



Emma Macdonald
Minerals & Waste Planning Policy Team
Dorset County Council
Colliton Park
Dorchester
DT1 1XJ

Dr Simon Cripps
Chair of Dorset Local Nature Partnership
Email: info@dorsetlnp.org.uk
Tel: 01305 264620

10 August 2016

Dear Emma

Dorset Local Nature Partnership Response to the Dorset Minerals Plan Update Consultation

The Dorset Local Nature Partnership (DLNP) was established in 2012 with a role to:

- Provide leadership for those working to protect and enhance the environment in Dorset;
- Advocate the good management of Dorset's natural environment for its own sake and the many benefits it offers;
- Articulate the importance of Dorset's natural environment to economic and social wellbeing;
- Ensure that the natural environment is taken into account in policy and decision-making.

The National Planning Policy Framework, in paragraph 180, states that "*Local planning authorities should work collaboratively on strategic planning priorities to enable sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships.*" In paragraph 165 LNPs are also identified as having a key role in working with LPAs to assess existing and potential components of ecological networks, to ensure planning policies and decisions are based on up to date information about the natural environment.

The DLNP welcomes this opportunity to comment on the Minerals Sites Plan. DLNP operates at a strategic level in policy and planning matters, and is generally unlikely to become involved in the detailed discussion of site-specific cases. It has taken an overview of the sites included in the consultation, to offer some overarching suggestions for principles which we believe the Minerals Planning process should follow, in line with the DLNP Vision and Strategy¹ adopted in 2014.

There are a range of sites included in the consultation where issues such as nature conservation and public enjoyment of the natural environment are of concern to LNP partner organisations, these are being raised in responses from individual partners.

¹ www.dorsetlnp.org.uk/Dorset_LNP_Vision_and_Strategy

However, whilst leaving the details to our partner organisations, the DLNP does have a role to alert you to sites which raise such serious issues, in this case impacts on nature conservation that it would appear to be very difficult indeed to adequately avoid or mitigate them. In some cases it will be essential to consider alternative boundaries and/or essential mitigation measures to avoid major conflict with natural environment and the DLNP would wish to see these discussions held at an early stage to adequately resolve the concerns raised by our partners.

The inclusion of sites which fail to meet the objectives that we have set out below would result in a plan which the DLNP could not support. We would urge careful examination of the potential impacts of all proposed sites, in line with the following principles as set out in the DLNP's Vision and Strategy.

Natural Capital

Dorset has some exceptional natural assets which already underpin the economic and social wellbeing of the county. The DLNP published its Natural Capital Investment Strategy² in April 2016. This sets out the principle that development can be achieved by taking a natural capital approach (ensuring there is a net gain in natural capital) to increase the quality of Dorset's assets and make them more resilient. In particular we would seek outcomes through the Minerals Plan which promote:

- Healthier natural systems which are managed in an integrated way.
- Maintenance and enhancement of high quality landscapes in which change is well managed.
- Bigger, better and more joined up wildlife sites.
- Demonstrable improvements in the quality and accessibility of green and blue infrastructure in urban and rural areas.

Natural Value

A healthy environment is a pre-requisite for a healthy economy globally and locally, and in Dorset it offers additional opportunities for sustainable economic growth which does not erode our natural capital. Outcomes we seek through the Minerals Plan are:

- A transition to a low carbon, sustainable economy in which every business is a greener business.
- Reduced transport related impacts which contribute to a healthy environment.
- More efficient and effective use being made of scarce natural resources, particularly land, water and energy sources.

Natural Resilience

Changes in the global economy, global climate and demography present a number of potential risks and threats to the resilience of both the environment and the communities which depend on it. But a well-managed, resilient natural environment can make a major contribution to our ability to adapt to these changes. In particular, the Minerals Plan can contribute to:

² [www.dorsetlnp.org.uk/Natural Capital Investment Strategy](http://www.dorsetlnp.org.uk/Natural_Capital_Investment_Strategy)

- A high quality built environment meeting increasingly high standards of sustainable construction, waste reduction, water and energy efficiency in new and existing development, and in which sustainable travel options are promoted.
- A spatial planning system which is proactive in the way in which it seeks to deliver landscape scale, ecological networks that are able to withstand the pressures of climate change.
- More widespread adoption of landscape scale approaches to extending and joining up natural areas as the best means of improving their resilience to future change.
- Promotion of shorter, more local supply chains for key resources such as food and energy, to improve our resilience to future shocks and promote sustainable local produce in the process.

Natural Influence

We are looking for the planning process to contribute towards integration of social, economic and environmental goals, including by:

- Accurate and transparent accounting for environmental costs and benefits in the planning and decision-making process.
- Widespread adoption of the concept of 'natural value' in the planning and decision making process.
- Identifying existing and potential ecological networks and policies for their improvement, and ensuring plans are based on an accurate and up to date environmental evidence base.
- An holistic approach to planning and development which takes account of the need to maintain and create quality natural and historic environments near where people live, and space for wildlife to get food and shelter in a changing environment.
- Greater awareness of the impacts of the decisions we take as consumers on the environment, and more sustainable choices being made as a result.
- Dorset's 'ecological footprint' being reduced over time both locally and globally.

Specific comments about the Minerals Plan Update consultation are:

The plan includes an area of search for aggregates – the DLNP feels that any area of search policy should clearly exclude environmentally sensitive areas, and set criterion which speculative proposals should meet.

The DLNP also urges the Minerals Planning Authority to also consider in the after uses of mineral sites that priority is given to access for the public, links with other greenspaces that might be in the locality and restoration with biodiversity enhancement in mind.

Bournemouth, Dorset and Poole Draft Mineral Sites Plan Conservation Regulations Assessment (CRA) Screening Report, June 2016

DLNP generally agrees with the summary of the steps to be taken to generate an appropriate assessment under the Habitats Regulations.

The DLNP considers it difficult without further detailed work to determine at this stage what mitigation would permit a conclusion of no likely significant effect. A more in-depth appropriate assessment of the proposed allocations is necessary. Potential mitigation strategies should be discussed with stakeholders and may include potential biodiversity offsetting so that when consents are granted, opportunities are taken to identify and secure other areas of land for biodiversity enhancement through legal agreements etc. At this stage we would not agree the assertion that “the Minerals Planning Authority can be confident that the allocated sites will not have an adverse effect on the integrity of the European sites” (page 11).

I hope you find the above comments helpful. Please contact Maria Clarke, LNP Manager, on the details above should you require further clarification regarding Dorset Local Nature Partnership’s response.

Yours faithfully

Dr Simon Cripps
Chair, Dorset Local Nature Partnership