 36. Bridport

#### **BRID3: Land to the east of Bredy Veterinary Centre, off Jessopp Avenue**

We welcome the need for the layout of the development to exploit opportunities to enlarge the existing buffer and provide high quality green infrastructure along the river corridor in 36.5.8 and the information provided about the protected species using the bankside habitat.

We consider policy BRID3 should be amended to reflect the text in 36.5.8. to state

**the Asker River corridor will be protected and the layout of the development will exploit opportunities to enlarge the existing buffer and provide high quality green infrastructure along the river corridor.**

## Appendices

### Appendix 3: Small sites and Appendix 4: Gypsy and Traveller Sites

As with some of the larger sites, these areas have not all been fully assessed against biodiversity impacts prior to inclusion in this list.

In the case of Appendix 3, there is no map to indicate exact locations, and therefore we cannot advise in detail, however we are concerned that the list of 'constraints' referenced in paragraph 1.1.5 will not be complete with respect to on-site biodiversity. It is particularly important that 'small sites' are not allocated at all if there are likely to be harmful biodiversity impacts, or the number of houses planned reduced to a realistic level to start with, as the smaller level of development is likely to make avoidance and mitigation less possible than it is for a larger site. Further assessment should be undertaken including on-site biodiversity assessment where appropriate and sites removed from the list in Figure A3 if biodiversity harm cannot be avoided.

#### **GT/WIMI/002 Blunts Farm, Wimborne**

To tie in with the requirements of the employment site at Blunt's Farm (FERN8) we would like to see similar policy requirements for that site if taken forward to the draft Local Plan i.e to ensure no harm to the Moors River System SSSI, protect the Site of Nature Conservation Interest and retain significant landscape buffers within the northern and eastern parts of the site, including against the SNCI. We also suggest amendment of the first bullet of Policy HOUS12 V to 'any impact resulting from the proposal on the character and value of the landscape, **priority habitats** ~~or~~ **and** the settlements adjacent to the site can be avoided or adequately mitigated; and'.