

## **Poole and Bournemouth HMA sub-regional strategy**

### **Executive summary**

- Natural England supports the draft RSS strategy with its emphasis on urban infill. The outstanding environment of the sub-region together with other constraints limits opportunities for urban extensions.
- The Dorset heathlands are amongst the largest and biologically richest of any of the heathland areas in the country. The mechanisms through which new housing proposed in the Bournemouth and Poole area would harm Dorset heathland international designated sites are summarised. A wide range of impacts on heathlands result from urban development in their vicinity. Natural England's advice is that the draft RSS would have an adverse effect on the integrity of all of the Dorset heathland international sites.
- The need for a strategic approach to tackle the heathland issues is explained. A summary is given for the types of mitigation and avoidance measures that need to be delivered so that adverse effects on the heathland international sites can be avoided. These include measures to restrict residential development in areas close to designated heathland, access management measures and provision of alternative greenspace. New policy and text is recommended.
- Effects from development on the River Avon SAC and the Avon Valley SPA and Ramsar site are considered. Water abstraction is adversely affecting River Avon SAC features and without new infrastructure, new housing will accentuate this impact. Speedy delivery of new infrastructure is essential if an adverse effect on the SAC is to be avoided.
- The breeding waders that are a feature of the Avon Valley Ramsar site are locally vulnerable to disturbance. Alternative greenspace is necessary to mitigate this potential impact.

*Is the draft RSS sufficiently clear about the spatial outcomes it is seeking in Bournemouth and Poole in terms of their present and future regional and sub-regional roles and their relationship with the other parts of the HMA?*

1. The environment surrounding Bournemouth and Poole severely limits possible spatial strategies and outcomes. The conurbation is constrained from significant outward expansion by Poole and Christchurch Harbours and the sea, the river valleys of the Stour, Avon and Moors, and the Dorset heathlands. The combination of these factors means that opportunities for urban extensions are extremely limited. Natural England supports the current RSS strategy with its emphasis on urban infill.

*Has the scale of additional greenfield development been adequately justified against the likely level of housing requirements and in particular the urban renewal opportunities in the main urban areas?*

2. Natural England believes that the outstanding environment around Poole and Bournemouth together with other constraints mean that there is limited scope for new greenfield development.

*Have environmental limits arising from matters such as flood risk and the protection of environmental assets been adequately taken into account and in particular do the proposals reflect the need to avoid any impact on the integrity of the important nature conservation areas around the conurbation?*

3. Our response here concentrates on the potential effects of proposed Natura 2000 (N2K) and Ramsar sites of the Dorset heathlands and the Avon Valley because we believe that these are key issues for the RSS.

## **Dorset Heathlands**

### Background

4. The Dorset heathlands (sometimes called the Poole Basin heaths) are amongst the largest (about 10% of the national total and the most extensive after the New Forest) and biologically richest of any of the heathland areas in the country and are of international importance for their plant and animal communities. They also have a rich archaeological heritage and significant cultural associations, particularly through the novels of Thomas Hardy.

5. From the Bronze Age onwards open heathland covered most of the land between the River Avon in the east and Dorchester to the west, interrupted only by river valleys. Heathland has greatly declined and, in places, disappeared almost throughout its European range. In Dorset, between the late 18<sup>th</sup> century and the present day, 85% of the heathland was lost to agriculture, urban development and commercial forestry.

6. Dorset heathland supports numerous uncommon and rare species, restricted in their distribution both by the present-day scarcity of the habitat and by climate. These include several grasshoppers and crickets, spiders, dragonflies, bees, wasps, ants and flies, rare reptiles such as sand lizard and smooth snake and rare birds such as Dartford warbler. For a number of critical species, for example the rare

reptiles (sand lizard and smooth snake), the Dorset heathlands are the national stronghold and hold the bulk of the national population.

7. More than half of the Dorset heathlands are now managed by conservation organisations or local authorities. Over 95% of the heathland is notified within over 40 SSSIs. The SSSIs are part of the Dorset Heathlands Special Protection Area (SPA) on account of rare or vulnerable heathland bird species and are also part of a Ramsar site on account of rare or vulnerable heathland wetlands and associated rare wetland species. They are additionally part of the Dorset Heaths (or Dorset Heaths [Purbeck and Wareham] and Studland Dunes) Special Area of Conservation (SAC) on account of rare or vulnerable heathland and associated habitats and some individual species.

8. The qualifying features of the SPA are breeding Dartford warbler, nightjar and woodlark, and wintering hen harrier and merlin. The heathland qualifying features of the SACs are dry heaths, northern Atlantic wet heaths, temperate Atlantic wet heaths, depressions on peat substrates of the *Rhynchosporion* and alkaline fens. There are 9 other qualifying habitat features and 2 other qualify species features associated with the heathland area. The conservation objective also applies to 'typical species' of the qualifying habitats by virtue of Article 1(e) of the Habitats

Directive. Typical heathland species would include rare invertebrates and the rare reptiles, sand lizard and smooth snake.

#### Appropriate Assessment

9. Natural England has advised the Regional Assembly that the proposals within the draft RSS would be likely to have a significant effect on each of the Dorset heathland international sites. Natural England's advice is that in its present form the RSS would have an adverse effect on the integrity of all of the Dorset heathland international sites. We explain the changes to the RSS that we believe would be necessary to avoid this adverse effect.

#### Effects of new housing - Mechanisms by which the interests of the European and Ramsar site might be affected

10. There is considerable documented information showing that urban development in the area around lowland heathland has an adverse effect on the quality of heathland interest features underlying the designation of the European sites, Ramsar site and SSSIs<sup>1</sup>. Much of this information is from research on the Dorset heathlands. A summary of 'urban effects' on heathland is given below:

- Increased incidence of arson (especially damaging during summer when the habitats and wildlife are most vulnerable).
- Increased use by dog walkers leading to disturbance of ground nesting birds with consequent effects on their distribution, abundance and breeding success.
- Increased number of feral predators (eg foxes, crows) affecting breeding success of ground nesting birds.
  
- Increased use of heathland for off road cycle and motorcycling, causing soil erosion, disturbance and damage to heath habitats. Similar disturbance and erosion of sandy tracks by horse riders damaging sand lizard and invertebrate breeding sites.
- Predation by domestic cats on birds and reptiles.
- Disruption to the hydrology of heathland wetland through drainage interception and enriched urban water discharges
- Presence of more people and greater recreational use leading to more difficulties and substantially increased costs in managing the heaths effectively (e.g. from general vandalism and enhanced requirements for recreation); increased problems with the introduction of essential management measures (eg free roaming livestock for habitat management).
- Increased degradation of the heathland habitats due to the dumping of garden and other waste by nearby property owners. Soil enrichment and habitat change through enrichment by dog faeces.
- Loss or degradation of key habitats used by nightjar for foraging (nightjar travel away from the heaths to forage).

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<sup>1</sup> For example Liley, D., Clarke, R., Tyldesley, D., Underhill-Day, J. & Lowen, J. (2007) Evidence to support Appropriate Assessment of development plans and projects in south-east Dorset, Dorset County Council, Footprint Ecology Ltd. brings together the findings of over 80 published studies and other reports on heathland interest features and urban effects.

- Loss of accessible green space or other facilities leading to diversion of pressures onto heathlands
- Loss of opportunities for using key land areas outside SSSIs but in their immediate vicinity to support the management of these sites for example by establishment of linkages between heathlands

11. Recent studies have demonstrated that the more housing there is around a heathland site the greater the magnitude of urban impacts. An analysis of the number of fires on the Dorset heaths in the 1990s showed that there was a strong relationship between the amount of urbanisation around each heath and the number of fires (Kirby and Tantrum 1999). Work on nightjar has demonstrated a strong negative relationship between the density on breeding nightjar on a heath and the amount of urbanisation around it (Liley and Clarke 2003).

12. These studies indicate that increasing the amount of housing in the areas around the heath would lead to deterioration in the quality of the qualifying species and habitats. Predictions of increases in urban pressures from new housing proposed by the RSS are that the number of visitors to the heaths would increase by an average of 13% with up to a 30% increase in some areas (Liley et al 2006).

13. Urban pressures on the Dorset heathlands have come under scrutiny from the Standing Committee of the Bern Convention. In 1998 the Standing Committee considered a report and recommendations from an on-the-spot appraisal to assess the conservation of the heathlands (De Molenaar 1998). The report confirmed the significance of urban development pressures and made wide-ranging recommendations to address the issue. On urban development the Committee has formally recommended to the UK Government (No. 67 1998) among various matters 'to avoid any more development close to existing heathland; for new housing to provide areas for playgrounds, sport or leisure in areas other than heathlands, to avoid unwanted pressure on heathlands'.

14. The recent examination of the south-east RSS examined in some detail potential mitigation measures and other elements of a strategic nature designed to avoid

adverse effects from new housing on the Thames Basin Heaths (TBH) SPA. The assessor's report has recently been made available. The evidence base

underpinning the identification of likely adverse effects was also examined as this had been challenged on the basis that almost all of the relevant research had been carried out on the Dorset heaths. The TBH technical sessions looked only at potential effects on the SPA. In Dorset both SPA and SAC sites are vulnerable to increased urban pressures from new housing.

15. Urban effects on heathland have also been examined in at several planning inquiries in Dorset and these decisions are reviewed by Tyldesley (2005). Natural England's view is that the evidence that demonstrates the harm that urban effects cause to the interest features of the N2K sites is robust.

#### A strategic approach

16. Natural England strongly supports the need for a strategic approach to the issue of the Dorset heathlands and development. The heathlands cover 6 local authority areas and visitors to the heathlands routinely travel between local authority areas.

The relevant local authorities have recently adopted an Interim Planning Framework that allows each authority to collect contributions through s106 agreements with developers. These contributions are funding mitigation and avoidance measures, with projects developed in a strategic way across the conurbation. Implementation is overseen by a combined group of members and other interested parties. We believe that the Interim Framework provides a sound basis through which a DPD can be developed and that the essential elements of the DPD need to be set out in the RSS.

A strategic approach has also been recommended in the recent assessors report on the TBH.

#### Mitigation and avoidance of potential effects

17. At present our view is that the draft RSS lacks the necessary mitigation and avoidance measures required to avoid the harm to the N2K sites that would result from additional urban pressures from new housing. The mitigation and avoidance measures outlined below are of the same type as those recommended by the TBH assessor.

18. The measures that need to be included in the RSS are as follows.

- Additional residential development should not be permitted in areas close to heathlands because in these areas it is not possible to mitigate or avoid adverse effects. In both Dorset and the TBH a zone of 400m from the boundary of the N2k site has been used and the TBH assessor recommended that this measure was an important part of a mitigation and avoidance strategy.
- Mitigation measures should include access management and the RSS should establish the necessary framework to allow these to be funded through developer contributions (as is already happening through the Interim Planning Framework). There is considerable experience in Dorset of implementing coordinated access management across the conurbation and this is summarised by Liley et al (2006). Access management here involves coordination between different agencies including the police and fire service and has a significant education component. It is additional to the everyday access management that is carried out by individual partners on their own sites. However, access management by itself cannot be relied upon to prevent the impacts of additional development.
- Alternative greenspace should be provided with the aim of redirecting heathland visitors to alternative sites. There is a long history of provision of nature reserves and country parks which are of a semi-natural, tranquil character, and which have come to be well used which suggest that providing alternative greenspace (termed Suitable Alternative Natural Greenspace – SANGS - in the TBH) is a worthwhile mechanism to divert visitor use away from heathlands. A visitor survey undertaken for English Nature in 2005 (Clarke et al 2006) gives a picture of where people travel from to visit the SPA, why they visit and what they do when then get there. It shows that the heathlands are particularly heavily used by dog walkers. Alongside other surveys which have been carried out, it provides an evidence base to locate and design improvements to alternative green space provision with the very specific function of attracting people away from the N2K sites. Areas of

undeveloped land surrounding N2K sites can be particularly important in this respect and can also help in mitigating additional pressures by providing greater management flexibility.

## **19. Recommended new RSS Text and policy**

*4.3.12 The sub-region contains significant areas of heathland within three European sites and a Ramsar site\* designated for their international importance for nature conservation. The designations cover parts of 6 local authority areas in Dorset and raise both statutory and policy considerations that affect the potential for development within the sub-region.*

*Technical work undertaken by the strategic planning authorities has concluded that strategic scale urban extensions are inappropriate, due to their potentially adverse impact on sensitive wildlife and environmental sites, specifically those covered by the European Habitats Directive. In addition, the cumulative effects of development and across the conurbation have pointed to the need for a strategic approach to the mitigation of anticipated adverse effects on these sites from growing urban pressures.*

*Authorities that are affected by the designations should address, in their Local Development Frameworks, the issue of the effects of development on these sites and adopt a policy framework to safeguard the integrity of the international sites whilst meeting development requirements.*

*This policy framework should include:*

- Policy to prevent the intensification of residential development in areas close to internationally designated heathlands where it is not possible to mitigate the effects of new housing.*
- Policy to secure mitigation that will remove the adverse effects on the integrity of these sites from additional residential development in the wider area of the sub-region.*

*A joint Development Plan Document (DPD) covering the sub-region and, if appropriate, other neighbouring local authority areas will be essential to ensure that mitigation measures are coordinated and consistent and to secure their delivery. An Interim Planning Framework covering the period until 2009 has been adopted by the relevant Dorset local authorities with the aim of securing mitigation against new urban pressures. The DPD should be adopted so that it can replace the Planning*

*Framework. It should build on the experience gained through preparation and implementation of the Framework.*

*Mitigation set out in the DPD must be appropriate and sufficient to remove effects on integrity of the international sites from additional residential development. Key types of mitigation measure are:*

- i) the provision of alternative land for recreational use so as to deflect and re-direct pressure from internationally designated sites.*

ii) changes in the use and management of suitably located land (eg adjacent to international sites) to enhance their ecological robustness and give greater management flexibility against effects on site integrity.

iii) access management measures to reduce unauthorised activity, guide and educate the public, to reduce preventable disturbance and to coordinate measures between authorities and across the heathland area.

The DPD must also set out a clear process for the funding and implementation of these measures. A range of options for alternative open spaces should be considered and their effectiveness tested and should lead to the identification of strategically important areas of land for mitigation (whether publicly or privately owned) where this would assist with implementation. Monitoring of the delivery and effectiveness of mitigation measures will be needed and if necessary, should trigger review of the phasing and/or distribution and/or scale of housing provision.

## 20. Possible New Policy

**i New residential development in the sub-region will be facilitated by measures to secure effective avoidance and mitigation policy of the potential adverse effects on the ecological integrity of the Dorset heathlands internationally designated sites.**

**ii The relevant local authorities will work with Natural England, supported by central and regional government and other relevant stakeholders, to encourage appropriate forms and designs of development and to secure, through policy in LDFs including a common Development Plan Document, appropriate and deliverable mitigation, and mechanisms that will fund and enable implementation of these measures.**

- \* Dorset Heathlands Special Protection Area (SPA)  
Dorset Heaths Special Area of Conservation (SAC)  
Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC  
Dorset Heathlands Ramsar site

## Avon Valley and River Avon

21. The River Avon SAC is designated as an SAC for the following features:

- Water courses of plain to montane levels with *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation
- Bullhead
- Brook Lamprey
- Sea lamprey
- Atlantic salmon
- Desmoulin's whorl snail

Avon Valley SPA is classified on account of wintering waterfowl and the Avon Valley Ramsar site has the additional feature of breeding waders.

22. Water quality and quantity are critical issues for the River Avon SAC features. These issues are discussed in the HRA report. The water abstraction issue is particularly critical for Bournemouth/Poole for given the requirements of the Habitats Regulations and policy RE6 there is a real risk that housing delivery will be held up until the necessary new infrastructure is in place. The RSS needs to consider how early delivery of this infrastructure can be achieved.

23. The breeding waders that are a feature of the Avon Valley Ramsar site are particularly vulnerable to disturbance because they nest on the ground. Public access to the Avon Valley in the vicinity of the Poole and Bournemouth conurbation is limited but nevertheless locally there are areas where disturbance of breeding waders is an issue. Proposed new development in Poole and Bournemouth would add to this problem and we believe that to overcome this impact alternative greenspace is required along the same lines as that proposed for the Dorset heathlands.

*Have infrastructure considerations been adequately take into account?*

24. Our views concerning infrastructure needs are given under question d.

*Do the proposals adequately reflect the need to reduce the need to travel, support the use of public transport and minimise congestion?*

25. Natural England notes that the RSS includes road schemes – A31 corridor improvements, access road to Bournemouth Airport – that will generate more traffic and could work against the more sustainable measures of investment in public transport, walking and cycling, and the prime transport corridor initiative.

*Does the draft RSS set out adequate guidance on the provision of green infrastructure*

26. Natural England supports the inclusion of green infrastructure in the infrastructure list under 4.3.14. However, we believe that the RSS should make it clear that there is a need for green infrastructure over and above alternative greenspaces that may be provided to mitigate effects on N2K sites.

## References

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