Dorset Heathlands Planning Framework 2020-2025 SPD Consultation Report January 2020

BCP Council and Dorset Council consulted jointly on the Draft Dorset Heathlands Planning Framework Supplementary Planning Document (SPD) for 4 weeks from 3 January to 3 February 2020. The Councils contacted everyone who registered an interest in being contacted about local planning consultations. The Communications teams raised awareness through social media and a press release. Hard copies of the SPD were displayed in every library in the BCP Council and Dorset Council areas and the SPD was available on both Council's websites.

The consultation attracted 115 responses as set out in the consultation report at Appendix 2, of which 62 responses were from organisations and 53 responses were from the public. The two tables below, one for organisations and one for members of the public provide a brief summary of the comment, an officer response and where relevant, actions for the SPD.

Responses from organisations:

Respondent	Comment	Officer response
Action 4 Alderholt	• Carbon emissions and Climate Control should weigh very heavily on any future development plans with all future new housing situated on brownfield sites as close as possible to existing public transport routes, existing infrastructure, existing public services and existing employment opportunities, effectively ruling out remote greenfield sites.	• Noted, this is an issue for the local plan and not relevant to the SPD
Amphibian & Reptile Conservation	• Remain supportive of the Dorset Heathlands Planning Framework which continues to provide an effective balance between development and mitigating the impact on the heathland environment. • Fully support the policies to avoid and limit impact to identified habitats and ecological networks i.e. Dorset's Ecological Networks. However, remain concerned with the ongoing loss of these ecological networks e.g. the loss of the potential habitats between Parley-Merritown heaths. • The more urban SSSIs are progressively becoming more isolated. Therefore need to safeguard additional zones of retained habitats around isolated SSSIs. • To comply with NPPF 174 it is essential that actual and potential ecological networks are safeguarded within Local Plans to ensure that these SSSIs do not continue to lose their functionality and resilience within the landscape via successive development. • Development continues to isolate some of the SSSI series e.g. Canford, Ferndown, Parley and Talbot Heath with a loss of function, structure and resilience of these protected habitats at a landscape level. For example large-scale development in: ○ North Poole is encroaching on encroaching on an area classified as a potential ecological	• Support noted. • Acknowledge the concerns raised. The emerging local plans will have to look carefully at the role of ecological networks.

Respondent	Comment	Officer response
	network, isolating Canford Heath and not clear Canford SANG will be effective. ○ Talbot Village - TV3 should have been restored to heath to reconnect and improve resilience. There is a failure to achieve net gain in biodiversity and a proposed SANG adjacent to SSSI is inappropriate. Reduce the TV2 footprint and increase the SANG. ○ Ferndown SSSI is becoming isolated and not effective to manage, e.g. arson. • Further emphasis should be given to define and safeguard areas that may currently be of poor ecological quality, e.g. as new Green Belt. • Concerned that some use class continues to allow development adjacent/within 400m of protected heathland, and that some of these use classes remain inappropriate e.g. student accommodation. • Agree that large scale development have binding agreements, e.g. SANGs should be completed before the development is occupied. Mitigation or compensation must be of sufficient extent and quality to offset loss and provide ecological gain, and enforced. • Poor quality evidence from ecological consultants is a concern on which planning applications are proposed. Furthermore monitoring to assess the effectiveness of mitigation and compensation schemes remains insufficient. • Harmful invasive non-native species continue to be planted within development schemes, to the direct detriment of SSSI and ecological networks.	
Arne Parish Council	• Arne Parish Council has considered the proposal and members would like to stress that they would not wish to see any form of relaxing of the 400m heathland mitigation zone.	• Comment noted
Blandford Forum Town Council	• The Town Council feel that this is a strongly evidenced document that has considered the factors involved in mitigation of development near and in heathland areas. • We therefore broadly welcome the findings of the document and note that it is a national strategy applied to the whole Dorset area. • We particularly welcome the continuance and possible creation of SANGS and would wish to see such areas developed more fully into 'semi-wilded' recreational spaces, which will add to bio-diversity and help mitigate climate change. They should never be merely a dog-walking area. • As climate change becomes a more urgent agent in the life of both heathlands and SANGS, we feel that examination of fire precautions needs to be investigated and if necessary, sufficiently strengthened as a preventative measure.' • Recognise the necessity for levying CIL contributions to SAMMS which will further mitigate impact on sensitive heathland environments.	• Support noted. • Note that the strategy only covers the 5km area around heathlands so does not cover the full extent of Dorset. Furthermore the area formerly within North Dorset District does not have CIL so will require planning obligations (S106 Agreements) unlike the rest of Dorset where CIL is in place. • Mitigation of the adverse impacts caused by fire is included as possible measure and the Councils will be looking to identify such projects.

Respondent	Comment	Officer response
	• Note that CIL contributions will levied on new developments within the southern part of the North Dorset area as a result of the mitigation criteria. • Although clearly not the purpose of the document, clarity on identified sites for development would enable some assessment of impact on sensitive areas to occur. • A spatial strategy that spreads the impact of developments across the whole region would lessen immediate impact on nearby social and retail centres such as Wimborne and Christchurch.	
The Blandford Group Practice	• Support the strategy to protect these valuable heathlands and to restrict building in these areas. As a GP Practice we feel we need to promote the protection of valuable outdoor space and our natural environment as this is key to people living healthier lives both from a physical and a mental perspective. There is extensive scientific evidence supporting links to having good access outdoor space / natural environment to the state of the health and wellbeing of the local population. In light of the recent events in Australia, it is prudent not to build too close to heathland as by their nature they are prone to be highly combustible (natural and deliberate)!	• Support noted
Bourne Leisure	• Current planning policy presupposes the protected habitat is in good condition and being managed effectively in a way consistent with the European Site Conservation Objectives. This 'blanket policy approach' is insufficiently nuanced, and instead proposed new development and bespoke mitigation solutions should be considered on a case-by-case basis, in terms of two interrelated aspects: o the nature of the use proposed and how it can be managed to avoid adverse impacts on heathland areas; and o potential benefits arising from such development, including funding to maintain and enhance heathland areas. • Planning policy restrictions threaten the future of the Holiday Park, and a funding source to contribute to regenerating Ham Common, which is in an unfavourable condition. A bespoke solution can be developed for Rockley Park that protects the integrity of Ham Common SPA, helps to regenerate the declining state of the heathland area, and enables the Holiday Park to evolve so that it can continue contributing to tourism and economic growth. • This will most likely need to be led by the Council's Local Plan review which will then prompt a review of the SPD. • An example of flexible policy within 400m of the SPA - Policy. NRM6 of the South East Plan (Thames Basin Heath SPA) that, *"…within the*	• The blanket approach provides certainty, although each application will be considered on a case by case basis. • Rockley park proposals will be considered through the BCP Local Plan process.

Respondent	Comment	Officer response
	zone of influence, there will be a 400m exclusion zone where mitigation measures are unlikely to be capable of protecting the integrity of the SPA. In exceptional circumstances, this may vary with the provision of evidence that demonstrates the extent of the area within which it is considered that mitigation measures will be capable of protecting the integrity of the SPA. These small locally determined zones will be set out in local development frameworks (LDFs) and SPA avoidance strategies and agreed with Natural England." The supporting text to the policy states that local authorities must, *"…put forward a policy framework to protect the SPA whilst meeting development requirements..." (Para 9.32) and that, "Where developers propose a bespoke [mitigation] solution, this will be assessed on its own merits under the Habitats Regulations."* (Para 9.36) Bracknell Forest Council states in its SPD that, *"Applications for non-residential development in Zone A will be assessed on a case by case basis, in agreement with NE."* (Para 3.2.3)	
Bournemouth Development Company	• BCP Council owns a number of allocated sites in Bournemouth town centre. • Welcome the fact that the Councils have been able to identify a strategy which will allow development to proceed, to maintain the prosperity of the region. • BDC and BCP Council need to work together to identify a solution to overcome the objections to development arising from the potential impacts on the protected Dorset Heathlands. • BDC requires certainty that the sites in its portfolio are deliverable in relation to the requirements of the Habitats Regulations and that it will not experience unnecessary delays when engaging with the local planning authorities and Natural England on these matters for the preparation and submission of planning applications. • The draft SPD removes 50 or more units threshold for providing SANGs, thereby removing a degree of certainty which is important to provide clarity and consistency across proposed developments. • Appendix A of the draft SPD provides guidance on types of SAMM measures and HIPs but does not provide detail on proposed strategic locations of such measures or projects nor how this will be monitored. The SPD should detail the specific locations for such mitigation measures and the proposed Monitoring, Projects and Implementation Plan should be published to provide this guidance. • There is limited information provided to quantify the 5 years of SAMM projects and costs for respective Councils. To be successful it is essential that the SPD provides the requisite level of certainty and consistency to allow the costs associated with development to be transparent	• Support noted. • The threshold for SANGs provision will be reinserted. • Specific locations and spend will be set out in the Monitoring, Projects and Implementation Plan. • The occupancy levels are based on census data. The SAMMs have been calculated on assumptions of house/flat split. The workings were considered too complex and unnecessary for inclusion in the SPD. • There is no right approach in respect of CIL or planning obligation. Each Council has chosen a different method and these methods will be reviewed through the local plan process. • Acknowledge Draft SPD was inconsistent regarding student accommodation. • Note the comments on SANG design and this section will be updated. **Action:** • **Re-insert threshold for the provision of SANGs**

Respondent	Comment	Officer response
	and understood, particularly given the heightened importance of viability matters. It is not certain when provision of an on-site SANG or HIP would be required for residential development within 5km of the Dorset Heathlands or, if financial contributions were made, whether these would be found to provide the required specific mitigation. It is important that the SPD provides a clear basis and justification for contributions. • There is no justification for occupancy rates of 2.42/house and 1.65/flat across the region. Similarly, the 'assumed % house/flat split' is not qualified. This should relate to the planned housing mix over the relevant (Plan) period, rather than previous trends. • The SPD is not clear which approach CIL/planning obligation approach is correct. • In accordance with Para 16 of NPPF, policies should be clearly written and unambiguous and should not be used to add unnecessarily to the financial burdens on development. • The potential to provide HIPs alongside major developments in the urban area is highly constrained. Suitable land for HIPs has become increasingly scarce as urban sites have developed/redeveloped over time. It is therefore important the SPD provides certainty regarding the circumstances in which a financial contribution towards a specific strategic HIP will be required, or where a bespoke HIP related to a specific development proposal is necessary. Accept that each site should be considered on a site-by-site basis but further clarification should be provided through the SPD so that developers can plan effectively. This certainty must be provided in advance of the adoption of the BCP Council Local Plan, which will not be adopted until 2023. • There is also a duty on the Local Planning Authority to ensure that contributions collected towards heathland mitigation are actually spent on projects that have been agreed with Natural England. • Appendix B – The table in this section indicates that 'University managed student accommodation' will not be allowed within 400m of the heathlands and that it will be permitted within 400m-5km of the heathlands provided a financial contribution is made by way of mitigation. The current version of the SPD indicates that managed student halls of residence on University campuses are likely to be different to C3 residential. There is no evidence to justify that a different approach should be followed. • Appendix D – certain aspects of Appendix D are too prescriptive and may prevent SANG / HIP being agreed and therefore affect the deliverability	• **Amend inconsistency with student accommodation**. • **Update Appendix D in line with best practice**.

Respondent	Comment	Officer response
	of new housing developments. The SPD should provide more flexibility: ○ Where a SANG/HIP car park is separated by a road crossing – subject to the type of road, its location and use patterns, it may not be an impediment to the use of the SANG/HIP; ○ Sites required to be within easy walking distance (400m) of the development linked to it – agree that to maximise the prospects of someone using SANG it should be within easy walking distance of a proposed housing scheme. However, this should not necessarily be limited to within 400m. A pragmatic approach must be taken to on a site-by-site basis, to ensure that sites which are within easy walking distance, but that may be further away than 400m, are not necessarily rejected on that criteria alone; ○ Provision of circular walking routes – to provide greater flexibility for the delivery of SANG sites in the urban area there should be circumstances where the required minimum walk lengths of 2.3-2.5km can be achieved through means other than just a circular walk e.g. through a combination of a shorter circular route with paths that cross the SANG area and link up; ○ All SANGs with car parks must have circular walks which start and finish at the car park – this requirement should allow for situations where the site shape and size characteristics do not allow for the circular walk to start and finish at the car park. Some sites, which otherwise meet all of the other SANG requirements, may require a short section of path before a circular walk can 'open up'. ○ SANG must provide a variety of habitats for visitors or experience – this could prove overly restrictive.	
British Horse Society	• Please increase horse access along all Castleman Trailway from Poole to the New Forest, especially across West Moors. • North Dorset Trailway link up to Poole one • From West Moors add old railway line could be a trailway to Salisbury. • From Shillingstone the link Great Ridgeway Trail goes all the way to Lyme Regis. • Combine funding with Chalk and Cheese Grant, Sport England and British Horse Society.	• Proposals can be considered in the Monitoring, Projects and Implementation Plan
Broadmayne Parish Council	• The Parish Council supports the principle of the SPD avoid any adverse effects on the integrity of the Dorset Heathlands, and welcomes the possibility of additional mitigation of adverse effects on existing heathlands and the provision of SANGs in the context of the proposed large scale developments in nearby Crossways	• Support noted. • There are no plans to apply restrictions to dog owners, the strategy aims to educate and encourage behavioural change.

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	• Appendix A - If the damage caused by domestic pets is one of the primary problems on protected heathlands then further controls on dogs (i.e. requiring them to be kept on leads) may be necessary. Bins for dog waste should also be provided at the entrances to sites. Education of users is vital - information boards, talks to parish councils and schools could be part of this. • Appendix D - SANGs should be integrated into the public rights of way network so that they can be easily accessed by users on foot, horseback and bicycle, not just those with access to cars. • Support the principles set out in Appendices E and F	• Agree that where possible SANGs should be linked into the public rights of way network. • Dog bins are considered on a case by case basis.
Catesby Estates Plc	• Welcomes the continuation of the Framework. The draft is timely and offers the new Councils scope to align practices. Commend the streamlining of the document to reflect the general acceptance and understanding of the pressures upon heathland sites and the current approach to mitigation. • The SPD needs to better articulate alongside the HRA process the connection between new development, potential in combination effects and proposals. • Paragraph 2.4 presents an opportunity to explain how the Councils undertake Appropriate Assessment when considering planning applications including use of relevant templates. • Para 5.9 should consider sites that are zero rated for CIL purposes as their impact still needs to be mitigated to satisfy an Appropriate Assessment. Ideally, in the interest of simplicity, a consistent approach should be adopted across the area. • It is unfortunate that an appendix identifying potential mitigation projects is omitted. • Disappointingly the evidence is not cited, nor how it has influenced the summary table in Figure 1. • Figure 3 - guidance on managed student accommodation would be welcomed. What is meant by '… run on their behalf …' as it would seem anti-competitive if the judgement was to rest with the established universities? Appendix B is inconsistent and contradicts figure 3, so needs adjustment. • Figure 4 - the average occupancy figures have been derived from research into the occupation of new homes. In considering SAMM provision, it is unclear whether baseline occupancy trends for the existing stock have been taken into account, which if falling might create headroom when considering the recreational pressures arising from new homes. • Welcomes that Dorset Council (excluding the north Dorset area) will collect financial contributions towards both SAMMs and HIPs by	• Support noted. • Para 5.15 refers to in perpetuity as 80 years, as this is the timeframe being used by the Councils to secure mitigation projects. • Agree that explanation of the appropriate assessment process would be helpful to applicants. • The evidence is cited in footnote 4 and through various habitats regulations assessments and monitoring work undertaken for local plans. • For housing proposals that are zero rated for CIL, para 5.12 and Appendix F set out mechanisms for how mitigation can be secured. With time following local government reorganisation, different approaches to mitigation in each local plan will become more consistent, and this will certainly become necessary through the local plan process. The section on university accommodation is inconsistent and will be amended. • The falling occupancy for existing housing stock is not taken into account as under the precautionary principle of the Habitats Regulations, average occupancy could also rise

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	means of CIL. Infrastructure lists (formerly Reg 123) will need to be amended accordingly, as this approach was previously only adopted in Purbeck. • Figure 2 provides a helpful map showing the distribution of the Dorset Heathlands and the 5km heathland area and aids the understanding of the reader. • Pleased to see the reinstatement of the Advisory Group but would suggest this includes private sector representation. Would also welcome informal opportunities for participation in the preparation of the 'Monitoring, Projects and Implementation Plan' recognising that the private sector has an important role in provision and management. • Para 4.19 - support the distinction being drawn between 'Strategic' and 'Non-strategic local' SANGs and the basic premise that draw / catchment is a determining factor. • Whilst the Appendix D Quality Standards have been rolled over from the previous iteration, concern is expressed at the lack of parity with the quantitative approach adopted in other regions, such as the Thames Basin, where a threshold of 8ha per 1,000 of population is applied. • Concern at the lack of flexibility afforded to new developments of 50-100 homes with on-site SANG. SANGs delivered in Swanage and Upton do not allow for a circular walk of 2.3km, notwithstanding their wider connectivity. Were new developments of this scale to provide a SANG of 8-16ha it would present significant overprovision; with consequential impacts for viability. • Suggest modifying Appendix D to identify the requirements for (i) strategic SANG and (ii) non-strategic SANG; the latter allowing greater flexibility.	• With the abolition of Regulation 123 the Councils will instead publish annually an Infrastructure Funding Statement to set out clearly where CIL and S106/S111 monies have been spent. • The Councils would welcome private sector representation in overseeing the heathland mitigation process. • The Councils continue to assess each SANG on a site by site basis with advice from Natural England. The 8/16ha standards are a guide but it is attractiveness of the SANG that is more important. The threshold for SANG provision will be reinserted. • SANGs may have features that compensate for a shorter walk such as viewpoints (Swanage) and proximity to the housing (Upton). The Councils are not aware of SANGs stopping sites coming forward on viability grounds. • Agree that Appendix D requires an update in line with best practice. **Actions:** • **Re-insert threshold for the provision of SANGs** • **In section 5 and Appendix F set out clearly the appropriate assessment process.** • **Add new appendix with references to evidence** • **Ensure Figure 3 is consistent with Appendix B** • **Update Appendix D.**
Churchill Retirement Living	• Agree in principle with the concept, but do not agree that an occupancy rate of 1.67 per flat is a fair contribution. A fair contribution for retirement living would be 1.25 per flat, calculating to be a SAMM rate of £201 per flat. Churchill's evidence of its own accommodation illustrates a reduced	• The SAMMs rate uses average occupancy to simplify the process. Bespoke arrangements as suggested cause complication and delay and

Respondent	Comment	Officer response
	occupation rate of 1.25. The average purchaser is a single female. Most purchasers of 2 beds tend to turn the second bedroom into a dining room or study, and only occupied by a maximum of two people. At present, 59% of customers are single women, 26% are couples and 15% are single men.	with an average occupancy there will inevitably be winners and losers.
Colehill Parish Council	• The Parish Council endorse the response given by East Dorset Environment Partnership on the Heathland SPD.	• Comment noted
Corfe Castle Parish Council	• On the basis there is no change from the existing policy the parish council do not have any objection to the document.	• Comment noted
Cranborne Chase Area of Outstanding Natural Beauty	• This AONB supports the principle of having the Heathland SPD and the 400m development control zone. The mitigation zone out to 5km seems less well founded, potentially confusing where it overlaps the AONB, and limiting areas for development not just by its existence but by requiring further land to be given over to Suitable Accessible Natural Greenspace [SANG]. I shall comment further on the 5km criterion later. Recommend that the 5km zone does not extend into the AONB so that mitigation for development within the AONB is for AONB purposes and outside the AONB mitigation is for heathland purposes. In effect the AONB boundary becomes the limit to the heathland mitigation zone. • Whilst the provision of SANGs is a laudable objective it seems to be a piecemeal, rather than strategic, approach to the provision of green space of a parkland nature for public recreation. It also has a side effect of taking undesignated land that is not of particular environmental or heritage value out of the available 'pot' of developable land in an area where such developable land is very limited. • The 'Legislative and Policy Background' does not set out other environmental designations, arguably oversimplifying a complicated situation. • Section 3 refers to 'public access to lowland heathland, from nearby development' but it seems to be stretching the interpretation of the 5km distance to regard that as 'nearby'. Studies relating to the provision of urban parks and green spaces have demonstrated the distances people walk in urban situations to recreation and green areas. They are measured in a few hundreds of metres and not kilometres. The 400m limit on additional new developments that are likely to accommodate active and mobile people seems to echo these studies, and seems a reasonable measure based on the potential for negative impacts. • The 400m to 5km zone seems less well founded, and seems based on an unsupported assumption	• The 5km zone is based upon evidence and there is no justification to adjust it to the AONB boundary. • Management of the location of car parking is used as part of access management works. **Action:** • **Update Figure 1 to include quantum of remaining heathland**

Respondent	Comment	Officer response
	that occupants of developments spread across the zone will, to an equal extent throughout, wish to access the heathlands. If pedestrian access is perceived to be a significant issue then 1km is quite a walk to and from a heathland site, giving a round trip of 2km plus the distance covered on the heathland. A zone out to 2km seems more than adequate to cover this aspect. • The extension out to 5km seems to be based on travel by car to heathland sites. However, taking money from developments to facilitate heathland access seems a bit quixotic when limiting parking at heathland sites could be a more effective means of encouraging car drivers to use other green space facilities. • In the light of the successes of recent publically funded projects to restore heathland the area given in Figure 1 of the heathland area in 1996 should be brought up to date. • Section 4 is potentially helpful in explaining how development can be enabled. If SANGs are to be effective in attracting inhabitants away from heathlands they need to be relatively near the new developments as well as being inherently attractive and well managed. An effective master planning approach could incorporate those spaces within the new developments, making those developments more attractive and obviating the need to use cars to access SANGs. • The information in Figure 3, page 12, is potentially helpful. However the indication that managed student accommodation would be permitted within the 400m zone conflicts with the statements in Appendix B that managed student accommodation would not be permitted. • Appendix D – it is less than clear how such SANGs are managed and maintained in the long term. If developments are to be expected to contribute, either annually or as a lump sum, that will make developments more costly. The acknowledged housing need in and around this AONB is for affordable housing, not more expensive housing. It seems, therefore, there could be some unintended consequences from the draft Heathland SPD of making newer developments less, rather than more, affordable. This AONB Partnership does, therefore, advise reflection on the wider impacts of the SPD. A number of the details should be adjusted to align with adopted AONB policies.	
Dorset Area Ramblers	• Support the principles set out in the SPD. • Appendix A - Agree with funding a core team to coordinate mitigation measures and provide educational activities. • It is clear from the document that “damage caused by domestic pets” is a key component in the deterioration of heathland habitats and suggest	• Support noted. • There are no plans to apply restrictions to dog owners, the strategy aims to educate and encourage behavioural change.

Respondent	Comment	Officer response
	that introducing controls on dog walking would be a useful way forward, e.g. by use of public space protection orders. If dogs were required to be kept on leads it would help protect sensitive sites and encourage the alternative use of SANGs instead. Dog waste bins should be provided at the entrance to sites and also used for general litter. Inevitably there is an emptying cost but there would be improvements to visitor experience. . • Page 26 - The section on "Accessibility - reaching the SANG" (p.26) does not mention the possibility of visitors using public transport to reach sites. Acknowledge that most visit by foot or by car but do not think that is a reason not to encourage visitors to use more sustainable modes of transport to visit new sites. It may involve asking bus companies to consider amending routes, as well as the provision of bus shelters. In some locations access by train might also be possible. This would be entirely appropriate in the light of Dorset Council's declaration on the climate change emergency. • Pages 26/27 - Paths which are too narrow would present problems to wheelchair users and those pushing buggies. Dog waste bins/general litter bins should be provided at all sites. • Strongly agree that SANGS should have good links to the public rights of way network. Ideally, the paths across SANGS should be dedicated as public rights of way so that they are available in perpetuity and are shown on Ordnance Survey maps, enabling those planning routes to make the best use of them.	• Acknowledge that consideration is needed on how to access strategic SANGs by public transport, cycling and walking. • Agree that where possible SANGs should be linked into the public rights of way network. • Dog bins are considered on a case by case basis. • SANGs are designed as an alternative to heathland, so wide paths are not a requirement, but it is good practice to do so.
Dorset CPRE	• Fully support the continuation of robust and effective protection of Dorset's inter-nationally important, precious and vulnerable heathland. It is vital that this protection should not be weakened or undermined in any way. The case for continuing to give the heathland the fullest protection is reinforced by the declaration of a climate and ecological emergency by both Dorset Council and the BCP Council. Effective and coherent heathland protection policies, including the 400m exclusion zone, which is vital to the integrity of the heath should be maintained and respected. • The designation of a Dorset National Park would help to ensure the effective conservation and appropriate recreational use and enjoyment of Dorset's heaths	• Support noted.
Dorset Dogs	• Pages 3 & 20 - Canford Park SANG should be added as a good example of a SANG as it is a relatively new, extensive and extremely well-used SANG that incorporates many 'best practice' principles and features for an effective SANG. It has built on experience from earlier SANGs as well as up-to-date knowledge acquired through monitoring feedback and expert sources.	Agree with the suggestions. **Actions:** • **Refer to Canford Park SANG in SPD** • **Rename Upton Farm as Upton Country Park**

Respondent	Comment	Officer response
	• Should 'Upton Farm' SANG be renamed so that people understand where it is referring to? • Suggest amending para 4.10 to read *"This is through raising awareness of the issues and value of the protected sites and includes employing wardens to manage visitor pressures on the heathland and delivering* ***awareness and*** *education programmes in local schools* ***and on the heaths and through local communities"*** to encompass work carried out by Dorset Dogs and others. • P.26 - some current SANGs reportedly do not have sufficient free parking, with consequent impacts on local roads or visitors reverting to heathland use. So the evaluation of what is sufficient for anticipated visitor numbers is important, especially if some parking in the area of a SANG is free at the time of establishment of the SANG but may become chargeable in the future. There should be safeguards or mitigation methods detailed against this occurring. • In appendix D there is some contradiction between the assertion that grazing management may be needed on some SANGs and the references to freely available off-lead space perceived to be safe by visitors with dogs. In practice grazing animals will and do put off visitors with dogs so will have an impact on the effectiveness of the SANG. Stringent methods should be in place so that visitors still feel able and safe to use most of the site – e.g. by dog-proof fencing and only grazing a small portion of the SANG for the shortest possible period, with clear information about where the livestock are and alternative routes provided. Some visitors will avoid SANGs if there is grazing in adjacent fields too, as livestock fencing is not sufficient, and some current SANGs have had problems with this. • It would be useful to update the information in appendix D or give further links to best practice design documents (e.g. provision of water bodies - access should be 'clean' and with a shallow slope into the water, accessible access points, provision dog training areas, adequate fencing extends to the access points too, provision of shade/shelter areas.	• **Amend para 4.10 as suggested** • **Review Appendix D**
Dorset Local Nature Partnership	• Para 3 is confusing, cumbersome and slightly contradictory. For clarity amend to read *'The Councils when granting planning permission have to be certain that the proposed development will not have an adverse effect on important areas of nature conservation. Any net increase in residential development within 5 kilometres will have an adverse impact on the Dorset Heathlands. Therefore, measures must be put in place to avoid and mitigate all harm caused.'*	• Agree with many of the suggested amendments to the SPD. • The ecological networks and nature recovery networks are best considered through the local plan process. • Nursing homes will be considered on a case by

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	• Welcome chapter 2 setting out of the context of the legislative framework. • A full review of the SPD will be undertaken as part of the development of the new Local Plans – for clarity we recommend reiterating this point in para 2.9 (or 2.10) • Welcome Figure 1 which sets out the issues and effects more clearly than in the adopted SPD. • Figure 3 – agree developments within 400m should be agreed on a case by case basis. In terms of nursing homes it is not clear if there has been consideration of the impact of staff and visitors to these homes. Local authorities have a key role to play in the health and wellbeing of residents and worker within the area. Therefore development of this type could impact on the heathlands. • Figure 3 and Appendix B - Clarity is needed within the SPD as to whether student accommodation is allowed or not within 400m • Para 4.17 – recommend that the Dorset Council box on Figure 4 includes the note about this relating to the North Dorset Local Plan area only to help clarity. The title above is not very clear especially because the payment for SAMMs is not set out until para 5.5. It is not clear that payments within the Dorset Council area are currently different in the different local plan areas. We recommend this is made clearer in para 4.17 and include reference to how SAMMs are to be calculated in the areas of Dorset Council outside the North Dorset Local Plan area. • There seems to be no reference in this section (or elsewhere in the SPD) that the requirement for HIPs, and especially SANGs, need to be fully operational before the first house is occupied? Without this requirement new residents will potentially get used to visiting heathlands, making it harder to change behaviour once the SANG is operational and therefore negate its purpose. Include this in both this section and appendix E. If it is already included then this could be made clearer. • Figure 5 - The scale of the map does not add a great deal to the document other than to underline how threatened our heathlands are. The only strategic SANG in the East Dorset area is that at Woolslope, West Moors. BytheWay, and SANGs that are to be created to mitigate the East Dorset New Neighbourhoods are local SANGs. • Para 5.5 - Clarity is needed for Dorset Council contributions taken for SAMMs from CIL. How will this be calculated? Further explanation is needed. • Para 5.15 - why is 'in-perpetuity' considered as 80 years' while the current SPD notes 80 and 125 years.' If there is a reason for only included 80	case basis and assess staff and car parking impacts. • Acknowledge Draft SPD was inconsistent regarding student accommodation. • Para 5.15 refers to in perpetuity as 80 years, as this is the timeframe being used by the Councils to secure mitigation projects **Actions:** **Amend the following sections:** • **Executive Summary Para 3** • **Paras 2.7, 4.17, 5.5, 6.1, 6.4** • **Figures 3 and 5** • **Appendix B**

Respondent	Comment	Officer response
	years within the revised SPD it should be noted in the SPD. • Para 6.4 - the phrase 'where feasible' in para 6.4 offers up potential 'get out' clause for delivery. Both councils have a responsibility for health and wellbeing and are part of the Integrated Care Network; biodiversity and environmental net gain is expected to become mandatory in the Environment Bill; and both councils' have declared climate and ecological emergencies and therefore projects should deliver multiple benefits. Recommend para 6.2 is amended to 'The Councils will ensure that projects accord with corporate objectives especially relating to supporting healthy lives, adapting to climate change and achieving a net gain in biodiversity, delivering multiple benefits, working with partners organisation as appropriate.' • Recommend that the Urban Heaths Partnership is referenced within section 6 – at present it is only included in para 3.2 and Appendix A. This lack of inclusion gives no assurance to the UHP for future delivery. • Bottom of page 5 and page 25 - The term 'alternative' not 'accessible' seems to be the accepted term within Dorset • As part of the full review of the SPD, further consideration is needed on the scale and likely sustainability of future development, related pressures on heathlands and the potential detrimental impacts to other land of high biodiversity value, which may become SANGs to avoid degrading other habitats.	
Dorset National Park Team	• Support the continuation of robust and effective protection of Dorset's internationally important, precious and vulnerable heathland. It is vital that this protection should not be weakened or undermined in any way. The case for continuing to give the heathland the fullest protection is reinforced by the declaration of a climate and ecological emergency by both Dorset Council and the BCP Council. • Effective and coherent heathland protection policies, including the 400m exclusion zone, which is vital to the integrity of the heath should be maintained and respected. • A National Park for Dorset would help to ensure the effective conservation and appropriate recreational use and enjoyment of Dorset's heaths. • The Dorset heaths are internationally recognised for their importance, as landscape, habitat, and for their cultural associations. Since the nineteenth century, 80% of England's lowland heath has been lost to development, afforestation and agricultural intensification.	• Support noted.

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	• The Dorset heaths include areas which have the greatest biodiversity found anywhere in Britain. • The heathlands represent an important part of Dorset's natural capital and therefore play an important role in an effective response to the climate and ecological emergency. • The heathland area's attraction is reflected in the designation of walks and trails.	
Dorset Wildlife Trust	• Welcome the revisions to the draft document but overall have noted conflicting statements and lack of clarity in some instances. • Support the DLNP and EDEP comments. • Executive Summary – the first para suggests all impacts can be mitigated; however, the appropriate application of the mitigation hierarchy should be encouraged and suggests the SPD relates only to 'housing' rather than all residential development (including tourism development). Reword as "The objective of this SPD is to set out a strategy for the avoidance and mitigation of impacts of residential development upon the Dorset Heathlands". • Para 3 does not clearly demonstrate the definitions of avoidance and mitigation, which may confuse readers of the document. Unavoidable adverse impacts can only be prevented by not undertaking the action; thus, the paragraph (and in particular the final sentence) should be reworded for clarity. • The final paragraph on page 4 might be moved to earlier in the Executive Summary, perhaps following the fourth paragraph on page 3, to make it clear that a full review will be performed in parallel to the Local Plan reviews for both councils later in 2020. • Para 1.5 - NPPF should be written out in full • Para 2.5 - State that the NPPF and NPPG is the current February 2019 version (or perhaps include a web link). • Para 2.6 omits reference to ecological networks in the NPPF. Nature Recovery Networks are also a key principle in the 25-year Environment Plan and forthcoming Environment Bill and are important in maintaining the integrity of designated sites and their associated features. Many species associated with the Dorset Heathlands are not solely reliant on this habitat, requiring a matrix of well-connected habitats to fulfil their needs. • As both councils have declared a climate and ecological emergency, greater emphasis must be placed on strategic landscape-scale planning, taking account of the need for ecological and nature recovery networks to maintain species populations and allow the natural dispersal of species throughout the landscape. Consideration of how much development can be sustained whilst	• Agree with many of the suggested amendments to the SPD. • The ecological networks and nature recovery networks are best considered through the local plan process. • The applicants have to provide sufficient information at outline planning application to enable the Council to conclude no adverse effects and the agreed mitigation is secured through section 106, with a detailed management plan expected at Reserved Matters stage. • The threshold for the provision of SANGs will be reinserted. **Actions:** • **Amend the following sections:** • **Executive Summary – Para1, 3 and final para.** • **Paras 1.5, 2.6, 2.7, 4.3, 4.5, 5.5, 5.11, 6.1, 6.4** • **Figures 1, 3, 4** • **Section 6** • **Appendix B, D, E**

Respondent	Comment	Officer response
	also maintaining the ecological functionality of the landscape in the long-term is needed. • Para 2.7 - add a para to clarify the Local Plans for the two councils are undergoing review, i.e. as per Para 5.13. • Welcome the greater detail included within Figure 1 on the main urban impacts and effects on lowland heaths in Dorset. Support EDEP's comments in relation to re-ordering these based on magnitude, to assist in determining the potential effects of developments both alone and in-combination. Suggest the addition of o Artificial lighting associated with developments, roads (i.e. traffic) and occupied dwellings, affecting for example, the foraging behaviour and life cycles (i.e. pheromone production, pupation) of insects; o Noise associated with developments, roads (i.e. traffic) and occupied dwellings, affecting for example, the breeding success of birds; o Planting (and thus spread) of invasive non-native plant species associated with developments and occupied dwellings (i.e. in gardens) affecting the vegetative structure of heathland; and o Fireworks associated with occupied dwellings leading to fire, noise disturbance and pollution. • Para 4.3 refers to 'Table 1' rather than 'Figure 1'. • Para 4.5 - support the statement that developments permitted within 400 m should be agreed on a case by case basis. However, although DWT accept that residents of *"Nursing homes within C2 Use Class where the residents are severely restricted with advanced dementia / physical nursing needs"* may not have an adverse impact upon the Dorset Heathlands, there appears to be a lack of consideration of the impacts resulting from staff and visitors to these nursing homes. An impact assessment would need to be provided in any planning application for this development type, with details of how the potential impacts resulting from staff and visitors will be mitigated. Applications should then be considered on a case by case basis. • It is also unclear whether student accommodation would be permitted within 400 m of the Dorset Heathlands, with contradicting statements between Figure 3 and Appendix B. Supporting evidence would be needed if permitted within 400 m as there may be a similar footfall by students to nearby heathlands as other residential developments. • Figure 4 - It is unclear whether the supply of new homes specified in paragraph 4.14 relates to the entire Dorset Council area, or only the area covered by the North Dorset Local Plan. The	

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	SAMMs calculation outlined in the 'Dorset Council' box of Figure 4 states this relates only to the area covered by the North Dorset Local Plan in the figure title but uses the same figure of 1500 homes specified in paragraph 4.14. The SAMMs contributions for the entire Dorset Council area thus remain unclear. • Para 4.15 also suggests all impacts can be mitigated; however, the appropriate application of the mitigation hierarchy should be encouraged. • Under 'Part 2: Heathland Infrastructure Projects (HIPs)', emphasise that HIPs (including SANGs) are fully operational and accessible prior to the first occupation of new residential development, as this has been omitted from the revised SPD. • Para 5.5, bullet 1, appears to suggest costs will be calculated on a case by case basis but this needs clarity. • Para 5.11 - Further detail is required on the threshold/s for the provision of SANGs. The current SPD set a threshold of 50 or more dwellings for the provision of SANGs. However, paragraph 5.11 states that the threshold varies by Local Plan area. • Para 6.1 should state that mitigation is provided before *first* occupation of new residential development. • Para 6.4 - Support monitoring of the delivery and success of mitigation measures to ensure compliance with corporate objectives. However, the term *"where feasible"* might be used in future to explain why projects have not met these objectives. • Appendix D: This section references the abbreviation SANGs as *"Accessible"*, rather than the accepted term of 'Alternative'. Greater emphasis must be placed on sustainable and strategic landscape-scale planning of the location of SANGs taking account ecological network maps. Avoid sites of high nature conservation value, which may already form part of the ecological network essential to maintaining the integrity of the Dorset Heathlands and their associated features. A greater understanding of the impacts of continued implementation and delivery of SANGs at a landscape-scale must be given if we are to ensure the maintenance of species populations, both within our heathlands and across all habitats in the wider landscape. Consideration might also be given to the visitor carrying capacity of existing established SANGs and these might be able to support new developments. Support the EDEP comments about 'lessons learnt' in relation to the design and delivery of SANGs. • Appendix E - This section refers to information required at the outline or full application stages,	

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	but states in bullet 6 that a *"full SANG management plan will be required as part of a reserved matters application if not previously provided at outline stage"*. DWT would expect details of the security and maintenance of a SANG in perpetuity to be provided at outline stage, so that the proposed mitigation measures in relation to the potential for impacts can be adequately assessed.	
Dorset and Wiltshire Fire and Rescue Service	• Firewise Communities is a multi-agency project encouraging communities to work together to reduce the risk to homes from wildfires and is supported by Dorset & Wiltshire Fire and Rescue Service, Dorset Police & Crime Commissioner and the Urban Heaths Partnership. • The current funding is programmed to cease in June, which will place further expansion of this positive programme in doubt. • Could funding be ringfenced for the Fire & Rescue Service to extend Firewise communities to new housing/heathland borders across the area? • Would BCP Council be willing to work with the Fire Service to assist in running a new scheme of Fire Bike patrols. This scheme would provide a trained group of people with skills and training to help reduce fires on the heath and also gain training on keeping themselves and others safe should a fire occur. • With reference to the current document on page 10, in the section titled 'Fires caused by human actions' we would like to suggest the following additions: o Careless disposal of smoking materials. o Intentional contractor work, controlled burning, vegetation management and resultant fires. o Arson / Juvenile Fire-setting	• The Councils can consider this as a potential SAMMs project. • Arson is already included in Figure 1. The other two issues are not an issue caused by a growing population.
East Dorset Environment Partnership	• The revised document is more difficult to follow than the current SPD with conflicting statements and overlap/duplication throughout. • Para 3 - if adverse impacts are unavoidable then by definition measures to avoid harm can only be achieved by not taking the harmful action. Throughout the document the term avoidance and mitigation is being used when mitigation within the 400m – 5km zone is being discussed. Suggest the terminology should be explained clearly. • It would be helpful if the last sentence of the Summary (p4) were moved back and included within para 4 (p3) which mentions that this is an interim update. • The para on the overall objective of the SPD (p4) should also be moved back to the early part of the Summary and perhaps a link to Habitats Regulation 63 included. • HIPS final para (p3) should be spelled out in full. A glossary would be helpful.	• Agree with many of the suggested amendments to the SPD. • Discussions with applicants can design out adverse effects, which is avoidance rather than mitigation and is recorded in the appropriate assessment process. • The ecological networks and nature recovery networks are best considered through the local plan process. • Para 5.15 refers to in perpetuity as 80 years, as this is the timeframe being used by the Councils to secure mitigation projects.

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	• BCP Council is at a more advanced stage in its Local Plan process than Dorset Council. It is essential the review meets the needs of both. • Para 2.6 refers to NPPF but has not addressed the requirement of NPPF 170d to establish coherent ecological networks that are more resilient to current and future pressures. This is a critical aspect of ensuring that a plan or project has no adverse effect on the integrity of a site, either alone or in combination with other plans and projects. Nature Recovery Networks are an underlying principle of the Government's 25 Year Environment Plan. The draft SPD has not considered the impact of further isolation of the heathlands through increasing development on the mapped potential ecological network. • Current policy treats all sites within the 400m – 5km zone equally creating a risk of development right up to the 400m boundary. It may be necessary to set an upper limit for development within the 5km zone and establish criteria for when development may and may not be permitted within it. Cannot keep building and expecting mitigation to be effective in preventing risk of further isolation of heathlands. • The SPD should consider in combination impacts at a landscape scale and provide a mechanism to deliver the necessary safeguards. Heathland species are not restricted to the heaths for all their needs and life stages and need natural areas into which to move out and expand their range. Protection of adjacent habitats is vital to allow for example nightjars to fly over heathland and feed over woodland and hedgerows. Climate change pressures make the need even more pressing. • To comply with NPPF 174, mapped potential ecological network should be safeguarded in much the same way as mineral resources are. This may be premature for this SPD revision but should be addressed in the full review later this year. • Figure 1- Welcome the inclusion of the additional column summarising the results of pressure but suggest they should be rearranged in order of magnitude of the impact. For example, the table has moved Reduction in area of the heaths and Fragmentation from the top of the table in the current SPD to points 7 and 8. Evidence shows that these are the most important factors closely followed by loss of supporting habitat. • Figure 1 – it is not only the change in soil nutrient levels caused by fly tipping garden waste that is damaging: it also poses a risk of disease, introduction of invasive plants, smothering of heathland species and overheating which prevent germination of seed. Amend Figure 1 accordingly.	• Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. • Nursing homes will be considered on a case by case basis and assess staff and car parking impacts. **Actions:** **Amend:** • **Executive Summary – Paras 1, 3 and final para.** • **Paras 1.3, 1.5, 2.6, 2.7, 4.3, 4.20, 4.21 and 6.1** • **Figures 1, 3 4 and 5** • **Appendix B, D and E**

Respondent	Comment	Officer response
	• There is a need to ensure all planting by developers is appropriate and is reviewed carefully – not just trees. The risk of harm from Invasive Non-native Species (INNS) should be included within this table. There should be a requirement for all large scale development proposals to omit species that are known to cause problems. For example, many developers include in planting schemes ground cover that, by definition, is invasive and also include species such as Cherry Laurel (and cultivars), Wilson's Honeysuckle, Cotoneaster and Snowy Mespilus that have a hugely damaging impact on heathlands, Heathland Support Areas and SANGs and impact worsens as plants mature and seed or cuttings get spread more widely. • Figure 3 states that managed student accommodation would be permitted within 400m. However, Appendix B says student accommodation would not be permitted within the 400m zone. Similarly, Fig 3 states that private student accommodation would not be permitted in the 400m zone and requires mitigation in 400m-5km zone but then draws a distinction between the requirement for payment of SAMMs. This distinction is not drawn in the summary table in Appendix B. Object to any new student accommodation within 400m and question what evidence there is to support the proposal that SAMMS should not be payable in the 400m-5km area? Accept that pet ownership can be controlled in on-campus halls of residence. However, there is no evidence students will not cause the same recreational pressures as other Class C3 residences. Policing of use and enforcement would be impossible. Economic considerations for the University or other educational establishments should not over-ride the legislative requirement for heathland protection. The SPD should retains the requirement for review on a case by case basis, and full impact assessment should be required. • Figure 3 - Nursing Homes. Both the current and draft SPD set a limit of c 40 bed spaces for purpose built high dependency nursing homes (frail elderly and dementia patients) that could be built within 400m of designated heathland. It is not the patients themselves but staff and visitors to the home who might then extend their visit to exercising on the heath with families and dogs, particularly when within a few minutes' walk. The SPD should take into consideration the risk of further proliferation of planning applications for small nursing homes that are likely to be unviable and unable to provide care that meets current standards of accommodation and then risk being used for some other purpose. The 40 bed-space guidance is out of date. Dorset Social Care Team advises that from a commercial perspective the	

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	optimum number of units is 64 and the need for considerably enhanced design to create small "household units" requires much larger buildings than the SPD has considered. Recommend • the SPD retains the requirement for review on a case by case basis, • full impact assessment should be required not blanket prior approval as implied in the draft SPD, and • on site car parking should be adequate to accommodate all staff and visitors and not overflow to roads leading to nearby heaths • Students, nursing home staff and visitors should all be educated on the fragility and importance of our heaths and directed to use SANGs or other accessible open greenspace for informal recreation. • Figure 4 and Section 5 are confusing as no SAMMs figure set for Dorset. The North Dorset sum is applicable across the whole Dorset Council area. • Para 4.20 supports the principle of Heathland Support Areas and the wording of this para. A cross reference to the table of possible HIPs (Appendix A) would be helpful. • Para 4.21 would benefit by clarifying that it refers to all three preceding paragraphs and refers to UHP partner organisations. • Para 5.15 - explain why "in perpetuity" has been reduced to 80 years rather than 80-125 years as in the current SPD. Funding must allow adequate mitigation to be put in place and maintained. • Supports the monitoring programme and recommend that more resources should be allocated to enable wider coverage of the whole of the Dorset Heaths area. This will be essential as more SANGs are created and development increases. • The delivery of the SPD and future review must be informed and guided by examples of excellent practice and recognition of poor practice. All SANG monitoring data should be made readily available to the UHP to enable public perception to continue to influence best practice design of future SANGs and for data comparison across the area. As advised below, this requirement should be included in Appendix E. • Appendix A Suggest removing the examples of on-site and access management projects as could be interpreted as encouraging people to go to heathlands. • The full review of the SPD as part of the Local Plan process should encompass a total review of the whole delivery of heathland mitigation including being more proactive in looking for SANGs. It should not depend totally on what is on	

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	offer from a developer and should be linked to delivering Nature Recovery Networks and the Dorset Ecological Network mapping. • Suggest that there should be some guidance in this document as to what would trigger the requirement for a SANG in each area • Para 6.1 should clarify that for major developments this requirement is prior to occupation of the first property. • Appendix D - Concerned about the extent of flooding on existing and proposed SANGs. This restricts the extent of useable footpaths. Can also damage soil structure. The construction and use of SANGs must not result in net harm to biodiversity. Concerned that in order to facilitate development there is a risk that land that is currently featureless is being selected for use as a SANG. While tree planting helps, it takes years to have the desired impact on a landscape and make the area attractive to dog walkers. People won't go to places they don't like. • All planting on SANGs should be native species of local provenance and enhance biodiversity not compromise it. SPD Guidance could usefully include a list of native species that are appropriate with associated soil pH. The Guidelines should make it clear that the prime purpose of the SANG is for dogs and that on such sites most of the SANG should be free of livestock grazing and appropriately fenced so that grazing does not deter users or affect safety of SANG users or their pets. • Appendix E : The following should be added 'All SANG monitoring data should be made readily available to the Urban Heaths Partnership to enable public perception to continue to influence best practice design of future SANGs and for data comparison across the area.' • Para 1.3 - penultimate line – remove 'of' to read 'to review the strategy. You may also wish to change the end of the sentence to 'can be mitigated effectively' • Figure 1 - Reduction in area - Reduction from Disruption to hydrology- natural water courses? • Para 4.3 last line - type of development • Appendix E -final sentence of first section - insert apostrophe in development's • Figure 5 - The only strategic SANG in the former East Dorset is that at Woolslope, West Moors. The other SANGs are local SANGs linked to the East Dorset – i.e. BytheWay. The maps also need to be updated to reflect the new urban developments. • The importance of Nature Recovery is now widely recognised and in the emerging Environment Bill. There should be some way of linking the SPD	

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	maps to the ecological network mapping and the DERC mapping.	
East Dorset Friends of the Earth	• It is essential that all new policies are consistent with the BCP and Dorset Action Plans for the Climate and Ecological Emergency (CEEAP). • Protection of existing heathlands must override other considerations (i.e. pressures for development). • There must be a strong presumption against development within 400m of heathland or a total ban. • Comprehensive planning policies need to exist to cover the zone up to 5km around heathlands • Prevention of damage to remaining sites, and restoration of already damaged areas must be the underlying principles of these policies. • In the absence of a robust research base, and of clear mechanisms for evaluating likely impact, “mitigation” cannot be regarded as sufficient to deal with the threats to remaining heaths. • If any net increase in development within 5km “will have an adverse effect” and “the Councils … have to be certain” that development will not have an adverse effect, this suggests that all additional development should be avoided. Mitigation is not an option. • Para 2.7 - Adoption of the Heathland SPD now is likely to place it in conflict with the CEEAPs. The SPD should only be adopted as an Interim Policy, pending the adoption of the CEEAPs and of the new Local Plans. • Paras 3.3 – 3.4 - Clearly, if the “cumulative effect” of further development within 5km of heathland will be to have a “significant impact” on designated sites, the Councils are bound, under the terms of the NPPF para. 8c cited, to prevent such development. It clearly cannot “contribute to and enhance the natural and local environment” if it has significant negative effects on designated sites. The priority must be on “avoidance”, especially where there is a lack of evidence on which to compare the effects of development with the efficacy of mitigation in avoiding those effects. • Para 4.3 Since mitigation is not possible within the 400m zone, no development can be permitted. Between 400m and 5km mitigation is likely to be insufficient to offset the cumulative effects of development. As section NPPF 11 b) ii) states, there needs to be a mechanism which demonstrably measures the environmental, economic and social costs and benefits of development, and of any proposed mitigation, prior to any assumption that development is sustainable. • The very title of Section 4 of the SPD implies that its priority is “enabling development”, whether or	• HIPs will generally align with CEEAPs but have a specific purpose that has to be effective. • Significance is a low threshold test, whereby one house has a locally significant effect in combination with others. The evidence demonstrates that mitigation can avoid adverse effects. • The SPD provides a mitigation for residential development (including tourism). Other uses are dealt with on a case by case basis at planning application stage.

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	not it is sustainable in terms of the NPPF. There is no evidence that any development can take place without a significant effect on designated heathland sites. • We note that the SPD only refers to proposals to develop residential dwellings. It fails to consider the impact of other developments such as minerals, infrastructure, agriculture, tourism, business premises and transport facilities. • Para 4.15 - There are clear grounds for requiring the developer to provide, and pay for, an Environmental Impact Assessment before any development takes place within the 5km. zone. • Para 4.17- The SAMMs calculations are too cheap, and only appear to be charging for some of the mitigation measures and not for opportunity cost: i.e. the loss of the rental value of the environmental services due to heathland damage. Including this latter cost would better reflect the economic value of heathlands, greatly increasing the charge to the developer, and encouraging sustainable development, away from important biodiversity sites. • The Draft SPD is based upon mutually inconsistent reasoning. It assumes that "mitigation" is both possible and sufficient to offset the inevitable significant and cumulative effects of development on heathland, and proposes no mechanism for achieving certainty. • Revise the SPD to include: o a presumption against all development within 400m of heathland, o research evidence on the effects of development within 5km of heathland, o research evidence on the effectiveness of a range of mitigation policies, o proposals for a mechanism (some form of cost-benefit analysis) for assessing development proposals (in the light of a) and b) above). This should be used to inform Policy at the Local Plan stage, and hence to guide decision-making at the development proposal stage, o a requirement for an environmental impact assessment for developments within 5km of heathland, o and that the SPD should then assume the status of an interim policy, pending the adoption of approved CEEAPs	
Forestry England	• Figure 1: o Fire- Failure to include release of carbon as a result from fire o Enrichment Need to include garden waste specifically as an example of fly-tipping of organic materials	• Suggestions welcomed. **Actions:** • **Amend Figure 1 where the suggestions relate to residential growth.** • **Amend Appendix A accordingly Refer to**

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	○ Criminal Activities / Antisocial Behaviour - Additional activities that could be added to the list of human activities are raves/parties and lewd behaviour ○ Predation - Under the result of pressure: repetition of reptiles ○ Hostility to conservation management - An additional, and sometimes forgotten, result of pressure is the stress impacts on staff managing those sites, due to confrontational and, in extreme cases, abusive behaviour ○ Fragmentation of heaths - Additional details are required to explain the description of this pressure: Other pressures contribute to fragmentation ○ Pollution Littering is also relevant. Dogs accessing watercourses/ponds lead to increase in turbidity, erosion, loss of bankside habitats, topical vet treatments entering watercourses (e.g. spot-on treatments regularly used on dogs) ○ Excavation and extraction. Under the result of the pressure, it would be useful to explain that appropriate/effective reinstatement post-extraction and monitoring of the ongoing management to ensure it fulfils what was promised must be required ○ Roads Pollution run-off should be included in the description as an additional item ○ Management costs Also biosecurity risks – consideration of non-native invasive species reintroductions, such as from garden waste (e.g. from ponds) • Appendix A: ○ Fire - There is no mention of education to reduce arson ○ Monitoring – There is no mention of monitoring the habitats or species. • Vegetation surveys and bare ground assessments could be used to gather evidence of the effects of increased trampling. Surveys of protected species such as nightjar on the SPA heathlands could also provide evidence on the impact of additional recreational pressure on those sites • This SPD falls short in addressing the need of a sustainable mosaic of habitats that can deliver multi-purpose benefits to society. Risks a piecemeal approach with areas of small additional recreation. More joined up approach would use funds from all the small developments to pay for one substantial area of recreation away from the heaths. This would, potentially, draw more people to it than a small addition to the existing area of heathland, e.g. the creation of new community woodlands, in the right location, could be part of the solution.	**ecological networks and multifunctional land use**

Respondent	Comment	Officer response
	• With the current concerns about climate change and the carbon agenda, retaining/ increasing woodland cover and carbon management is now an important factor in deciding appropriate land use and management. • A healthy natural environment across a range of habitats maximises opportunities for nature to thrive. • Outdoor recreation benefits wellbeing and mental health of an increasing population. • Therefore the protection of the Dorset Heathlands should not be considered in isolation, and a holistic approach to land management is required to ensure the resilience of our habitats across the landscape, as well as providing the necessary opportunities for recreation. • Heathlands support a significant resource of peat-based habitats such as mires and wet heathland with capacity to store as much or more carbon as an equivalent area of woodland. For this reason, the Government has also made the restoration of peatlands a priority for the UK. • Removing trees and scrub from open heathland and grassland areas is a continuation of a long tradition of heathland management and critical to maintaining and restoring the protected habitats and species of our heathlands. Opportunities for the use of heathland arisings must be sought to ensure the sustainability of our heaths. • The potential impacts of new developments and associated infrastructure insufficient buffering and lack of holistic approach. It is inevitable that public recreational pressure will increase on the nation's forest (land managed by Forestry England) as a consequence of the development of the neighbouring land and we are keen to find a positive way forward to factor in the increase in recreational pressure at the same time than protecting special habitats and species. • Design the associated green infrastructure, including green space and woodlands, as well as public footpaths and cycle ways to build on the evolving network of green infrastructure linking the adjacent conurbations to the countryside. Opportunities for woodland habitats can be created in a far greater range of landscapes both locally and nationally. It is therefore important to target areas most suitable for woodland expansion and creation and to secure the remaining rare heathland habitat where we have the ability to do so. • The government's 25-year Environment Plan has an emphasis on Biodiversity Net Gain and the creation of a Nature Recovery Network across England. This is an opportunity to explore ways to embrace a constructive collaboration between BCP Council and Dorset Council, developers and	

Respondent	Comment	Officer response
	Forestry England in respect of delivering a truly sustainable development in the Council that could be viewed as a model project by central Government.	
Fortitudo	• Welcomes the continuation of the Framework. The draft is timely and offers the new Councils scope to align practices. Commend the streamlining of the document to reflect the general acceptance and understanding of the pressures upon heathland sites and the current approach to mitigation. • The SPD needs to better articulate alongside the HRA process the connection between new development, potential in combination effects and proposals. • Para 2.4 presents an opportunity to explain how the Councils undertake Appropriate Assessment when considering planning applications including use of relevant templates. • Para 5.9 should consider sites that are zero rated for CIL purposes as their impact still needs to be mitigated to satisfy an Appropriate Assessment. Ideally, in the interest of simplicity, a consistent approach should be adopted across the area. • Disappointingly the Evidence section does not cite the evidence or how it has influenced the summary table in Figure 1. • Figure 3 - guidance on managed student accommodation would be welcomed. What is meant by '… run on their behalf …' as it would seem anti-competitive if the judgement was to rest with the established universities? • Appendix B is inconsistent and contradicts figure 3, so needs adjustment. • Figure 4 - the average occupancy figures have been derived from research into the occupation of new homes. In considering SAMM provision, it is unclear whether baseline occupancy trends for the existing stock have been taken into account, which if falling might create headroom when considering the recreational pressures arising from new homes. • Welcomes that Dorset Council (excluding the north Dorset area) will collect financial contributions towards both SAMMs and HIPs by means of CIL. Infrastructure lists (formerly Reg 123) will need to be amended accordingly, as this approach was previously only adopted in Purbeck. • Welcome that BCP will accept upfront contributions towards SAMM secured through s111 of the Act, thereby restricting the need to enter into S106 agreements which are frequently cause for delay.	• Support noted. • Agree that explanation of the appropriate assessment process would be helpful to applicants. • The evidence is cited in footnote 4 and through various habitats regulations assessments and monitoring work undertaken for local plans. • For housing proposals that are zero rated for CIL, para 5.12 and Appendix F set out mechanisms for how mitigation can be secured. With time following local government reorganisation, different approaches to mitigation in each local plan will become more consistent, and this will certainly become necessary through the local plan process. • The section on university accommodation is inconsistent and will be amended. • The baseline occupancy for existing housing stock is not taken into account as under the precautionary principle of the Habitats Regulations, average occupancy could also rise • With the abolition of Regulation 123 the Councils will instead publish annually an Infrastructure Funding Statement to set out clearly where CIL and S106/S111 monies have been spent. **Actions:** • **In section 5 and Appendix F set out clearly the appropriate assessment process.** • **Add new appendix with references to evidence**

Respondent	Comment	Officer response
		• **Ensure Figure 3 is consistent with Appendix B**
Godshill Parish Council	• Support the proposals to provide greater protection for Dorset heathlands. • Request that a paragraph addressing the impact of development in Dorset on the New Forest National Park in Hampshire be added, e.g. as per Policy 2, Main Modification 1 in the New Forest District Council Local Plan.	• Support noted. **Action:** • **After para 3.4 refer to the New Forest National Park**
Highways England	• No comments to make	• Noted.
Holt Parish Council	• No comments, but wish to continue to be part of the consultation process especially when a full review is undertaken.	• Noted.
Hurn Parish Council	• The Parish of Hurn contains extensive areas of heathland. These are greatly valued by residents and visitors. Councillors are in general agreement with the planning policy and agree it is very important to protect this unique environment and the rare species	• Support noted.
Kingfisher Resorts	• The proposal to redevelop the Knoll House Hotel, Studland has included a detailed assessment of the potential for significant effects on the designated areas within 400m of the site. The proposal will result in a reduction in the number of people accommodated on site compared with the existing hotel, but will provide premium facilities and more space per visitor (but fewer bedspaces). • Supportive of measures to protect and, where appropriate, mitigate any impacts on the Dorset Heathlands and, therefore, the broad principles of the SPD are supported. • There are certain circumstances such as with Hotels and guest houses where the approach will be considered on a case by case basis within 400m of the designated sites. Similarly, replacement dwellings will also be acceptable in such locations. In these circumstances, it is implicit that the key issue is one of impact rather than the development itself and this should be made explicit within the SPD. • Whilst there be a partial change of use within the redevelopment of Knoll House, which will include a net increase in C3 units, this will be offset in the reduction of number of guests when compared with the current hotel. There will also be a range of additional facilities which will provide a realistic alternative to the use of the Heathland for recreational purposes (providing a net benefit) and a range of enhancements in respect of education and signage focused on Heathland Conservation.	• Each planning application will be considered on a case by case basis, but the approach to the 400 metre heathland area has been consistent since 2007, and there is no evidence to depart from this blanket approach.
Land Trust	• Para 5.16 - SANGS and HIPs can be owned by bodies other than the Local Planning Authority.	• Agree about wider ownership of SANGs.

Respondent	Comment	Officer response
	• Para 4.19 – does this mean that all strategic SANGS will have a 5km catchment regardless of the size? • Request that privately owned SANGS can be funded via a bespoke funding mechanism • Service charges or estate rent charges are not suitable funding mechanisms for SANGS as they are a planning requirement and the cost of which should not be borne by residents of new developments, particularly as SANGS attract existing residents that do not live within the new developments. • There is no indication of how funding will be ring fenced and guaranteed in perpetuity - is it a commuted sum? • Support para 5.16 but add that 'service charge or estate rent charges are not suitable funding mechanisms for SANGS'.	• Will indicate how far people travel to visit a SANG once it is in place. • The SPD doesn't preclude bespoke funding arrangements and there are a number of different methods used for existing SANGs, agreed on a case by case basis. Some developers prefer to use service charges and others a commuted sum for 80 years. **Actions:** • **Amend Paras 5.16 to refer to wider ownership.**
Langton Matravers Parish Council	• The parish council is generally supportive of the document, and of the principle of protecting local heathland as a priority.	• Support noted.
Lulworth Estate, Redwood Property & Mr Andrew Jackson	• Promoting the 'Wool Urban Extension', a draft Purbeck Local Plan allocation. • Generally support the overall direction and content of the SPD and welcome the Council's joint approach to updating the existing SPD which is essential to facilitating the delivery of much needed homes. • To be successful it is essential that the SPD provides the requisite level of certainty and consistency to allow the costs associated with development to be transparent and understood, particularly given the heightened importance of viability matters. • Paras 5.11 and 5.16 - support the statements as intend to provide a SANG at Coombe Wood as part of the development. • Appendix D and E continues the existing guidance, although it would benefit from the inclusion of some more quantitative criteria. • Para 5.13 - there appear to be inconsistencies with the SAMM contributions that need resolving.	• Support noted. • Appendix D and E need updating to reflect best practice. • The Councils are looking to rectify any inconsistencies in the application of mitigation, but this will be led by the policies of extant local plans. **Action:** • **Update Appendices D and E**
Marine Management Organisation	• Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and The South Marine Plan to ensure that necessary regulations are adhered to.	• Noted
Mark Hinsley Arboricultural Consultants Ltd.	• Some of the mitigation money should fund the planting of 50m wide native deciduous woodland shelter belts around the edges of the heathlands that interface with residential areas. These would have several benefits: ○ By discouraging people from passing through it onto the heath.	• Acknowledge these suggestions for project proposals. **Action:** • **Consider any specific projects through the**

Respondent	Comment	Officer response
	○ Deciduous woodland does not burn and would therefore act as a fire break between heathland and residential areas. ○ Native deciduous woodland would increase the biodiversity of the site – particularly along the woodland/heathland edge. ○ The woodlands would act as windbreaks – something that is likely to be needed as climate change causes more frequent and stronger high winds. ○ Domestic cats would be unlikely to range beyond the woodland out onto the heath. ○ As the woodland fringes develop their effectiveness could be monitored which, in time, may allow a change in policy regarding the acceptable uses in the 400m/5k bands, thus helping ease the development pressure on other areas.	**Monitoring, Projects and Implementation Plan.**
Natural England	• Support and welcome the SPD in principle. • Para 2.1 The final two designated sites are Dorset Heaths not heathlands. • Para 3.1 Insert a new sentence at the end: "Some of these effects are direct impacts on the designated sites but many such as recreational use will be ongoing for the duration of the development. In the case of additional housing the effects arising are considered to be permanent requiring ongoing mitigation measures. • Fig 1. Additional points in Result of Pressure column: ○ Fire : Increased costs of site management ○ Criminal Activities/Antisocial behaviour : Increased costs of site management ○ Fragmentation : delete current bullet and add in "Loss of connectivity and functional ecological interactions ○ Supporting habitats : delete current bullet and add in "Reduced foraging opportunities for mobile species", "Increased vulnerability of designated sites to external adverse effects", "Increased adverse effects relating to fragmentation" ○ Management costs : reword to be consistent with above To "Increased costs of site management due to increased visitors and adverse effects arising from additional housing" • Para 3.3 - Consider making the paragraph more explicit "the cumulative effect of a single dwelling up to 5km…" • Para 4.1 - Should this refer to 5 years or rather 2024 or what ever is the two authorities deadline for Local Plan adoption? • Para 4.3 - At the end of the first paragraph please insert "however many of the effects listed in Table	• Support noted and suggestions welcomed. • The Monitoring, Projects and Implementation Plan will set out the project list. **Actions** **Amend as suggested:** • **Paras 2.1, 3.1, 3.3, 4.1, 4.3, 4.5, 4.7, 4.23, 5.10, 5.13, 6.4** • **Figure 1** • **Appendix B and D** • **Add new appendix with references to evidence**

Respondent	Comment	Officer response
	1 will act together (synergistically) to create effects which can be worse than each individual effect." • Para 4.5 - Insert a sentence to read "The uses outlined in Figure 3 are indicative rather than definitive." To allow for consideration of mitigation proposals. • Para 4.7 - Insert at the end "The authorities policy position within 400m and in the 400m to 5km area are mutually supportive in enabling appropriate development which does not adversely affect the integrity of the designated sites." • Para 4.16 Natural England will work with the authorities to ensure that the SAMM element of the mitigation measures is appropriate and functionally effective. • Fig 5 - Natural England concur with the defined 5km area set out by the authorities. • Para 4.23 - Insert "prior to commencement" at the end of the third sentence. • Para 5.5 - This could be shortened by simply referring to Fig 4. • Para 5.6 - Are similar administrative costs required by DC? • Para 5.10 - At present the authorities have not set out an Implementation Plan which is a key part of the strategic approach. The work relating to this part needs to be done prior to the implementation of the SPD so that Natural England and the competent authorities are aware that the measures are of a suitable nature, located well in relation to development and the designated sites and deliverable in the appropriate time scales relative to forthcoming developments. • Para 5.13 - make reference to recent ECJ rulings, Sweetman 2 Wind over people and the Dutch Nitrogen case as well as the Holohan case which all reinforce the need for a rigorous approach. • Para 6.4 - make reference is made to the Climate Change Emergency adopted by both councils as well as the need to secure carbon neutrality/offsetting measures where appropriate. • Appendix A - Will Dorset Council assist in populating examples from the wider area outside BCP where a number of projects have been delivered? • Appendix B – it is worth reiterating here that early engagement with the planning authority/Natural England is always worth while. The final row of the table needs to be reconsidered re: Student accommodation within 400m. • Appendix D – this needs some minor adjustments where there are inconsistencies e.g. over walked distances. • It is advised that the SPD have a references appendix, this will be useful to include more recent	

Respondent	Comment	Officer response
	evidence reports such as the review carried out by Purbeck.	
National Grid	• One or more proposed sites are crossed or in close proximity to National Grid assets. National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.	• Noted that mitigation projects will need to take into consideration the National Grid Guidance.
National Trust	• The Trust continues to support the aim of protecting areas of sensitive heathland, particularly given the pressures of new housing development. • There are ongoing management, project and capital costs for the managers of designated heathland sites. At present, the funds raised through the Dorset Heathlands SPD go chiefly to site monitoring / awareness raising, and to heathland infrastructure projects rather than to supporting conservation work on the designated sites. • As an example the interim mitigation strategy for Rodborough Common SAC (Stroud district) funds scrub removal on National Trust land. One potential project that could benefit from this is the grazing project at Arne/ Hartland. • Whilst it is important to manage and control potential additional recreational impacts on the heathlands, there may be some benefit in specific diversification projects (small-scale, sustainable, appropriate to spirit of place) – as long as the funds were designed to benefit nature conservation. This is something that is currently being explored in the emerging Visitor Engagement Strategy for the soon-to-be-created Purbeck Heaths NNR (i.e. income from visitor accommodation providing funds for conservation work). • By contrast, some large-scale commercial development proposals within the 400 metre zone (e.g. re-development of a hotel site to include residential apartments) may get viewed with more flexibility by the councils despite the ostensibly strict controls set out in the current SPD..	• The mitigation strategy focusses on managing recreational impact rather than conservation work. • Each planning application will be considered on a case by case basis, but the approach to the 400 metre heathland area has been consistent since 2007, and there is no evidence to depart from this blanket approach.
New Forest National Park Authority	• The National Park Authority welcomes and fully supports the strategic approach to mitigate the impacts of new development on the internationally designated sites. • Supports the proposed use of a combination of strategic access management measures and heathland infrastructure projects to provide mitigation. Whilst recognising in para 5.12 that each application will be considered on a case by case basis, it would be helpful to clarify the proportion of the overall mitigation strategy that will be dedicated to each of these two main components.	• Support noted. • The spend will be set out in the Monitoring, Projects and Implementation Plan enabling it to be updated and scrutinised annually. • The visitor accommodation referred to all falls under the term ‘self catering’ so is covered.

Respondent	Comment	Officer response
	• The clarification of the types of development which will be permitted and those which will not be permitted within 400 metres and up to 5 kilometres from the protected sites in Figure 3 is useful. Whilst self-catering, caravan and touring holiday accommodation are mentioned, we wondered whether new camp sites, static caravans, holiday parks and newer forms of visitor accommodation such as lodges, glamping and pods should also be covered on the basis that all forms of new visitor accommodation add recreational pressure to the protected sites. • Welcome the requirement to provide mitigation for the lifetime of the development but the amount of funding required for the 80 year in-perpetuity period has not been identified. • The Authority has operated a Habitat Mitigation Scheme since 2012 to secure mitigation measures from new development. Consultation on a revised Scheme SPD closes on 19 February 2020. • Research on the wider impacts of planned development on the New Forest SPA and SAC is due to be completed shortly and will provide a framework for the preparation of a more strategic, cross-boundary approach to habitat mitigation for the New Forest.	
Open Spaces Society	• All public rights of way should be well maintained, properly recorded and signposted and waymarked. • For wardening, consider other models of community engagement through voluntary effort, so that local residents cooperate with those who are employed by the councils. • There should be a detailed ongoing monitoring plan prepared, with staged results, before additional funds are spent. • Oppose the creation of SANGS on existing open spaces and instead provide genuinely new public open spaces. Developers should be required to provide this before being given consent. • There is also the opportunity for developers voluntarily to register land as town or village green within development, which gives local people rights of recreation and protects the land in perpetuity (Commons Act 2006, section 15(8)). Require this in exchange for approving development.	• Monitoring is a key part of the evidence that supports this strategy. • Investment in some open spaces can provide effective mitigation. • Agree that town or village greens are an option. HIPs are also protected by in perpetuity by legal agreement.
Pennyfarthing Homes Ltd	• Generally support the overall direction and content of the SPD and welcome the fact that the Councils have been able to identify a strategy which will allow development to proceed, to maintain the prosperity of the region • The draft SPD removes 50 or more units threshold for providing SANGs, thereby removing a degree of certainty which is important to provide clarity and consistency across proposed developments.	• Support noted. • The threshold for HIP provision will be reinserted. • Specific locations and spend will be set out in the Monitoring, Projects and Implementation Plan. • The occupancy levels are based on census data. The

Respondent	Comment	Officer response
	• Appendix A of the draft SPD provides guidance on types of SAMM measures and HIPs but does not provide detail on proposed strategic locations of such measures or projects nor how this will be monitored. The SPD should detail the specific locations for such mitigation measures and the proposed Monitoring, Projects and Implementation Plan should be published to provide this guidance. • There is limited information provided to quantify the 5 years of SAMM projects and costs for respective Councils. To be successful it is essential that the SPD provides the requisite level of certainty and consistency to allow the costs associated with development to be transparent and understood, particularly given the heightened importance of viability matters. • There is no justification for occupancy rates of 2.42/house and 1.65/flat across the region. Similarly, the 'assumed % house/flat split' is not qualified. This should relate to the planned housing mix over the relevant (Plan) period, rather than previous trends. • The SPD is not clear which approach CIL/planning obligation approach is correct. • In accordance with Para 16 of NPPF, policies should be clearly written and unambiguous and should not be used to add unnecessarily to the financial burdens on development.	SAMMs have been calculated on assumptions of house/flat split. The workings were considered too complex and unnecessary for inclusion in the SPD. • There is no right approach in respect of CIL or planning obligation. Each Council has chosen a different method and these methods will be reviewed through the local plan process. **Action** • **Re-insert threshold for the provision of SANGs**
Primetower Properties	• Welcomes the continuation of the Framework. The draft is timely and offers the new Councils scope to align practices. Commend the streamlining of the document to reflect the general acceptance and understanding of the pressures upon heathland sites and the current approach to mitigation. • The SPD needs to better articulate alongside the HRA process the connection between new development, potential in combination effects and proposals. • Paragraph 2.4 presents an opportunity to explain how the Councils undertake Appropriate Assessment when considering planning applications including use of relevant templates. • Para 5.9 should consider sites that are zero rated for CIL purposes as their impact still needs to be mitigated to satisfy an Appropriate Assessment. Ideally, in the interest of simplicity, a consistent approach should be adopted across the area. • Disappointingly the evidence is not cited, nor how it has influenced the summary table in Figure 1. • Figure 3 - guidance on managed student accommodation would be welcomed. What is meant by '… run on their behalf …' as it would seem anti-competitive if the judgement was to rest with the established universities? Appendix B is	• Support noted. • Agree that explanation of the appropriate assessment process would be helpful to applicants. • The evidence is cited in footnote 4 and through various habitats regulations assessments and monitoring work undertaken for local plans. • For housing proposals that are zero rated for CIL, para 5.12 and Appendix F set out mechanisms for how mitigation can be secured. With time following local government reorganisation, different approaches to mitigation in each local plan will become more consistent, and this will certainly become necessary through the local plan process. The section on university accommodation is inconsistent and will be amended.

Respondent	Comment	Officer response
	inconsistent and contradicts figure 3, so needs adjustment. • Figure 4 - the average occupancy figures have been derived from research into the occupation of new homes. In considering SAMM provision, it is unclear whether baseline occupancy trends for the existing stock have been taken into account, which if falling might create headroom when considering the recreational pressures arising from new homes. • Welcomes that Dorset Council (excluding the north Dorset area) will collect financial contributions towards both SAMMs and HIPs by means of CIL. Infrastructure lists (formerly Reg 123) will need to be amended accordingly, as this approach was previously only adopted in Purbeck. • Welcome that BCP will accept upfront contributions towards SAMM secured through s111 of the Act, thereby restricting the need to enter into S106 agreements which are frequently cause for delay.	• The baseline occupancy for existing housing stock is not taken into account as under the precautionary principle of the Habitats Regulations, average occupancy could also rise • With the abolition of Regulation 123 the Councils will instead publish annually an Infrastructure Funding Statement to set out clearly where CIL and S106/S111 monies have been spent. **Actions:** • **In section 5 and Appendix F set out clearly the appropriate assessment process.** • **Add new appendix with references to evidence** • **Ensure Figure 3 is consistent with Appendix B.**
Public Health Dorset	• Spending time in natural environments is associated with a range of positive physical and mental health outcomes. Ensuring that new development provides access to natural environments is an important consideration for the planning process as set out in the NPPF. • Support the overarching approach and policies set out in the draft SPD, including the mechanism for delivering Heathland Infrastructure Projects to ensure that Dorset residents are provided with access to safe, high quality natural environments as an alternative to visiting Dorset Heathlands.	• Support noted.
RSPB	• The RSPB has supported the Planning Framework since its inception in 2007, and are keen to be involved in the forthcoming strategic review as part of the local plan process. • No substantive comments on the proposed SPD, which as stated above is effectively a roll forward. • However reference to the EU directives and the current Habitats Regulations will need to be updated once the new legislative programme is in place, which is likely to be within the 5 year period of the SPD. • Would like to receive further details of the remit and constitution of the Advisory Group • Note possible area of minor confusion with SANGS being described as both Suitable Accessible Natural Greenspace and Suitable Alternative Natural Greenspace. The RSPB would advocate the use of the latter term throughout.	• Support noted. **Actions:** • **Add to para 4.1 that a review may be earlier than 5 years** • **Amend references to 'Accessible'**

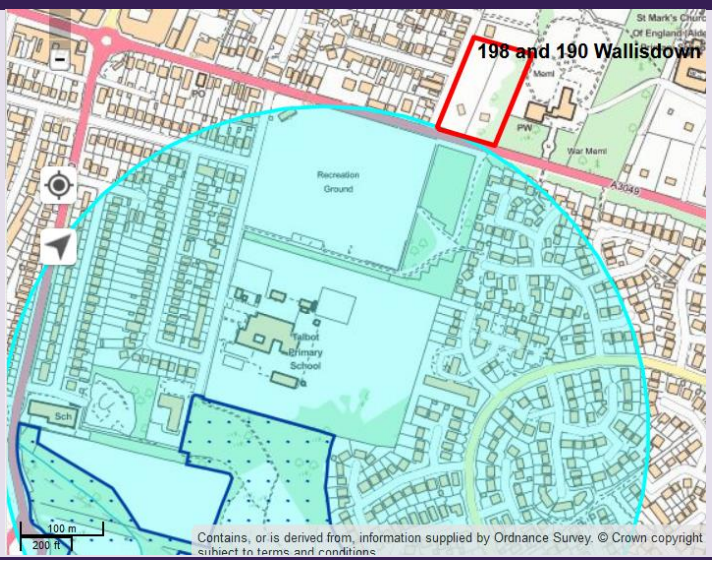
Respondent	Comment	Officer response
Save Land North of Merley	Assesses the proposed SANG as part of Planning Application APP/19/00955 for land north of Merley. Concerned that the proposed SANG does not fulfil the criteria set out in the SPD. In particular in Appendices D and C regarding the design of new SANGs: • The land is floodplain and not suitable for all year round use. • To offer year round walking an excessive amount of boardwalk would be needed which is likely to detract from the site's natural feel • The SANG is narrow in places, prone to flooding from the adjacent river • The urban feel from the close proximity to the A31 is not consistent with the SPD and the provision of an equivalent "air of relative wildness". • The possible circular walks conflict with usage by rowing coaches and are prone to flooding, including the Carriageway which floods from heavy rainfall. • The increased river-side footfall and the increased presence of dogs will pose a very real threat, with a consequence of permanent disturbance, loss of habitat and diminished biodiversity contrary to the SPD • The limitations of the proposed SANG, with its proneness to bogginess and flooding and with its lack of large open spaces (in particular the narrow eastern area) not be able to function as a SANG without principle leading to a net harm to biodiversity	• Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. • In general SANGs are taken out of agricultural use and include an element of re-wilding to improve attractiveness for users, so have the potential for significant biodiversity benefits compared to the existing agricultural use. • In terms of this particular SANG at Merley, it has the support of Natural England as providing suitable mitigation for the adjacent housing proposal (Site UE1 North of Merley). **Action** • **Clarify the issue of flooding in SANG design in Appendix D**
SGN	• Have no comments to make	• Noted
Sibbett Gregory	• Would it not have been a good idea to have widened the scope to include the issue of nitrates and coastal waters? • Has anybody given any thought to the fact that it is people who cause adverse impacts NOT houses? What is the rate of population growth compared with increase in houses/households?	• The mitigation strategies for Dorset Heathlands and Poole Harbour are currently set out as three separate mitigation strategies in three SPDs, with 3 associated costs to developers. Combining these strategies into a single mitigation charge could be considered in the future. • The Councils work on the basis that if the homes are built they can be fully occupied at some point in the future, and use average occupancy as the basis of the mitigation. As population may change during the lifetime of the home (in perpetuity) this is seen as precautionary

Respondent	Comment	Officer response
		approach as set out in the Habitats Regulations
Sport England	• Whilst Sport England supports the aims and objectives for the most of the SPD, concerned that balance needs to be addressed for protecting the heathlands and allowing sport to take place. • Support the remarks around BMXing (paragraphs 4.19, 5.17, Part 2 (appendix A) and in the guidelines for SANGs (appendix B). However this appears to be unorganised, almost recreational BMXing and motor sports. • If organised sport, which may have been happening for years is stopped it can have a detrimental impact on the sport locally. • There is a focus on housing, which I accept, but there are sports facilities which will need to develop their club houses and ancillary spaces. • The SPD could be interpreted as a presumption against development; and appendices E and F could put a local club's aspirations in financial jeopardy. • The SPD needs to provide sound guidance to D2 use with Sport England advice in its preparation. • The heathlands help deliver the government's health and well being agenda by being a destination for people to ramble, walk, cycle. Again there has to be a balance between these activities and protecting the heathlands. • Appendix D is a start, but other elements should be included such as use of technology, areas for rest, accessible paths and toilets.	• Heathlands are protected through legislation and this will effect some existing uses. • Access management on the heathland and the provision of HIPs elsewhere can provide attractive alternatives that mitigates the impact. • The SPD is aimed at the C Use Classes (residential). • Good practice will mean that a number of the suggestions are incorporated into SANG design.
Studland Parish Council	• The Parish Council welcomes the SPD and supports effective protection of the precious Heathlands including the retention of the 400 metre exclusion zone. • The Council recognises the internationally important Heathlands as an area deserving the highest level of protection. The significant loss of the Heathlands over the last 200 years needs to be fully recognised and measures taken to ensure no further losses in particular due to development of and associated with the areas of heathlands. • The designation of a National Park for Dorset would assist in the effective conservation of the areas of heathland. • The Council requests that a robust approach is taken to the quality assurance of mitigation measures, and that such an approach is subject to independent evaluation.	• Support noted. • The advisory group and publication of an annual Monitoring, Projects and Implementation Plan will enable proper scrutiny.
Swanage Town Council	• The Council is in support of the update of the current SPD and the rolling forward of the existing strategy and has no further comments to make at this stage. • However, the Council wishes it to be noted that it is looking forward to engaging in the full review of the strategic approach to avoidance and mitigation	• Support noted.

Respondent	Comment	Officer response
	through the emerging local plans later in 2020 and would like more information about this review.	
Talbot Village Residents Association	• There are local residents who disagree with the Proposed Highmoor Farm Digital Village, and residents that want to protect this valuable piece of Heathland. • The Digital Village will be restricted to B1 Uses that are appropriate in a residential area, but what will happen if they can't fill the premises with B1 Users? • Wholeheartedly agree with Cllr Phipp's statement in the press release for this consultation. So why allow this Digital Village to be built on our Talbot Village Heathland? With electronic communication it could be built anywhere on a brownfield site or on the university campuses. • AUB/Talbot Village Trust plan to park 150 contractors' cars on the heathland behind Bishop Road for 15 months and install three 20ft Lighting Towers behind our residents' houses. This will also present a security risk for Travellers to enter the heath. • Talbot Village Trust want to erect a Digital Sub Station on Highmoor Farm ahead of the construction of the Digital Village. • All Planning for Talbot Heath should be put on hold until the results of the Heathland SPD have been agreed.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. The land identified for development is not on the heathland. For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Talbot Village Trust	• The SPD needs to be supported by more recent and extensive evidence. Results from monitoring should be made publicly available as and when completed. The Councils have been collecting funds for monitoring for more than ten years but the SPD only references documents up to 2005 and there is no obvious public availability of the monitoring that has been done since. The monitoring results should be made available for all to understand how the heathland strategy is working. • The text makes inappropriate references to the '…avoidance and mitigation strategy of this SPD', when the strategy is already established in the local plans. SPD's do not set policies or strategies, so these references need to be amended. • The SPD should set out arrangements for transparent governance. This should include the terms of reference for the proposed Heathland Panel, confirming it will be a public meeting with public records. It is unclear how the implementation of projects and monitoring has been overseen. Decisions on the delivery of mitigation projects to be transparent and subject to public scrutiny. • Accounts should be made public showing the SAMM and CIL heathland income and how this	• Agree that the evidence should be listed. • Discussions with applicants can design out adverse effects, which is avoidance rather than mitigation and is recorded in the appropriate assessment process. • The advisory group and publication of an annual Monitoring, Projects and Implementation Plan will enable proper scrutiny of the project list and spend. • Details of the advisory group is unnecessary for the SPD. • The threshold for HIP provision will be reinserted. • Acknowledge Draft SPD was inconsistent regarding student accommodation. Figure 3 wrongly included student accommodation within 400 metres as there is no evidence to show the effects are any different from C3 housing.

Respondent	Comment	Officer response
	has been allocated. The Councils collect substantial financial contributions for SAMM and are supposed to commit a large first portion of their Community Infrastructure Levy (CIL) towards heathland mitigation. It is presently unclear what sums have and are being collected by the Councils, and how they are being allocated. • The SPD should set out the terms of reference for the Advisory Group, including who are the participants, and the meetings should be open to public view and representation. Minutes of the meetings should also be made public. Additionally, regular reports should be made available on the delivery of mitigation schemes and monitoring, including financial expenditure and the criteria used to assess which projects are progressed. • The new SPD should retain the reference made in the existing document, to developments of more than approximately 50 dwellings being required to deliver a SANG. Smaller schemes should make financial contributions through CIL towards strategic SANG provision. There is no clear evidence supporting why the 50 dwelling trigger for provision of SANGs has been deleted and will create uncertainty, as it appears all sites are now potentially required to provide SANG mitigation, whatever their size. This is wholly unrealistic and could either slow or prevent the delivery of suitable small residential sites. The SPD should therefore be amended to reinsert the threshold reference to provide clearer guidance to landowners, developers and other interested parties. • The new SPD should be amended to consistently confirm that university managed student accommodation can be acceptable within 400m of the heaths. Figure 3 and Appendix B are not consistent, e.g. student accommodation. The Trust supports the existing approach and therefore objects to an outright refusal of student accommodation within 400m of the heathland. • The draft SPD has removed HIPs and states they will be replaced by a new, but as yet, unpublished document. The Councils are asked to publish this document as soon as possible to identify the HIPs to be delivered over the SPD period, as well as reporting on progress of those delivered since the inception of the heathland policy. • The new SPD should include a comprehensive list of HIPs to be delivered over the period of the document. Alternatively, accompanying HIPs documents should be published and regularly updated to reflect new and completed projects. • The Councils need to publish clear criteria which will be used to measure the suitability of HIPs. The Trust considers the Councils should set out and	• Suggested project noted and can be included in the Monitoring, Projects and Implementation Plan. • The 400m consultation area would need to be altered through the local plan process. This is just a consultation area and each application will be determined on a case by case basis. **Action** • **Re-insert threshold for the provision of SANGs**

Respondent	Comment	Officer response
	consult on the criteria used to assess whether a scheme is a suitable HIP. At present it is unclear how funds will be allocated, which makes it hard to optimise HIP submissions, and provides no obvious basis by which to understand funding decisions. For instance the SPD should address: ○ What weight is given to different criteria used to allocate resources? ○ Will such decisions be made by the proposed Heathland Panel, or by a group, or individual officers? ○ Will those proposing HIPs be able to present their schemes? ○ Is there recourse to challenge funding decisions? • The Trust owns land at Talbot Village that could be used to help mitigate the impacts of residential development on the heaths. Approximately 10 hectares of woodland to the north of Wallisdown Road offers the opportunity to deliver a HIP. The woods are open to limited public access, but have not been managed to encourage recreational use. There is scope to re-imagine this area and provide a highly attractive recreational facility. A combined plan for Slades Farm and Talbot Woods could provide a very effective area for heathland mitigation within the very restricted conurbation. • The 400m heathland buffer zone should be amended to exclude numbers 198 and 190 Wallisdown Road The update of the SPD provides the opportunity to review the 400m heathland boundaries to amend anomalies, e.g. numbers 198 and 190 Wallisdown Road where the 400m heathland buffer only just touches the front garden of number 198 and does not reach number 190. However, the heathland buffer restricts residential development on these properties. For no obvious reason, they are the only dwellings north of Wallisdown Road which are included within the 400m buffer. To reach the heath from these houses, someone would have to cross the busy Wallisdown Road and travel over 600m, which is a distance far greater than used to establish the buffer. Additionally, land to the north of the dwellings is allocated in the Bournemouth Local Plan as suitable for residential development. These would be accessed off Alton Road, which is outside the 400m buffer.	

Respondent	Comment	Officer response
		
Verwood Town Council	• The Town Council support the document.	• Support noted
Walsingham Planning	• The calculation on the SAMMs excludes allowance for the additional classes of development set out in Appendix B, e.g. hotel bedrooms. . Assuming all anticipated housing to be built (and charged) this would result in a surplus of payments beyond the anticipated costs. • It is an oversimplification to assume that these additional classes of development would give rise to the same extent and type of use as dwellings. For example, dog walking is identified as a particular potential impact on the Heathlands but the % of hotel guests that bring dogs is very low thereby resulting in much lower potential impact. Similarly, whilst residents will take a wide range of opportunities for leisure activities, including the possibility of walking in the Heathlands, visitors will have a very different pattern of behaviour to permanent residents Likely usage should be taken into account in setting any charge, e.g. 10% of the charge for a flat – or suitable justified figure. • It is unclear how HIP mitigation is to be agreed for any particular proposal. Section 5 seems aimed at larger scale residential proposals which para 5.10 suggests may deliver specific SANGs/HIPs. But there will be many other schemes that are captured. Para 5.9 states HIPs will be delivered through CIL contributions – this requires that a specific cost will be calculated – assuming that is the case this SPD should set how the cost will be assessed and distributed between different types of proposal. • The flexibility set out in para 5.12 to deal with cases on a case by case basis is welcomed, but in the absence of any guidance does not provide clarity about potential liability for prospective developers or how the Council(s) will know their duties have been discharged.	• As the number of other types of development cannot be quantified they cannot be included the calculations. Any surplus will be put towards mitigation. • The Councils work on the basis that if the homes are built they can be fully occupied at some point in the future, and use average occupancy as the basis of the mitigation. As population may change during the lifetime of the home (in perpetuity) this is seen as precautionary approach as set out in the Habitats Regulations. • Where a development pays CIL the appropriate level of mitigation will be directed towards a relevant HIP project and this will be set out in the Appropriate Assessment. If a development does not pay CIL there are different costs depending upon the specific mitigation project that the development has to contribute towards – i.e. a SANG in Poole or a SANG in Christchurch. These costs will be shared with the applicant at the time. Applicants can contact the Council at pre-application

Respondent	Comment	Officer response
	• Merely stating that HIPs will be required without setting out a methodology does not assist either the Council(s) or prospective developers.	stage to understand the likely project that will mitigate their development and the proportion of that project the developer will have to contribute.
Wareham Neighbourhood Plan Steering Group of Wareham Town Council	• Fully support the aim and objectives of the SPD in ensuring the mitigation of the effects of new development on highly valued heathland. • The difficulty in preparing the Wareham Neighbourhood Plan concerns achieving a deliverable SANG to mitigate development of the 300 dwelling indicative housing requirement for the Town set by Dorset Council. • In line with the NPPF the priority is to bring forward underused and vacant brownfield land for residential development before considering greenfield and Green Belt sites. These brownfield sites are in multiple ownerships and bringing them forward is a challenge. The problem has come in providing mitigation arrangements through a SANG. The ownership of the brownfield land does not include any greenfield land and therefore providing a SANG has required negotiation with adjoining landowners. The key issue concerned the level of financial contributions Welbeck were seeking towards the provision of a SANG. Welbeck Land preferred bringing forward development of land in the Green Belt in Estate ownership to meet most of the housing requirement which was not something which the Town Council supported. • Further discussions with Dorset Council and Natural England have resulted in an agreed Statement of Common Ground which limits housing allocations north of the railway line to up to 50 units with financial contributions towards HIPs and enhancement of an existing SANG at Bog Lane for development south of the railway line achieved through a financial contribution. However, this has considerably delayed progress of the Neighbourhood Plan and there remains further potential brownfield land north of the railway line • The key issue which therefore needs to be addressed is how mitigation measures are to be achieved for brownfield land where there is no land available in the same ownership for mitigation. There needs to be a simple method of discharging the requirement at a financial level which recognises the challenging viability associated with developing brownfield sites. This would best be achieved by the local authorities taking a proactive approach in conjunction with Natural England, the DWT, etc to provide a network of SANGs throughout the area covered by the policy. This requires a strategic approach	• Situations such as this need to be resolved at the plan making stage.

Respondent	Comment	Officer response
	which is linked to the development strategy and a greenspace strategy for the whole of South East Dorset. Relying on private landowners to provide SANGs can lead to a ransom situation which fails to bring forward brownfield land in line with Government policy. • Part of the solution to this problem could be through the preparation of the next round of Local Plans for Dorset and BDP but it would be helpful to address this issue in the current SPD.	
Wareham Town Trust	• The need to protect our precious heathland and to mitigate the impacts so as to ensure the protection of endangered species is clearly of vital importance. • Wareham is a highly constrained settlement where surrounding land is protected by a wide range of designations and the Wareham Neighbourhood Plan is seeking to maximise the use of underused brownfield land in accordance with the NPPF. • Mitigation of brownfield land needs to take into account the viability issues associated with developing brownfield land. Relying on negotiations with private landowners for the provision of a SANG is clearly untenable if brownfield land is to be encouraged to come forward for development in line with government policy. • Recommend mitigation of brownfield land by means of a financial contribution which takes account of the viability and that the Council is responsible for the provision of SANGs.	• Situations such as this need to be resolved at the plan making stage.
Welbeck	• Welbeck, representing the Charborough Estate, is broadly supportive of the SPD • It should be noted in the Heathlands SPD that mitigation measures will be part of an overall package that will ensure much needed development is acceptable in planning terms and a balance is struck across the three strands of sustainable development. The viability of payments and mitigation alongside the need for a net gain in biodiversity will be vital in delivery • Despite the future strategic review of mitigation through the local plan there is a lack of specificity in the Heathland SPD. The solution is the provision of a strategic scale SANG at North Wareham in combination with sustainable housing development. • The Charborough Estate's extensive land ownership provides a rare opportunity to deliver development alongside a SANG on land in the same ownership. • An emerging master plan for the proposed SANG at North Wareham will see the creation of over 19ha of natural greenspace to include: o A 3.76 km circular walking route o Informal, mown paths	• Comments noted. Large scale proposals will be considered through the local plans process. • Adherence to the Habitats regulations trumps other planning requirements. • The Councils are not aware of SANGs stopping sites coming forward on viability grounds.

Respondent	Comment	Officer response
	○ Visitor parking for 20 cars ○ Two pedestrian crossing points on Bere Road to enable a larger circular walk to be achieved ○ Management and enhancement of areas of wet grassland and acidic grassland ○ New native tree and scrub planting. ○ New planting along key boundaries ○ 25 m planted buffer to Wareham Forest to deter public access ○ Creation of several viewpoints ○ Provision of interpretation boards ○ Protection of the tumuli ○ A secure area for dogs to be off lead • The SANG has the indicative capacity for approximately 660 new units (or 1,583 population) based on 12 ha per 1000 population. There would therefore be additional capacity of 505 dwellings beyond those being promoted by Welbeck Land. Delivery would be on phased basis.	
Wessex Water	• Para 4.23 - Would welcome clarification in the SPD that Permitted Development Rights afforded to statutory undertakers under Schedule 2 Part 13 of the Town and Country Planning (General Permitted Development) (England) Order are not within scope of these requirements. Reference to Appendix C for further information on this topic should actually be to Appendix F. • The SPD only briefly touches on the other environmental impacts from development on the Dorset Heathlands. As part of the Dorset Heaths SAC Judicial Review Process further information on the condition of the Heaths and the impacts of diffuse and other pollution on their status has been put forward. It would be beneficial for section 3 to be updated with references to water pollution and drainage related issues, with the document signposting other relevant measures in place to address these impacts (for example, the Nitrogen Reduction in Poole Harbour SPD). • Consider through the Local Plan process broadening the scope of mitigation delivered by the SPD beyond solely recreational measures, in order to begin to address wider impacts on the Dorset Heaths, e.g. surface water drainage, flooding, diffuse pollution, nutrient enrichment etc. It would be beneficial for SANGs to include consideration of multi-benefit solutions to ensure that developments cohesively and sustainably deal with their impacts to the sensitive habitat, i.e. natural capital gains. Such an approach would be in line with emerging Government expectations towards delivering net biodiversity/environmental gain and could support delivery of multiple outcomes.	• This SPD covers permitted residential development. Other uses and permitted development rights have to be in accordance with the Habitats Regulations. • The impacts identified in the judicial review are a result of historical development rather than additional development so does not need reference in the SPD. However, the multi functionality of HIPs could be highlighted as mitigating both recreational and nitrate pressures on heathlands and Poole harbour. **Action:** • **Amend Appendix reference in para 4.23.** • **Highlight that HIPs can be multi functional in Section 4**

Respondent	Comment	Officer response
West Parley Parish Council	• Concerned about the impact from staff and visitors to nursing homes within the 400 metre area, who may well take advantage of the close proximity to the heathland to exercise family and dogs. A full impact assessment is needed. • In addition small nursing homes may not prove to be viable leaving an empty building within the 400m zone. • Fully supports the principal of Heathland Support Areas. Details of the funding available needs to be promoted. • The requirement to provide a SANG is not always clear to residents and although it is set out in the Local Plan, it would be helpful if the SPD set out the framework for these areas and their intended use. • The life of the SANG was intended to be in perpetuity but this now appears to have been revised to 80 years which appears a retrograde step. • Equally the requirement for the SANG to be operational before the first occupancy should be included in the revised SPD. • Not all SANG sites selected are considered suitable and attractive enough to encourage residents to make use of them and away from protected areas. Many areas designated as SANGS are prone to flooding in Winter and unusable. Serious consideration should be given to these sites before approval and not accepted as the cheapest and closest available to the application site. • Monitoring of these sites is essential and the parish supports the monitoring programme. • Developers should be encouraged to plant native species and local wild flowers species and not the most available non native species, which may spread seeds to heathlands. • P12 states managed student accommodation will be allowed within 400 zone while previous SPD states these will be considered case by case. This appears a retrograde step. Consideration should be given to the level of development within the 400m-5KM which although generates funding for mitigation at present, should the level of development increase to a much higher level the impact on protected areas will need a greater level of protection.	• Nursing homes will be considered on a case by case basis and assess staff and car parking impacts. • The requirement to provide a SANG is set out in the respective local plans. A number of factors are considered in assessing the suitability of SANGs, in particular whether they will be attractive and therefore effective. • Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. • Acknowledge Draft SPD was inconsistent regarding student accommodation. **Actions:** • **Clarify the issue of flooding in SANG design and native species in Appendix D** • **Sort out student accommodation inconsistency** • **Amend para 6.1 regarding first occupation**
WH White Ltd	• Welcomes the continuation of the Framework. The draft is timely and offers the new Councils scope to align practices. Commend the streamlining of the document to reflect the general acceptance and understanding of the pressures upon heathland sites and the current approach to mitigation.	• Support noted. • Agree that explanation of the appropriate assessment process would be helpful to applicants. • The evidence is cited in footnote 4 and through various habitats regulations

Respondent	Comment	Officer response
	• The SPD needs to better articulate alongside the HRA process the connection between new development, potential in combination effects and proposals. • Paragraph 2.4 presents an opportunity to explain how the Councils undertake Appropriate Assessment when considering planning applications including use of relevant templates. • Para 5.9 should consider sites that are zero rated for CIL purposes as their impact still needs to be mitigated to satisfy an Appropriate Assessment. Ideally, in the interest of simplicity, a consistent approach should be adopted across the area. • It is unfortunate that an appendix identifying potential mitigation projects is omitted. Suggest that the Riverside SANG be added to the stated examples • Disappointingly the evidence is not cited, nor how it has influenced the summary table in Figure 1. • Figure 3 - guidance on managed student accommodation would be welcomed. What is meant by '… run on their behalf …' as it would seem anti-competitive if the judgement was to rest with the established universities? • Appendix B is inconsistent and contradicts figure 3, so needs adjustment. In addition the advice for C1 uses and C2 residential education, as contained in the table set out in Appendix B, is unclear (i.e. "Depends") and should be elaborated upon more fully with hypothetical examples. • The clarity on approach to HMO's is considered pragmatic. • Figure 4 - the average occupancy figures have been derived from research into the occupation of new homes. In considering SAMM provision, it is unclear whether baseline occupancy trends for the existing stock have been taken into account, which if falling might create headroom when considering the recreational pressures arising from new homes. • Welcomes that Dorset Council (excluding the north Dorset area) will collect financial contributions towards both SAMMs and HIPs by means of CIL. Infrastructure lists (formerly Reg 123) will need to be amended accordingly, as this approach was previously only adopted in Purbeck. • Welcome that BCP will accept upfront contributions towards SAMM secured through s111 of the Act, thereby restricting the need to enter into S106 agreements which are frequently cause for delay. • Figure 2 provides a helpful map showing the distribution of the Dorset Heathlands and the 5km heathland area and aids the understanding of the reader.	assessments and monitoring work undertaken for local plans. • For housing proposals that are zero rated for CIL, para 5.12 and Appendix F set out mechanisms for how mitigation can be secured. With time following local government reorganisation, different approaches to mitigation in each local plan will become more consistent, and this will certainly become necessary through the local plan process. • Agree about wider ownership of SANGs. • The section on university accommodation is inconsistent and will be amended. • The falling occupancy for existing housing stock is not taken into account as under the precautionary principle of the Habitats Regulations, average occupancy could also rise. • Para 5.15 refers to in perpetuity as 80 years, as this is the timeframe being used by the Councils to secure mitigation projects. • With the abolition of Regulation 123 the Councils will instead publish annually an Infrastructure Funding Statement to set out clearly where CIL and S106/S111 monies have been spent. • The Councils would welcome private sector representation in overseeing the heathland mitigation process. • The Councils continue to assess each SANG on a site by site basis with advice from Natural England. The 8/16ha standards are a guide but it is attractiveness of the SANG that is more important.

Respondent	Comment	Officer response
	• Pleased to see the reinstatement of the Advisory Group but would suggest this includes private sector representation. Would also welcome informal opportunities for participation in the preparation of the 'Monitoring, Projects and Implementation Plan' recognising that the private sector has an important role in provision and management. • Whilst the Appendix D Quality Standards have been rolled over from the previous iteration, concern is expressed at the lack of parity with the quantitative approach adopted in other regions, such as the Thames Basin, where a threshold of 8ha per 1,000 of population is applied. • Concern at the lack of flexibility afforded to new developments of 50-100 homes with on-site SANG. SANGs delivered in Swanage and Upton do not allow for a circular walk of 2.3km, notwithstanding their wider connectivity. Were new developments of this scale to provide a SANG of 8-16ha it would present significant overprovision; with consequential impacts for viability. • Suggest modifying Appendix D to identify the requirements for (i) strategic SANG and (ii) non-strategic SANG; the latter allowing greater flexibility. • Not clear why the SAMM contribution for Christchurch and East Dorset is set to increase markedly (by circa 60%)? • It is unclear why paragraph 5.16 distinguishes between Council controlled sites and SANG's delivered by the private sector as all need to be secured in-perpetuity and that funding is secured to maintain them. • Concerned by the disparity in the thresholds applied to settlement extensions and / or greenfield sites as these are not clearly defined in Local Plan policies. • Para 19 - support the distinction being drawn between 'Strategic' and 'Non-strategic local' SANGs in para 19 and the basic premise that draw / catchment is a determining factor. The Riverside SANG is sufficiently attractive to draw persons from an extensive area and support its identification as a 'Strategic' SANG in figure 5. However, the SPD should adopt a more transparent approach to the identification of Strategic SANGs and their potential role in enabling future development. Draw is influenced by quantitative. Factors like overall scale, number of circular walks available, availability of facilities and qualitative factors like landscape setting, tranquillity, connectivity and convenience. The draft SPD contains no assessment of how 'draw' (existing or likely) has been assessed by the Council's in pulling together figure 5. With respect to the qualitative aspects, it is evident that	• SANGs may have features that compensate for a shorter walk such as viewpoints (Swanage) and proximity to the housing (Upton). The Councils are not aware of SANGs stopping sites coming forward on viability grounds. • Agree that Appendix D requires an update in line with best practice. 2.3km is a correction for consistency with the evidence. • SAMM contributions have been re-calculated on basis of the new Council area and have changed accordingly for consistency. • Each SANG is assessed as part of the planning application, and good practice is a learning experience as set out in Appendices D and E. • Para 5.15 refers to in perpetuity as 80 years, as this is the timeframe being used by the Councils to secure mitigation projects **Actions:** • **Amend Paras 5.16 to refer to wider ownership.** • **Action – In section 5 and Appendix F set out clearly the appropriate assessment process.** • **Appendix A - Refer to Canford SANG as a good example** • **Ensure Figure 3 is consistent with Appendix B.** • **Update Appendix D.** • **Amend paras 1.3, 2.1, 4.3, 5.8 and Figure 5 as suggested.** • **Add new appendix with references to evidence**

Respondent	Comment	Officer response
	professional judgement needs to be exercised. Underpinning judgements should be published in a table as an appendix to the SPD, thereby enabling scrutiny. Surprised by the inclusion of the UE1 SANG and smaller SANGs shown in east Dorset. • Para 6.4 presents an opportunity to refer to the Stour Valley Concept • Para 1.3 – delete 'of' in final sentence. • Para 2.1 – insert '(SAC)' after Conservation. • Para 4.3 – delete the first 'to' in the final sentence. • After para 4.11, it might be helpful to draw distinction between SAMM and the landowner's statutory obligations for biodiversity management consistent with the SAC / SPA objectives. • Figure 5 - exclude SANG link at Canford. • Figure 5 show HSA to the south of Magna Business Park. • Para 5.8 clarify means of indexation as a footnote. • Appendix D: The reason for altering 2.2km to 2.3km is unclear? • Support the fourth paragraph on page 26, but highlight that Natural England and the Council has been reticent to engage on matters such as SANG capacity, although recent discussions on the future role of SANGs has proved constructive. • Appendix E: it is unclear why the guidance on perpetuity meaning 80-125 years has been removed?	
Woodland Trust	• For the later full review of the SPD we would like to see an integrated, strategic approach to nature recovery embedded in the Local Plan process. • A Green Infrastructure Strategy should integrate the requirements for protected species and sites with a strategic approach to safeguarding and enhancing the wider ecological networks of which they are part, whilst unlocking wider benefits (ecosystem services) to people and nature. • The emerging Environment Bill requires local planning authorities to develop and deliver on Nature Recovery Strategies, the commitment to Nature Recovery Networks in Government's 25 Year Environment Plan and the work of the Local Nature Partnership in coordinating a collaborative approach to nature recovery across Dorset. • In combination effects must be considered not only on the protected heathlands, but the wider ecological networks of which they are part and which help sustain them. The draft SPD does not currently reflect the impact of further isolation of the heathlands through increased development. • In the SPD refer to the existing mapped potential ecological networks, with Nature Recovery Plans to be wholly integrated in the full review later this year.	• Suggestions for the local plan process are noted. • **Action: Refer to the Ecological Network in the SPD**

Respondent	Comment	Officer response
Wyatt Homes	• Welcome that both councils intend to review the overall approach as part of the preparation of their new local plans. In any such review assessment is needed of the financial viability impacts of any proposed development contributions to ensure that policy requirements do not undermine deliverability. • Consider through the local plan process the opportunities to bring forward large scale development, at sustainable locations, that can deliver significant new areas of green infrastructure, including on-site SANGs to mitigate the impacts of both new and existing development on the Dorset Heathlands e.g. • Dudsbury Golf Course, south of Ferndown (Dorset Council) provides the opportunity to deliver a new neighbourhood to Ferndown of around 700 dwellings and 24 hectares of green infrastructure. It could include a strategic-scale SANG, connections to existing green infrastructure links, including the Stour Valley Way, a new connection across the river to the Millhams Mead Nature Reserve and improved linkages between SANGs and other green infrastructure along the Stour Valley. • Higher Clockhouse Farm, west of Bransgore (BCP Council) provides for a new neighbourhood of around 300 dwellings, adjacent to the west of the village of Bransgore. Some 20 hectares of public open space, including the opportunity to create a new strategic-scale SANG for the northeast of the BCP area and for the village of Bransgore. • Pages 2-3 - support the reference to Wyatt Homes Frenches Farm development as being a 'good example' of a SANG. • Figure 3 is not consistent with Appendix B resulting in Figure 3 presenting a significantly more restrictive approach than is envisaged by the detailed guidance at Appendix B. For C2 development to be potentially acceptable within 400 metres it is not necessary for it to comprise 'nursing homes'. In order to address this inconsistency revise Figure 3 as follows: *'Permitted within 400 metres: Certain types of development within C2 Use Class where there is an element of close care provided on site 24 hours a day, or where, by the nature of the residents' disabilities, they are unlikely to give rise to any significant effect on heathlands. Not permitted within 400 metres and requiring mitigation between 400 metres and 5km: Development within C2 Use Class where no element of close care is provided on site 24 hours a day, or where residents' level of activity is likely to give rise to a significant effect on heathlands.'* • Para 4.16 refers to Appendix A (part 1), which provides a general description of the possible	• Comments noted. Large scale proposals will be considered through the local plans process. • If there is only an element of close care then this is C3 development and not appropriate in the 400 metre heathland area, e.g. Nursing homes and specialist facilities (Use class C2) can be clearly differentiated from extra care or retirement housing (Use class C3). • The cost changes to SAMMs reflect the fact that the costs have been amalgamated into two Council areas. The advisory group and publication of an annual Monitoring, Projects and Implementation Plan will enable proper scrutiny. Furthermore, the SPD includes a caveat that it can be reviewed within the 5 years.

Respondent	Comment	Officer response
	types of SAMMs measures. Thus there is no information to justify the overall cost figures set out within paragraph 4.16. The currently adopted SPD quotes a total cost of SAMMs measurers over a 14 years period as £4.3 million (average of £0.307 million per year). Concerned this has now increased to £2 million for 5 years (average of £0.4 million per year) a 30% increase without clear justification. The CIL Regulations 2010 (as amended) require that planning obligations are "fairly and reasonably related in scale and kind to the development" • Concerned that the overall contribution cost per dwelling has increased even more steeply than the overall aggregate costs (when averaged). Taking the contribution for houses, the increase set out within Figure 4, over the current contribution rates is as follows: • BCP: Current rate for houses = £241, new proposed rate = £394, giving an increase of £153 per dwelling or a 63% increase. • Dorset (applicable through s106 to those affected areas in the North Dorset Local Plan area): Current rate for houses = £241, new proposed rate = £406, giving an increase of £165 per dwelling or a 68% increase. The Draft SPD provides no justification for these very significant increases which is a concern for developers. The cumulative impact of all of the various planning obligations and CIL has the potential to harm the viability of otherwise sustainable and much-needed residential development. • Paragraph 4.21 (page 14) Support the guidance that in some cases promoters of larger developments may wish to deliver bespoke measures which will be considered by the Councils with advice from Natural England. Some larger sites will provide particular opportunities to provide strategic SANGs which could be of benefit to a wider section of the community than those occupying the new development and can improve linkages to existing green infrastructure assets.	

Responses from the public:

Respondent	Comment	Officer response
Abernethie, Ann	• Excellent! Comprehensive, detailed, good information. From the perspective of a non-specialist, just a Verwood resident! Thanks to all who have worked so hard and contributed to this plan.	• Support noted.
Amey, Jo	• Concerned there is a presumption that development is the way forward and that the negative impact of such development can be counteracted in various ways. • Surely BCP Council's climate emergency implies that protection of our remaining natural environment must take priority over other issues. • Include a condition for developers of any site within 5 km of heathland to fund an independent baseline bio-diversity survey carried out by a reputable organisation and this survey is to be submitted with their application. • Commercial development should not be considered within the 5 km zone as commercial needs are rapidly changing and any benefits would not be worth the damage caused to the environment.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Arkell, Vivienne	• Concerned with the effectiveness of SANGs. By-the-way is a good example but others are not, in particular the proposals on UE1 North of Merley which are at odds with the statements in the document as this proposed SANG is totally unsuitable to be used for mitigation purposes. The UE1 SANG: o Does not 'avoid sites of high nature conservation value' which this is. o Floods regularly every year for many months it is narrow in places and has an urban feel with the roads. Where will they go for the months it is unsuitable? The nearest and driest being the Heathland. The extent of board walks needs make that unsuitable as well, o The biodiversity of the area close to the river would make it unsuitable for dog walkers. o Only one circular walk exists all year and the length is 0.9km under the recommended guidelines, a significant percentage. o The area is rich in wildlife including Great Crested Newts, otters, kingfishers, night jars, bats and much more. The delicate balance needed to ensure their protection will be under threat by people and pets.	• Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. • In general SANGs are taken out of agricultural use and include an element of re-wilding to improve attractiveness for users, so have the potential for significant biodiversity benefits compared to the existing agricultural use. • In terms of this particular SANG at Merley, it has the support of Natural England as providing suitable mitigation for the adjacent housing proposal (Site UE1 North of Merley). **Action:** **Clarify the issue of flooding in SANG design in Appendix D**

Respondent	Comment	Officer response
	○ It is estimated that 1 in 4 households have a dog which would result in 125 more dogs in that area potentially.	
Barraclough, Andrew & Trishia	• The overall strategy is a move in the right direction with regard to harm avoidance and mitigation. • However, we are concerned that this applies only to residential and tourist related development and does not cover developments to use for the purposes of retail, industrial or academic institutions, particularly if these are sited close to existing lowland heathland for instance Highmoor Farm in relation to Talbot Heath, where the impact of such development would be significant in the following regards: • Reduced carbon sink from building on farmland as well as increased CO production related to construction • Loss of species rich buffer zone • Pressure on existing infrastructure • Increase in traffic and associated pollution • Loss of future green space utility within the conurbation • The cavalier approach of development at Highmoor farm in December 2019 contractors excavating a trench for fibre-optic cabling not only cut through an underground electricity cable but disturbed the hibernation site of slow worms (a protected species) as well as letting stock roam through a gate left unsecured. •	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Bateman, Helen	• Object to the digital village at Highmoor Farm BCP Council has stated that the climate emergency is a priority. • There is no need for a digital village so close to Talbot Heath when there are numerous empty commercial units nearby - Wallisdown rd, Alder Rd, Branksome - rejuvenate these existing sites and the dying town centre instead of ruining what little green space is left in the area? • In a few years it is likely to be surplus to requirements as the demand for residential university study is replaced by apprenticeships and remote courses.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites
Baylis, J	• SSSI land should be protected but not by making the land around it unusable. • Where there is a 'hard' barrier such as a main road between SSSI and other land, it should be possible to have new residences within reasonable amounts. Domestic pets will not survive crossing a main road with constant traffic.	• Fencing around development is not an effective mechanism in perpetuity due to maintenance and its appearance as it has to be high to stop cats. • Businesses are allowed within 400 metres heathland area provided the Council's can be assured that

Respondent	Comment	Officer response
	• Small businesses should also be allowed providing they do not effect the air, pollute water or create noise. • The heathland can be protected by fences around small developments. • Information notices could be placed to inform the public and in certain places request that they do not let dogs off leads and to remain on the paths. • Do not have car parks near sensitive parts of heathland. Despite not allowing development, people drive to heathland areas for walks, cycling and riding. • During sensitive times e.g., ground nesting birds, the nearby car parks could be closed and information notices placed. • Development such as sheltered accommodation for elderly people could also be allowed, where they are not likely to have domestic pets. • Applications for redundant farm buildings for residential purposes could also be considered, where there would be very little risk to surroundings. • Mitigation to pay for heathland rangers could be made. • Barriers need to be placed on the access to footpaths and bridleways to prevent fly-tipping. • 'One size does not fit all', each application for development should be considered with honest regard and whether barriers e.g. roads, rivers, fencing, reduced car parking could be effective to allow development close to heathland.	employees will not access the heathland. • The SAMMs payment includes signposting and raising awareness of bird nesting season and controlling dogs at this vulnerable time for birds. It also pays for wardens (rangers). • Managing the location of car parks, by providing alternative car parks in less sensitive areas is part of the mitigation approach. But closing car parks is difficult as they are often privately owned. • The blanket approach to residential use in the 400 metre heathland area provides certainty, although each application will be considered on a case by case basis. The redevelopment of redundant farm buildings for a residential use within the 400 metres heathland area is not allowed for the reasons set out in the SPD.
Benson, Ian	• Because of the predation of cats, houses should be kept at least 3 miles away from the heathland. Cats kill an enormous number of birds. At least 80% of the area should be fenced off and inaccessible to dog walkers.	• The evidence shows that a 400 metre buffer is a sufficient range to discourage cats from visiting heathland. Due the CROW Act giving rights to open access of land fencing cannot be used to discourage access.
Black, Karin	• There are so many alternative sites to Talbot Village for that can be used for a Digital Village that won't cause such a detrimental effect to wild life and local residents	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites
Brown, Greg	• Object to any measure, policies or plans that will result in the building of new homes on Dorset's heathland areas. The areas are precious and need to remain green spaces for the enjoyment of all, not a means to an	• The Councils have to balance the delivery of housing to meet needs with the protection of the environment. New development would not be permitted if it were to

Respondent	Comment	Officer response
	end of this government to build yet more homes that are just not required.	have an adverse effect upon the Dorset Heathlands.
Casey, Desmond	• Object to using the precious Talbot Heathland for the provision of a digital village. With the horrors of climate change and increasing carbon footprint surely we should preserve the heathland. How relevant it would be to plant indigenous trees and bushes instead of siting more buildings, roads and associated services. For the sake of your and our children/grandchildren and the rare fauna and Flora please consider siting this development somewhere else where it would have less impact on a treasured facility and the population.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites
Casey, Susan	• Object to the siting of a digital village on the heathland in the Talbot area and spoiling this area of pristine heathland by building not only offices and work stations on it but also access roads to, from and within it. Once the heathland has been destroyed there will be no way back. • Surely there are empty premises in the Poole/Bournemouth area which could be used? • The Council should preserve this unique landscape and its habitat not to despoil it by not only building on it but making it accessible to motorised vehicles. • What happens if the industry for which it is being constructed decides it would rather be located closer to transport links, presumably it will be turned over to light industry and storage units.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites
Cassels, Anne	• Object to the proposed Digital village on Talbot Heath • The Council has declared Climate Emergency so this will be in the forefront of your minds when deciding about protecting the Heathlands and how crucial they are to our environment, amongst the other impacts.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Colman, Andrew	• The council has already allowed building on an area at Bearwood which was part of the feeding area of nightjars from the SSSI. This area which was part wetland also supported bats, frogs, toads, palmate newts and a large selection of insects. More care must be taken in planning, once you have destroyed the habitat you cannot replace it. 350 new houses here will also add to the footfall on the heath. • The area set aside as SANG has spent most of the winter underwater and is not usable by the public?	• The former Borough of Poole Council only granted planning permission for 324 homes to the south of Magna Road as the possible adverse effects of the development will be mitigated. Alternative foraging land has been secured in perpetuity to the south of the development near to the heathland. Residents will not have direct access onto Canford Heath and a SANG has been provided which is proving to be very

Respondent	Comment	Officer response
		attractive to walkers whom may otherwise visit the heath. • Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. **Action:** • **Clarify the issue of flooding in SANG design in Appendix D**
Cooper, Bob	• Object as the NPPF and the Habitat Regulations require that consideration is given to any application for Development which may have an effect on a protected habitats site. • The draft SPD does not comply with the NPPF because it only covers residential development. The SPD should be extended to include policies which cover the potential effect of that ANY type of proposed development	• This document is a strategy for mitigating the impact of housing. For the Council to grant planning permission all proposals (not just housing) will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Cooper, S	• Object to development by Talbot Village Trust of the areas boarding Talbot Heath, • How the BCP council can declare a climate emergency then allow such a vast destruction of our green space for commercialism? • We need all the existing the green space, without this, the area will continue to choke its self with congested roads, infrastructure and energy use. The region is already over developed, over populated and cannot sustain anymore growth. • All development should be halted until we are able to see significant improvements in climate change, locally as well as nationally. • The 'Innovation quarter would be better placed in the many empty shops that occupy Bournemouth and Poole, to revive the towns and bring in increased footfall.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites
Cox, Dorothy Joyce	• Please preserve all heathland in Dorset there is so much protected wildlife and it must be saved. There used to be an area on Turlin Moor at the end of Junction Road and Dartford Warblers lived there until the council cut it down. Please be more aware of the damage caused by allowing vegetation to be removed, wildlife need homes as well.	• The Councils have to balance the delivery of housing to meet needs with the protection of the environment. New development would not be permitted if it were to have an adverse effect upon the Dorset Heathlands.
Dobbs, Nick	• The reality is that even for sites with protected designations we really don't accurately know what we are mitigating for because of the lack of up to date baseline data from which to assess the impact of any	• To satisfy the Habitats Regulations the SPD sets out a mitigation strategy to ensure there are no adverse effects. There is no requirement for a net gain in

Respondent	Comment	Officer response
	development in terms of net gains (or losses) in biodiversity. • In any planning application that has the potential to impact a site with designation it is Natural England's submission that is regarded by Councils as prima facie. Why? It is well reported in the media that Natural England is significantly under resourced on the frontline; consequently and by their own admission, Natural England has very limited understanding of how wildlife is faring (e.g. species present/population fluctuations) – even on nature reserves with supposed protected designations. • Despite both Council's declaring a Climate Emergency in only one place in the entire draft SPD document (para 6.4) is there a reference to the Council's desire to achieve net gains in biodiversity. • Submits a flowchart for how the planning system can deliver a net gain in biodiversity.	biodiversity to mitigate the adverse impact of urban pressures. However mitigation projects by their very nature provide opportunities to re-wild countryside and improve biodiversity and therefore the strategy is likely to have a positive effect. The Council is the decision maker and relies upon Natural England for advice before reaching a decision. Part of the SAMMs payment is used for monitoring of bird populations on protected sites and human access patterns.
Farrell, Nigel	• Object to the proposed digital village on land at Highmoor Farm as development is likely to harm the adjacent heathland which is one of the few remaining green areas in the conurbation. It should be protected rather than creating increased risks of fires and further encroachment. • There would also be traffic and amenity are also issues.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Gawler, Keith	• As a parish councillor, support the strategy as proposed. • However, suggest that better quality mapping of the heathland areas will be helpful to everyone including health walkers around Verwood.	• The maps are small scale due to the nature of the SPD, but are set out in greater detail on Local Plan Policies Maps.
Glazer, Holly	• Object to the planning permission. The roads will not cope with the increased traffic. Wallisdown is already gridlocked / moving at a snails pace.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan.
Green, Tara	• No development should be allowed on the heathland and agree with limitation on development within a further 400m distance around it. • The issues regarding degradation and erosion of the heathland habitats, particularly highlights the need to ensure further provision is made for additional public open space and SANGs in Corfe Mullen. • Non-heathland pockets of public open spaces in Corfe are limited by grazing animals, poor maintenance and poor drainage (i.e. unable to get through as often overgrown or waterlogged - such as the walks through the Happy Bottom Nature Reserve areas and	• Comments noted.

Respondent	Comment	Officer response
	further overuse - such as the Badbury Rd rec and the play area behind the Coop. • Retain open spaces around Corfe Mullen as an alternative to the heathland, esp. the Corfe Mullen, Badbury Road recreation ground - the entire rec. (incl. the end field which borders the main Wimborne Rd / Higher Merley Lane and the western edge of Stour View Gardens end as well as the fields / wildflower meadow and adjacent field bordering to the NE part of Rectory Avenue). This valuable recreation space is the only place where dogs and children can stretch their legs and run and play in any sort of reasonable space.	
Gunn, John	• The SPD will need to undergo Habitats Regulations Assessment. • The Sweetman judgement will also apply • Can SANGs be more biodiverse e.g. create patches of heathland in Queens Park, Bournemouth • The payments for SAMMs are too low and do not take into account the full cost benefit analysis • Can protected sites be monitored by CCTV?	• The SPD provides guidance to poilicies set out in higher level local plans. The local plans were subjected to habitats Regulations Assessment. • Each planning application also has to undergo appropriate assessment as a result of the Sweetman judgement • SANGs have a particular purpose, but opportunities to improve biodiversity are encouraged. • The SAMMs cost reflects the mitigation costs only as the mitigation has to ensure no adverse effect, rather than site improvement. • CCTV would be costly.
Gundry, J	• Development in close proximity to conservation areas especially Heathlands, is particularly undesirable – the impact of people could prove extremely adverse in many ways. It is most certainly the case that our local heathlands should be respected and protected. We do indeed have a legal duty to safeguard our environment.	• New development would not be permitted if it were to have an adverse effect upon the Dorset Heathlands.
Guntrip, Rosa	• Strongly disagree with any proposed building work on the Heathland, soon there will be no green spaces left!	• Comment noted
Harris, Matt	• The proposed development is a great idea for the conurbation. The University has been a success for the region and it makes sense to collocate digital businesses around these thought centres as many other university cities across the country have.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan.
Heward, Julie	• Under no circumstances build on them or reduce them as it is our leisure and pleasure place to unwind and get back to nature. All this council want to do is build build build and build again. I live in Broadstone but go to	• The Councils have to balance the delivery of housing to meet needs with the protection of the environment. New development would not be permitted if it were to

Respondent	Comment	Officer response
	Corfe Mullen as Broadstone is so over built up, too many cars. It has lost its identity.	have an adverse effect upon the Dorset Heathlands.
Hudson, Martyn	• Natural England has too much influence whereby the exclusion zones force unnecessarily large areas of genuine Green Belt to be de-classified so that substantial housing estates can be created with insufficient improvement in the surrounding infrastructure. That position cannot be maintained if we are going to be able to house the population that require it. • Suggest reducing the zones to 300m or even 250m and exclude Natural England from any influence within village envelopes, so that we can maximise the inhabitable content of a village or small town, where existing infrastructure can absorb the development permitted. We are not utilising to the fullest extent possible the areas that we already inhabit, before we use open land to build even more houses.	• The heathland areas are based upon evidence. To amend these areas would require new compelling evidence of which there is none.
Keats, Chris	• The precious Dorset Heathlands house, feed and protect many wild creatures and plants and it is essential that this continues through the next few centuries, irrespective of housing requirements for humans. After all, the wildlife have inhabited Dorset much longer. • Perhaps there is an argument for designating certain restrictions for new housing? Like cat owners ensure their animals wear bells to warn creatures, especially birds and smaller mammals like shrews, etc. of their approach? • Perhaps voluntary wardens or rambling groups could be recruited to advise home owners of their responsibilities if they end up living so close to Heathland areas? The new BCP Council was the first in the U.K to really do something for wildlife, rather than talk about it. Pet-free homes might be rather refreshing to lots of people.	• The suggestions for cats are not currently enforceable. • Developers will fund wardens to raise awareness, but equally the role of the voluntary sector should be encouraged.
Kenward, Robert E.	• In a democracy, conservation requires consent of citizens who elect decision makers and citizens need to appreciate the value of heathland in order to support future conservation. The value that heathland's international designation has created in planning terms (for preventing over-development around Wareham) is inestimable, but the CIL (with integral SAMMs and HIPS) adds to planning costs for local householders as well as on developers. If local people gain aesthetic appreciation from SAMMs, and health benefits through SANGs, citizen consent may be sustained.	• The Habitats Regulations are UK law. • The proposals seek not to stop people from doing as they wish, but encouraging a change in behaviour over time by offering up alternative places to visit and educating people on the benefits of protecting heathland sites. The Habitats Regulations ensure that development does not have an adverse effect upon the protected sites so is not aimed at improving the heathland sites, although the projects have the potential to

Respondent	Comment	Officer response
	• It is therefore important that tourism is not unduly constrained by pets. The science shows an association between proximity to households and disturbance of wildlife, but not the causal mechanism for that association. Dogs might be involved, and poorly controlled dogs are undesirable, but there is more evidence in general for wildlife impact from cats, and plenty for generalist wild predators (foxes, badgers) that may benefit from bird-tables and worming on lawns. It is therefore good that, in the strategic plans (p.7-8) that tourist (and student) accommodation is permitted within 400m of heathland, given mitigation (and supervision), especially because tourists are probably more likely to bring their dogs than their cats. • Anomalous therefore that Table 2 HIPs projects focus on dogs rather than heathland connectivity projects that could enable rewilding processes.	create the wider health and environmental benefits as suggested.
Lees, Clare	• Appendix D – In light of the declaration of a climate emergency reconsider the statement that most visitors to SANGs arrive by foot or car. Housing sites should be selected with the possibility of providing SANGS alongside. It should be considered undesirable to provide an attractive destination accessible only by car.	• Agree, ideally everyone would walk to SANGs but this is not possible in all cases, particularly those functioning as a strategic SANG. Car parks are necessary until such time as the access behaviour of the public shows a significant modal shift e.g. to cycling/buses/e-cars etc. **Action:** • **·Amend Appendix D**.
Lloyd-Jones, Stephen	• A prerequisite of SANGS should be that they are able to offer sufficiently stable mitigation for large developments. The Canford Park SANG patently does not as it is necessary to close it due to flooding during spells of heavy rain. The knock on effect is of course much greater use of the heathland for the exercise of dogs during the winter months.	• Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. **Action:** • **Clarify the issue of flooding in SANG design in Appendix D**
McManus, Theresa	• There should be no further development. Neither increasing the urban density nor extending its footprint, until healthy wildlife numbers are re-established. • A threshold of 5km should be redundant. However, if one is required, dog owners probably drive 10 miles. • Given the precarious state of the Dorset Heathlands, and their lack of interconnectedness, highlight areas which could over time be developed as green	• The Councils have to balance the delivery of housing to meet needs with the protection of the environment. New development would not be permitted if it were to have an adverse effect upon the Dorset Heathlands. • Acknowledge that linking heathlands through green infrastructure is an important

Respondent	Comment	Officer response
	wildlife corridors between the patches of heathland and apply 10 miles to these potential heathland connectors as well. • SANGs seem to be sited in peripheral areas that would not have had any value as development land, are where people are likely to drive to them (carbon footprint), and may be unattractive for several months of the year due to flooding • SAMMs charges -why are they so low, and why aren't they being used to encourage affordable development? Why not charge £1K per bedroom (as the potential footfall is the problem) with fee of just £500 for each affordable home?	strategy for the upcoming local plans to address. • SANGs use wide open rural areas of similar attraction to heathland, which necessitates using land around the edge of the conurbation, along the Stour Valley. • The flooding on SANGs is generally outside of nesting season. • The SAMMs charges are based on the costs of mitigating the impact and to ask for more from developers would be unlawful..
Mellor, Carolyn	• Object to the proposed Digital Village. The extra traffic and activity is detrimental to the residents and to the wildlife.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Miles, Robert	• The EU produced a badly worded document which instead of dealing with the proposal at which it directed, allowed it to be applied universally, which has resulted in the loss of 44% of potential development land in Poole and 66% in the Isle of Purbeck. • There are hundreds of serviced building plots available within the existing urban framework which could be developed rather than provide new roads and services to Green Belt land at a time when we are all are concerned about the planet, yet here we are utilising Green Belt, which helps to heal our planet.	• The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) transposes EU legislation into law in the UK. This UK law ensures that any plan nor project does not cause harm to a protected wildlife interest.
Mitchell, Susan	• Our heathland is a most important habitat and it is upsetting that a lot has been lost through arson. The creatures and plant that live in these areas are unique and we should do all we can to care for them.	• Comments noted.
Monsell, Suzy	• No mention of the Climate Emergency and its impact on heathland • No suggestions as to how the heathland will be made safer in the future from fire breakouts • Plan to "wet" the heaths to avoid fire spread • Revise this document in the light of the Government's plan for Climate Change Action • Provide manpower/volunteers to develop these strategies and groundforce taskforces	• Reducing arson events is an important part of the mitigation approach - through wardens and education in schools as set out in Appendix A. • The heaths are protected and the suggestion to change dry heaths to wet heaths would not support certain protected species. Furthermore in summer the rivers are low and water extraction is restricted. • Developers will fund wardens, but equally the role of the voluntary sector should be encouraged.

Respondent	Comment	Officer response
		Action: • **Refer to the Council's commitment to the Climate Change Emergency.**
Oswald, Carol	• Am strongly against any further building on Dorset heathland. These are vital areas that need 100% protection. Once the area is covered in concrete it will be lost forever, as will all the wildlife that depends on it.	• The Councils have to balance the delivery of housing to meet needs with the protection of the environment. New development would not be permitted if it were to have an adverse effect upon the Dorset Heathlands.
Phillips, George	• Generally in favour of this framework, but not convinced this will provide sufficient housing to allow the younger generation to get established on the housing ladder. • Offer alternatives but do not block people or their dogs from enjoying the heathlands. If 'managing access' or 'manage visitor pressure' means stopping walkers and their dogs from going on to the heathlands, then not only will this cause a lot of friction, but it will be unfair on the walkers. • Lone Pine Park seems to be adding dozens of higher density housing, including dogs with another 15 still to be installed. This has been at the expense of dozens of trees, some with retrospective TPO permission.	• The strategy enables the Council's to grant permission for housing. Without this strategy the Council would not be able to do so. • Management is about influencing people's behaviour over time so that people become more understanding of the risks to protected species and choose to change their behaviour accordingly. • Lone Pine Park benefits from deemed consent without condition or limitation. Thus the provision of additional caravans on the site would not require planning permission but would need to comply with the details contained in the current site license.
Piot, Bernadette Richmond	• The local heathlands should continue to be protected as areas of natural beauty and interest with birds and animals. They are also areas much used by local people and visitors for recreation and sport. • It is vital to keep and protect the Dorset Heathlands and not to use the land for building more houses. The roads in the area are saturated and it would cause even more problems and pollution.	• Comments noted.
Pope, Marion	• Significant damage has been caused to Canford Heath by industrial development: household waste processing and inert recycling facilities adjacent to White's Pit. The SPD should be enhanced to mitigate against damage caused to protected sites from both housing and industrial developments. • It is unfortunate that the Government reduced the CIL rate for North Poole from £175 per sq. metre proposed by the Council to £115 per sq metre. Doubtless it was done to encourage developers to commit to opening up the sites but SAMMs are only one item to be met from a CIL rate which is now little more than it has been for years.	• The evidence does not illustrate that a mitigation strategy is needed for the in-combination effects of industrial uses. Each planning application will be determined on a case by case basis and may include bespoke mitigation to avoid adverse effects upon the Dorset Heathlands. • The Councils prioritise the funding of heathland mitigation from CIL before the majority of other types of infrastructure. If the Council had insufficient funds for up-front mitigation the housing would not be allowed.

Respondent	Comment	Officer response
	• Where SANGs are built on flood plains, they can be unusable for many months while the rivers are in flood. When that happens, local populations will revert to using heathlands which somehow defeats the object. • The SPD will only be effective if its policies are rigorously adhered to. Too often in the past, damage has been caused to lowland heath habitats and protected species by the LPAs themselves. Those preparing the SPD should first read the Proof of Evidence of the late Dr John Underhill-Day - APP/13/00272/P 3 February 2014). It is a great pity that his evidence has largely been ignored. I should be grateful if you would let me know where these comments, and those of other residents, will be published.	• Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. • The late Dr Underhill Day's research (and others) provides the evidence of urban pressures upon the Dorset Heathlands. This evidence is paramount to preparing the mitigation strategy set out in this SPD. **Action:** • **Clarify the issue of flooding in SANG design in Appendix D**
Price, Hazel J	• If any more homes are built in Bearwood, Canford Magna or Merley there will be gridlocked roads, ruined heathlands destroyed wildlife habitats and excessive flooding on the land meant to absorb high water levels during the winter months. • The SANG area designated on the old river course is closed due to flooding and this will continue for most of the winter months so this in no way compensated for the loss of land for housing. • All open areas and habitats should be protected for future generations of both humans and wildlife	• Flooding events generally do not coincide with the bird nesting season (March-July) when the adverse effect of people upon protected birds is most sensitive. If flood events occur in this period they are for a short timespan compared to the wetter winter months. **Action:** • **Clarify the issue of flooding in SANG design in Appendix D**.
Smith Jennie	• The reason our heathland is under pressure is because little by little you are allowing developers to encroach on green areas. • Look for building opportunities on empty industrial estates, brownfield sites, etc. and stop land grabbing the few remaining green areas we have for leisure purposes.	• Comments noted.
Stewart-Jones, Harriet	• Development has been allowed to eat away at our precious lowland heathland in Poole over the past 40 years. Please let's put a stop to heathland destruction now. • On Talbot Heath the universities have been allowed to encroach gradually, nibbling away at the farmland on Highmoor Farm, removing the buffer between the heathland and buildings. And if the proposed "Digital Village" were to be given permission to go ahead it would seriously impact the heathland further. I'm opposed to the use of the farmland as a light industrial innovation park. There are other more suitable locations for this. It does not need to be near the university.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.

Respondent	Comment	Officer response
	• I believe it is time to cease construction in this area. Leave the green fields for grazing and as a taste of the natural world for residents and future generations. And for the wildlife that currently uses it. • The BCP Climate and Ecological Emergency plan currently in preparation will surely mandate the planting of trees and use of heathland edges as carbon sinks. It is necessary to make room for these measures by taking them into consideration in the SPD.	
Thomas, Jo	• As a nearby resident to Upton Heath for over 50 years, notes: • Fire danger to the Heath was high from the motorbikes, this has been stopped by notices and the presence of wardens. Further fire danger has been low, and usually accidental. • The greatest continuing danger to the wildlife is from loose dogs. Many people let the dog off the lead on reaching the heath. Many of these dog-walkers park their cars in Beacon Road. Suggest making Beacon Road a no-parking zone, with residents having parking permits. • Dog-walkers could be entirely restricted to the heathland area next to Springdale Road, where there is a car park, and the undergrowth is in process of being cleared. • This change would need widespread publicity. • Walkers on Upton Heath seem to keep to the established footpaths, and notices requesting that could accompany the above publicity. • The restrictions on changes to established residences, and the building of new homes, could therefore be viewed more leniently. We need more homes for young people and families – at a price they can afford. The result of present restrictions is that Broadstone is becoming overwhelmed by the elderly • It might be possible to forbid the keeping of pet dogs or cats in any new build?	• Comments noted.
Tuffin, J	• The Heathlands are desperately important to all of us in Dorset. We need these lungs of green between areas of residential development. The variety of wildlife and the environmental balance must be maintained for future generations. • Highmoor Farm, (Talbot Village), is an important local resource. Could we have some "City Farms" providing a learning resource for local schools ? • The Digital Village would replace this last local farm and the heathland at Talbot Village would be surrounded by development. Why	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan.

Respondent	Comment	Officer response
	could it not be developed on the universities sites?	
Vincent, Nicola	• Object to plans for the Digital Village on Talbot Heath. The UK has lost 95% of its lowland heathlands since the time of the Talbot Sisters (Victorian) and the amazing and unique wildlife that exists upon them. Talbot Heath is definitely worth preserving for future generations.	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites
Waite, Julia	• Have concerns about existing pressures from people and animals on nearby heathland, and do not any assessment of how effective mitigating measures were, which is surely critical if you are doing more of the same (i.e. allowing development within 400 metres). • Do not think existing proposals for mitigation are strong enough: appointing some wardens and visiting a few schools seems very little if you are trying to change local behaviours. • Why not get local children involved and make them junior wardens who can help out at weekends? Or adult volunteers to replace/ supplement the wardens? Has anyone asked the RSPB, Dorset Wildlife Trust or any other relevant organisation if they would help in protecting the sites for birds and other wildlife? • And rather than just visiting schools and talking at teachers and pupils, why not identify an area of heathland for class visits, where children can see for themselves the birds, animals, reptiles and insects that live there, and link this to the climate emergency and how valuable these natural spaces are? • The council may go through the motions of mitigation and as a result, what is done may be ineffective and cause the heathland to deteriorate as an environment for wildlife.	• A full review of the effectiveness of mitigation will be considered through the local plan process. Local organisations manage a number of the heathlands and thus are already play an important role in their protection. Note the positive suggestions for educating children.
Walford, Leigh	• To maintain the wildlife richness of this area, it is important to respect and protect the little remaining heathland that we have. • While the document was clear about residential development, it did not discuss commercial development which is more dangerous to Talbot Heath. Recently we have examples of developers attempting to building <400m from the Heath and trying to take advantage of permitted development to break ground before planning was approved.	• This SPD focuses on mitigating the impact of housing. Commercial development still has to undergo appropriate assessment at the planning application to ensure that there would be no adverse effect on the heaths.

Respondent	Comment	Officer response
Webber Jill	• One of the pressures you highlight is disruption of hydrology. The increase in tarmac & paved areas is significantly affecting the water table & increasing floods in all areas not just the heathlands. • There should be the ability in planning conditions to ensure water permeable surfaces are used in ALL new developments, small & large. Also ensure ground water drainage is an integral part of all new buildings, instead of surface water going down drains. Especially in flat developments, where car parks can have a major impact. • The conditions should remain with the building so future owners can't just tarmac over everything.	• Comment noted.
Welch, Gregory	• Currently in a Climate Crisis, a Policy adopted by the BCP Council. • Losing any more green space/biodiversity would be calamitous and so unnecessary as a Digital Village could be placed on a brown site elsewhere in the conurbation e.g. at the top of Alder Road behind Homebase • The increase in traffic increase pollutants from vehicles	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.
Wellman, Sue	• If there is evidence to prove harm to our precious heathlands then we should not allow development within 5kms under any circumstances • There are still plenty of brownfield sites that can be adapted and used for development, more higher raised flats within urban areas and with new tax legislation that will start to discourage owners to have buy to let mortgages and rent/own a second home, which may well reduce second home ownership, that there should be other options. • The bush fires and floods around the world are being blamed on climate change reminding us to be aware of the importance of protecting our nature and environment before it is too late. • Would be greatly saddened if further development (even if mitigating action was taken) were permitted to these precious rural areas and green belt and heathlands are not protected.	• The Councils have to balance the delivery of housing to meet needs with the protection of the environment. New development would not be permitted if it were to have an adverse effect upon the Dorset Heathlands.
Worthy, Mr & Mrs	• Object to the proposed Highmoor Farm Digital Village which is a valuable piece of Heathland close to the town centre and must be protected. The proposed site would be some 240m from Talbot Heath Nature SSSI. • Why it is necessary to replace an area of heathland with a digital village when there are	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites

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	numerous other areas that would be more suitable such as existing brown field sites. • We also understand that Highmoor Farm is recognised as an essential buffer zone for the heath and is currently a tenanted farm that, if maintained, could be turned into a valuable learning centre for local schools. • Public access to real nature on their doorstep has enormous benefits to public wellbeing and health. • Why cant this be built on the university campuses? • Additional traffic will cause further congestion	
Young, Daniel	• Strongly reject the planning for a proposed digital village on Highmoor Farm as the area is full of wonderful birds, animals and creatures The disruption of the current building is bad, this would be ginormous. Parking and noise just to make a few. Also flood lighting, would be bad for the houses backing onto the farm like us. • The area cannot cope with the extra cars. • The expansion of the university is compromising the environment. Every last bit of land is being build on. Talbot village is being engulfed by university buildings	• The proposed Innovation Quarter is an allocated employment site in the Poole Local Plan. • For the Council to grant planning permission proposals will have to pass appropriate assessment to ensure that there is no harm the protected sites.