

BOURNEMOUTH, DORSET & POOLE MINERAL SITES PLAN EXAMINATION

STATEMENT IN RESPONSE TO INSPECTOR'S MIQs

My comments are shown against the relevant question reference number raised by the Inspector, included in the letter from the Programme Officer dated 12th July 2018. All comments relate to the area of my original representations, being the soundness of the inclusion of sand and gravel site AS-12 Philliols Farm, Hyde.

SECTION C) SOUNDNESS

MATTER 1: PROPOSED MINERAL SITES

ISSUE: Whether the allocations provide a sufficient supply of economically viable minerals

I consider that the 'Viability' analysis included on page 118 of the Sustainability Analysis (SA) for the AS-12 site is unsound and gives a very misleading impression. This is for two major reasons:

- a) The site may have been promoted 'in the past' but the promoter/extractor withdrew their interest soon after a geological survey of the site around 2008, and no other promoter has come forward. The amount of mineral claimed to be present is taken from that survey. It is therefore highly unsound to say that 'the site has been strongly promoted'.
- b) The amount of mineral deposit claimed in 2008, and as now shown, is very much at variance with previous estimates. In particular, the representation made by the owner of the land formerly included in the allocated area of AS-12, but now withdrawn by the owner, claims that geological work showed that around 50% of the mineral formerly claimed, is not now available. (See representation from C. Masters to Draft Mineral Plan Update 2016 on 5th August 2016; Comment ID 2016DMSP218). Again, this a very unsound background to the site inclusion, especially as the MPA confirm that 'no specific assessment has been done' by them.

GENERAL – QUESTION 23

Difference in grading between Site Assessment and Sustainability Analysis

An example of this difference in grading between the Site Assessment and the SA is the landscape impact on the AS-12 site as detailed in Question 6 below.

GENERAL – QUESTION 25

Can substantial negative impacts be mitigated to acceptable level

I feel that references to 'mitigation' as regards the negative aspects of site AS-12 are unsound in two ways: firstly, in that the measures that will adequately mitigate the problems are rarely detailed, and secondly, consideration of mitigation is often deferred until an ultimate planning application and therefore falls totally outside of the present mineral site plan analysis and balancing exercise.

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GENERAL – QUESTION 26

Has landscape and visual impact been adequately assessed

I think that there has been a totally inadequate assessment of site AS-12 as regards landscape and visual impact. The lack of capacity to absorb mineral development was a prime consideration in the examination of this site in 1996 when deletion of the site was recommended and, despite the response of the MPA that these earlier findings are no longer relevant, it is significant that the SA contains both a Strong Negative impact ('A'), as well as recognising the 'intimate' nature, and sensitivity of the landscape. The Site Assessment criterion 8 also refers to the obtrusiveness but rather inconsistently notes a slightly lower 'B' level of impact. Even allowing for the fact that in this, as in so many areas of assessment for this site, the 'mitigation' is totally unspecified, the MPA can still only say that the capacity of the area to absorb any development is medium/low, even with mitigation. It is also significant that in the SA, the MPA acknowledge that a view may have to be taken on whether a 'time limited impact would be acceptable' should mitigation not be possible. In the interest of the soundness of this area of assessment, and the total lack of any definition of what constitutes 'mitigation', the fundamental lack of capacity to absorb such development should be acknowledged now.

GENERAL – QUESTION 29

Have hydrology assessments been undertaken

No hydrological assessment has been undertaken for AS-12. The MPA actually state in the Site Assessment that such an assessment will not be undertaken at the plan preparation stage. This is wholly unsound for such a vulnerable low lying river valley site where actual surface water flooding is common in winter months. It is disappointing to see the Site Assessment rather dismissively refer to 'some theoretical risk of surface water flooding'.

The Environment Agency response in 2016 specified that a full hydrological assessment should be undertaken as part of the present 'site allocation process'.

GENERAL – QUESTION 30

Are there significant negative impacts where mitigation is not possible

As mentioned already in the response to Question 6, adequate mitigation cannot be envisaged for the adverse impact of landscape character and visual impact.

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SITE SPECIFIC QUESTIONS – AS-12

QUESTION 102

Can the Very Significant/Strong negative impacts be adequately mitigated

This is an extensive list of 'very significant' or 'strong negative' impacts which would be even longer if item C8 of the Site Assessment also showed a very significant impact for landscape capacity, consistent with ob. 7 of the SA.

The idea of 'adequate' mitigation seems to be just wording rather than practical reality due to: (a) the spread of impact caused by all these areas, (b) in certain areas, mitigation is not a logical possibility (see Question 10 response), and (c) much mitigation is totally unspecified and/or simply deferred to a future date.

QUESTION 104

How will residential amenity be protected

No protection by specific distances away from residential properties has ever been mentioned by the MPA. Responses have simply stated that this is a decision for any future planning applications, not for the present MSP. This is unacceptable for residential properties. I believe that the NPPF guidance requires site specific distances to be mentioned in the plan documents. My residence, and a number of others are less than 50 metres from the AS-12 site.

QUESTION 106

Mitigation of harm to Bere Stream SSSI

I think the question should refer to the River Piddle rather than the River Frome. The River Piddle, of which the Bere Stream is a tributary, forms the southern boundary to the site but the River Frome is not near this area. The Environment Agency do refer to the Frome in their submission but then correct this to the Piddle, later in their response.

The Bere Stream SSSI forms part of our property and lies less than 50 metres from the AS-12 site. We have a Management Agreement with Natural England to ensure this sensitive natural environment is properly maintained. I refer again to the Environment Agency requirement for a hydrological assessment as part of this present plan process (see Question 9 response).

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CONCLUSION

I would like to pull together these points into a final paragraph. The MPA generally take the view that they have a duty to include any site where mineral deposits can be found. If this was the main criterion, this MSP process could be condensed into a short period with a straightforward list of sites as the end product. But the whole, deliberately lengthy, planning process for minerals must surely have as its aim, the inclusion of fully analysed and appropriate sites. Can it be at all sound that this site is being pushed forward despite severe doubts about its viability ; no extractor is prepared to put their name forward ; a long list of criteria where even the MPA have to admit that the site would suffer severe impact, sometimes because the capacity of the site to withstand this development is very low or non-existent ; the site was taken out of the Draft Mineral Sites Plan in 2015 before being reintroduced in 2016 for reasons that have not been made clear ; and a continual reference to 'mitigation' where no effort has been made to specify how and if this is applicable, or where the 'mitigation' is simply and continually deferred to an unspecified date? And can it be at all sound that, despite these points, a site can then find its way into a legal planning document where it could lay, for all to inspect, for 15 years or more?

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