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22nd March 2022

Dear Sir/Madam,

Bournemouth, Christchurch & Poole Local Plan – Issues and Options Consultation

Thank you for consulting Dorset Wildlife Trust (DWT) regarding the Issues and Options Consultation ahead of the draft Local Plan for Bournemouth, Christchurch and Poole.

Some general comments follow with more specific comments in response to the issues presented in the consultation document beneath.

A Climate and Ecological crisis

Dorset Wildlife Trust welcome the frequent reference to the need for the Local Plan to address climate change and the commitment set out for carbon neutrality for Bournemouth, Christchurch and Poole by 2050, in line with Government commitments nationally. However, it is disappointing that there is no mention of the equal importance of addressing the biodiversity crisis and ecological emergency which goes hand in hand with being equipped to deliver the necessary climate change adaptations required.

Although the declaration of a Climate and Ecological Emergency by BCP Council is referenced several times, this is only ever addressed in the context of climate change, carbon neutrality and net zero and makes no recognition of the duality of the crisis facing our planet today.

The introduction to the consultation document makes no mention of biodiversity or the natural environment but this is a key element in ensuring that local planning policy provides a sustainable future for the environment that we live in, value and enjoy.

Evidence Base

Page 2 of the consultation document includes a request for updated evidence on the deliverability of potential site allocations. As requested in our in our response to the initial consultation on the Key Issues for the BCP Local Plan in 2019, DWT would urge that this should include baseline ecological assessments undertaken on all potential allocation sites to ensure that the selection of sites is informed by recent and relevant data identifying the consequences of developing each site on biodiversity, both individually and cumulatively.



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Biodiversity Net Gain

The legal requirement for 10% Biodiversity Net Gain detailed in the Environment Act 2021 presents both a challenge and an opportunity to BCP Council. A minimum of 10% net gain will be mandated from November 2023, calculated using Defra's Biodiversity Metric.

This will require BCP council to integrate biodiversity appraisal into the planning process. It will be essential that any submitted Biodiversity Metric calculations and Net Gain proposals are reviewed independently by experienced ecologists with a good understanding of habitat assessment and creation in order to ensure that the proposals put forward by developers are ecologically sound and will deliver on the requirement for net gain in practice.

Your authority will also require a strategy for identifying how and where off-site biodiversity net gain will be delivered for development within the BCP area, whether within or outside the Council area and how BCP Council will work with adjacent local authorities to ensure strategic and appropriate habitat delivery can be secured.

Further detailed comments on each section of the consultation document follow:

2 About our area (p 3)

Section 2 of the consultation document makes no mention of nature or biodiversity, despite the huge significance of the internationally important heathland, floodplain and coastal habitats and their wildlife which inevitably shape where and how development can be delivered within the BCP area.

Parts of the Dorset Heaths Special Area of Conservation (SAC) and Dorset Heathlands Special Protection Area (SPA) and Ramsar sites extend well into the urban area of the BCP conurbation which also includes the Poole Harbour SPA and Ramsar site, as well as the lower part of the Avon Valley SPA and Ramsar site which extends to Christchurch Harbour.

3 Vision and Objectives (p 4)

In contrast, the vision set out in Section 3 recognises the importance of the 'unrivalled natural environment' of the area for the people who live and work in our communities and the quality of life benefits that they bring. It is essential that biodiversity and nature is integrated throughout the new Local Plan from the introduction and vision through to clear policies which will deliver a sustainable future for both for people and the wildlife that our area supports.

The objective to 'conserve and enhance our protected habitats and biodiversity, and our network of green infrastructure and open spaces' is very welcome however it misses the potential opportunity to seek to create and protect new areas of habitat which link and integrate with green infrastructure and open spaces. Simply protecting remaining areas of habitat isn't enough, BCP needs to actively seek to extend, link and improve them in order to build ecological resilience and combat the climate and **ecological** emergency. DWT would urge that BCP Council push for greater ambition and seek to deliver a local plan that not only protects what exists now but actively works to reverse the decline of nature.

This duality of approach is also missed in the objective to work towards achieving carbon neutrality which refers directly to the climate and ecological emergency but again fails to address the 'ecological' aspect.

4.1 Regenerating our town centres (p 5)

The role of nature for wellbeing has already been recognised, and the proposed strategy to support vibrant local communities includes access to open spaces within safe walking distance (p 10). DWT recommend that BCP Council use this opportunity to aspire towards not only open green spaces, but biodiverse multifunctional spaces

for people and wildlife; providing recreational space but also well-connected habitat patches and corridors through our urban areas.

4.2 New market and affordable homes (p 11)

DWT are pleased to see that consideration of biodiversity has been included as part of the Housing and Economic Land Availability Assessment (HELAA) with presence of priority habitats on site and potential Nightjar foraging areas being identified as constraints informing the suitability assessment. However, the presence of SNCIs appears to have been overlooked as a constraint and some priority habitats have been missed.

Two sites (ABV0035 and CT005) identified as 'potentially suitable, available or deliverable' within the HELAA have SNCIs on site which has not been identified as part of the assessment. There is potential for this to be true of other smaller sites also and an exhaustive check was not completed based on the information made available as part of this consultation. The HELAA should be updated to include thorough screening for designated sites and priority habitats.

Likewise, some of the sites proposed for green belt release have protected or priority habitats on site, or are located immediately adjacent to SNCIs. All these are currently identified in the HELAA as 'Not suitable' which is welcomed, however, the presence of priority habitats on site and designated sites on site or immediately adjacent should be identified as constraints to inform assessment if it is necessary to give these sites further consideration. See Appendix 1 for a (non-exhaustive) list of the sites identified as having constraints not picked up in the HELAA.

As identified, viability of development is essential and as well as mitigation measures such as SANGs and HIPs delivery, the new legal requirement for quantifiable Biodiversity Net Gain is something that needs to be considered at an early stage of this Plan. Not only does sufficient land need to be allocated for development, but a strategic approach should also be taken at a Local Plan Level to identify where and how the required Biodiversity Net Gain can be delivered. Given the spatial constraints of the BCP Council area, it is likely that both large and small developments will find it challenging to deliver the legally required minimum of 10% Net Gain on-site. BCP Council must consider the need for Net Gain and how this will be delivered as part of the Local Plan process.

This need to be able to quantify the likely demand for Net Gain provision supports the need for a baseline biodiversity assessment of both allocated sites and potential off-setting sites so that the baseline biodiversity loss and potential gains can be calculated at a plan level prior to final allocations. The baseline biodiversity of a site and the availability of Net Gain provision may have a significant impact on the viability of proposed allocations.

DWT support the proposal to identify a lower locally derived housing need figure in order to reduce development pressure on the environment and biodiversity and better enable delivery of net zero, biodiversity net gain and nature recovery.

4.3 A prosperous economy (p 21)

Site proposed for new visitor attractions include sites in close proximity to protected habitats including Towns Common SSSI and the Moors River System SSSI. The site at Hurnwood Park (Ref 11(11)) in particular is located immediately adjacent to DWT's Sopley Common Reserve and development for leisure facilities is likely to result in increased recreational pressure.

Further considerations such as transport needs and infrastructure needed to support attractions in these locations must also be a factor in their allocation. Being outside the town centres and within the greenbelt, development of these sites should not be put forward unless sustainable infrastructure can be secured and the use of these sites is not reliant on car-based transport.

4.5 Providing a safe, sustainable and convenient transport network (p 36)

The focus on a low carbon transport network that reduces reliance on car-use and maximises non-car travel is welcomed. This should include policies which will promote the use of public transport and active travel.

There are also opportunities to consider nature-based solutions to mitigate emissions and deliver improvements in air quality. Well-designed green-infrastructure can not only mitigate carbon emissions and reduce exposure to air pollution but also encourage active travel choices by enabling safer space-sharing and making routes more attractive for walking and cycling.

4.6 Our natural environment (p 39)

The objective to “*Conserve and enhance our protected habitats and biodiversity, and our network of green infrastructure and open spaces*” is welcomed, however it should strive for a greater ambition. The objective should be to not only conserve and enhance what exists but seek to extend, connect and develop a more extensive network that is integrated throughout the Local Plan area. Again, there is no mention of the climate and ecological emergency which should underpin the approach taken by BCP and the ambition to do more than what is required as a duty.

Legal protection of nationally and internationally designated habitats and the local importance of other sites is recognised in the introductory section, however, there is not mention of other aspects of the national legal and policy framework which underpins the conservation of biodiversity and the natural environment. Of greatest significance is the Governments 25 Year Environment Plan and the Environment Act 2021 which strengthens the existing duty on Local Authorities to conserve biodiversity and includes new provisions for the production of Local Nature Recovery Strategies for all areas of England.

Issue: *Conserving and enhancing biodiversity and geodiversity (p 39)*

As above, DWT consider that the recommendation to “*fulfil our duty to conserve and enhance biodiversity and geodiversity by including appropriate policies in the Local Plan*” is weak and lacks ambition. It is essential that BCP fulfils its legal duty as a minimum, but the Local Plan must work to not only avoid and mitigate damage but actively seek to support and enhance important sites through a strategic approach to green infrastructure and development allocation. This is key in a plan which is underpinned by the current global emergency and means that nature recovery is an absolute priority.

It is important that the quest for Net Gain and Enhancement does not override the basic requirements of National Planning Policy and application of the mitigation hierarchy. Policies detailed in the Local Plan must make it clear that development must seek first to avoid harm to biodiversity by retaining existing habitat of ecological value as far as possible, then to mitigate to minimise the harm caused and seek to provide compensation on-site for any residual impacts. Only once these have been applied can off-site compensation and delivery of ecological enhancement and Biodiversity Net Gain be considered.

Likewise, the introduction of mandatory 10% Biodiversity Net Gain for all developments through the Environment Act (2021) is an opportunity for BCP to consider whether this Local Plan should seek to deliver the minimum requirement or strive for greater ambition as well as embed Biodiversity Net Gain in local policy in advance of the anticipated secondary legislation that will provide a framework for national delivery. A number of local authorities in England have committed to delivering 25% Biodiversity Net Gain, well in excess of the minimum statutory requirement and this level of ambition is to be applauded.

The recognition of not only internationally designated sites but also locally designated sites and habitats and species of principle importance outside any site designation is welcomed. It is noted however, that while *Figure 15 – BCP’s network of protected habitats* identifies SNCLs, Local Nature Reserves, Ancient Woodland, SACs and Ramsar sites, it fails to identify Habitats of Principle Importance outside of these sites which are readily identifiable from Natural England datasets. Within the BCP area, these include Deciduous Woodland, Lowland Heathland, Coastal and Floodplain Grazing Marsh, Mudflats, Coastal Saltmarsh, Maritime Cliff and Slope and Lowland Fens. It would be desirable to see any additional areas of these priority habitats recognised on the

habitat map and protected to the same level as locally designated sites. The commitment to enhancing the local ecological network to develop, link and improve these assets is strongly supported.

Issue: Protecting Dorset Heathlands and mitigating development impacts (p 41)

DWT support the proposal to continue implementing the approach advocated in the existing Local Plan policies and detailed in the Dorset Heathlands Planning Framework Supplementary Planning Document (SPD).

However, this approach must be thoroughly reviewed in the context of the lifetime of the new Local Plan. The approach and figures calculated for Strategic Access, Management and Monitoring (SAMM) and Heathland Infrastructure Projects (HIPs) is based on the housing trajectory expected for the period 2020-2025. This must be reviewed in light of the amount of planned development proposed as part of this local plan and the suitability and success of the strategy assessed with regard to any changes that this may identify. The approach and figures may need to be revised based on this review.

Many of the existing employment areas lie within the Heathland buffer which is identified as being unsuitable for residential development, however, government changes to use classes and permitted development which allow Class E uses to be changed to residential under permitted development rights may pose a risk to these heathland habitats. The Local Plan approach to safeguarding of employment areas must include consideration of the potential for change of use and impacts on designated sites in order to ensure that BCP Council are fulfilling their duty to avoid and mitigate potentially harmful development in the future.

Issue: Provision of strategic suitable Alternative Natural Greenspaces (SANGs) (p 43)

DWT support the provision of strategic SANGs to mitigate recreational impacts to protected habitats as well as provide high quality open space for people and deliver biodiversity benefits and ecological connectivity.

The option for changing the use of existing open spaces such as golf courses must also take into account potential recreational impacts on locally designated sites. A number of golf courses within the BCP area have been selected as SNCIs due to the value of the habitat they support which is often preserved and maintained through the sites operation. Any proposals for change of use must consider potential impacts to biodiversity that may arise.

Issue: Improving the air quality on Dorset Heathlands (p 43)

DWT support the proposal to formalise the Dorset Heathlands Interim Air Quality Strategy (2020-2025) as policy within the new BCP Local Plan. As above, it should be reviewed in light of the amount of planned development proposed as part of this local plan. The interim strategy should then be formalised as a supplementary planning document (SPD).

As outlined within the strategy document, policies should include:

- *The siting of new development by focussing growth in the urban area where there is better access to facilities and services and thereby minimising the need for additional car trips past heathland sites;*
- *The siting and design of new agricultural buildings that create pollutants, e.g. stocking sheds, slurry pits, etc.;*
- *The change of use of agricultural land near heathland to lower nitrogen inputs;*
- *Ensuring that any major development proposals in the countryside near heathland include measures to reduce impacts elsewhere in the wider land ownership;*
- *Look to identify multiple use benefits in the siting of Heathland Infrastructure Projects (HIPs),*
- *Poole Harbour Infrastructure Projects (PHIPs) and nitrogen offsetting projects on sites adjacent to heathland; and*
- *Help implement the outcomes of the government's Nitrogen Futures project.*

Issue: Dealing with Poole Harbour Nitrate Pollution (p 44)

As above, DWT support the proposal to incorporate the strategy detailed within the existing Nitrogen Reduction in Poole Harbour SPD into the new Local Plan.

There may also be opportunities to layer nutrient mitigation with biodiversity enhancement if suitable sites can be identified. Delivering not only nitrogen offsetting but also habitat enhancement and creation that will contribute towards delivery of biodiversity net gain.

Issue: Supporting green infrastructure and open space (p 45)

The proposal to retain existing open spaces is supported and DWT support the (p 45) requirement for all large scale developments to provide sufficient well-designed and multi-functional green space for recreation in order to contribute to a well-connected network of habitats and ecological corridors.

Options 1 and 2 which may allow the loss of open space must include consideration of the reasons for under-use and the strategic role that the site might also play in the local ecological network and opportunities for delivering ecological enhancements or biodiversity net gain. Poor quality green spaces could be enhanced to encourage greater use and create functional and well-connected habitats within the urban area. Attractive and well used local open space close to residential and employment areas is essential not only for wellbeing of the users but also for mitigating the impacts of development on local designated sites and these indirect impacts resulting from loss of open space must be considered.

A Draft Green Infrastructure Strategy is referenced but does not seem to be available for review or comment at this time. This is an opportunity for BCP to commit to the highest quality of green infrastructure for example by using the standards framework developed by Building With Nature¹. As the consultation document recognises, green infrastructure is an essential tool for addressing the climate and ecological emergency and the RTP1 Guide to climate action tools identified Building with Nature as a tool which addresses the five key elements of adaptation, mitigation, climate justice, plan making and development management. The Green Infrastructure Strategy must form part of the evidence base for the BCP Local Plan and be released for review and comment, to then effectively inform the draft Local Plan.

Alongside the Stour Valley Park Project the Green Infrastructure Strategy and new Local Plan should identify other priority areas for investment. Strategic sites could include Holes Bay Nature Park, Lytchett Bay Nature Park, Turlin Moor Local Nature Reserve, The Great Heath project area, Bourne Valley Local Nature Reserve and the coastal corridor among others.

It is likely that developer contributions towards enhancement or provision of alternative greenspace are likely to be required in relation to some development sites as identified in *Option 3*. The Local Plan should seek to identify at a strategic level where such contributions would be best employed to deliver the greatest benefits for local people and biodiversity. The Plan should also outline how developer contributions will be secured to deliver off-site conservation and strategic enhancements to the Ecological Network. This could be detailed within a nature conservation SPD.

There is potential within the new Local Plan for BCP Council to also require developers to attain the highest standards of green infrastructure provision, for example, by employing Building With Nature or similar standards for large scale developments. Policies that encourage the greening of the urban area for smaller scale development are also welcomed and features such as effective native and wildlife beneficial planting schemes, green roofs and green walls will contribute to providing stepping stones for biodiversity within the urban centres.

DWT support the proposals for the identification and allocation of sites for tree planting *and other habitat creation* through the Local Plan process to be included as part of this strategic approach to green infrastructure and enhancing Dorset's ecological networks. However, baseline ecological assessment is also essential, in the same way as for the allocation of development sites. Any tree planting must be undertaken in the right place with the right trees, with an emphasis on the use of a mix of species, and native broadleaved species rather than non-native species chosen for amenity over biodiversity value.

¹ Building with Nature (2022) [Building with Nature](#) [accessed 3rd March 2022]

4.7 Our Built Environment (p 47)

Although the diagram shown in *Figure 17 - The characteristics of good design* shows Nature to be a key component, there does not appear to be any further link to nature in this section. The value of planting and greenery in enhancing the appearance and character of urban areas could play an important role in mitigating increasing urban intensification and changing microclimates in town centres resulting from development.

It is also important that the preservation of coastal and landscape character does not override the potential for attaining greater biodiversity benefits. Planting proposals designed for screening or visual mitigation should also seek to deliver ecological benefits and connectivity in addition to the functional role from a landscape and amenity perspective.

4.8 Promoting Health and Wellbeing (p 52)

Although access to open spaces is mentioned, there is no link to nature-based wellbeing opportunities or the importance of open spaces being green and biodiverse spaces. In 2021 Mental Health Awareness Week had the theme of Nature, and during the coronavirus pandemic, research undertaken by the Mental Health Foundation identified that 45% of people reported that spending time in green places had been vital for their mental health². Access to nature and provision of high quality natural green spaces for experiencing nature is both a mental health and social justice issue as well as an environmental one.

4.9 Tackling Climate Change (p 55)

The reference to BCP Council's commitment to reduce carbon emissions and declaration of a Climate and Ecological Emergency in 2019 is welcomed and the ambition to work to achieve carbon neutrality ahead of 2050 is supported. It is essential that ambitious short-term targets are set in order to ensure that the national goal of carbon neutrality by 2050 can be achieved.

DWT would very much support a commitment by BCP Council to set a higher local standard for energy efficiency and carbon emissions rates beyond the building regulations requirements, with use of measures such as BREEAM ratings secured in policy to assess the standard that developments achieve.

There is also a missed opportunity to incorporate nature-based solutions into the strategic approach to tackling climate change. Although many of the features that would provide climate change mitigation including all aspects of green infrastructure, such as living walls, green roofs, tree planting and urban greenspace have been discussed in other chapters, they should also be referenced here. Nature-based solutions have a multi-functional role to play in delivering on almost all the main objectives of the Local Plan and the role in climate change mitigation is a significant one.

Good quality green infrastructure will absorb carbon dioxide and other pollutants, improve water quality and flow management and contribute to management of flood risk, provide urban cooling and improve air quality as well as benefiting biodiversity when well planned to maximise habitat connectivity.

6.0 References - Evidence Base (p 63)

As referenced above, where up to date information does not already exist, DWT considers it essential that sufficient ecological information is gathered at the correct times of year to enable assessment of the biodiversity value of land before allocations are made.

This will be especially important with new sites coming forward and would provide evidence that sites are viable. Not only should an assessment be made of the site itself, but also its importance in the ecological network, for

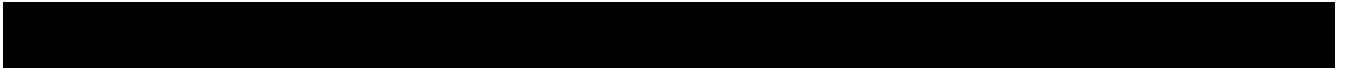
² Rowland, M. (2021) [Why nature was the theme for Mental Health Awareness Week 2021 | Mental Health Foundation](#) [accessed 3rd March 2022]

example acting as part of a biodiversity corridor or stepping-stone between key biodiversity sites. Baseline assessment must also provide sufficient information to identify the scale of likely off-site biodiversity net gain required as a result of the development of the site and confirm that a strategy for delivery has been identified.

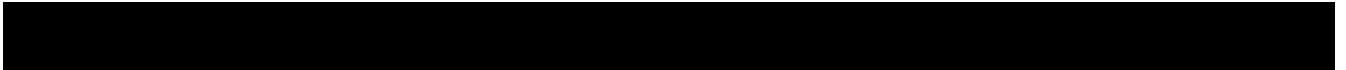
This evidence of viability will be essential if the plan is to be assessed as 'sound', in line with the need for the plan to be effective and consistent with national policy as set out in the National Planning Policy Framework (2021).

I hope these comments are useful; please do not hesitate to contact me if you would like to discuss them further.

Yours Faithfully,



Conservation Officer – Planning and SNCI
Nature-based Solutions Team



Appendix I: Additional biodiversity constraints for promoted greenbelt and proposed allocation sites

This list is not exhaustive and screening for SNCIs and priority habitat should be reviewed as part of the HELAA assessment

Reference	Location	Constraint
02_08	The Hamworthy Club, Magna Road, Canford Magna	Includes: SZ09/029 Moortown Copse
02_03	Merley Court Holiday Park, Merley House Lane, Wimborne	Adjacent: SZ09/028 Merley Park
02_14	Land north of Merley Park Road	Adjacent: SZ09/013 Livett's Hill Coppice
17_01	Land at Kinson Manor Farm, Bournemouth	Includes Priority Habitat: Coastal and floodplain grazing marsh
21_01	Land north of Muscliffe Lane, Bournemouth	Adjacent: SZ19/014 Berry Hill
11_15	Knapp Mill, Mill Road and Marsh Lane, Christchurch	Includes Priority Habitat: Coastal and floodplain grazing marsh
07_18	Land west of Salisbury Road, Burton, Christchurch	Includes Priority Habitat: Coastal and floodplain grazing marsh
07_21	Land at the Manor Arms, Salisbury Road, Burton, Christchurch	Includes Priority Habitat: Coastal and floodplain grazing marsh and deciduous woodland.
16_03	Chewton Glen Farm, 9 Chewton Farm Road, Walkford, Christchurch	Adjacent: SZ29/011 Chewton Glen Farm
ABV0035	Land and premises at Francis Avenue	Includes: SZ09/025 Alderney Waterworks, Adjacent: SZ09/041 Knighton Heath Golf Course
CT005	Two Riversmeet car park	Includes: SZ19/036 Stanpit