



**Purbeck District Council**  
Purbeck Local Plan  
**'Planning Purbeck's Future'**  
**Main Modifications to the Core Strategy**  
Representation Form (June/July 2012)

**Your Details**

**Agent's Details** (*where relevant*)

Title	Mr & Mrs	
Name	Andrew & Nicola Baggs	
Job Title ( <i>where relevant</i> )	Hayward Wareham Common Farmers West Mill Farm	
Organisation ( <i>where relevant</i> )	John Baggs (Farmers) Ltd	
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**Responses should be sent to:**

**Email:**     **ldf@purbeck-dc.gov.uk**

or

**Post:**     Planning Policy, FREEPOST RSAX-LTRK-TRKE, Purbeck District Council,  
Westport House, Worgret Road, Wareham, Dorset, BH20 4PP

**Fax:**     01929 557348

**Representations will only be accepted that refer to a change shown in the Schedule of Main Modifications, or to the Habitats Regulations Assessment Update or Addendum to Sustainability Appraisal.**

**Return to Purbeck District Council by Tuesday 31<sup>st</sup> July 2012**

Late or anonymous representations will not be accepted. All representations received will be published on the Council's website, along with your name.

An example of a completed form is available on the Council's website.

Alternatively, if you would like help completing this form please contact the Planning Policy Team.

For further information, visit [http://www.dorsetforyou.com/purbeck\\_consultation](http://www.dorsetforyou.com/purbeck_consultation), email **ldf@purbeck-dc.gov.uk** or call 01929 557359 to speak to a member of the Planning Policy Team.

You should comment only on the Main Modifications, the Habitats Regulations Assessment Statement and/or the Addendum to the Sustainability Appraisal.

Responses on the above documents will be sent to the Planning Inspector. **Therefore, you do not need to repeat your previous comments or re-submit your previous representations.**

The Inspector will decide if further public hearing sessions are required as part of the examination process. All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments on the Main Modifications. Do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

To explain the importance of mitigation measures for the whole of Wareham Common under policy CEN as adjoining land owners/managers/farmers and residents bearing in mind the inadequacy of the proposed SANG land to provide suitable mitigation for the proposed development at Worgret Road as an alternative to Wareham Common.

Please note that the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature Andrew & Nicola Baggs

Date 28<sup>th</sup> July 2012

**Representations:**

You are asked to comment on the Main Modifications to the Core Strategy, the Habitats Regulations Assessment Statement and/or the Addendum to the Sustainability Appraisal:

**Part A: Legal Compliance** – Has the **process** of preparing this Core Strategy been followed in accordance with national guidance?

**Part B: Soundness** – Is the **content** of the Core Strategy sound, in other words, is it 'justified', 'effective' and 'consistent with national policy'?

Please use the forms overleaf to submit your response.

**FORM A: Your Comments on Legal Compliance**

**Are the Main Modifications to the Core Strategy legally compliant?**

*(In other words, has the **process** of preparing this version of the Core Strategy been followed in accordance with national guidance?)*

Yes

No

No Comment

**Comments:**

Please use the space below to provide more detailed comments (expand box as necessary)

**FORM B: Your comments on the Schedule of Main Modifications**

**PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER**

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1):

MM23

*Comments without the relevant reference number will not be accepted.*

**Do you consider this Main Modification (in box above) proposed by the Council to be 'Sound'?**

*(In other words is the Main Modification 'justified', 'effective' and 'consistent with national policy')*

Yes

No

No Comment

If you have chosen 'No', do you consider this change to the Core Strategy be unsound because:

*(tick all that apply)*

It is not 'justified'

*(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)*

It is not 'effective'

*(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)*

It is not 'consistent with national policy'

*(For explanation of terms refer to guidance notes below)*

**Comments:**

Please use the space below to provide more detailed comments (expand box as necessary)

Modification MM23 - Policy CEN fails to recognise the recreational impact of the proposed development of 160 - 200 homes on the whole area of Wareham Common and the surrounding farm land and river meadows some of which are also classified as SNCI. The policy modification should also take into account the views of the local residents living on the Common at West Mill as well as Natural England's concerns with regard to the SSSI.

As stated in previous representations Wareham Common is already heavily used by the existing population of Wareham as an amenity and as an interceptor site for visitors. It is crossed by the London to Weymouth train line and the Wareham by-pass so is well known by car users.

In particular the area of the Common adjacent to the River Piddle which is a Priority Action Plan Habitat as part of the Dorset Wild Rivers Initiative and is closest to the proposed development at Worgret Road, is used by the public as a facility for recreation. During the summer months many people come to swim in the river and the weir at West Mill including large numbers of children and young people. This brings with it the associated problems of littering, anti social behaviour

including under age drinking, and vehicles driving and parking on the Common to get as close to the river bank as possible, ignoring signage informing drivers that access is on foot only. This behaviour causes problems for the residents of West Mill and ourselves as farmers of the land. West Mill Farm is part of our working dairy farm and having to lock the gate across the Common track to prevent illegal vehicle access is an inconvenience to all legitimate users as well as the running of our farm business.

Wareham Common is owned by a private landowner (The Rempstone Estate) and managed by the Hayward. Whilst the public have CROW access rights it is not a park managed for their benefit, it is agricultural land with nature conservation areas such as the SSSI's, the river and wetland habitats and is grazed by cattle and ponies. There are also no physical boundaries between the SSSI and the rest of the Common. However management of public access and its effects will become an even bigger issue for the land owner, Hayward and residents of the properties at West Mill should the development go ahead and this should be taken into account in the planning process as a matter of local concern. It is a naive view to consider that the proposed development will not have a considerable adverse impact on Wareham Common.

Both Wareham Town Council and Purbeck District Council have been informed of the problems such as littering and vehicle issues but have always quoted the inability to provide any assistance because the Common is in private ownership. Many parents delivering and collecting children from the schools adjacent to the Common entrance use it as a parking area because of the inadequate parking arrangements within the school grounds. Wareham Town Council and Dorset County Council are aware of the parking problems but no solution has been suggested. Our concern is that if these problems increase due the influx of a large number of new residents the 2 councils will have the same answer - it is not their responsibility because of Wareham Common's status as private land.

The proximity of the proposed development will also increase the the large number of dog walkers on the Common many of whom are unaware of the requirement to keep dogs on leads of no more than 2 metres long on CROW access land between 1 March and 31 July and it will increase the amount of dog fouling and conflict with the grazing farm animals near which dogs should be kept on leads.

Paragraph 110 of the NPPF requires that local plans should minimise pollution and other adverse effects on the local and natural environment. By specifying that the impacts of recreation should only apply to the SSSI sites on Wareham Common, MM23 ignores the impact on the rest of the local area and so does not comply with the NPPF. The Council should modify policy CEN to account for this clearly identified and justified local need as it has not been referred to in any of the Core Strategy documents previously produced.

**Suggested Alterations:**

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

MM23 under policy CEN should be altered to the following wording:

Wareham

The role of Wareham will be supported through...

- Minimising impacts of recreation on Wareham Common and the River Piddle including the SSSI areas so as not to further increase the urban effects of public use beyond current levels and to allow the land to continue to be managed for environmental and agricultural benefit.

Note: Please use a separate sheet when responding to more than one Main Modification. Additional sheets can be photocopied and attached to this form or downloaded from [www.dorsetforyou.com/purbeck\\_consultation](http://www.dorsetforyou.com/purbeck_consultation)

**FORM B: Your comments on the Schedule of Main Modifications**

**PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER**

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1):

MM24
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*Comments without the relevant reference number will not be accepted.*

**Do you consider this Main Modification (in box above) proposed by the Council to be 'Sound'?**

*(In other words is the proposed change 'justified', 'effective' and 'consistent with national policy')*

Yes

No

No Comment

If you have chosen 'No', do you consider this change to the Core Strategy be unsound because:

*(tick all that apply)*

It is not 'justified'  
*(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)*

It is not 'effective'  
*(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)*

It is not 'consistent with national policy'

*(For explanation of terms refer to guidance notes below)*

**Comments:**

Please use the space below to provide more detailed comments (expand box as necessary)

MM24 Map 11 does not provide a detailed map location of the proposed SANGS land at Holme Lane showing boundaries, size of the proposed SANGS and access points for the public to make comments on. As the landowner has stated their ability to bring the site forward a more detailed proposal and map should be provided in the main modifications for the public to make comments on. Detailed plans should be provided of walking routes from the proposed development at Worgret Road showing safety measures for walking along and crossing the Wareham by-pass.

**Suggested Alterations:**

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

MM24 Map 11

Amend map to show exact size and location of SANGS at Holme Lane showing access routes on foot as well as by car from Worgret Road.

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**PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER**

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications to the Core Strategy in the box below (e.g. MM1):

MM25

*Comments without the relevant reference number will not be accepted.*

**Do you consider this Main Modification (in box above) proposed by the Council to be ‘Sound’?**

*(In other words is the proposed change ‘justified’, ‘effective’ and ‘consistent with national policy’)*

Yes

No

No Comment

If you have chosen ‘No’, do you consider this Main Modification to the Core Strategy be unsound because:

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*(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)*

It is not ‘consistent with national policy’

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**Comments:**

Please use the space below to provide more detailed comments (expand box as necessary)

MM25

It is not only the responsibility of the developer of the proposed site at Worgret Road to manage the recreational impact of an additional 200 homes adjacent to Wareham Common to ensure no adverse effects upon the SSSI. It should also be the responsibility of Purbeck District Council who are proposing the site allocation as part of the Local Plan. This liability should extend to the whole area of the Common not only the SSSI because of the existing recreational impacts already referred to in our comments on MM23. The planners should take account of the local concerns expressed in previous representations to the Core Strategy and formulate a policy with all concerned parties going forward for the future. Once building work is completed the developer will hand over management to various bodies such as the Council who will not be interested in impact on the Common. Is the developer expected to have responsibility for the impacts in perpetuity?

For example the developer must put boundary fencing in place to prevent illegal access being created onto Common land but who will have responsibility for the fence maintenance after a period of time when it requires repair or replacement.

The Police often have to deal with gatherings of teenagers under age drinking on the Common and the surrounding farmland who can go on to cause problems in the town centre of Wareham if they are not apprehended. This problem has increased since Purbeck District Council cleared trees and undergrowth on the Wareham Walls displacing under age drinkers to other locations around the town including the Common. This is not a responsibility the developer can be held accountable for but it is one of a number of urban effects that will only increase with the proximity of the proposed development. Because the area is Common land some members of the public mistakenly believe that there are no conditions to their access rights and this causes problems for those of us who have to manage and farm the land.

MM25 should be modified in order to comply with paragraph 110 of the NPPF to resolve the concerns of the land owner and the Hayward of Wareham Common, the residents of properties at West Mill and West Mill Farm as well as Natural England's concerns in relation to the SSSI areas.

**Suggested Alterations:**

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

**MM25 Policy CEN 7.3.10**

To resolve Natural England's concerns as well as those of the landowner, Hayward and residents of Wareham Common, add to 'Housing':

Housing development will not be approved until an appropriate area of SANGS land is brought forward to provide alternative mitigation for the recreational impact of the proposed development on Wareham Common, the River Piddle and surrounding farmland including the SSSI and SNCI meadows.

Alternatively the developer of the housing allocation, Wareham Town Council and Purbeck District Council will need to work with the landowner, the Hayward and the residents of Wareham Common to ensure that recreational impact is managed so that there are no increased adverse effects on any part of the Common, the SSSI's, the River Piddle and the water meadows.

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**FORM B: Your comments on the Schedule of Main Modifications**

**PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER**

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1):

MM80

*Comments without the relevant reference number will not be accepted.*

**Do you consider this Main Modification (in box above) proposed by the Council to be 'Sound'?**

*(In other words is the Main Modification 'justified', 'effective' and 'consistent with national policy')*

Yes

No

No Comment

If you have chosen 'No', do you consider this change to the Core Strategy be unsound because:

*(tick all that apply)*

It is not 'justified'  
*(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)*

It is not 'effective'  
*(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)*

It is not 'consistent with national policy'

*(For explanation of terms refer to guidance notes below)*

**Comments:**

Please use the space below to provide more detailed comments (expand box as necessary)

The proposed new appendix 5 only provides guidance for SANGS in relation to the Dorset Heathlands and internationally protected sites. "The guidelines concentrate on the type of SANGS designed principally to cater for heathland dog walkers". These are not the only habitats in the district that require protection and mitigation from development and dog walking is not the only form of recreation undertaken. The river and wetland areas in the area are under as much pressure as the heaths. Where development will have an impact on these environments especially an increase in public use, developers should provide alternative SANGS land that is more attractive to residents for recreation purposes.

Each area of SANGS land put forward as mitigation for development should be directly linked and close to the particular development so that it is safely and easily reachable on foot as a priority rather than by car. Where a development will place further pressure on an existing public access area which already fulfill's many of the requirements of Appendix 5 of the Schedule of Main Modifications then a more appropriate SANGS must be provided.

The proximity of Wareham Common to the proposed Worgret Road development under policy CEN is the most prominent example of an already heavily used public access area which will be placed under even greater pressure. It is adjacent to the site and will still be favoured by new as well as the existing Wareham residents as a preferable option to the proposed SANGS located at Holme Lane which is an inevitable car journey away because walking alongside and crossing the Wareham by-pass is not a safe or pleasant option for anyone especially parents with children or dog walkers.

The developer should be providing a SANG for Worgret Road that residents can access on foot, but it has to be questioned if the Wareham by-pass route is a safe option on this very busy road into the Purbeck's without a safe crossing point. Residents will not walk to Holme Lane therefore reducing its ability to mitigate the effect of recreational impact on Wareham Common as well as the Dorset Heaths.

### **Suggested Alterations:**

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

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