

Purbeck District Council Core Strategy – Examination in Public
Hearing statement on behalf of Andrew Baggs – Respondent Reference No – 6404

Matter 11: Biodiversity and Geodiversity (Policies BIO, DH and PH)

Issues 11.1 and 11.4

In my capacity as Hayward of Wareham Common and the adjoining land owner to the Common I consider that the proposed heath land mitigation measures (primarily the SANGs) are not sufficient and are not satisfactory to provide protection for the land adjacent to the proposed Worgret Road Development (Map 1).

Wareham Common comprises 125 acres of farmland grazed by cattle and ponies, SSSI meadows and the final inland water stretch of the River Piddle before it enters Poole Harbour. The Common habitats include rare plant species such as the Marsh Marigold and the meadows are used as a feeding ground by birds such as the Black Tailed Godwit in winter and spring.

The Common and the SSSI are also located within the conservation area of Wareham and are subject to a Countryside Stewardship Management agreement in conjunction with Natural England. Funding is currently being applied for by the Dorset Wildlife Trust under The Dorset Wild Rivers Project to enhance the entire stretch of the River Piddle running through Wareham Common. Habitat protection measures and mitigation will be required if the proposed development of 200 homes at Worgret Road and potential development on Wareham Middle School playing fields is implemented.

Foot Print Ecology have conducted a HRA¹ that proposes mitigation measures for the heaths and coastal areas of Purbeck that are sites of international and european importance but have not taken into account the importance of the river valley habitats that feed into Poole Harbour in relation to development. In particular there is only one reference to the national designated SSSI on Wareham Common in that the location is unsuitable for SANG provision **because** of the SSSI. Policy BIO specifically refers to resisting development that could adversely affect SNCI's, Biodiversity Action Plan habitats and wetland interests all of which apply to this site.

The primary purpose of SANGs is to provide alternative recreational mitigation so that there is no increase in pressure on existing areas used for this purpose. The proposed SANG land at Nutcrack Lane and Holme Lane has been promoted because it is in the same ownership as the Worgret Road land rather than because it provides suitable mitigation for the development. Why would any new resident walk for at least 20 minutes on busy roads or drive to access the 2 proposed SANGs sites almost 2 kilometres away when there is 125 acres of CROW access land right on their doorstep, and direct access to Wareham Forest via the footpath named The Wareham Forest Way, and Worgret Heath via the Purbeck Way. Because of these footpath links the SANGs will not help to reduce the pressure on these sites which are referred to in the HRA as requiring mitigation measures.

¹ Habitats Regulations Assessment SD6 (2010) and SD16 (2011)

The River Piddle meadows that comprise the Wareham Common SSSI are already subject to considerable public amenity use and this has not been taken into account in the HRA. There have been no assessments conducted or consultation with the landowner about the likely effects of visitor pressure on the adjoining land going forward into the future. It is not included on Table 5 of the report in the predictions of heath land visitor rates. The Core Strategy places little importance to the value of the Common as an existing facility for the residents of Wareham in particular for dog walking. All of the detrimental urban effects that are listed in the HRA² in relation to the heaths are also existing problems on Wareham Common and the development of 200 homes will only increase the pressure. Neither Purbeck District Council or Wareham Town Council currently provide any management assistance on the Common because it is privately owned but a large number of additional residents is going to create increased management issues for the landowner and myself as Hayward and adjoining landowner over and above any existing access issues.

The Worgret Road Draft Development Brief³ adopted under Policy CEN makes no reference to mitigation measures that would ease these pressures, it only refers to mitigation for the internationally protected nature conservation sites, in particular the heaths. DEFRA in their guidance notes for public bodies “encouraging positive partnerships” with regard to SSSI’s are specific that planning authorities should not allow development to take place that will have a detrimental effect on an SSSI as do Natural England.

Purbeck District Council have placed great emphasis on developers providing mitigation for the heaths but in relation to the largest proposed development in the district at Wareham have made no reference to the importance of Wareham Common and providing mitigation for visitor pressure on this area. The Core Strategy can be made sound by requiring a habitats appraisal and assessment under Policy BIO on the effects of the anticipated Worgret Road Development on Wareham Common and its SSSI meadows to the same standard that has been given to the habitats of the heaths in order to comply with paragraphs 113 and 117 of the NPPF. Suitable alternative SANG land should also be provided that is more appropriate to fulfil the mitigation requirements under section 11 of the NPPF than that proposed.

The Draft Worgret Road Development Brief³ should be amended to make it sound by recognising the existence of the SSSI within 400 metres and a requirement for consultation by the developer and Purbeck District Council with the adjoining private landowner, the Hayward of Wareham Common, Natural England and other relevant bodies such as The Dorset Wildlife Trust to meet the increased demands arising from this proposed development in order to provide suitable mitigation to comply with paragraph 110 of the NPPF.

² Habitats Regulations Assessment SD6 (2010)

³ CD152 Worgret Road, Wareham Development Brief Appendix 3 (Adopted 13/3/12)