

By e-mail

22nd January 2018

Planning Policy (North Dorset)
South Walks House
South Walks Road
Dorchester
DT1 1UZ



Dorset Wildlife Trust

Dear Sirs,

North Dorset Local Plan Review – Issues and Options Consultation

Dorset Wildlife Trust's mission is to create an environment rich in wildlife for everyone. We aim to inspire people about the natural world so that they value it, understand their relationship with it and take action to protect and restore it. Through our work with the planning system, we work to promote opportunities to improve the natural environment at every stage.

Thank you for inviting Dorset Wildlife Trust to comment on this document. We have the following comments to make.

Scope of Review

The Issues and Options consultation document states in paragraph 1.4:

In terms of the scope of the review, the Inspector detailed that it should be all encompassing in respect of its content. It should therefore consider those matters which are covered in LPP1 and those matters which were due to be considered as part of the North Dorset Local Plan Part 2. It is envisaged that once the review is complete the new Local Plan will replace LPP1 and all the retained policies from NDDWLP.

Given the fact that LPP1 has only recently been adopted by NDDC it is likely that a number of its policies will largely be carried forward without any changes.

The Issues and Options Consultation document makes no proposed amendments to the current Local Plan Part 1 (LPP1) on a range of policies, including Environment, Climate Change, Ecosystem Services and Green Infrastructure.

Are we therefore able to make the assumption that these all of will be retained policies? DWT wants to state clearly that we would wish to see the following Policies retained and not weakened during the Local Plan Review process:



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- Policy 3. Climate Change
- Policy 4. The Natural Environment
- Policy 15. Green Infrastructure

Even in the context of this document on allocations of areas for housing and other development, we would expect to see a much greater reference to the natural environment, not merely as a constraint to development as mentioned in a number of instances throughout the document, which gives an overall negative impression, but including the importance of green infrastructure and the value of Natural Capital and the Ecosystem Services (including climate change mitigation, reduction in flood risk, health and wellbeing etc.) provided by the natural environment as opportunities to be embraced during the planning review.

All housing developments should be healthy, attractive and inspiring places where people and wildlife flourish together. Good quality housing in the right place can provide access to nature for residents, while also making a positive contribution to our wildlife and the health of our environment. In order to achieve these positive outcomes for new residential development, it is essential that environmental considerations are built into the plan at the earliest stage.

The Wildlife Trusts have just published a document (Homes for people and Wildlife – How to build housing in a nature-friendly way)¹ setting out a vision for exemplar housing developments which incorporate wildlife and nature features from the very start to provide the many benefits to people and the natural environment such as:

- Improved health and quality of life for people living and working nearby;
- Access to high quality wildlife-rich natural green space for everyone, enabling people to enjoy the natural world;
- Effective water management, pollution and climate control provided by greenspaces and water courses, trees, woodlands, wetlands and other natural features;
- Connectivity between wild places enabling both wildlife and people to move through the landscape, and for natural processes to operate effectively;
- Measurable gains for wildlife; all development should result in a net gain for biodiversity (NPPF para 109).

This is the vision we would like to see in the North Dorset Local Plan.

Dorset Wildlife Trust therefore recommends that available information on important wildlife sites from a number of sources is utilised in preparing the new Local Plan. e.g. the latest available datasets from Dorset Environmental Records Centre, on Internationally, Nationally and Locally recognised Wildlife Sites, and also *Dorset's Ecological Networks*² just published, a series of Ecological Network Maps developed by the Dorset Local Nature Partnership with the Dorset Environmental Record Centre, showing the network of sites of varying levels of importance for nature conservation, and the links between them. Mapping and conservation/enhancement of ecological networks is required under paragraph 117 of the National Planning Policy Framework.

For example, we would recommend that the Ecological Network Maps are used instead of the "Key Environmental Constraints " map shown on page 14 of the document, as these are up to date, and include all the levels of Nature Conservation designations (International, National and

Local) as well as well as potentially important sites representing buffer sites, wildlife corridors and stepping stones.

Again, if the previous documents are going to be incorporated into the new Local Plan, then it is essential that the most up to date data on Nature Conservation sites is included. There are not likely to have been major changes to the nationally and internationally designated sites since the LPP1 was developed, but the SNCIs get monitored and reviewed on a rolling programme, and there may have been some changes to the boundaries on these which need to be incorporated into the new document.

We are also concerned that in this document there is no mention of the major vision to restore, recreate and reconnect the historic landscape of the Gillingham Royal Forest, which will have multiple benefits for the landscape and natural heritage, as well as for local people, whilst making an increasing contribution to the sustainable development of Gillingham. This important project, which was included in LPP1, has many partners, including North Dorset District Council, and we believe it is essential that such a major project should be mentioned and supported through the development of the new Local Plan.

Areas Allocated for Additional Housing Development

With regards to the specific potential areas for development being considered around the four main towns, plus Stalbridge, it is difficult from the information provided to determine whether the most appropriate areas have been included. It seems that the main reason for discounting certain areas for potential future housing allocations is that at least a part of the area is at risk of flooding, yet some areas where this is the case have still been allocated. It is also acknowledged that development in many of the proposed areas will have impacts on biodiversity as well as landscape and heritage assets, and we believe that these issues need to be considered in more depth for each individual area before such allocations are made.

In particular we note that:

Blandford: Area F includes part of The Cliff SNCI (ST80/016) which would need to be fully protected.

Gillingham: Areas B falls within the Gillingham Royal Forest project area. **Area D** falls immediately adjacent to ST82/012 Palemead Coppice SNCI and Ancient Woodland site.

Shaftesbury: Area I would impact on a number of SNCIs, but it is noted that there is no intention to allocate further areas beyond that which has already been allocated in LPP1. For that area careful attention will need to be paid to protection, buffering and mitigation for any adverse impacts on the adjacent Ancient Woodland SNCI (ST82/038 Kingsettle Wood).

Sturminster Newton: The western end of **Area A** lies immediately adjacent to ST71/026 Twinwood Coppice Ancient Woodland SNCI which would need to be fully protected if further housing development was allocated here.

Stalbridge: Area B includes ST71/053 Stalbridge SNCI and LNR which will need to be protected against any adverse impacts of further housing allocations. **Area D** includes part of ST71/052 Basel Bridge, a highly vulnerable grassland SNCI of great value which again would require protection and buffering from further housing development.

Important Open or Wooded Areas

We note the rationale suggested for the removal of the designation of Important Open or Wooded areas (IOWAs). However, whilst we have no problem with this designation being removed in areas which are now regarded as open countryside and therefore protected from development, we are concerned at the suggestion that other sites which are currently designated as IOWAs can be protected through other policies such as those designed to protect biodiversity or heritage interests. It does not seem sensible to rely on designations which are designed to protect the wildlife interest (or heritage), to protect the land by default for other purposes (i.e. the open character and visual amenity of the site). It could be that a development is proposed which is acceptable in terms of its protection for the wildlife value of the site, but from the local residents' point of view, harms the setting of the village (e.g. a proposal which has a visual impact but a small actual footprint). If the site is important from an amenity point of view, then logically an amenity designation should stay in place.

The A350 Corridor

DWT does not believe that it is useful or necessary to safeguard the land for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass, for the reasons outlined in the document:

It is recognised in the document that *"Funding and environmental constraints mean that any major scheme is unlikely to progress during the period covered by LTP3 and the focus will need to continue to be on low cost traffic management measures."*(para. 15.3)

Although, as stated (para. 15.9) *"Local authorities in Dorset, Bath & North East Somerset Council (BANES) and Wiltshire Council are working with Highways England to make the case that a major route study should be undertaken in advance of the next Roads Investment Strategy period (RIS 2)."*, yet para 15.10 recognises that *"...given the scale and significant nature of the improvements that are required along the A350 corridor, funding to support delivery of the improvements is uncertain at this stage. Furthermore, it is of note that if a major route study was undertaken by Highways England it would need to consider the whole route and focus potential improvements on those parts of the route that are under the greatest pressure."*

If, which seems unlikely, funding for road improvements to include these two sections of bypass were found within the lifetime of this Local Plan, along with similar schemes in Wiltshire, this would put considerable pressure on the remaining sections which have not been upgraded. We would be particularly concerned at any resurrection of proposals for a Melbury Abbas bypass, as there is no realistic alternative which would not cause significant harm to the chalk grassland SAC at Melbury and Fontmell Down and would therefore be totally unacceptable.

DWT has consistently opposed such a scheme. Our most recent response was to the Dorset Structure Plan deposit plan in 2004 when we objected to the strategy to upgrade the A350 and supported the recommendation of the then Bristol/Bath to South Coast Study (GOSW 2004) which recommended the A37 route rather than the A350 for prioritisation of any future funding, stating the case that in particular the C13/A350 between Blandford and Shaftesbury, should not be promoted as an inter-regional route.

In that response DWT stated that *“DWT would strongly object to the re-instatement of a Melbury Abbas bypass along the alignment previously proposed, or any other which adversely affects the considerable nature conservation interests in the area. Previous studies have shown that construction of a primary route standard road in the vicinity would be likely to harm internationally protected sites and SNClS, unless a long detour is utilised. Given the lack of regional priority for the route, it is highly unlikely that it would pass the tests of “over-riding public interest” and “no satisfactory alternatives” required by the Habitats Directive should there be a likely significant effect on the cSAC areas.”*

Our view regarding this potential scheme has not changed since then and we would strongly object to such a proposal. In addition there would be considerable nature conservation arguments against even the two sections of bypass which are the subject of consultation in this document, and overall we feel that removing them from the safeguarded status for potential bypass would clarify that upgrading the A350 to a standard to make it an inter-regional route is not a viable option, and it would be better to put resources towards upgrading/maintaining a western north-south route via the A37-M5, and an eastern north-south route from Poole via the A31-M27-M3-A34.

I hope these comments are helpful, but please contact me if you have any queries concerning them.

Yours sincerely,



Dr Sharron Abbott
Land Use Planning and Evidence Manager
Dorset Wildlife Trust



¹http://www.wildlifetrusts.org/sites/default/files/homes_for_people_and_wildlife_hr_-_spreads.pdf

²www.dorsetlnp.org.uk/ecological_networks