

Bournemouth, Christchurch, Poole and Dorset Responses to Consultation on Main Modifications

Cranborne Chase & West Wiltshire Downs Area of Outstanding Natural Beauty

Modification: General
Para 1.1

233589/**MSPMod70**

Objector/Support: **Not Stated**

Representation: It appears that the Mineral Sites Plan will have minimal direct impact on this AONB. As I have mentioned before, this AONB is concerned about HGVs associated with mineral sites using the narrow lanes of this AONB and potentially causing physical damage to the verges and disturbing the tranquillity, a key feature of this AONB.

Gloucestershire County Council
497321/**MSPMod66**

Modification: General
Para 1.1

Objector/Support: **Not Stated**

Representation: Thank you for consulting Gloucestershire County Council on the Modifications to the Bournemouth, Christchurch, Poole and Dorset MLP. On this occasion we have no comments to make.

South West Water
1066355/**MSPMod7**

Modification: General
Para 1.1

Objector/Support: **Not Stated**

Representation: I refer to the above document and would advise that South West Water has no comment.

Cllr J G Laker
1193566/**MSPMod69**

Modification: MM 67
Para 1.1

Objector/Support: **Object**

Representation: Other respondents to this particular section have commented on the concerns arising from impact on the local communities and on the infrastructure. The only input on the subject of transport has been associated with - and drawn from - the comments of the authority responsible for the strategic network - Highways England - whose influence and interest extend only to the A31 and its access points.

This has led to an assumption that the possible rate of 80 vehicle movements per working day would affect only the Eastbound element of the C2 to Ashley Heath, along with a small possibility of leakage to the A31 via West Moors. The Assessment is not adequate in this respect. The capability of the C2 to carry significant numbers of heavy goods vehicles is regularly queried by local communities, the section westbound from AS27 having a poor record of maintenance and constricted sections hampering heavy goods vehicles.

Although passing reference is made to climate change mitigation, impacts must be addressed. Two changes have emerged in the recent days: the Council has committed itself to a 'Climate Change Emergency', and the central government has declared net zero carbon emissions as a legally-binding undertaking by 2050. These could seriously affect the viability of the Plan as is, particularly in the matters of extraction/haul and delivery.

The assumed number of 80 vehicles per day could be overtaken as the technology is forced to change, and adjacent and en route communities and infrastructure take the brunt. The reader has no indication of the start/finish dates of the operation of AS27, merely the estimated extent of the duration of work, which could change to allow compliance with new climate change requirements.

Suggested Change: The document must indicate clearly that the impact on local infrastructure is likely to extend outside the eastbound assumption of access to the A31 via Ashley Heath which is suggested by the Highways England contribution to the Assessment.

The rate of extraction and demand suggests a duration of 12-17 years, based on the capacity of current vehicles. The operation is likely to run concurrently with significant changes to the movement of material by road to meet emerging climate change regulations.

Although the Plan briefly acknowledges the impact of climate change, there should be an indication of the possible extent of change to the number of daily movements which could arise from the requirement for new compliant vehicle design and the consequent duration of the operation.

Weymouth Town Council
1210426/**MSPMod14**

Modification: No Comment
Para 1.1

Objector/Support: **Not Stated**

Representation: Weymouth Town Council has No Comment

FRAME (Frome Residents Against Mineral Extraction)
933995/**MSPMod94**

Modification: MM1
Para 2.17

Objector/Support: **Not Stated**

Representation: MM1 The practice of extracting minerals has already destroyed vast areas of land in the county of Dorset. The term "restoration" means to "take back to its original form", a wholly inaccurate term that has been used throughout the minerals Plan when describing land use after minerals extraction operations. Hundreds of years of history demonstrate that such land is either left fallow or reclaimed for use in another form. It is rare that reclamation to a near original state occurs and in these instances it takes decades to achieve, incurring the loss of economy/amenity in the meantime.

The proposals in this Plan, to excavate 1000 acres (AS 19/25/26), will destroy forever the amenity that is known as the "Valley of the great Dairies" by Thomas Hardy. Good and productive agricultural land with a wealth of natural flora and fauna that will be permanently adversely compromised by extraction operations. In addition to the comments on the MMs that follow, all of FRAME's previous submissions still stand and should be considered too.

Mr John Wickenden
1148225/**MSPMod75**

Modification: MM1
Para 2.17

Objector/Support: **Object**

Representation: NB - this objection relates to MM1 in the New Paragraph at the end of Section 2. Objection text: The MPA and DC are still intent on destroying Thomas Hardy Dorset Countryside and heritage over huge swathes of land. Restoration is a misnomer as the land can never look the same and offer the same amenity as before mineral extraction. Mineral extraction is not a sustainable policy and the DC should not be actively encouraging it. Future generations of residents and visitors will not be able to witness the beauty of the River Frome valley; to coin a recent BBC phrase: "What on earth did you do?" I would have liked to comment on the modifications to the plan having seen the Inspector's report which we are at present denied. Anything I comment on in this consultation does not mean that in any way I accept the inclusion of AS19/AS25 or AS26 in the plan. I also expect that all previous submissions are taken into account.

Suggested Change: Changes required: Remove Cluster 4 sites from plan

Knightsford parish council
1150495/**MSPMod119**

Modification: MM1
Para 2.17

Objector/Support: **Object**

Representation: MM1 Duty to co-operate. There does not appear to be a MM section where we can comment on this consultation process. It is very disappointing that we are having to comment on this document without having the opportunity to read the Inspector's report from the Sept/Oct 2018 examination in public.

Suggested Change: Changes necessary. Inspector's examination in public report should be available as part of the consultation process.

Mr Nigel Hill

Modification: MM2

197579/**MSPMod166** Statement - Sand and Gravel Demand & Supply During the Plan Period

Objector/Support: **Not Stated**

Representation: Three .pdfs attached

5428450_0_1.pdf; 5428452_0_1.pdf; 5428447_0_1.pdf

MSP - MM2 Pt 1- page 17 - green box

MSP - MM2 Pt 2 - rolling 10 year average.pdf

MSP - MM2 Pt 3- rolling 10 year average.pdf;

Knightsford Parish Council

Modification: MM2

1150495/**MSPMod122** Statement - Sand and Gravel Supply During the Plan Period

Objector/Support: **Object**

Representation: Policy AS2 & Strategy para 7.51-54 Sand & Gravel - Monitoring and maintaining separate landbanks. The Mineral Site Plan does not even attempt to present how much Poole Formation Sand & River Terrace gravel will be provided from each site. Industry quality estimates from borehole analysis are available to the proposers and should be, probably is, available to the MPA. If it is not available to the MPA then they are not doing their job properly in assessing sites and the sites should be refused. The information should be made available to the public. In not presenting this information it is impossible to assess whether the plan provides separate sand and gravel landbanks equivalent to at least 7 years' supply in each case as required by the 2019 NPPF 207h, Minerals PPG guidance para"s 81-85 and Minerals policy.

Suggested Change: Make separate landbank information publicly available.

M B Wilkes Ltd

Modification: MM4

197269/**MSPMod62**

Para 3.5

Objector/Support: **Not Stated**

Representation: My client is currently the only producer of sand for industrial purposes in the County. As part of consultations on the development of policies for industrial sand both prior to the hearing in 2018 and in connection with the Modifications now being considered I commented on the relevant wording of the Plan and the Modifications. Others have also commented on the Modifications. Three points arise: (a) It was stressed by myself and others that the chemistry of industrial sand is an important consideration and that this is not merely the presence of a high silica content but the presence and form of other constituents which may be essential or harmful to the industrial end use. Indeed it is often the presence and form of these other constituents that is more significant in defining an industrial use potential than the high silica content because all the sands have a high silica content.

This point is not identified in the Modification (it merely references "high silica content") and not the chemistry of the sand. It is essential that the modified Plan references

'chemistry' in defining the material. (b) In that all the sands extracted for either aggregate or industrial use generally have a high silica content, and that it is the chemistry of the other constituents which is of dominant importance in defining an industrial non-aggregate use, there is a preference for referencing such material as Industrial Sand not Silica Sand. (c) The future supply of industrial sand and the future supply of aggregate can have a relationship by being produced from the same extraction site.

The future provision for sand and gravel as now set out in MM2 and in the treatment of allocations and unallocated sites relates to the supply of aggregate, although that is not always specified as such. It would be helpful to include words in the section on industrial sand stating that the supply of industrial sand is without the calculated further provision for aggregate.

Mr Nigel Hill
197579/**MSPMod167**

Modification: MM4
Para 3.5

Objector/Support: **Not Stated**

Representation: ** See attached .pdf **

5428451_0_1.pdfPDFMSP - MM4 - Silica sand.pdf

Knightsford Parish Council
1150495/**MSPMod123**

Modification: MM3
Para 3.5

Objector/Support: **Object**

Representation: Policy AS2 & Strategy para 7.51-54 Sand & Gravel - Monitoring and maintaining separate landbanks. The Mineral Site Plan does not even attempt to present how much Poole Formation Sand & River Terrace gravel will be provided from each site. Industry quality estimates from borehole analysis are available to the proposers and should be, probably is, available to the MPA. If it is not available to the MPA then they are not doing their job properly in assessing sites and the sites should be refused. The information should be made available to the public. In not presenting this information it is impossible to assess whether the plan provides separate sand and gravel landbanks equivalent to at least 7 years' supply in each case as required by the 2019 NPPF 207h, Minerals PPG guidance para"s 81-85 and Minerals policy.

Suggested Change: Changes necessary. Make separate landbank information publicly available.

Highways England
1181888/**MSPMod8**

Modification: MM5
Para 3.8

Objector/Support: **Not Stated**

Representation: MM5 and MM8 - we note the removal of Site AS12 Philliols Farm and allocation of AS27 Horton Heath. We also welcome the additional text to strengthen the requirement for satisfactory mitigation to be provided.

Mr Nigel Hill
197579/**MSPMod168**

Modification: MM5
Para 3.9

Objector/Support: **Not Stated**

Representation: ** see attached .pdf **

5428444_0_1.pdf PDF MSP - MM5 - allocated sites.pdf

East Stoke Parish Council
911187/**MSPMod42**

Modification: MM5
Para 3.9

Objector/Support: **Object**

Representation: SCHEDULE OF MAIN MODIFICATIONS ; MM5: "The following sites are allocated through Policy MS-1, shown in figure 1".

It is disappointing that item 1) The Great Plantation (AS06) has not been modified to show its precise location. While it does indeed lie south of (but not immediately south of) the Puddletown Road, and is adjacent to the existing Hyde Pit, we would insist for a modification to show its site also as "forming part of Hethfelton Wood, East Stoke." Nowhere in this document is The Great Plantation shown as being within Hethfelton Wood (including in the corrected Habitats Regulations report, where it is now rightly shown as being in the Parish of East Stoke), and East Stoke Parish Council believes that it is important that those making decisions as the Plan progresses should be fully aware of its position within this Open Access land.

Suggested Change: See comments above.

The Moreton Estate
928830/**MSPMod134**

Modification: MM5
Para 3.9

Objector/Support: **Not Stated**

Representation: Please note that text in italics is taken from documents published by the council, with our proposed amendments shown in bold and underlined. MM5 Given the change of wording to Paragraph 3.9 (MM5), the sentence should be further amended to read "Proposals to develop these allocations should must demonstrate that there will be no significant adverse effects on the integrity of European and Ramsar sites."

Mr Nigel Hill
197579/**MSPMod169**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Not Stated**

Representation: ** see attached .pdf **

5428525_0_1.pdfPDFMSP - MM8 - MS-1 - List of sites.pdf

Mrs Hilary Chittenden
224280/**MSPMod39**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Support**

Representation: MM8 EDEP supports the strengthening of wording of Policy MS-1 (Production of Sand and Gravel) from "should" to "must" . This removes all doubt regarding what is required of a developer to ensure protection of European sites.

East Stoke Parish Council
911187/**MSPMod43**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Object**

Representation: SCHEDULE OF MAIN MODIFICATIONS: MM 8: Item i, a, AS06 The Great Plantation, has been modified to show the site as in East Stoke and not in Bere Regis, but does not place it in Hethfelton Wood Nowhere in this document is The Great Plantation shown as being within Hethfelton Wood (including in the corrected Habitats Regulations report, where it is now rightly shown as being in the Parish of East Stoke), and East Stoke Parish Council believes that it is important that those making decisions as the Plan progresses should be fully aware of its position within this Open Access land.

Suggested Change: Please see above comments for modifications.

FRAME (Frome Residents Against Mineral Extraction)
933995/**MSPMod95**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Object**

Representation: Object. There is inconsistency about whether AS19 and AS26 contain river terrace or Poole Formation, these sites are adjacent to one another and are of the same geology. Extraction of Poole Formation means far deeper workings, so impact of the working operations of the varying forms on the land and River Frome will be very different. The MPA are still failing to define separate land banks for Poole Formation and River Terrace deposits as required by the NPPF. There is still no allocation for recycled aggregate meaning the requirement is overstated. The plan continues to be unsound.

Suggested Change: Changes. Accurately determine and differentiate between river terrace and Poole Formation allocations. Also, state any adverse environmental impacts on the integrity of the river Frome, European and Ramsar sites of extracting the differing forms.

Mr John Wickenden
1148225/**MSPMod76**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Object**

Representation: Objection text: There is inconsistency about whether AS19 and AS26 are containing river terrace or Poole Formation as these sites are adjacent to one another and are of the same geology. Any extraction of Poole Formation means far deeper workings so impact on the land and River Frome will be very different. The MPA are still failing to define separate land banks for Poole Formation and River Terrace deposits as required by the NPPF. There is still no allocation for recycled aggregate meaning the requirement is overstated. The plan is therefore unsound.

Suggested Change: Changes required: Remove Cluster 4 sites from plan

Knightsford Parish Council
1150495/**MSPMod124**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Object**

Representation: Policy AS2 & Strategy para 7.51-54 Sand & Gravel - Monitoring and maintaining separate landbanks. The Mineral Site Plan does not even attempt to present how much Poole Formation Sand & River Terrace gravel will be provided from each site. Industry quality estimates from borehole analysis are available to the proposers and should be, probably is, available to the MPA. If it is not available to the MPA then they are not doing their job properly in assessing sites and the sites should be refused. The information should be made available to the public. In not presenting this information it is impossible to assess whether the plan provides separate sand and gravel landbanks equivalent to at least 7 years' supply in each case as required by the 2019 NPPF 207h, Minerals PPG guidance para"s 81-85 and Minerals policy.

Suggested Change: Changes necessary. Make separate landbank information publicly available.

Highways England
1181888/**MSPMod9**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Not Stated**

Representation: MM5 and MM8 - we note the removal of Site AS12 Philliols Farm and allocation of AS27 Horton Heath. We also welcome the additional text to strengthen the requirement for satisfactory mitigation to be provided.

Dorset Wildlife Trust
1215894/**MSPMod44**

Modification: MM8
Policy MS1: Production of sand and gravel

Objector/Support: **Support**

Representation: DWT supports the strengthening of wording in MS-1 C to require all the development guidelines to be addressed, as well as cumulative effects, and that proposals must demonstrate that there would be no adverse effects on integrity of internationally designated sites.

Aggregate Industries UK
1217481/MSPMod63

Modification: MM9
Para 3.1

Objector/Support: **Not Stated**

Representation: Background The need for main modifications to the approach and policy on unallocated sites are based on the discussions that took place at the EiP where the Inspector specifically stated that there needs to be opportunities for mineral sites in the AONB to come forward that meet the tests of para 172 of the NPPF. It is therefore crucial that the main modifications address the issue of working within the AONB

This provides new supporting text for policy MS2 and now sets out the approach to be taken in respect of unallocated sites both within and outside the Superficial and Bedrock Aggregate Resource Blocks. The reference to working within the AONB is noted but the exceptional circumstances test in national policy should be qualified in that it only applies to major development, as defined in the NPPF, see footnote 55.

We would therefore propose the following re-wording of the paragraph dealing with unallocated sites outside the Resource Blocks:

"Points i-iv also apply to the proposed development of unallocated sites outside the Resource Blocks. Proposals for unallocated sites outside the Resource Blocks are likely to comprise land within an AONB and where major development is proposed the exceptional circumstances test would have to be demonstrated in line with the NPPF. Proposals for unallocated sites which are both outside the AONB and the Resource Blocks are thought to be unlikely and are likely to be subject to other environmental constraints, however if proposals come forward they will be judged on their merits and against all relevant policies in the Minerals Strategy and Minerals Site Plan."

Suggested Change: see above

Aggregate Industries UK
1217481/MSPMod64

Modification: MM11
Para 3.1

Objector/Support: **Not Stated**

Representation: Main Modification 11 The proposed re-wording of Policy MS2 does not reflect the approach taken in the supporting text outlined above and only seeks to provide policy guidance for sites within the Superficial and Bedrock Aggregate Resource Blocks which have been drawn to exclude land subject to constraints such as the AONB. This does not therefore address the point made by the Inspector at the EiP. It is noted in the new supporting text that the Plan seeks to apply the same 4 tests to sites coming forward whether they are within the resource blocks or not.

Therefore in order for the revised policy to address all the scenarios outlined in the proposed new supporting text ie unallocated sites within resource blocks and outside resource block the policy needs to delete reference to the resource blocks so that it simply applies to all unallocated sites, as follows:

MS2 Proposals for sand or gravel extraction from unallocated sites will only be permitted where they meet all of the following criteria: In addition the first criteria of the policy does not fully reflect the approach set out in the supporting text in respect of net environmental gain and the following text should be inserted: i) There is a demonstrable shortfall in supply (determined through assessing the size of the landbank and the existing and/or projected level of demand), particularly if a site proposal contributes to meeting a shortfall in a specific type of aggregate; or unless it involves prior extraction of sand and gravel in

advance of non-mineral development where this would avoid the permanent sterilisation of safeguarded minerals; or unless it provides a net environmental gain.

Suggested Change: see above

Mr Nigel Hill
197579/**MSPMod170**

Modification: MM9
New Section

Objector/Support: **Not Stated**

Representation: ** 2x .pdfs attached **

5428446_0_1.pdf; 5428449_0_1.pdf

MSP - MM9 - Area Search - Unallocated Sand Grav sites.pdf;

MSP - MM9 - Area Search - Resource blocks.pdf

Knightsford Parish Council
1150495/**MSPMod125**

Modification: MM9
New Section

Objector/Support: **Object**

Representation: This section refers to constraints on mineral extraction imposed on areas such as AONB"s. It should also recognise other constraints from impacts on Cultural Heritage assets (including their setting) where there is also not a presumption in favour of mineral development per Feb 2019 NPPF section 16 paras 184-202.

Suggested Change: Changes necessary . Include all constraints.

Dorset Wildlife Trust
1215894/**MSPMod45**

Modification: MM9
New Section

Objector/Support: **Not Stated**

Representation: We note the deletion of the area of search for aggregates and inclusion of policies for unallocated sites. The concern here is that sites may come forward where extraction would be harmful to nature conservation sites, habitats and species, or indeed could contribute to restoration of nature in time, in a more ad hoc nature than would happen with allocated sites alone. It is essential that proper environmental assessment is not bypassed if such sites come forward, and rushed decisions not made without adequate information if they are in response to a supply shortage. We welcome the text (bullet iii in MM9) seeking net environmental gain and contributions to ecological networks. However, the revised wording of policy MS-2, criterion iii (MM11) is a little vague (see comments on MM11).

Dorset Wildlife Trust
1215894/**MSPMod46**

Modification: MM11
Policy MS2: Unallocated sand and gravel site

Objector/Support: **Not Stated**

Representation: We note the deletion of the area of search for aggregates and inclusion of policies for unallocated sites. The concern here is that sites may come forward where extraction would be harmful to nature conservation sites, habitats and species, or indeed could contribute to restoration of nature in time, in a more ad hoc nature than would happen with allocated sites alone. It is essential that proper environmental assessment is not bypassed if such sites come forward, and rushed decisions not made without adequate information if they are in response to a supply shortage. We welcome the text (bullet iii in MM9) seeking net environmental gain and contributions to ecological networks. However, the revised wording of policy MS-2, criterion iii (MM11) is a little vague. Though it is welcome that it requires that any adverse impacts must mitigated, it would be helpful if the criteria were revised.

Suggested Change: Though it is welcome that it requires that any adverse impacts must be mitigated, it would be helpful if the criteria were revised to state: "iii In all cases, sites must undergo thorough screening and impact assessment against the same criteria as allocated sites, and any adverse impacts must be avoided in the first instance, mitigated and net environmental enhancements agreed to the satisfaction of the Mineral Planning Authority;"

Mrs Sally Feben Smith
1148253/**MSPMod21**

Modification: AM9
Para 3.26

Objector/Support: **Object**

Representation: There are no exceptional circumstances for this extension to go ahead. The MPA acknowledges that there is an adequate supply of crushed rock within a reasonable distance of this area. To allow the extension of this site is a matter of convenience only. It does not warrant the destruction of this highly visible part of an AONB.

Mrs Jackie Barker
933323/**MSPMod111**

Modification: MM12.1
Policy MS3: Swanworth Quarry Extension

Objector/Support: **Not Stated**

Representation: This point states that if the quarry destroys the landscape, some sort of environmental compensation is required to make up for the destruction of this ancient landscape. There is NOTHING that will compensate for the loss of this landscape and once it's gone sadly it will be too late for retribution. This AONB will have disappeared.

Mr Philip Collins
1009164/**MSPMod86**

Modification: MM12.1
Policy MS3: Swanworth Quarry Extension

Objector/Support: **Object**

Representation: The development of the new Swanworth quarry has to be appraised under the NPPF "exceptional circumstances" test regarding AONBs. All three limbs of the test have to be satisfied; and, if they are satisfied, in addition there have to be overriding public benefits that outweigh the protection given to the AONB. It is only at that stage that any issue of compensatory landscape enhancement arises.

The issue does not arise under the third limb of the NPPF test. The modification therefore presents a highly confusing and misleading picture of the position. In this case, it is highly unlikely based on the evidence that the new Swanworth quarry can satisfy the three limbs of the NPPF test. Even if they could be satisfied, the overriding public benefits are not borne out by the evidence presented in public before the MPA and the Inspector - and no new evidence has been produced. It should be recalled that the MPA withdrew the claim in the earlier text of the plan that Portland suppliers could not meet the demand for crushed rock (Portland suppliers stated in evidence that they could) and the MPA has failed throughout the plan preparation process to investigate and consider objectively all alternatives, including supply by rail. The modification further demonstrates that the plan is not sound in relation to Crushed Rock and the new Swanworth quarry. Positive preparation has not been undertaken; it cannot be justified as the strategy for crushed rock is not appropriate when considered against reasonable alternatives, based on proportionate evidence; it is not effective and it is not consistent with national policy as it is highly unlikely to be deliverable within the NPPF.

Suggested Change: The site should be removed as an allocated site from the Plan.

Mrs Sally Feben Smith
1148253/**MSPMod18**

Modification: MM12.1
Policy MS3: Swanworth Quarry Extension

Objector/Support: **Object**

Representation: The proposed site, formed 3.8 billion years ago, is part of our ancient, historical landscape. There is no legal justification within an AONB for removing one single atom from it. If it is carved up, no amount of "compensatory environmental enhancement" will adequately mitigate for the loss of this hugely visible area. The inclusion of this 'compensation' is a get-out clause to appease planning officials in the belief that it justifies such destruction.

Suggested Change: Remove the site from the Mineral Plan.

Mrs Sally Feben Smith
1148253/**MSPMod22**

Modification: MM12.1
Policy MS3: Swanworth Quarry Extension

Objector/Support: **Object**

Representation: There will be an adverse impact if this site goes ahead as discussed at the October hearing last year. No amount of "compensatory mitigation" can replace this natural environment on the Purbeck uplands.

Dorset AONB Team
1148613/**MSPMod26**

Modification: MM12.1
Policy MS3: Swanworth Quarry Extension

Objector/Support: **Object**

Representation: The modification should make it clear that any compensation would not form part of the appraisal of the development in relation to the NPPF exceptional circumstances test concerning AONBs (para 172). In my opinion, compensatory measures should only be considered if an application is considered to meet all three aspects of the test and if there are deemed to be overriding public benefits that outweigh the protection afforded to the AONB.

Should such a case be established, which is a position which the AONB Team regards as highly doubtful to occur in light of the questionable need for the extension, recourse to compensatory landscape enhancement funding could be supported through reference to Dorset AONB Management Plan 2019-24 Policy C2.f: "Proposals that are harmful to the character and appearance of the area will not be permitted unless there are benefits that clearly outweigh the significant protection afforded to the conservation and enhancement of the AONB. Where impacts cannot be mitigated, planning gain and compensatory measures will be considered." However, the consideration given to such measures would not form part of the third part of the NPPF test. The reference within NPPF 172.c to 'moderation' of effects would be considered to relate to conventional mitigation, whereas compensatory measures would be considered separately following the consideration of exceptional circumstances.

Dr Mary Sparkes
1209682/**MSPMod1**

Modification: MM12.1
Policy MS3: Swanworth Quarry Extension

Objector/Support: **Object**

Representation: The modification suggests that if there is 'any adverse landscape and visual impact that cannot be avoided or adequately mitigated', 'compensatory enhancements' will be required. Surely that is what 'mitigation' means? The visual impact, in such an exposed area will be huge, and to think otherwise is disingenuous. Quite apart from the potential loss of the historical site (the tumuli etc in the area have been conveniently forgotten, it seems) the wording of the modification seems to be a way of 'getting out' of AONB and other requirements.

Suggested Change: The planned allocation should be removed from the plan.

Mr Richard Sedgley

Modification: MM72

1210559/**MSPMod15**

Policy MS3: Swanworth Quarry Extension

Objector/Support: **Object**

Representation: Any proposal to extend Swansworth Quarry should require that it justifies the test of exceptional circumstances, including the availability of alternative sources of crushed rock. The effect of the passage of HGVs travelling to and from Swansworth Quarry should be taken into account in considering any proposal for extension, both in terms of the natural and built environment in Purbeck.

Suttle Stone Quarries - Mr Steve Lamb

Modification: MM12.1

1210840/**MSPMod19**

Policy MS3: Swanworth Quarry Extension

Objector/Support: **Support**

Representation: The modification is supported and reflects the discussions held at the EIP.

Suggested Change: No changes considered necessary.

The Moreton Estate

Modification: MM22.1

928830/**MSPMod135**

Policy MS8: Preventing land-use conflict

Objector/Support: **Not Stated**

Representation: Please note that text in italics is taken from documents published by the council, with our proposed amendments shown in bold and underlined. We note that MM22.1 includes "To minimize land-use conflict, Policy MS-8 9 establishes a 250m consultation area around each minerals site" which could infer the safeguarding of permitted sites only. This should be amended to include a clarification that the consultation areas will be applied around "each permitted and allocated mineral site". For the sake of clarity, the allocated sites should also be included in the safeguarded sites listed in Appendix B.

Suggested Change: see above

FRAME (Frome Residents Against Mineral Extraction)

Modification: MM24

933995/**MSPMod96** Table 2 :Implementation and Monitoring Framework - Mineral Sites Plan

Objector/Support: **Object**

Representation: Object. Policy AS2 & Strategy para 7.51-54 Sand & Gravel - Monitoring and maintaining separate landbanks. The Draft Mineral site plan does not identify which sites are Poole formation sand & which are River Terrace gravel landbanks so fails to calculate and maintain separate landbanks equivalent to at least 7 years' supply in each case as required by the NPPF (see para"s 81-85) and Minerals policy. In monitoring supply the MPA/DC need to understand where the minerals are being delivered to. DC/MPA strategy document 2014 states that lorries should not be covering more than 40 miles from any quarry. This is being routinely ignored as observations of lorries and their company addresses proves.

Suggested Change: Changes. DC, as custodians of the county, must apply their own policies correctly to protect the Dorset countryside.

Mr John Wickenden

Modification: MM24

1148225/**MSPMod77** Table 2: Implementation and Monitoring Framework - Mineral Sites Plan

Objector/Support: **Object**

Representation: Objection text: In monitoring supply the MPA/DC need to understand where the minerals are being delivered to. DC/MPA strategy document 2014 states that

lorries should not be covering more than 40 miles from any quarry. This is being routinely ignored as observations of lorries and their company addresses proves. DC should review the need and apply their own policies correctly thus saving the destruction of Dorset countryside.

Suggested Change: Calculate the minerals need for a 40 mile radius only and then remove Cluster 4 sites from plan.

Knightsford Parish Council

Modification: MM24

1150495/**MSPMod126** Table 2: Implementation and Monitoring Framework - Mineral Sites Plan

Objector/Support: **Object**

Representation: Policy AS2 & Strategy para 7.51-54 Sand & Gravel - Monitoring and maintaining separate landbanks. The Mineral Site Plan does not even attempt to present how much Poole Formation Sand & River Terrace gravel will be provided from each site. Industry quality estimates from borehole analysis are available to the proposers and should be, probably is, available to the MPA. If it is not available to the MPA then they are not doing their job properly in assessing sites and the sites should be refused. The information should be made available to the public. In not presenting this information it is impossible to assess whether the plan provides separate sand and gravel landbanks equivalent to at least 7 years' supply in each case as required by the 2019 NPPF 207h, Minerals PPG guidance para's 81-85 and Minerals policy.

Suggested Change: Changes necessary. Make separate landbank information publicly available.

Knightsford Parish Council

Modification: MM29

1150495/**MSPMod127**

Table 5

Objector/Support: **Object**

Representation: There does not appear to be any indication of where the site for provision of recycled aggregates will be. Recycling obviously introduces crushing noise so there is an understandable concern that they will be added to sites in the proposal to prolong their life.

Suggested Change: Changes necessary. Give an indication of where the recycling sites will be.

East Stoke Parish Council

Modification: MM36

911187/**MSPMod59**

Site AS-06: Great Plantation

Objector/Support: **Object**

Representation: SCHEDULE OF MAIN MODIFICATIONS; MM 36. Site AS06 "Offsite mitigation should be provided in advance of the development of the site. Specific mitigation measures identified include: "Creation of an off-site heathland support area to mitigate displaced recreation." East Stoke Parish Council would wish this clause to be extended to specify that this area of mitigation affecting displaced Open Access walks/tracks should be contiguous with those already in use within Hethfelton Wood and afford a circular route as available at present. East Stoke Parish Council would find it unacceptable that an area of replacement land should be located away from the present peripheral area of the site, or (as has been informally suggested) outside the Parish.

Suggested Change: Please see above comments for modifications.

East Stoke Parish Council

Modification: AM28

911187/**MSPMod60**

Site AS-06: Great Plantation

Objector/Support: **Object**

Representation: SCHEDULE OF ADDITIONAL MODIFICATIONS; Site AS06 AM 28:

As commented under MM5 and MM8 the location of site AS06 has been modified to show it correctly as within the Parish of East Stoke, and south of the Puddletown Road. This might be seen as directly south of the Puddletown Road, which is not the case, and it does not place it within Hethfelton Wood. East Stoke Parish Council sees this as an important omission, as those taking decisions as the Plan progresses should be made fully aware of its location.

Suggested Change: Please see above comments for modifications.

East Stoke Parish Council
911187/**MSPMod61**

Modification: AM29
Site AS-06: Great Plantation

Objector/Support: **Object**

Representation: SCHEDULE OF ADDITIONAL MODIFICATIONS; AM 29: Other issues to take into consideration. Site AS06 Item a. "The site is open access and any loss of access, even if only temporary, must be replaced by other opportunities for the public". East Stoke would have wished this clause to have been modified to specify that such opportunities should be made available within the area of Hethfelton Wood surrounding the site, and that walks/paths should be contiguous with those already in use (see comments under MM 36 above).

Suggested Change: Please see above comments for modifications.

Dorset Wildlife Trust
1215894/**MSPMod47**

Modification: MM36
Site AS-06: Great Plantation

Objector/Support: **Support**

Representation: We welcome the additional requirements for Great Plantation, to address the Habitats Regulations Assessment.

West Parley Parish Council
814649/**MSPMod118**

Modification: MM 5
Site AS-09: Hurn Court Farm Quarry, Hurn, Christchurch

Objector/Support: **Not Stated**

Representation: pleased to note the deletion of Hurn Court Farm Quarry

New Forest District Council
820357/**MSPMod2**

Modification: MM42
Site AS-13: Roeshot, Christchurch

Objector/Support: **Support**

Representation: New Forest District Council is content that the comments it submitted in January 2018 have been adequately addressed in the modifications regarding Site AS-13 (Roeshot, Christchurch). In particular the changes positively help to clarify that 1) the two mineral sites at Roeshot are not to be worked simultaneously, and 2) it is also more specific about Habitats Regulations Assessment requirements and the need for SANG provision for the Christchurch urban extension.

New Forest District Council
820357/**MSPMod3**

Modification: MM47
Site AS-13: Roeshot, Christchurch

Objector/Support: **Support**

Representation: New Forest District Council is content that the comments it submitted in January 2018 have been adequately addressed in the modifications regarding Site AS-13 (Roeshot, Christchurch). In particular the changes positively help to clarify that 1) the two mineral sites at Roeshot are not to be worked simultaneously, and 2) it is also more specific

about Habitats Regulations Assessment requirements and the need for SANG provision for the Christchurch urban extension.

Dorset Wildlife Trust
1215894/**MSPMod48**

Modification: MMs 43, 44, 46, 47
Site AS-13: Roeshot, Christchurch

Objector/Support: **Support**

Representation: We welcome the additional requirements for Roeshot, to address the Habitats Regulations Assessment, New Forest National Park and other designated sites, and to ensure delivery of SANGs within Christchurch.

Highways England
1181888/**MSPMod10**

Modification: MM50
Site AS-15: Tatchells Quarry Extension, Wareham

Objector/Support: **Not Stated**

Representation: We note and welcome the inclusion of additional text regarding cumulative impacts with the operation of the Trigon ball clay quarry.

Mr Nigel Hill
197579/**MSPMod172**

Modification: MM56
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: ** See attached .pdf **

5428448_0_1.pdf

MSP - MM56 60 - St Rd - devel guidelines.pdf

Historic England
233457/**MSPMod121**

Modification: MM 53
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Thank you for sharing the proposed post hearing modifications. We note the numerous revisions relating to our previous involvement and correspondence. The only issue we feel requires further comment is in relation to the proposed allocation at Woodsford (AS 19). The relevant extract is as follows: Mineral from the extension should continue to be processed at the existing plant site, with no intensification of production or simultaneous working of the current site and extension. Mineral will be transported from the point of extraction to the processing site via internal routes within the quarry. No external roads will be used for transport to the processing site. (MM53) Access to the site will be via the existing access.

A Transport Assessment will be required, to assess possible impacts and identify appropriate mitigation. The Minerals Authority will be aware that Historic England is anxious to ensure that any required additional silting lagoons at the existing Woodsford quarry avoid harm to the significance of Woodsford Castle (Grade 1 listed), which lies immediately to the north. It would be helpful if the Authority were to clarify in the Plan that any additional lagoons or processing infrastructure required in relation to AS 19 shall be located and designed in such a way as to avoid or minimise harm to the significance of Woodsford Castle.

FRAME (Frome Residents Against Mineral Extraction)
933995/**MSPMod100**

Modification: MM55
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Object. In addition to the protection of the National Grid power lines protection should be afforded to the isolated trees within AS19.

Suggested Change: Include the protection of isolated trees within sites.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM56
933995/**MSPMod101** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Object. The impact of visual, noise, vibration and dust to the sensitive areas north of AS19 and AS26 must be considered for soil stripping and restoration as well as quarrying operations. It must be acknowledged that bunds and tree planting do not mitigate against noise; ref. BS5228.

Suggested Change: Include soil stripping and restoration within the impact assessment.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM57
933995/**MSPMod102** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Object. The proposed "restoration" to wetland is contrary to returning to its original agricultural use. Also, such wetlands have not been proven in reducing phosphates, nitrogen and sediment loads; many of these pollutants are currently generated further upstream in Dorchester. The Plan does not state how or the extent of recreational amenity will be achieved. The current landowner has ensured, through planning law, that there are no public rights of way across AS26.

Suggested Change: There must be a full scientific assessment carried out to determine the efficacy of wetlands and the impacts of quarrying operations on the River Frome, SSSI and Ramsar sites.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM52
933995/**MSPMod165** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Object. The impact assessment on the River Frome that must be carried out should not be limited to commercial interests but must include the natural flora and fauna; a rare chalk stream with unique salmon species.

Suggested Change: Changes. A full and wide assessment on the River Frome.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM52
933995/**MSPMod97** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: MM52 Object. The impact assessment on the River Frome that must be carried out should not be limited to commercial interests but must include the natural flora and fauna; a rare chalk stream with unique salmon species.

Suggested Change: A full and wide impact assessment on the River Frome.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM53
933995/**MSPMod98** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Object. Internal routes should be kept away from the northern boundary of AS26 to reduce dust, vibration and noise from Tincton, Pallington and Sculpture by the Lakes.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM54

933995/**MSPMod99** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Object. The Plan does not make it clear that soil stripping, quarrying and restoration work all contribute to the cumulative impact assessment.

Suggested Change: Define the word "worked" to include soil stripping, quarrying and restoration operations.

Mr John Wickenden Modification: MM52
1148225/**MSPMod78** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Objection text: Impact assessment on River Frome fisheries must be conducted is welcome but should not only refer to just fisheries as this implies commercial but should also refer to all fauna & flora as the River has a unique chalk stream environment. The genes of Atlantic salmon in the river have been proven to be completely unique to the river.

Changes required: Review all fauna & flora not just fisheries.

Mr John Wickenden Modification: MM53
1148225/**MSPMod79** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Objection text: Additionally internal routes need to be kept away from northern boundary to reduce dust, vibration and noise impact on Pallington and Sculpture by the Lakes.

Suggested Change: Changes required: Internal routes need to be kept away from northern boundary.

Mr John Wickenden Modification: MM54
1148225/**MSPMod80** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Objection text: The plan still lacks substance on this subject. The use of the word "must" is welcome to ensure Operators and Planners understand the impact properly and resulting mitigation measures must be made mandatory.

Changes required: Make mitigations mandatory

Mr John Wickenden Modification: MM56
1148225/**MSPMod81** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Objection text: Welcome the word "must" to ensure Operators and Planners understand the impact properly but must include all operations: ie soil stripping and restoration. Once again the MPA must recognise that BS5228 states that bunds and tree mitigation is ineffective against noise impact.

Changes required: Make mitigations mandatory.

Mr John Wickenden Modification: MM57
1148225/**MSPMod82** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Objection text: The reduction of phosphate etc is unproven and the restoration vision is completely misleading, uneconomic and impractical. The main source of pollutants is from up-stream in Dorchester/Poundbury. The plan now states that there will be hydraulic connection with the River and hence with the SSSI and RAMSAR site which means a full scientific assessment needs to be conducted now to determine impact.

Changes required: Remove AS19 from plan.

Mr John Wickenden Modification: MM57.1
1148225/**MSPMod83** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Objection text: The words "should be" need to be replaced by the word "must" , otherwise Operators will find ways of ignoring these essential guidelines. There are no reasons what-so-ever for removing hedges as every field has a gateway, the case stating "convenience" is unacceptable.

Changes required: Remove AS19 from plan.

Knightsford Parish Council Modification: MM57.1
1150495/**MSPMod128** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: The section mentions a full heritage and setting assessment. It is also a requirement as a schedule 1 development under Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that an Environmental Impact Assessment is mandatory. NB. An EIA was not carried out for the Woodsford Quarry's 2005 planning application. The full heritage and setting assessment must include the impact of silt lagoons required for AS19 gravel washing on the setting of Grade 1 listed Castle.

Given Woodsford Quarry's current plans to expand by 7 ha (for 10yrs quarrying) the existing quarry's silt lagoons into the setting of Woodsford Castle because there is nowhere else to put them, then it follows that the silt lagoons needed for AS19 can only further encroach on the Castle's setting.

2a refers to employing parcel by parcel extraction and leaving hedgerow and tree boundaries intact as far as possible. Stating as "far as possible" leaves the wide door open for the MPA and mineral companies to completely remove any "inconvenient" trees or hedges. All the fields in AS19 have gateways so are accessible. There is no reason for any hedgerows or trees to be lost. 2b refers to "compensative mitigation". There is no description in the glossary. What is this? 2d refers to appropriate evaluation. What is an appropriate evaluation?

Suggested Change: Changes necessary. 1) Add the requirement for an EIA which covers all aspects of any sites planning application, 2) Clearly state that CH assessment must cover impact on Grade1 Woodsford Castle, 3) Make it clear that hedges and trees must only be lost in exceptional circumstances when there is no other way of accessing a field, 4) Add a definition/examples of compensative measures to the glossary, 5) Define who will carry out appropriate evaluation.

Knightsford Parish Council Modification: MM52
1150495/**MSPMod129** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Refers to impact on fisheries in the Frome. Fisheries implies a commercial fish farm. This section should encompass impacts on wild fish and all fauna and flora.

Suggested Change: Changes necessary. add wild fish, Fauna & Flora.

Knightsford Parish Council
1150495/**MSPMod130**

Modification: MM54
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Cumulative Impacts must be considered as part of the mandatory Environmental Impact Assessment for this Schedule 1 site per Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Para a,b,c It should be made clear that "worked" means soil stripping, quarrying and restoration activities lest the operator claim that it only applies to sand and gravel digging operations. The Cumulative Impact Assessment must include the Cumulative impact of silt lagoons required for AS19 gravel washing on Woodsford Village amenities and the setting of Grade 1 listed Castle. Given Woodsford Quarry"s current wish to expand by 7 ha the existing quarry"s silt lagoons towards the village and into the setting of Woodsford Castle because there is nowhere else to put them, then it follows that the silt lagoons needed for AS19 can only further encroach on the Village and the Castle"s setting.

Suggested Change: Changes necessary. a) Make clear that working means soil stripping, aggregate extraction & restoration, b) Clearly state that CH assessment must cover impact on Grade1 Woodsford Castle, Woodsford village and its amenities.

Knightsford Parish Council
1150495/**MSPMod131**

Modification: MM55
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: There is an old large single oak close to the southern most pylon. It can easily be protected on the unquarried island around the pylon.

Suggested Change: Changes necessary. Just state that single trees should be protected where practical eg, close to pylon or hedge.

Knightsford Parish Council
1150495/**MSPMod132**

Modification: MM56
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: Refers to "..it may be necessary to limit extraction to winter months.." This should also include the noisier soil stripping and restoration activities associated with extraction.

Suggested Change: Changes necessary. Make clear that winter month limitation applies to soil stripping, extraction & restoration.

Knightsford Parish Council
1150495/**MSPMod133**

Modification: MM57
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Object**

Representation: To date there has been no reports/proof showing that large scale wetland restoration will significantly reduce phosphate, nitrogen and sediment load in the river. There has also be no indication of how the scheme will provide significant recreational opportunities -significant implies something significantly more than a footpath - eg RSPB / public access nature reserve? Public access kayaking lakes?

Suggested Change: Changes necessary. a) Provide report or data supporting significant reductions, b) provide examples of what significant recreational opportunities means.

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - p.108 para. 11.2

1150495/**MSPMod147**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 108 11.2. Refers to compressors which are not a usual item at the quarry face. This should be more specific to noisy quarrying equipment such as reverse alarms (including white noise alarms), Bulldozer tracks, Digger and front loader buckets. And, the continuously noisy grading/screening machines that separate aggregate at the quarry face.

Knightsford Parish Council
1150495/**MSPMod148**

Modification: Sustainability Appraisal MSPSD18
Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 129 6th bullet point. States " the fact that this is an extension site, and the processing plant and other infrastructure is already available" is not in fact correct as the extension will require additional silt lagoons in the setting of Woodsford Castle.

5428668_0_1.pdf;

5428680_0_1.pdf;

5428681_0_1.pdf;

5428682_0_1.pdf;

5428683_0_1.pdf

msdcc85-screening-of-proposed-sites-for-cumulative-impacts-may-2019 with KPC
comments.pdf;

KPC comments on Cumulative Impact Assessment MSPSD85 - June 2019
consultation.docx.pdf;

KPC comments on Sustainability Assessment MSPSD18 - June 2019 consultation.pdf; KPC
comments on Main Modifications to Draft Mineral Site Plan -June 2019.pdf; mspsd18-
sustainability-appraisal-may-2019-pages-1-288 with KPC comments corrected 200619.pdf

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - p.172, Sus
Objective 2

1150495/**MSPMod149**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 171, Item 2 European/international designations. Mitigation is
directly at odds to later statements saying land will be returned to pre-quarry level
agricultural land. Which is it!?

Suggested Change:

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 172,
item 2 protected species

1150495/**MSPMod150**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 172, item 2 protected species. Water voles are in severe decline. How
will this be managed during and after quarrying?

Suggested Change:

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 172,
item 2 ancient trees

1150495/**MSPMod151**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 172, item 2 ancient trees. There are large oaks in the fields (not the
hedgerows) of AS19. One in particular is close to a pylon so could easily be saved if it is

included in the unquarried island around the pylon. Similarly there are isolated oaks close to hedgerows which could be included in the hedgerow quarry margin.

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 174, Item 6, Historic buildings, first bullet point
1150495/**MSPMod152** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 174, Item 6, Historic buildings, first bullet point. This statement does not take into account the impact on Grade 1 listed Woodsford Castle's setting (a building of the highest importance not mentioned in this document!). AS19 will require silt lagoons (again not mentioned anywhere in this document!). The Quarry and Landowner have already ruled out using land South of the Woodsford Quarry processing plant due to severe constraints on proposed housing plans in the exiting quarry (even though the housing is not in the local plan) The only place therefore is closer to grade 1 listed Woodsford Castle, the village and its amenities. This cumulative impact on the Castle's setting and noise impact on residents for a further 10 years must be taken into account. Second bullet point. Restoration proposals bear no resemblance to Historic Hardy landscape. Unless they are proposing that dairy herds learn to swim! The third bullet point. Refers to enhancing the historic environment. This is complete nonsense when the objective is to dig up and destroy the historic water meadows

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 175, item 9
1150495/**MSPMod153** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 175, item 9. This is completely at odds with other parts of the documentation suggesting lakes?

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 176, Item 13, 2nd bullet point
1150495/**MSPMod154** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 176, Item13, 2nd bullet point. The negative economic impact must be expressed explicitly. It was agreed by the Inspector at the 2018 examination that Sculpture by the Lakes, one of Dorset's most popular tourist attractions, is a Cultural Heritage asset. It's current tranquility will be destroyed by quarrying activity which KPC, the MPA, and the quarry operators and their agents, know full well cannot be mitigated by soil bunds or tree screens.

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 178, item 17, impact on existing settlements
1150495/**MSPMod155** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 178, item 17, impact on existing settlements. Per Feb 2019 NPPF 205c the first and obvious stage is to eliminate noise at source. NPPF PPG para 019 states "identify proposals to minimise, mitigate or remove noise emissions at source"; It is well established from British Standard 5228, the standard applicable to quarry noise that bunds are not effective at distances over 250m and that tree screens are not effective noise barriers. This is also very well known to the MPA due to the failure of bunds and trees to attenuate noise at the existing Woodsford Quarry leading to noise conditions being broken at the closest residence.

Knightsford Parish Council Modification: Sustainability Appraisal MSPSD18 - Page 179, item 18, PRowS

1150495/**MSPMod156**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 179, item 18, PRowS. To the North of the site on the West side of the bridge on Watery lane, and across the field just the other side of the river there are footpaths that are not used because footbridges across the river and the North channel are not present - the council has no money. Footbridges across the river and channel should be part of the 'compensative measures'

Knightsford Parish Council Modification: Cumulative Impact Assessment document MSDCC-85 -- page 2, Further work

1150495/**MSPMod157**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Page 2, Further Work. The only references in this document to an Environmental Impact Assessment is in the cultural heritage sections of AS19,25&26. EIA covers all aspects of a development including Cumulative Impact - not just Cultural Heritage. Per EIA regs any quarry larger than 25Ha qualifies as a Schedule 1 development requiring EIA at planning application stage.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 -- AS19, Page 57, item 2, comments

1150495/**MSPMod158**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: DG should also include loss of large single trees within fields all of which are close to hedges or pylons.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 -- AS19, page 67, section 6, noise

1150495/**MSPMod159**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: AS19, page 67, section 6, noise. LSE/impacts due to the noisier soil stripping and restoration activities must also be taken into account. These negative economic impacts must be expressed explicitly. It was agreed by the Inspector at the 2018 examination that Sculpture by the Lakes, one of Dorset's most popular tourist attractions, is a Cultural Heritage asset. Its tranquility will be destroyed by quarrying activity which KPC, the MPA, and the quarry operators and their agents, know full well cannot be mitigated just by soil bunds or tree screens.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 -- AS19, page 60, soil, permanent column

1150495/**MSPMod160**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: AS19, page 60, soil, permanent column. This is disingenuous. It is more than likely that a significant amount of land will be lost.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 -- AS19, page 66, item 6, Historic Landscapes

1150495/**MSPMod161**

Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: AS19, page 66, item 6, Historic Landscapes. This assessment completely fails to recognise the LSE/impact on the setting of Grade 1 Listed Woodsford Castle. Based on the current application for an additional 7 hectares of silt lagoon area for the remaining 10 year life of the existing quarry, then there is a requirement for an additional 7 hectare silt lagoon requirement for AS19. This will impact the setting of the castle as, according to the operator, there is nowhere else to put the lagoons in the existing quarry close to the processing plant where the quarry is washed which will not affect the setting of the castle.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 --
AS19 page 67 item 6 Historic Buildings Secondary LSE
1150495/**MSPMod162** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: AS19 page 67 item 6 Historic Buildings Secondary LSE. As per Historic Landscape comment above. This assessment completely fails to recognise the LSE/impact on the setting of Grade 1 Listed Woodsford Castle. Based on the current application for an additional 7 hectares of silt lagoon area for the remaining 10 year life of the existing quarry, then there is a requirement for an additional 7 hectare silt lagoon requirement for AS19. This will impact the setting of the castle as, according to the operator, there is nowhere else to put the lagoons in the existing quarry close to the processing plant where the quarry is washed which will not effect the setting of the castle.. Stating "none expected" in the secondary LSE column highlights the complete blind spot the MPA has regarding cumulative impact from the extending the life and area of the current quarry to accommodate AS19.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 --
AS19, page 68, item 7, Landscape
1150495/**MSPMod163** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: AS19, page 68, item 7, Landscape. There is no reason why any trees or hedgerows should be lost. All the fields are currently accessible. As mentioned above there will be secondary effects on the setting of Woodsford Castle due to the requirement for silt lagoons for AS19 near the existing quarry's processing plant.

Knightsford Parish Council Modification: Cumulative Impact Screening MSDCC-85 --
AS19, page 69, item 17, Amenity, Secondary and Cumulative columns
1150495/**MSPMod164** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: AS19, page 69, item 17, Amenity, Secondary and Cumulative columns. Operating the processing plant for a further 10 years will have an LSE on amenity due to noise from the plant at Higher Woodsford. It should be remembered that Noise levels are being exceeded continuously at the moment. This is likely to continue for a further 10 years. Also location of Silt lagoons within the setting of Grade 1 Listed Woodsford Castle needs considering. Pre-planting for visual screening communities across the river should consider using native evergreen trees.

Highways England Modification: MM54
1181888/**MSPMod11** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: MM54, MM60 and MM62 in relation to allocated sites AS19 Woodsford, AS25 Station Rd and AS26 Hurst Farm "" we note and welcome the inclusion of additional text to manage the cumulative impacts due to their close proximity.

National Grid Modification: MM55
1195477/**MSPMod68** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Not Stated**

Representation: Electricity Transmission Site Ref Asset Details Appendix Ref AS19: Woodsford Quarry Extension, Woodsford 4VN Route - 400Kv two circuit route from Chickerell substation in West Dorset to Mannington substation in East Dorset ET354 Please see enclosed plan referenced ET354 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here:
https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf

File

5423087_0_1.pdfPDFNational Grid Rep - for MSPMod 68.pdf

Dorset Wildlife Trust Modification: MMs 57, 57.1
1215894/**MSPMod49** Site AS19: Woodsford Quarry Extension, Woodsford

Objector/Support: **Support**

Representation: We welcome the additional requirements for Woodsford Quarry Extension (MM57.1), to retain trees and hedgerows where possible and that restoration must explore the opportunity to provide a large scale wetland restoration scheme (MM57).

Mr Nigel Hill Modification: MM60
197579/**MSPMod174** Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: ** see attached .pdf **

5428445_0_1.pdf

MSP - MM60 - St Rd - Cumulative impacts.pdf

Mr Nigel Hill Modification: MM61.1
197579/**MSPMod175** Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: ** see attached .pdf **

5428443_0_1.pdfPDFMSP - MM61.pdf

The Moreton Estate Modification: MM58
928830/**MSPMod136** Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: Please note that text in italics is taken from documents published by the council, with our proposed amendments shown in bold and underlined. MM58 With regards to Hydrology and Flood Risk matters referred to in DG3, we consider the wording of MM58 should be amended as follows: *"There is a water course that flows eastward towards the*

Frome, through Moreton village, from the vicinity of the site. Although it is recognised that the rate and volume of flow in water courses varies naturally **and seasonally**, development of this site must ensure that the preparation, working and restoration of this site ~~does~~ **should** not cause or result in any **significant** overall, long-term or permanent decrease in rate or volume of flow or deterioration in water quality." Reason: as drafted this design guideline does not adequately take into account naturally occurring changes that will arise according to the time of year and prevailing weather conditions.

To the last paragraph of DG3 it appropriate to add a sentence as follows: "**It is widely acknowledged that many mineral extraction sites can provide benefits in terms of surface water flooding in the short, medium and long term.**"

Suggested Change: See above

The Moreton Estate
928830/**MSPMod137**

Modification: MM59
Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: MM59 For Transport and Access considerations under DG4, reference could be made as to the need for these assessments to consider the need for public access from Moreton village to the railway station across the Estate"s land. We consider the need for a new public access across the Estate"s land should be determined at the planning stages in the Transport / Access Assessment required in DG4. Accordingly, we consider the wording of MM59 should be amended as follows: "**Subject to appropriate assessment and prior identification of need**, during development of this site a safe pedestrian access facilitating non-car access between Moreton Station and Moreton village over land **belonging to** the Moreton Estate **could** be provided. **If deemed appropriate such an access would** remain after development is complete and the site is restored."

Suggested Change: above

The Moreton Estate
928830/**MSPMod138**

Modification: MM60
Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: We strongly object to the prescription of quarry operations indicated in MM60 being made at this allocation stage. This ignores the long history of mineral extraction in the area where in the recent past there were four working quarries in relative close proximity. Today there are only two and one of these, at Redbridge Road, is due to cease in the near future to be replaced by AS25 and AS26. While we understand the preference to limit the amount of simultaneous extraction at the sites within Cluster 4, prescribing the working method at this stage is unnecessary and potentially counterproductive. Such decisions should be made after careful consideration of all the evidence collected during the relevant environmental impact assessments for a future planning application and not before. To dictate in advance the sequence of working by separate independent operators has the potential to be used for commercial advantage which, in turn has the potential to affect supply, which would not be in the public interest.

In addition, while it may be preferable for AS25 to be worked from a single processing plant located at AS26, there would be a significantly higher economic and environmental cost as a consequence during the initial period of establishment. Accordingly, in order to mitigate these impacts, it will be necessary to commence extraction within AS26. The high capital infrastructure costs required to transport mineral from AS25 to AS26 for processing dictate that extraction must commence in AS26. We note the revised plan on P141 of the MSP shows a site boundary that has been amended from that submitted by the promoters of the site. We maintain our objection to this boundary change on the grounds that appropriate environmental surveys have yet to be undertaken that would justify this boundary change.

Site boundary changes should only be made subject to appropriate assessments at the planning application stages.

The purpose of the allocation system is to identify sites from which mineral resources could be worked and for the particular environmental safeguards pertinent to that site to be applied at the time of making a planning application when detailed environmental surveys will have been undertaken. In the case of AS25 the principle concern has been heritage impacts which has been addressed in the form of detailed heritage study the conclusion of which is that mineral extraction could take place within the original red lined area without having an unacceptable impact on the heritage setting of the existing listed properties. Whether other impact assessments, (eg, noise, dust, visual etc), might contradict this view has still to be determined.

By arbitrarily changing the red lined boundary alongside the Moreton Heritage Conservation Area without the supporting evidence to justify this modification, the Policy risks sterilising otherwise workable mineral conflicting its own safeguarding policies by preventing the adoption of a range of mitigation methods that could provide suitable safeguards in this instance.

The Moreton Estate
928830/**MSPMod139**

Modification: MM61.1
Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: MM61.1 We consider that the requirement for retention of significant field boundaries in AS25 (MM61.1 paragraph 2) should include the wording "*as far as reasonably possible*". In addition, for 2b that reinstatement of any boundaries removed should occur in accordance with the findings of an appropriate assessment by a suitably qualified specialist.

At paragraph 3 of MM61.1 it would be appropriate for the words "***Other than for the necessary mitigation of identified environmental impacts (e.g. noise, visual, dust)***" to be inserted before "*visually intrusive mineral/soil/spoi...*"

We note that paragraph 5 of MM61.1 requires the detailed structural assessment of Hurst Bridge an ongoing monitoring thereafter. We object to the inclusion of this paragraph on the grounds that it would be normal practice for a Traffic Impact Assessment to be conducted at the time of making the planning application. Furthermore, this paragraph overlooks the likelihood that the preferred route for quarry traffic will be along the existing route westwards past Woodsford Quarry. A significant impact on the bridge is therefore not anticipated. Any requirement for bridge assessment and subsequent monitoring should be considered and determined in the Transport / Access Assessment referred to in DG4 and in consultation with the Highways Department.

Mindful of the need to safeguard the integrity of Hurst Bridge, which has no weight restriction, as an alternative the Development Guideline could prescribe a requirement that for any increase in HGV traffic above a limit of 15% generated by its quarry traffic the applicant would contribute towards ongoing monitoring and examination by a structural engineer.

Suggested Change: above

The Moreton Estate
928830/**MSPMod146**

Modification: Cumulative Screening
Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: AS25 Station Road: In addition to the benefits noted on p71 of the Screening of proposed sites for Cumulative Impacts, it should be acknowledged that the restoration of mineral extraction sites is widely accepted as giving rise to a net gain in terms of biodiversity, particularly where water is involved.

We note that p74 of the Screening of proposed sites for Cumulative Impacts includes under AS25, Water and Direct "*Development of this site must ensure that the flow of water [in a watercourse that flows eastwards through Moreton village] is not [to be] affected in anyway.*" Further to comments we have previously submitted we consider the wording should be amended to "the flow of water is not to be affected in any **permanent or significant** way".

Suggested Change: above

FRAME (Frome Residents Against Mineral Extraction) Modification: MM58
933995/**MSPMod103** Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Object. The risk of surface water flooding/ponding is not 'theoretical', it is fact. Photographic evidence has been provided that proves this regularly occurs during periods of heavy rainfall. The water course is hydraulically connected to the whole area of AS25 through an ancient drainage system. Extraction will destroy this drainage system risking raising the already high water table in adjacent properties. The watercourse flows into the River Frome, Poole Harbour and the Ramsar site.

Suggested Change: Properly research and assess the environmental impacts of the destruction of the ancient drainage system. Accept facts when they have been presented and that there are no mitigation options during operations or restoration solutions.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM59
933995/**MSPMod104** Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Object. The "non-car access" must include pedestrians AND cyclists. It is well known that the agricultural quality of stored top soil deteriorates, therefore it will take many years to rejuvenate in addition to the dormant years of quarrying operations.

Suggested Change: Specify that the non-car route is for both pedestrians and cyclists.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM60
933995/**MSPMod105** Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Object. Mineral extraction in AS25 will have a detrimental impact on the setting of Moreton, an important tourist and recreational amenity; it will also destroy good agricultural land. The Plan completely ignores two properties (Woodleigh and Daisy Cottages) that directly overlook the site. Any operations will adversely affect the occupants' health and wellbeing. Also, the site is adjacent to a Conservation Area and any bunding/tree planting mitigation is wholly unsuitable. The statement to move the north-eastern boundary has not been shown a map of AS25. No processing of minerals on AS25 must include "no portable processing" and a conveyer system "must" be used. Evidence demonstrates that operators ask for changes in conditions during operations in their favour.

Suggested Change: Specify that a conveyer system must, not should, be used. Also, that there must not be any portable processing on AS25 or changes agreed at a later stage by the MPA.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM61.1
933995/**MSPMod106** Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Object. The Plan recognises the special nature of the Moreton Estate land and the amendments acknowledge the adverse impact of noise, vibration and dust on the

Conservation Area in general and two cottages. However, two further cottages (Woodleigh and Daisy Cottages) are omitted, these directly overlook AS25. Proposal to move the boundary southwards must be mandatory, not reliant of further assessment. The boundary line must be clearly identified in the plan and take into account further distance from Woodleigh and Daisy Cottages.

The Plan also omits to recognise Moreford Hall and Coach House Cottage immediately abutting AS25 on the southwest corner. The boundary line must be moved northwards and bunding/tree planting will not provide adequate mitigation against, noise, vibration and dust; ref. BS5228. These amended boundaries must be mandatory. It is understood that the ancient hedge and tree boundaries in AS25 are protected by TPOs and this needs to be acknowledged in the Plan. Extracting Poole Formation sand requires working at deep levels, this will be devastating to the Conservation Area, the setting and the natural environment; rendering the area utterly changed. Any conditions proposed in this Plan must be mandatory and not subject to potential unfavourable changes by the operators or the MPA. Experience demonstrates that guidelines are merely just that and open to interpretation which operators can exploit.

Suggested Change: Please see above text.

Mr A P Read
1146041/MSPMod6

Modification: MM61.1
AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Where the modification states the following; Development of this site will include the following mitigation: To offset impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, the north-eastern boundary of the proposed site will be moved back (southwards) to the next field boundary to the south, which incorporates a line of mature trees, unless it can be demonstrated following further detailed assessment that some part of this field can be worked without causing unacceptable impacts on heritage interests; This paragraph neglects to mention the location of Woodleigh and Daisy Cottage, residential properties which lie in the south western corner of the Moreton Conservation area and directly opposite the proposed AS25 site where the proposed boundary adjoins Station Road. Both properties are facing and directly over look the proposed site, with only a thin line of juvenile trees lying in-between. The prevailing wind from the south will also exacerbate the direct impact of dust and noise. The position of the properties make it difficult to avoid any visual impact.

Suggested Change: The location and position of Woodleigh and Daisy Cottage properties to be added to this paragraph, and noted that any impacts on these two properties be considered within further assessments. Especially around the direct impact upon sensitive human receptors and amenity.

Mr John Wickenden
1148225/MSPMod84

Modification: MM58
Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Objection text: Object The water course is hydraulically connected to the whole area of AS25 through an ancient drainage system which must not be destroyed as there is risk of raising the already high water table in adjacent properties. The watercourse therefore flows into the River and hence to Poole Harbour and the RAMSAR site. What assessment has been done to prove contamination won't occur?

Changes required: Conduct proper survey.

Mr John Wickenden
1148225/MSPMod85

Modification: MM59
Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Objection text: Non car must mean specifically cycling path as well as pedestrians. This sop goes no way to mitigate the destruction and impact of quarrying AS25.

Changes required: Add cycling and pedestrians explicitly.

Mr John Wickenden
1148225/**MSPMod88**

Modification: MM60
Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Objection text: The plan still means the destruction of good quality farmland and a direct impact on the village of Moreton and its estate setting. Extracting Poole Formation sand in deeper workings will mean restoration back to farmland will be impractical and uneconomic. The current setting will be lost forever. Conveyor system: the word "should" needs to be replaced by must to ensure the mitigation is not ignored by the Operators. Experience shows that Operators at Woodsford routinely ask for changes to conditions in their favour which are almost always accepted by the MPA.

Changes required: Remove AS25 from the plan.

Mr John Wickenden
1148225/**MSPMod89**

Modification: MM61.1
Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: Objection text: Recognition of the special nature of the land (Moreton Estate) is welcome and clearly demonstrates why AS25 must be taken out of the plan.

The amendments admit that there will be noise, vibration and dust impact on the Moreton Conservation area in general and East Cottage and Lilac Cottage/Santa Maria in particular.

To quote:- "The north-eastern boundary of the proposed site will be moved back (southwards) to the next field boundary to the south, which incorporates a line of mature trees " **this mitigation needs to made mandatory and it is unacceptable to use the words**, "unless it can be demonstrated following further detailed assessment that some part of this field can be worked without causing unacceptable impacts on heritage interests." Clarity is needed to explain which field boundaries could be moved and then should incorporated into the map properly.

The impact mentioned will be more severe at Daisy Cottage and Woodleigh Cottage on the boundary so it is unacceptable for the MPA to ignore this fact and therefore the boundary of AS25 must be moved further south away from these cottages too for the same reasons as protecting East Cottage and its inhabitants.

The plan still fails to recognise that properties Moreford Hall and Coachhouse Cottage in the southwest corner of AS25 directly overlook the site.

These properties also require a full buffer zone to protect the inhabitants from impact. All buffer zones need to be made mandatory and incorporated on the site map properly. The plan now states that there would be no processor plant in AS25, this condition also must include any mobile processing equipment.

Mention of the ancient system of field boundaries is welcome and it is understood that all ancient trees in AS25 are now protected under CPOs.

Restoration plans are misleading as any extraction of Poole Formation sand will have huge and damaging implications meaning restoration to existing levels of land is totally impractical and uneconomic.

Any land fill operations would be catastrophic to the area, be hugely environmentally damaging and prolong operations unacceptably. All sentences using the word "should"

needs to use the words "**must**" as Operators will merely find ways of ignoring these guidelines. The Glossary of the plan fails to define "compensative mitigation" ; what does this mean?

Suggested Change: Changes required: Make all guidelines mandatory. Mandate that no mobile processing equipment can be utilised in AS25. I urge the Inspector to have this site removed now.

Mrs Joanna Foote
1150479/**MSPMod71**

Modification: MM6.1
Site AS-25: Station Road, Moreton

Objector/Support: **Object**

Representation: The modified plan states: To offset impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, the north-eastern boundary of the proposed site will be moved back (southwards) to the next field boundary to the south, which incorporates a line of mature trees, unless it can be demonstrated following further detailed assessment that some part of this field can be worked without causing unacceptable impacts on heritage interests; Given the historic nature of the system of field boundaries within and around the site, and the degree to which these relate to the 18th and early 19th century development of the Moreton Estate as reflected within the Conservation Area. No consideration has been made to the properties (Moreford Hall and The Coach House) on the southern boundary. These too have significant historical and cultural importance in the history of the Moreton estate and should also be subject to mitigation from dust, vibration and noise pollution. The heritage interests of ancient woodland and field boundaries should also be protected and considered on the southern side.

Suggested Change: Both the properties (Moreford Hall and The Coach House) situated directly on the southern boundary of AS25 should be considered with regards to noise, dust and vibration during further consultations. As should the ancient woodland and field boundaries surrounding these properties.

Highways England
1181888/**MSPMod12**

Modification: MM60
Site AS-25: Station Road, Moreton

Objector/Support: **Not Stated**

Representation: MM54, MM60 and MM62 in relation to allocated sites AS19 Woodsford, AS25 Station Rd and AS26 Hurst Farm "" we note and welcome the inclusion of additional text to manage the cumulative impacts due to their close proximity.

Dorset Wildlife Trust
1215894/**MSPMod50**

Modification: MM61.1
Site AS-25: Station Road, Moreton

Objector/Support: **Support**

Representation: We welcome the additional requirements for Station Road, Moreton, to retain trees and hedgerows where possible.

Mr Nigel Hill
197579/**MSPMod173**

Modification: MM66
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: ** see attached .pdf **

5428448_0_1.pdf
MSP - MM56 60 - St Rd - devel guidelines.pdf

The Moreton Estate

Modification: MM62

928830/**MSPMod140**

Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: MM62 We strongly object to the restrictions made in MM62 (and MM54) regarding the working and / or phasing of mineral extraction at this and other sites within Cluster 4 at this stage because it completely ignores the realities of geology and market demand neither of which are within the control of the operator. We accept that there may be a need for the MPA to ensure cumulative impacts within this cluster are kept to a minimum, however, the phasing and coordination of these future quarries will necessarily be informed by EIA works undertaken at the planning stages. Accordingly, we propose the following rewording "~~The following requirements are set out~~ **criteria should be given full and proper consideration by the developer and MPA** in order to minimise cumulative impacts, particularly between AS19 and AS26:"

1. *Although both sites AS25 and AS26 are allocated for development, AS25 **should preferably** be worked before AS26 - there will be no simultaneous extraction. This will allow AS19 to be worked while AS25 is being worked.*

Reason; in order to ensure a smooth transition from AS26 to AS25 it will be essential for there to be a period of overlap between completion of working in one area to commencement of working in the other for the purpose of establishing site infrastructure and maintaining continuity of feedstock to the processing plant. Due allowance should also be made for the different mineral horizons in each which may dictate differential rates of extraction which in turn may enforce an overlap between cessation in one area and commencement in the other. This is particularly important given the Councils wish to see both sites served by a single processing plant. If continuity of supply is to be maintained. it is simply not feasible to close one site then open the other without an overlap.

2. *The eastern area of AS19 and the western area of AS26 will should preferably not be worked simultaneously.*

Reason; for the reasons set out above this will be dictated by the geology and market requirements. Furthermore, the results of the EIA might determine that the sequence of working should in fact be reversed in order to mitigate assessed environmental impacts.

3. *When AS19 is worked, the northern and eastern parts of the site ~~will~~ **should preferably** be worked before the southern/western areas to ensure that by the time work begins on AS26, then even if AS19 is not finished, the adjacent parts of the two sites would **preferably** not be worked simultaneously.*

Reason; the resource identified within AS19 contains only river terrace deposits whereas the resource within AS25 and AS26 have each been identified to contain a lower Poole Formation horizon. Consequently, the rate of extraction in terms of both tonnes per annum and hectares per annum will inevitably not be consistent. Accordingly, this criterion may not be realistic without risking a potentially adverse impact on mineral supply.

For the reasons noted above, point 4 of MM62 "~~When working begins on AS26 it will start at the eastern end of the site and progress westward~~" should be removed entirely.

There is more than adequate scope within AS19 and AS26 to allow for the asynchronous phasing of each site to be scheduled at the planning stages to ensure adjacent areas are not worked simultaneously.

Suggested Change: above

The Moreton Estate
928830/**MSPMod141**

Modification: MM64
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: We note that MM64 indicates that the site is crossed by a National Grid high voltage electricity transmission line. We object to this wording as this is not the case. The HV line in question passes to the northwest of the site and is at least 250m distant from the site boundary at its closest. Accordingly, we recommend this is deleted.

The Moreton Estate
928830/**MSPMod142**

Modification: MM65
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: MM65 In the "Restoration Vision" delete the words "large scale" from the following sentence: *Post mineral working, restoration must explore the opportunity to provide a ~~large scale~~ wetland restoration scheme hydrologically connected to the River Frome.*

Reason: it is anticipated that significant areas of the site will be capable of being restored back to agriculture. Only the northern margins of the site which sit at the lowest elevation proximate to the River Frome floodplain are considered likely to be suitable. Hence a "large scale" wetland is unlikely to be appropriate.

The Moreton Estate
928830/**MSPMod143**

Modification: MM66
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: MM66 We note that MM66 places possible limitations on the quarrying activities to winter months due to potential impacts on sensitive receptors to the north of the site. Such limits would likely be counterproductive due to the environmental constraints of winter-only working on a commercial scale that might include reduced natural light (requiring the need for artificial lighting), wetter conditions, greater flood risk and run off, and reduced screening due to lack of foliage on trees etc.

The Moreton Estate
928830/**MSPMod144**

Modification: MM66.1
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: MM66.1 We consider our comments on AS25 Station Road Development Guidelines under MM61.1 are equally applicable for Hurst Farm DG2 (MM66.1) (see above).

The Moreton Estate
928830/**MSPMod145**

Modification: MM65
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: In the "Restoration Vision" delete the words "large scale" from the following sentence: *"Post mineral working, restoration must explore the opportunity to provide a ~~large scale~~ wetland restoration scheme hydrologically connected to the River Frome."*

Reason: it is anticipated that significant areas of the site will be capable of being restored back to agriculture. Only the northern margins of the site which sit at the lowest elevation proximate to the River Frome floodplain are considered likely to be suitable. Hence a "large scale" wetland is unlikely to be appropriate.

Suggested Change: above

FRAME (Frome Residents Against Mineral Extraction)
933995/**MSPMod107**

Modification: MM62
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Object. The estimate of Poole Formation sand in AS26 is questionable, borehole data is not publicly available. Some evidence given at the Public Examination suggests that it is not present in the same geological area. Processing plant will be operational in AS26 ahead of excavation, the impact of this has not been detailed in the Plan.

Suggested Change: Change. Make public specific geological findings. Assess the impact of processing plant activities during differing excavation activities.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM65
933995/**MSPMod108** Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Object. The introduction of wetlands to reduce pollutants is unproven. "Restoration" to recreational use is inaccurate, there are no such facilities currently. Indeed the landowner has ensured that there are no public rights of way. Even given time this proposal does not reclaim agricultural land; a loss to the economy and livelihood. If deep excavation for Poole Formation sand were to occur this would be extremely damaging to the environment, economy and amenity; making the potential for "restoration" far less attainable.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM66
933995/**MSPMod109** Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Object. Reference to moving the boundary in AS26 'some distance' to the west is vague and needs to be specified and indicated on a map of the site. There are existing access points through the field boundaries therefore there is no need to remove any part of the ancient hedges/trees. Reinstating such boundaries to its pre-existing state is not possible. Bunding and tree planting to mitigate noise pollution is not possible; reference BS5228 statement.

Suggested Change: Specify the revised boundary of AS26. Note: ref. MM64 inaccurate statement; there are no National Grid high voltage power lines crossing AS26. This statement should be removed.

FRAME (Frome Residents Against Mineral Extraction) Modification: MM66.1
933995/**MSPMod110** Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: The Plan omits to acknowledge cottages on the north eastern of AS26 and listed properties across the B3390. Boundary changes must be clarified and shown on the site map.

Mr John Wickenden Modification: MM62
1148225/**MSPMod90** Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Objection text: Extracting in any order still means the destruction of good quality farmland adjacent to the River Frome, an area of environmental uniqueness. Impact on the economy of the farm and benefit to society is still being ignored. The proposers very late in the planning phase have stated that there is Poole Formation minerals present in AS26. The operators in the adjacent Woodsford quarry do not believe that this can be the case since the geology is the same. The data from boreholes exploration should be made public. The processing plant will be operational ahead of all workings, the impact of which needs to be explicitly explained.

Changes required: Validate that Poole Formation sand is present and reassess impact for deeper workings. Remove AS26 from the plan.

Mr John Wickenden
1148225/MSPMod91

Modification: MM65
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Objection text: The reduction of phosphate etc is unproven and the restoration vision is completely misleading, uneconomic and impractical. The main source of pollutants is from up-stream in Dorchester/Poundbury. Restoring to introduce " significant recreational opportunities " is incorrect as there are none at present and this therefore would equate to change of use. Any Poole Formation extraction throws the restoration vision into doubt as the workings would be deeper and far more damaging to the environment and in particular to the Rover Frome.

Changes required: Validate that Poole Formation sand is present and reassess impact for deeper workings. Remove AS26 from the plan.

Mr John Wickenden
1148225/MSPMod92

Modification: MM66
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Objection text: Welcome the word "must" to ensure Operators and Planners understand the impact properly but must include all operations: ie soil stripping and restoration. Once again the MPA must recognise that BS5228 states that bunds and tree mitigation is ineffective against noise impact.

Changes required: Any operations disturbing Pallington Lakes needs to include all operations including stripping and restoration. Remove AS26 from the plan.

Mr John Wickenden
1148225/MSPMod93

Modification: MM66.1
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Object**

Representation: Objection text: Moving the boundary west is welcome but the modifications fail to recognise the cottages on the north eastern corner of the site and the listed cottages over the B3390 road. The boundary changes need to be made known now and incorporated properly into the site map.

Changes required: Conduct boundary study now to properly understand impact on listed cottages and also cottages adjacent to Hurst Bridge. Declare boundary changes now and specify them on the site map.

Highways England
1181888/MSPMod13

Modification: MM62
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Not Stated**

Representation: MM54, MM60 and MM62 in relation to allocated sites AS19 Woodsford, AS25 Station Rd and AS26 Hurst Farm - we note and welcome the inclusion of additional text to manage the cumulative impacts due to their close proximity.

Dorset Wildlife Trust
1215894/MSPMod51

Modification: MM65 & MM66.1
Site AS-26: Hurst Farm, Moreton

Objector/Support: **Support**

Representation: We welcome the additional requirements for Hurst Farm, Moreton, to retain trees and hedgerows where possible (MM66.1) and that restoration must explore the opportunity to provide a large scale wetland restoration scheme (MM65).

Holt Parish Council
221963/**MSPMod24**

Modification: MM67
SiteAS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: Objection to the inclusion of AS-27 in the Plan "" which we believe is not justified in this location due to the detrimental effect on the locality when accounting for other significant developments in the area: The sustainability assessment identifies the "good link" via the C2 to the A31 to the EAST and via the B3072 through West Moors. It estimates site AS-27 will generate around 80 lorry movements per day. It does not however identify the expansion of the Woolsbridge Industrial Estate on the EASTBOUND approach to the A31 which will also generate significantly more traffic movements. It does not identify the large number of visitors to Moors Valley Country Park (particularly in the school holidays) also on the EASTBOUND approach to the A31. And there are a number of holiday sites on the C2 and these should all be considered. Inevitably traffic will look to alternative less congested routes. Holt Parish Council is extremely concerned this will effect the parish of Holt and its residents as traffic will seek the shortest and closest alternative route via HOLT HEATH National Nature Reserve to Wimborne to meet the A31. Holt Road through Holt Heath is a minor road, with a narrow bridge and dangerous bends. Holt Heath SSSI is also used for grazing cattle from March to September as part of land under National Trust Conservation which will present an additional hazard. Traffic will also seek to travel westbound along the C2 which is already suffering with the movement of HGV"s travelling west and north. It should also be highlighted that there are some 1200 homes currently being built in Wimborne which will severely impact on the local road network.

Suggested Change: We consider the Sustainability Assessment should include the above and form part of the Transport Assessment to identify the extent of the traffic impact not only on the STRATEGIC network but more importantly on the LOCAL network.

Mrs Hilary Chittenden
224280/**MSPMod40**

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Not Stated**

Representation:

MM67

Notwithstanding our continued opposition to the inclusion of AS-27 Land at Horton Heath, EDEP supports the proposed Development Guidelines for AS-27 - Horton Heath subject to inclusion of the following additions/amendments: Prior to any consideration of a planning application, full compliance with all conditions relating to all previous planning applications for Horton Heath including AS08, Redman"s Hill Quarry and the Solar Farm will be required.

All Guidelines/Conditions applied to AS-27, haul routes and onward transport will be monitored and enforced.

Guideline 1

- Extraction to a strictly controlled depth will be restricted to the plateau and not create a deep void to the NW of E46/32 nor impact on the steep slope at the northern end of the site.
- Habitat heterogeneity will be encouraged by ensuring the extraction depth is not uniform.
- Mineral extraction and restoration will be phased as at the Redman"s Hill Quarry site.
- The extraction period will be limited so that restoration to address the historic habitat loss can be undertaken as a matter of priority.

- Compensation for loss of habitat during site works will include extension and linkage of existing good quality habitat (SSSI and SNCIs).
- Restoration of acid grassland will include in perpetuity appropriate management and monitoring. (Note this should preclude any soil enrichment or introduction of improved grassland species and cultivars).
- Some exposed surfaces will be retained to create additional sand martin habitat and nesting sites for burrowing bees and wasps.
- There will be no backfilling with waste of any description. Restoration will be at the level of the completed extraction .

Guideline 3

Hydrological studies will include assessment of the water that will be used to damp down haul routes, its impact on soil pH over the full 12-17 years and its availability given requirements to adapt to climate change and reduce water consumption.

Guideline 4

The Transport Assessment will include:

1. potential impact on the whole of the surrounding road network, road users and residents and identify
 - i) the maximum acceptable daily vehicle movements;
 - ii) where restrictions on vehicle movements would be appropriate;
- the in-combination impact of expansion of Woolsbridge Industrial Estate and use for Waste Handling and the growth in housing in the West Moors and Verwood area);
- vibration that would be caused by passing machinery both within the proposed extraction site and on Bridleway E46/32 that might impact on sand martins' nests.
- Mineral extraction and the haul road will be limited to specified distances from PRowS where the users will be at no risk from inhalation of particulates from dust or diesel or diesel fumes.
- To protect the interests of PRow users and residents, noise levels will be restricted through vehicle specification and timing of operations.
- Bridleways will be maintained in good and safe condition throughout the extraction and restoration periods.

Guideline 5

AS-27 is sandwiched between Bridleway 30 and 32. We suggest the wording of the second para. should be changed to "*The adjacent bridleways are key visual receptors*".

Suggested Change: See comments above.

West Parley Parish Council
814649/**MSPMod120**

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Not Stated**

Representation: Disappointment at the designation of AS27 for extraction. It urges Dorset Council to consider carefully required improvements to the existing roads infrastructure in this rural location and habitats protection as recommended by local Conservation bodies including East Dorset Environmental Partnership

St Leonards & St Ives Parish Council
814793/**MSPMod41**

Modification: MM5
Site AS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: We strongly object to the inclusion of this site as an allocated site for the reasons previously stated in our response dated 28 th January 2019 none of which have been recognised or mitigated in anyway and still stand.

In summary:-

- The inclusion of site AS27 is unsound.
- The impact of the additional traffic as a result of the use of this site is significantly underestimated
- Whilst the plan recognises that there is a possible impact it does not indicate how it will be mitigated. The cumulative impact of the resultant traffic of this proposal and other proposals with additional traffic predicted within the immediate vicinity will result in an untenable situation and must not be underestimated. We stress the need to consider the impact on this part of the County which will also have to cope with the Purple Haze and Blue Haze sites and the expansion of the Woolsbridge Industrial Estate. This plan needs to also recognise that the Plan for Hampshire also has sites in the near vicinity which will have a traffic impact on what are rural roads and small communities interspaced with sensitive SSSI land. The traffic for the use of this site will share the same roads as these other proposals, namely the C2 Horton Road.
- The plan fails to take into account the detrimental impact on the environment, local businesses and tourism in the area.
- The plan fails to adequately consider the full impact on the infrastructure and the effect of the additional volume and weight of the access traffic for this proposal on the numerous communities along its access route C2 Horton Road. It also underestimates the effect on the existing use of this area by the community, visitors to it and the potential impact on the water table and effects on nearby SSSI sites.
- The plan fails to recognise that the C2 route is unsuitable for use for this site it was not designed for traffic of this volume or weight and already the basic structure of the road is breaking down and under constant repair
- Due to the geography of the existing habitation there is insufficient space to improve the structure of the C2 to an acceptable level for this type and volume of traffic. The lack of width of the road, pavements and sheer weight of numbers will seriously conflict with the personal safety of other road users, cyclists, pedestrians and horse riders. The plan mentions the possible cumulative impacts of the use of this site and the already permitted quarry to the East and other nearby operations but it needs to also recognise and fully appreciate the additional impact of the Waste proposal and Woolsbridge Industrial Estate expansion which are already further along in the planning process. Put simply C2 is not suitable for this type of usage and it is contrary to the Dorset Local Transport Plan 2011-2026.
- The use of this site will severely impact on the linking wildlife corridors which are essential for the biodiversity of this area.
- The negative impact of this proposal on the character of the area must not be underestimated. The major priority concern is the impact and consequences of the sheer volume of the HGV traffic on a totally unsuitable route.
- Use of site AS27 must be subject to a full Transport Assessment which should include the potential impact on the whole of the surrounding road network, road users and residents and identify where restrictions on vehicle movements would be appropriate, it must also take into account the additional traffic of proposals agreed within the Waste Plan and Local Development Plan.

Mr David Steadman
1008497/MSPMod25

Modification: MM67
SiteAS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: Key factors for objection; Destruction of heathland and recreational facilities. Threat to neighbouring SSSI Horton Common. Massive impact on traffic with up to 80 lorry movements per day lasting up to 17 years. This is the unnecessary and wanton destruction of a beautiful area that is already being massively overdeveloped. I hope we have a shortage of sand and gravel - maybe that will halt the development of housing estates that nobody wants and that are not selling because they are overpriced and still do not provide affordably entry level housing.

Suggested Change: Removal of site AS27 as entirely unsuitable.

Ms Bernadette Richmond Piot
1012282/**MSPMod5**

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: I strongly object to Horton Heath being one of the sites selected as it is an area of natural beauty and a reserve for wild life. The area will be destroyed by the work on the site. It is very popular with local residents as a recreation area. It is not acceptable to destroy heath which is in a beautiful setting. Furthermore the lorry traffic will cause great disruption to local residents as Horton Road is already saturated with traffic. It will also cause noise and pollution for local residents in the area. The increased truck traffic will undoubtedly cause traffic jams and accidents on a busy and narrow road.

Mr Peter Hawkins
1149698/**MSPMod16**

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: As you know, I attended the recent meeting at Horton Hall re A 27 Horton Heath -Sand. Many objections were made, particularly in relation to Transport problems. This is, of course, just even more traffic to that being wrongly allowed by yourselves through the further development of Woolsbridge Industrial Estate. A measure made through your department etc. by removing Green Belt purely to generate funds! Representations made regarding each of these proposals have been utterly ignored! At the Horton Heath meeting person after person stated why the further effects of increased traffic were unacceptable.

Despite this M/s Ord then commented she couldn't see any problems with transport! At this point it was clear that this indicated that the proposals were a 'done deal' and several people, including myself, got up and walked out! I have repeatedly stated these meetings seem to be nothing more than a process you have to follow in order to progress in the manner already planned. It is now necessary for Dorset County Council to explain to the Rate Payers how they are going to right these wrongs and how a new democratic procedure will be set up for the future.

Mr Peter Hawkins
1149698/**MSPMod17**

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: The comments I made clearly stand which confirmed that the objections made are continually ignored. This has happened on every occasion. It seems reasonable, therefore, to ask Dorset County Council to acknowledge that the rate payers objections have not been acted upon. In recognition of their intentions they then acknowledge this by confirming they will provide the appropriate direct road to the A31 that they failed to provide at the very beginning. This will then be able to take the Woolsbridge traffic and due to the much reduced levels of traffic the Horton Sand lorries. The Council will then finally be doing what it is paid to do.

Mrs Kim Deabill
1196536/**MSPMod4**

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: Please see my previous comments on proposals re Horton Heath as these are still relevant.

Suggested Change: Removal of the Horton site from proposals.

Dorset Wildlife Trust
1215894/MSPMod52

Modification: MM67
Site AS-27: Land at Horton Heath

Objector/Support: **Object**

Representation: Dorset Wildlife Trust maintains its objection to the inclusion of the site at Horton Heath (AS27) in the Minerals Sites Plan.

It is not justified because the sites already recommended with the plan provide more capacity (an over-supply of 6.31mt) than required during the plan period. There is also a new unallocated site policy, by which this site could be considered if the operator put it forward. Additionally a number of sites proposed for development in the Local Plan review will require prior extraction of minerals, and these will be prioritised over other sites in order to deliver the required housing on time.

It is not effective because the need for much detailed survey information and the substantial mitigation measures required would make delivery of the site potentially too expensive to be deliverable.

It is not consistent with national policy because mineral extraction over this large area will prevent any connectivity between the remaining areas of good quality habitat during the lifetime of the extraction period, contrary to NPPF para 170d *"to establish coherent ecological networks that are more resilient to current and future pressures"* and para 174b *"to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species: and identify and pursue opportunities for securing measurable net gains for biodiversity."*

Dorset Wildlife Trust's major objection to this site is that it will cause further fragmentation of the remaining areas of heathland of the once extensive Horton Common (areas all now designated as either SSSI or SNCI). Until 1980 this whole area including all of the AS27 site was heathland. It was ploughed immediately before it was due to be designated as a SSSI in a widely publicised case.

If, despite the objections of DWT and others, the AS27 site is allocated, there would be a need for substantial compensation for habitat loss during the works, including measures to extend and link the remaining areas of heathland/acid grassland habitat to comply with the above requirements of NPPF. There will be a requirement for full habitat and species assessments, as well as detailed hydrological investigations to ensure no adverse impacts on the nearby designated sites. We would also suggest investigation into vibrations caused by machinery that might impact on nearby sand martin nests.

The Habitats Regulations Assessment has identified that development of this site may have significant effects (hydrological and by displacement of recreation) on internationally designated sites, so feasibility is questionable. Detailed survey and assessment with robust mitigation measures will be required to ensure no adverse impacts on the hydrology of Horton Common, (and the adjacent parts of Horton Common SNCI).

The adjacent area of Redman's Hill received planning permission last year (3/17/0967/DCC) and is already being worked, adding to the area of biodiversity loss. There is an active sand martin colony on this site, and the Biodiversity Mitigation Plan which was conditioned as a part of the planning consent required measures to ensure the maintenance of the colony throughout the works and the creation of a further face for nesting in another part of the site. The site is only separated from the proposed AS27 site by a bridleway, and this much larger area of disturbance with many more lorries, and more noise over a longer period of time may well make it impossible to maintain this sand martin colony.

In addition we would expect to see full restoration of the site to acid grassland as soon as possible following any sand and gravel extraction. However, the previous planning permission for extraction of sand on the nearby AS08 area in the same ownership (PA3/04/0833) in 2004 which damaged part of the Horton heath SNCI, required restoration to heathland by the end of 2006, and a cessation of motor cross activities on this site.

Neither of these conditions have been adhered to, which gives little confidence that in any future successful planning application on the AS27 site, any such restoration would be effectively secured.

Suggested Change: DWT previously made some suggestions to be included in policy wording for this site if allocated, not all of which have been addressed in the suggested wording. We would therefore suggest that if, despite our objection, the site is included, that the development guidelines for AS27 are amended and added to as follows:

Insert at the start of the guidelines:

Compliance with all conditions relating to previous planning applications for Horton Heath (including AS08) will be required before consideration of any planning application.

Natural Environment - amend criteria c

c. Restoration of the worked areas to high quality species-rich acid grassland to support the adjacent European heathland sites.

Restoration Vision - amend as follows to ensure clarity and effective restoration:

Extraction and restoration should be phased as at the Redman's Hill Quarry site. The extraction period should be limited so that restoration to address some of the historic local habitat loss can be undertaken as a priority. There should be no backfilling with waste to ensure the speediest possible restoration to acid grassland. Restoration should be to high quality species-rich acid grassland as this is a priority habitat and must ensure continuation of the hydrological link with Horton Common SSSI. If hydrology allows, restoration at excavated levels is the preferred option and would see a valley running from a high point in the southernmost corner down to the pond that lies a short distance to the north of the area. The sides of the valley would slope from the tracks along either side of the triangle, so the perimeter tracks and hedges would be maintained. Some exposed vertical surfaces should be retained to create additional sand martin habitat and nesting sites for burrowing bees and wasps. Compensation for loss of habitat during site works should include extension and linkage of existing good quality habitat (SSSI and SNCIs). Restoration to acid grassland should include appropriate management and monitoring in perpetuity.

Mrs Jackie Barker
933323/**MSPMod112**

Modification: MM68
Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Not Stated**

Representation: Again this point states that "wherever practical, access to the extension should be lowered below eyeline". This statement gives too much leeway to the developers. What happens if it isn't practical, how high over the eyeline can it go? This does not give any limits, the same as in point MM12.1. You are just saying that if the quarry blasts too much of the landscape then they have to try and rectify it - NOT POSSIBLE.

Mrs Jackie Barker
933323/**MSPMod113**

Modification: MM69
Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Not Stated**

Representation: I have been present at most of the hearings and read all of the documentation regarding this proposed development and not once has a new access been mentioned. I cannot possibly imagine where this will be and as this has not been revealed I cannot comment on it. Also the sentence "once constructed, there will be no access from the B3069 to the north" does not make sense. The only access to the north of the B3069 in the vicinity is to Afflington Farm.

Mrs Jackie Barker

Modification: MM70

933323/**MSPMod114** Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Not Stated**

Representation: You have deleted the creation of a tunnel over the access to the extension area - this was never going to be a tunnel, it was going to be a bridge? So how is the new quarry to be accessed?

Mrs Jackie Barker Modification: MM72
933323/**MSPMod115** Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Not Stated**

Representation: This point is the same as the first MM12.1. There is no doubt there WILL BE impacts that cannot be appropriately mitigated. Giving a licence to a new open cast quarry will produce irretrievable damage. I fail to see what compensatory environmental enhancements can be carried out once the destruction has occurred.

Mrs Jackie Barker Modification: MM71
933323/**MSPMod116** Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Not Stated**

Representation: "All necessary mitigation measures should be implemented in order for impacts to be reduced to an acceptable minimum". What is an acceptable minimum? Yet again you are handing out what appears to be a limitless licence.

Mrs Jackie Barker Modification: MM74
933323/**MSPMod117** Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Not Stated**

Representation: "in a phased manner at the earliest opportunity" - what does this mean? There needs to be a timescale and targets. This is so vague this statement could have been written by a politician!

Mr Philip Collins Modification: MM 72
1009164/**MSPMod87** Site PK-16: Swanworth Quarry Extension, Worth Matravers

Objector/Support: **Object**

Representation: The development of the new Swanworth quarry has to be appraised under the NPPF "exceptional circumstances" test regarding AONBs. All three limbs of the test have to be satisfied; and, if they are satisfied, in addition there have to be overriding public benefits that outweigh the protection given to the AONB.

It is only at that stage that any issue of compensatory landscape enhancement arises. The issue does not arise under the third limb of the NPPF test. The modification therefore presents a highly confusing and misleading picture of the position.

In this case, it is highly unlikely based on the evidence that the new Swanworth quarry can satisfy the three limbs of the NPPF test. Even if they could be satisfied, the overriding public benefits are not borne out by the evidence presented in public before the MPA and the Inspector - and no new evidence has been produced. It should be recalled that the MPA withdrew the claim in the earlier text of the plan that Portland suppliers could not meet the demand for crushed rock (Portland suppliers stated in evidence that they could) and the MPA has failed throughout the plan preparation process to investigate and consider objectively all alternatives, including supply by rail.

The modification further demonstrates that the plan is not "sound" in relation to Crushed Rock and the new Swanworth quarry. "Positive preparation" has not been undertaken; it cannot be "justified" as the strategy for crushed rock is not appropriate when considered

against reasonable alternatives, based on proportionate evidence; it is not "effective" and it is "not consistent with national policy" as it is highly unlikely to be deliverable within the NPPF.

Suggested Change: The site should be removed from allocation in the plan.

Mrs Sally Feben Smith Modification: MM72
1148253/**MSPMod23** Site PK-16: Swanworth Quarry Extension, Worth Matravers
Objector/Support: **Object**

Representation: This site is not a justified inclusion in the plan because no amount of "compensation" can restore it to its original, natural beauty. Previous mitigation, promised in 1993 for the present Swanworth Quarry, states that it would be transformed from being "visibly intrusive to become an exceptional nature reserve over a ten year period". This has not happened. The future "restoration" of this proposed site is very questionable.

Suttle Stone Quarries - Mr Steve Lamb Modification: MM68, 69, 70, 71, 72, 73 and 74
1210840/**MSPMod20** Site PK-16: Swanworth Quarry Extension, Worth Matravers
Objector/Support: **Support**

Representation: All the modifications (MM68 to MM74) are supported and reflect the discussions held at the EIP.

Suggested Change: No changes are considered necessary.

Dorset Wildlife Trust Modification: MM74
1215894/**MSPMod53** Site PK-16: Swanworth Quarry Extension, Worth Matravers
Objector/Support: **Not Stated**

Representation: We welcome the requirement for restoration to limestone pasture of conservation interest. For clarity we would suggest this just says "including unimproved limestone grassland", as has been done for other Purbeck stone sites, for example see MM82.

Dorset Wildlife Trust Modification: MM82
1215894/**MSPMod54** Site PK-02: Blacklands Quarry Extension, Acton
Objector/Support: **Support**

Representation: We welcome the additional requirements for restoration to unimproved limestone grassland and that consideration should be given to the provision of bat roosts.

Dorset Wildlife Trust Modification: MM84
1215894/**MSPMod55** Site PK-10: Southard Quarry, Swanage
Objector/Support: **Support**

Representation: We welcome the additional requirements for restoration to unimproved limestone grassland and that consideration should be given to the provision of bat roosts.

Dorset Wildlife Trust Modification: MM87
1215894/**MSPMod56** Site PK-17: Home Field, Acton
Objector/Support: **Support**

Representation: We welcome the additional requirements for restoration to unimproved limestone grassland and that consideration should be given to the provision of bat roosts.

Dorset Wildlife Trust
1215894/**MSPMod57**

Modification: MM89
Site PK-18: Quarry 4 Extension, Action

Objector/Support: **Support**

Representation: We welcome the additional requirements for restoration to unimproved limestone grassland and that consideration should be given to the provision of bat roosts.

Dorset Wildlife Trust

1215894/**MSPMod58** Site PK-19: Broadmead Field, Gallows Gore, Worth Matravers Parish
Langton Matravers

Modification: MM90 & MM93

Objector/Support: **Support**

Representation: DWT welcomes the additional wording in the development guidelines to protect the adjacent SSSI (MM90). We also welcome the additional requirements for restoration to unimproved limestone grassland and that consideration should be given to the provision of bat roosts (MM93).
