

DRAFT MINERAL SITE PLAN AS 12 PHILLIOLS FARM

Reference Bournemouth, Dorset and Poole Mineral Site Plan Independent Examination dated 22 Aug

1. I am providing this statement for 2 reasons.
 - a. I may not be able to attend the oral hearings at the end of September for which I have been allocated a space and:
 - b. I have now read the general issues on soundness posed by the inspector as well as the many detailed questions asked of DCC relating to Philliols Farm and to the transport issues for the 3 Wareham sites (AS12,AS15 and BC04). It seems unlikely that we will hear the answers until the oral meeting, when it may prove difficult to provide counter arguments in the short time available. This statement allows me to expand a few of those important issues which the inspector has identified.
2. I accept that Sand and Gravel are strategic issues. It is, however, important to ensure that only the most appropriate sites are selected, both from a cost effective perspective and from the impact any gravel workings will have on the area. From both aspects Philliols Farm is unsuitable.
 - a. Philliols Farm is a small site. Borehole drillings, I believe taken in 2007, indicate that there are only 1.5m tons of gravel available over an area of 72 hectares (There seems to be some doubt as this may now be 67 hectares). There are 3 owners of the area, the Drax Estate, Bradford and Mrs C Masters. A mineral survey carried out by Mr Masters 10 years ago indicated that some 50% of the total is under his land and his widow does not wish to have excavation on that land. (If the reduction in area is as a result of the removal of that area belonging to Mrs Masters unless there has been a more recent drilling it seems strange that there has been no reduction in the tonnage available) It is also of interest that Aggregate Industries have withdrawn their adoption of this site. There are many other sites within Dorset which seem to have much more gravel available and with fewer serious impacts to risk manage.
 - b. It is clear from the questions asked by the inspector (para 102 to ref) that the overall impacts, whatever the mitigation, are very severe. Philliols Farm is a productive working farm, with good soil, where it is highly likely that the tenant will lose his livelihood if the gravel pit goes ahead. The local countryside will be ravaged, both because this virgin land will be dug up, but particularly because much of it will be returned, at the best to heathland, and most likely a swamp – such is the closeness of the water table to the surface. Natural England may prefer a swamp to the DCs heathland restoration vision, but neither will help future agriculture. Of course, this is of no consequence to the owner as there is more profit from mineral extraction than farming.
3. At Para 102 to Reference the inspector also highlights the large number of adverse impacts which need to be mitigated. Risk Management is always a difficult and somewhat imprecise science. It is easy to provide mitigation but so often when it is proved to be inadequate subsequently it is too late. It is difficult to imagine how a gravel pit with many dwellings close by can adequately mitigate the noise, the dust, the permanent visual impact and the inconvenience to locals and visitors alike. One property close to the proposed site was put on the market several months ago and is still having difficulty in finding a buyer, even at a very reduced price. At no stage during the process, both in the past and now, has the DCC or mining companies explained how they can mitigate any of the more serious issues. They must be able to provide full and workable solutions which, ideally have been used satisfactorily before. It is of interest that the risk management of

rubbish from the Trigon landfill site, which would not escape from the site, has failed significantly as the local campsites will testify with scraps of rubbish polluting the surrounding land.

4. River Piddle. Whilst in the document (Para106 to reference) potential harm to the Bere Stream and the River Frome is raised, no mention is made of the River Piddle which runs along the Southern boundary of the proposed site. As the river Piddle, the Western most chalk stream in the country with its sensitive and unique aquaculture, is the closest to the proposed site, any leaching of silt or other contamination will have serious impacts on the river life. It is not clear that any hydrological survey has been carried out, or what is the risk management process. But the past experience by the Game and Wildlife Conservation Trust at the Allerton Project has shown how easy it is even for septic tanks to leach into rivers many miles away through geological fault lines with serious consequences. Despite careful risk management of dust and silt on the Bovington Training area there have still been serious incidents of contamination of the River Frome. Any contamination of the river from the gravel site would affect both the Piddle and the Frome into which it flows at Poole Bay.
5. Landscape Capacity and Visual Impact. (C i General Para 26) There does not seem to have been any real consideration of the landscape as a whole. The River Piddle valley is an unspoilt area with a wide panorama of natural countryside, respected for its seclusion and wild life by residents and farmers and much admired by tourists, riders, bicyclists and walkers. The adjoining ridgeline area to the South has been largely excavated and returned to a wasteland of gorse, rhododendron and land fill sites. The development of large gravel workings with the associated vehicular activity will act as a further stain on this area in perpetuity as it can never be returned to its former state. The workings will be clearly visible from the road running from Gallows Hill to Bere Regis. I believe the visual impact consideration was the main reason why the last inspector turned down the last application.
6. Traffic implications. (Cluster 2 paras 36 -40) There is a considerable amount of Lorry traffic already as a result of gravel extraction and landfill activities. This becomes particularly problematic during the summer season with the increase of tourists and bicyclists on the 2 narrow approach roads B3075, and the 'Old Puddletown Road' between Wareham and Bovington. The latter is exacerbated by tank movement and a skip hire business. The development of the Trigon landfill site with the increase of traffic was considered acceptable on the basis that lorries could only travel to and from the A35 as the road could take no more traffic safely. The Philliols Farm traffic is liable to double the lorry traffic with a consequent danger to the public and inconvenience to the many camp sites either side of the road.
7. In conclusion. Whilst DCC is required to assess all potential gravel sites, it seems strange that they should seriously be re- considering the Philliols Farm site again especially as in the intervening year there has been no serious evaluation of impacts. There are a very large number of significant impacts to be mitigated, the site is relatively small, the farm could never be returned to its former state, the farmer has little say in the matter and in any cost benefit analysis normally would be turned down. I understand this was the view of DCC when they turned it down in 2016 only for the Drax Estate to raise an objection to this decision as a result of which the site was re-instated. Finally there is also a danger of allowing this gravel pit to go ahead on the basis that a planning application would properly consider the risks, as acceptance at this stage might imply a degree of approval and make the gravel pit more difficult to contest at a later stage.