

**BOURNEMOUTH, DORSET & POOLE MINERAL SITES PLAN EXAMINATION**

**Representations on behalf of M B Wilkes Ltd**

**John Cowley, Director, Mineral & Resource Planning Associates Ltd**

**Inspectors Matters, Issues and Questions**

**Issue C**

**Matter 1**

**(iii) General Questions**

**Q69-80**

1 The position with regard to separate landbanks has been a matter on which the authorities have sought a response from industry. I enclose in Appendix JFC 1 the relevant email correspondence between myself and Mr Badley on that point in which I conclude that separate landbanks are not justified but that the allocations in the Plan are mostly on terrace deposits and may not therefore enable future demand for sand to be satisfied.

2 There is therefore a need for the Plan to assess how the proposed allocations would or would not meet future demand for sand. Currently it would appear that the Plan would not satisfy future demand. There is therefore a need for the Plan to identify how that should be resolved be that via allocations focussed on sand provision or a more realistic and less onerous approach through the Areas of Search (see representations on Q 169-177).

2 The references to 'soft sand' and 'sharp sand' in the Plan, and therefore in Q71, are unfortunate and confusing the response of the Plan to the future sand demand. It was common to see in historical documents reference to 'sharp sand' and 'soft sand', which terms were used to describe a resource broadly suitable for use as concreting sand or building sand respectively. These terms were also often erroneously used deterministically to relate to resources, where terrace deposits were correlated with 'sharp sand', and thus the supply only of sand for concrete; and bedrock deposits were correlated with 'soft sand,' and thus the supply only of sand for mortar.

3 The relevant BS and BS EN specifications have excluded these terms for decades precisely because of the misleading nature of their incorrect deterministic inference and because they thereby discount the substantial sustainability potentials of using resources according to their actual properties as opposed to some preconceived assumptions . In reality, a wide range of resources, including crushed rock 'sand', secondary aggregate and recycled aggregate, can be used to meet specifications for concreting sand and building sand.

4 For example, In Devon and Staffordshire thick bedrock deposits are the primary source of both concreting and building sand, while conversely in Essex the superficial deposits are the primary source of both sands. In Cornwall, recycled China Clay 'sand' waste is the primary source. In South Wales and parts of Northern England, as well as nearby in Somerset, crushed rock 'sand' (quarried for that purpose or produced as a by-product at

crushed rock quarries) is used on its own or blended with marine sand, or indeed sand from Dorset, etc. Further, both in Dorset and elsewhere across the country a limited supply of sand to specification arises from crushed and screened construction and demolition waste.

5 In Dorset the bedrock sands can and are worked to produce both concreting sand and building sand. Further, the thick superficial 'gravel' rich deposit at Chard Junction (just in Dorset and adjacent to Devon) produced both concreting sand and building sand. It is very unfortunate that the Plan still continues to use the terms 'soft' and 'sharp', because that clearly is misleading and affects allocations to meet future demand as it implies, for example, that concreting sand ('sharp sand') can only be provided from the superficial terrace deposits.

6 The degree to which the various bedrock sand units in Dorset can meet concreting and/or building sand specifications is comprehensively clarified in tables in grading diagrams in Appendix 9 of the 2002 BGS report 'Mineral Resources of East Dorset' (attached as Appendix JFC 2). This shows that the average grading of the Branksome Sand and all the named sand units in the Poole Formation will comply with the BS envelope for either concreting sand or building sand. This also confirms that the sands in the London Clay are too fine for concreting or building sand (although not for some industrial uses) and their inclusion in Areas of Search for sand and gravel aggregate (see representations on Q169-177) is flawed and unhelpful.