



Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan

Modifications to the Pre- Submission Draft

Representation Form

This form should be returned by **5:00 pm** on **20th June 2019** to the address at the end of the form, or via email to mwdf@dorsetcouncil.gov.uk Additional copies of the form can be obtained from the Dorset Council website: www.dorsetcouncil.gov.uk/mineral-sites

Late representations cannot and will not be accepted.

- The Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan was previously known as the Bournemouth, Dorset and Poole Mineral Sites Plan.
- **All documents and copies of this form are available at** www.dorsetcouncil.gov.uk/mineral-sites
- **During this consultation you can comment on the modifications proposed to the Pre-Submission Draft Mineral Sites Plan.** The modifications are set out in the Schedule of Modifications and in the 'Modified Mineral Sites Plan'. They include main modifications necessary for the Mineral Sites Plan to be capable of being found 'sound' and additional modifications, which do not impact on whether the Plan is 'sound' or not. Main modifications are written in underlined red text and have the prefix 'MM' Additional modifications are written in underlined red italics and have the prefix 'AM'.
- If your representation does not relate to a modification it will not be valid.
- Please make it clear which modification your representation relates to – reference numbers can be found in the Schedule of Modifications and are written in brackets in the Modified Plan.
- A separate representation form should be provided for each modification commented on.
- You can also choose to comment on the sustainability appraisal and habitats regulations assessment
- The Planning & Compulsory Purchase Act 2004 (as amended) states that the purpose of the Examination is to consider whether the plan complies with legal requirements, the duty to co-operate and is 'sound'. Your comments on the modifications must therefore relate to these matters.

To be 'legally compliant':

Any comments which you wish to make on the way in which the Council has prepared the published plan must relate to matters of legal compliance, which include, in particular, whether the plan:

- ▶ has been prepared in accordance with the Local Development Scheme; the Statement of Community Involvement and the Town & Country Planning (Local Planning) Regulations 2012;
- ▶ has been subject to sustainability appraisal; and
- ▶ has had regard to national policy.

To be 'sound' a local plan should be:

- ▶ Positively prepared – Does the plan seek to meet objectively assessed needs for minerals; take account of unmet requirements from neighbouring/other authorities where it is reasonable to do so, and achieve sustainable development?
- ▶ Justified– Does the plan provide the most appropriate strategy when considered against reasonable alternative options?
- ▶ Effective – Do you think that the policies in the plan are capable of being delivered during the plan period?
- ▶ Consistent with National Policy – Does the plan enable the delivery of sustainable development in accordance with the National Planning Policy Framework?

This form has two parts:

Part A - Personal details (please only fill in Part A once);

Part B - Your representation(s) – Please fill in a separate sheet (Part B) for each representation you wish to make.

Please send in Part A and all representations together.

Part A – Respondent Details

	1. Personal Details	2. Agent's Details (for use only when using an agent)
Title	██████	
First Name	██████████	
Last Name	██████	
Job Title (where relevant)		
Organisation (where relevant)		
Address	████████████████████ ██████████████████ ██████████████	
Postcode	██████████	
Telephone	██████████████	
Email Address	██████████████████████████████	

Data Protection:

The information you provide will be used by Dorset Council for the purpose of preparing the minerals and waste local plans. It will only be retained for as long as required for that purpose.

Note that representations, including respondent details, will be forwarded to the Planning Inspector who has been appointed by the Secretary of State to examine the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan. Please be aware that all representations will be made available for public inspection, including on the council's website.

By submitting this form, you are consenting to its use as detailed and you are agreeing for your details to be added to our database. Further information about the use of personal information is available on our web site at www.dorsetforyou.com or by contacting the Council's Data Protection Officer by email at data.protection@dorsetcouncil.gov.uk or by post at RMU, County Hall, Dorchester, DT1 1XJ

Part B – PLEASE USE A SEPARATE FORM FOR EACH REPRESENTATION

1. Please state the modification you are commenting on
(Please complete one sheet per main modification or additional modification)

Main modification number:

MM 2 Part 2 – 1.48mt
10 year rolling average

Additional modification number:

AM

2. Do you support or object to the modification

Support

Object

3. If you object to a Main Modification, do you think it fails any of these statutory tests: (Please leave this blank if you are commenting on an Additional Modification)

Legal compliance



Soundness



Compliance with the duty to co-operate



No comment



3(a) If you are commenting on soundness, please indicate which test of soundness?

Positively prepared



Justified



Effective



Consistent with National Policy



4. Please use the space below to provide more detailed comments on the modification

1. The 10 year average in the extant 2015 Local Aggregate Assessment covers the 10 years up to 2015.
2. I constructed the table below to show the approximate values of extraction for 2016, 2017 and 2018 in order to produce a rolling average for 2018.
3. I then added the 10 year rolling averages from the Local Aggregate Assessments 2011 to 2016.
4. The table shows that the average of the last eight 10 year rolling averages is 1.53.
- 5 From 2011 to 2015 the 10 year rolling average was above 1.55 and hence the 1.48 value is very out of character and it would be far more appropriate to use 1.53.
6. The table also shows that the economic problems of 2008 had a short term impact on output only in 2009 when it dropped to 1.26mt and the next year was 1.41 and then 1.52mt. Thereafter the output appears to be unaffected by external economic conditions.
7. The table highlights the unreality of just using one year's 10 year rolling average total as is the case in MM3.

10 year averages									
figures from Local Aggregates Assessments, except years 2017 and 2018 calculated									
	2002-2011	2003-2012	2004-2013	2005-2014	2006-2015	2007-2016	2008-2017	2009-2018	
Number of years	1	2	3	4	5	6	7	8	
2001									
2002	1.56								
2003	1.63	1.63							
2004	1.66	1.66	1.66						
2005	1.71	1.71	1.71	1.71					
2006	1.8	1.8	1.8	1.8	1.8				
2007	1.56	1.56	1.56	1.56	1.56	1.56			
2008	1.67	1.67	1.67	1.67	1.67	1.67	1.67		
2009	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	
2010	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	
2011	1.52	1.52	1.52	1.52	1.52	1.52	1.52	1.52	
2012		1.43	1.43	1.43	1.43	1.43	1.43	1.43	
2013			1.6	1.6	1.6	1.6	1.6	1.6	
2014				1.73	1.73	1.73	1.73	1.73	
2015					1.5	1.5	1.5	1.5	
2016						1.39	1.39	1.39	
2017							1.3	1.3	
2018								1.26	
10 year totals	15.78	15.65	15.62	15.69	15.48	15.07	14.81	14.4 mt	
10 year average	1.58	1.57	1.56	1.57	1.55	1.51	1.48	1.44 mt	
Average of 10 year averages 2002 to 2018 = 12.26 ÷ 8 = 1.53									
Difference between the last year's total and the associated 10 year average	-0.06	-0.14	0.04	0.16	-0.05	-0.12	-0.18	-0.18	Average -0.07 mt
Difference as a % of the 10 year average (last year's total ÷ associated 10 year average)	-3.8%	-8.9%	2.6%	10.2%	-3.1%	-7.8%	-12.2%	-12.5%	Average -4.4% mt
Variation Highest	1.8	1.8	1.8	1.8	1.8	1.67	1.73	1.73	
Variation Lowest	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	Average
Variation Difference	0.54	0.54	0.54	0.54	0.54	0.41	0.47	0.47	0.51 mt
	2002-2011	2003-2012	2004-2013	2005-2014	2006-2015	2007-2016	2008-2017	2009-2018	
Number of years	1	2	3	4	5	6	7	8	

8 The table also shows that the difference between the output in 2017 (1.3) and the 10 year rolling average for 2008-2017 (1.48) was 0.-0.18mt or a difference of -12.2% when the average difference is only -4.4%. Clearly one year is an unreliable indicator upon which to base a 10 year plan.

9. A further factor to bear in mind is that quarries are a long term investment. Warmwell, and Moreton-Redbridge Quarries have been in operation for over 30 years. Woodsford will be in operation for 30~40 years, both the proposed Station Road and Hurst Farm quarries are planned to be in operation for over 20 years.

10. Just one year's 10 year rolling average is a very weak basis upon which to make such a large investment decision.

11 The average of the 8 ten year rolling averages of 1.53 provides a far better basis upon which to take a major investment decision.

12. The table below has been extracted from the 2011 Local Aggregates Assessment on page 8.

13. A comparison with the list of quarries in the extant Pre-Submission Draft Mineral Sites Plan (and erroneously due to disappear under MM3) highlights that many of the quarries in the 2011 Assessment are still in operation.

14 Furthermore 3 of the 8 quarries proposed in the Mineral Sites Plan (Woodsford, Hurn Court, and Tatchells) are on the 2011 list. Masters quarry may well operate for about half of the Plan Period before Great Plantation starts.

Site	Operator/Owner	Mineral primarily produced
Binnegar Quarry	Raymond Brown	Sand (Poole Formation)
Dorey's Pit	Holme Estate	Sand (Poole Formation)
Henbury Pit	M B Wilkes	Sand (Poole Formation)
Hines Quarry	Hanson	Sand (Poole Formation)
Hyde Quarry	Hanson	Sand (Poole Formation)
Masters North and South	Holme Sand & Ballast	Sand (Poole Formation)
Tatchells Quarry	Aggregate Industries	Sand (Poole Formation)
Trigon Hill	Giles Sturdy	Sand (Poole Formation)
Warmwell Quarry	Aggregate Industries	Sand (Poole Formation)
Avon Common	Tarmac	River Terrace - sharp sand and gravel
Chard Junction Quarry	Aggregate Industries	River Terrace - sharp sand and gravel
Hurn Court Farm	New Milton Sand & Ballast	River Terrace - sharp sand and gravel
Moreton Pit	G Crook & Sons	River Terrace - sharp sand and gravel
Woodsford Quarry	Hills Quarry Products	River Terrace - sharp sand and gravel

15. What the chart above and the comparison of past, extant and allocated quarries clearly shows is that the aggregate industry takes a far more long term view of the value of an investment in a new quarry than simply looking at the latest 10 year rolling average.

16. The Mineral Sites Plan should reflect this approach and not base its calculation of the number of quarries required to just the latest 10 year rolling average.

17. MM2 compounds this failing by inventing a 10 year rolling average for 2018 of 1.48 million tonnes based upon a projection of output based upon the previous year's output. The chart above highlights that this is wrong.

18. For example the output in 2009 was 1.26mt and in 2010 it was 1.41mt, a rise of approximately 12%. And 2 years later it was 1.52mt, a rise of approximately 21%.

19. The chart above also shows that the average of the eight differences between the last year's output and its associated 10 year rolling average is -4.4%. This means that the 10 year rolling average lags the last year's associated output. In 2017 the difference between the projected 10 year rolling average and the projected output for the year is 12.2%.

20. The use of just one 10 year rolling average such as 1.48 million tonnes can mean that the Mineral Sites Plan allocates too few quarries.

21. As my chart shows in MM2, the Pre-Submission Draft Mineral Sites Plan and the modified version, both allocate too few quarries.

22. This serious error has been compounded by a lack of understanding about the output profiles of the allocated quarries.

23 The *Demand and Supply* section on page 17 states:

It is estimated that the sites allocated by Policy MS-1 (3) below provide for up to 16.5 approximately 17 million tonnes. This figure is higher than the 10.69 million tonnes required to be provided for through this Plan, providing necessary flexibility should sales rise or allocations not come forward as expected.

24. Of the 17.98mt that the allocated quarries can produce, only about 10.63mt will be available during the Plan Period.

25. The above *Demand and Supply* statement assumes the proposed Hurst Farm quarry will be available during the Plan Period. But Hurst Farm quarry will not start operation until about 2045, 11 years after the end of the plan period.

26. The use of the 1.48 million tonnes figure is wrong and has resulted in the aggregates section allocating too few quarries.

27. For Dorset all the above arguments are academic. Aggregate extraction is limited by the number of proposed sites suitable for extraction. As I have shown in my chart included in the first part of my response to MM2, there aren't enough sites to provide the aggregate for a 10 year rolling average of 1.48mt, which is itself 0.05mtpa below the average figure for the eight 10 year rolling averages from 2011 to 2017.

5. Please use the space below to give details of what change(s) you consider necessary to the modification (please restrict your response to the modification named above only)

1. Just using the one 10 year rolling average of 1.48 million tonnes as the basis for the calculation of the quantity of minerals to be provided during the plan period is wrong.
2. The Mineral Sites Plan should use the average of the 8 previous 10 year rolling averages. This would take into account all the economic and social changes since 2002 and provide a far more realistic basis for the selection of quarries to be allocated.

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Please indicate if you wish to be notified of any of the following:

The publication of the Inspector's report following the Examination in Public



The adoption of the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan



Signature:

Nigel Hill

Date:

20 June 2019

Please send completed forms to the address below.

If you would like more information on the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan or this process, please contact the Planning Policy Team at:

Minerals & Waste Planning Policy Team,
Planning and Community Services,
County Hall,
Colliton Park,
Dorchester,
Dorset DT1 1XJ

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