

Swanworth Quarry, Eastington Road,
Worth Matravers, Swanage, Dorset,
BH19 3LE.

**Bournemouth, Dorset and Poole Pre-Submission
Draft Mineral Sites Plan 2017.**

**Representations regarding the Allocated
Swanworth Quarry Extension reference PK-16.**

January 2018



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Representations made on behalf of Suttle Stone Quarries by Quarryplan (GB) Limited

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1.0 INTRODUCTION

- 1.1.1 This submission relates to the potential quarry extension to Swanworth Quarry allocated in the Bournemouth, Dorset and Poole Pre-Submission Draft Mineral Sites Plan 2017 as a suitable site for the supply of crushed rock (site reference PK-16 Swanworth Quarry Extension, Worth Matravers). The submission is made by Quarryplan (GB) Limited on behalf of Suttle Stone Quarries the operators of Swanworth Quarry.
- 1.1.2 The Bournemouth, Dorset and Poole Minerals Strategy was adopted in May 2014 and sets out the key principles to guide the future winning and working of minerals up to 2028. It also sets out the development management policies against which planning applications for minerals development will be considered.
- 1.1.3 The Pre-Submission Draft Mineral Sites Plan includes specific proposals and policies intended to deliver the various strategies for the different mineral types and to maintain mineral production. It also includes other measures to facilitate and control minerals development and the management of land.
- 1.1.4 The Pre-Submission Draft Mineral Sites Plan contains a specific policy regarding the extension of Swanworth Quarry to contribute to the adequate and steady supply of crushed rock (**Policy MS-3: Swanworth Quarry Extension**).
- 1.1.5 This submission is divided into a number of sections which provide information on the background to Swanworth Quarry and the Suttle family business; the detail of the proposed quarry extension area and the provision of crushed rock within the Pre-Submission Draft Mineral Sites Plan. Importantly information is provided relating to national planning policy and particularly the three “exceptional circumstances” tests required by the National Planning Policy Framework (NPPF) for major development in designated areas (NPPF paragraph 116), in this case the Dorset Area of Outstanding Natural Beauty.
- 1.1.6 Information is included to demonstrate the need and economic benefits associated with the quarry extension, the limited alternative sources of supply of aggregate materials and the environmental impacts of the proposals including on landscape and visual aspects, ecology, water regime, cultural heritage and highways.
- 1.1.7 It is considered that there are very clear and compelling exceptional circumstances to justify the allocation of the Swanworth Quarry extension and that the development would be in the public interest.

2.0 BACKGROUND

- 2.1.1 Swanworth Quarry is located some 500 metres to the south of the B3069 road between Corfe Castle and Swanage, almost 1.0 kilometre to the north-west of Worth Matravers and 5.0 kilometres west of Swanage in Dorset. The quarry is located within the Dorset Area of Outstanding Natural Beauty (AONB). A **Site Location Plan** is provided in the Plans section showing Swanworth Quarry, the allocated extension area and surrounding surface features. The existing quarry covers an area of 36 hectares (ha).
- 2.1.2 The quarry is operated by Suttle Stone Quarries (Suttle) and produces a range of limestone aggregates for use in local building and construction work. Suttle are a local, family run company producing and supplying building stone, construction aggregates and recycled materials from several locations in Bournemouth and the Swanage area.
- 2.1.3 Suttle have operated Swanworth Quarry since 2011 and prior to then the quarry had been operated by Tarmac for approximately 30 years. The quarry originally commenced working before the advent of the planning system in the early 1900's and was substantially developed during the Second World War for the construction of defence related works in the region.
- 2.1.4 The operational activities and restoration of Swanworth Quarry are undertaken in accordance with planning permissions issued by Dorset County Council (Dorset), the mineral planning authority. An extensive set of modern planning conditions were established for Swanworth Quarry in 1994 when permission was granted for a quarry extension along the eastern boundary together with detailed working and restoration schemes. The planning conditions and restoration scheme have been updated since 1994 and the end date for extraction has been extended to June 2024 with restoration to be completed by June 2025. The most recent set of planning conditions was issued in July 2017 (planning permission reference 6/2017/0258) when the quarry restoration scheme was subject to a minor variation.
- 2.1.5 Historic output from Swanworth in the 1980's was in the region of 400,000 tonnes per year with a peak of almost 1 million tonnes. During the 1990's output reduced to 200,000 tonnes per year and during the 2000's output averaged around 120,000 tonnes per year.
- 2.1.6 The current quarry output is much less than has been previously achieved which is in part a deliberate business decision and has also been influenced by the recent economic downturn. Sales of limestone since 2015 have been maintained between 120,000 and 130,000 tonnes each year and are unlikely to increase in the future.
- 2.1.7 The quarry contains extensive modern processing plant, stockpile areas, workshops, offices and welfare facilities together with the necessary site infrastructure to operate in an efficient and environmentally sound manner. The quarry produces a range of construction materials including various sizes and types of aggregate, Gabion stone, rock armour, rockery stone and agricultural lime utilising modern and efficient fixed and mobile processing plant. Stone has also been cut and sold for dimension stone.

- 2.1.8 The quarry is the only source of limestone aggregates in Dorset outside of Portland and plays an important role in supplying construction materials to the eastern half of Dorset and particularly to Purbeck, Bournemouth and Poole. Approximately half the limestone aggregates produced in Dorset come from Swanworth. If the quarry were to cease operating the Purbeck, Bournemouth and Poole market for limestone aggregate would have to be served from Portland which is an additional 20 miles away or from the Mendips which is almost 40 miles further away.
- 2.1.9 At the beginning of 2018 the estimated reserves of limestone remaining within the quarry were less than 300,000 tonnes. The reserves are likely to last for only a further two to three years.
- 2.1.10 The restoration of the quarry utilises inert waste material, primarily arising from construction projects, to create a new landform with varied nature conservation habitats and which will provide biodiversity and geodiversity benefits. The approved restoration scheme is depicted on the accompanying **Landscape Restoration Concept** plan.
- 2.1.11 The restoration work has been managed for a number of years by Dr Barbara Smith, an ecological consultant, and a restoration summary report from 2015 on the creation of species rich grassland in the south-west third of the existing quarry is included in **Appendix 1**.
- 2.1.12 Up to 70,000 tonnes of inert waste are imported each year for restoration. Planning permission also exists for the recycling of inert wastes to produce up to 30,000 tonnes per year of recycled construction aggregates. The recycled aggregates are used to complement and where possible blend with the limestone products to produce a range of construction aggregates.
- 2.1.13 Swanworth Quarry is the head office and main operating base for Suttle Stone Quarries. The Suttle business also operates a building stone quarry and cutting yard at California Quarry near Swanage and an aggregate recycling and merchandising depot at Mannings Heath in Tower Park, Poole. In addition the Suttle business includes a specialised civil engineering contractor known as Suttle Projects. The various Suttles operations work closely together and there are particular synergies between Swanworth and the Mannings Heath depot in terms of material supply and heavy goods vehicles (HGV) movements.
- 2.1.14 There are over 30 employees based at Swanworth Quarry including five employees in the quarry, three employees in the workshop, ten office and sales staff and 15 heavy goods vehicle drivers. Suttles employs almost 50 additional people in other activities at Mannings Heath, California Farm Quarry and Suttle Projects.
- 2.1.15 The total expenditure at Swanworth Quarry amounts to over £4.0 million per year on such things as transport, wages, fuel, business rates and quarry purchases. A substantial amount of the annual expenditure directly benefits the local economy.

3.0 EXTENSION AREA DEVELOPMENT

Extension Area

- 3.1.1 In order to ensure that Swanworth could continue to provide an adequate and steady supply of crushed rock an extension to the quarry was promoted for consideration in the Mineral Sites Plan as part of the Bournemouth, Dorset and Poole Minerals and Waste Development Framework.
- 3.1.2 A total of three 'calls for sites' exercises have been carried out by Dorset, in 2008, 2012 and 2014 seeking sites for consideration for future mineral extraction. Suttle promoted an area to the north-west of the existing quarry as a potential extension area in response to the 2012 call for sites exercise, however the original design raised cultural heritage and landscape concerns. Consequently the extension proposals have been radically amended and the design influenced by landscape constraints to minimise landscape and visual impact. A revised extension design was promoted to Dorset in 2014 and was subject to further refinements in 2015 and in 2016 following discussions with Dorset planners and landscape officer, Historic England and the AONB landscape planning officer.
- 3.1.3 The extension area is identified on the **Site Location Plan** and is shown in greater detail along with the existing quarry on the accompanying **Aerial Photograph**. The extension area amounts to approximately 12ha of land consisting of parts of two agricultural fields sloping in a southerly and easterly direction from 132 metres Above Ordnance Datum (mAOD) to 124mAOD. Limestone extraction would be carried out from an area within the extension of some 10ha. The access corridor connecting the extension area and the existing quarry amounts to 1.5ha.
- 3.1.4 The extension area is bounded by incised valleys to the east and south with further agricultural land to the north and west. The valleys contain part of the long distance Purbeck Way right of way that runs between Corfe Castle to the north and the sea to the south.
- 3.1.5 The revised extension design is shown on a series of development plans included with this submission which are referred to further below. There is no extraction proposed in the southernmost field where the Scheduled Monument (tumuli) is located. Only vehicular access would be required through this field within a narrow cutting.
- 3.1.6 The saleable reserves of limestone within the extension area have been reduced from 2.0 million tonnes to 1.7 million tonnes, sufficient for 13 - 14 years of stone sales at a rate of 120,000 to 130,000 tonnes per year.
- 3.1.7 The extraction area would be restored progressively to agricultural use at original ground levels by the importation of inert waste materials as is currently the case with the restoration of the existing quarry site.

Quarry Operations

- 3.1.8 All of the existing quarry infrastructure would continue to be used for the extension area development including the access to the public highway, processing plant, stockpile areas, workshops, offices and welfare facilities. There is no necessity to provide new infrastructure which is an important element of the development.
- 3.1.9 The limestone in the extension area lies beneath soil and clay/shale overburden which has an average depth of 4 to 5 metres. This material would be removed progressively to uncover the limestone and would be used to create shallow screenbanks around parts of the access and extraction areas. The overburden face would be excavated at a shallow angle, soiled and seeded to minimise visibility. Extraction operations would be carried out below the base of the overburden.
- 3.1.10 Extraction would be carried out using the same methodology and equipment as used in the existing quarry, namely drilling and blasting of the limestone before it is transported by dump truck to the processing plant. Limestone would be extracted in two benches of approximately 12 metres in height and blasting would occur between 10 and 12 times per year, as occurs currently. The processing plant in the existing quarry would be used and there is no need for additional plant to develop the extension area or for processing plant within the extension area. There is no requirement or intention to increase sales of limestone from the site above 120,000 to 130,000 tonnes per year.
- 3.1.11 The extension area would be worked in three consecutive phases with two quarry benches (ie the full depth of limestone) being worked in each phase. Infilling would follow behind extraction and would reinstate the extraction area to original ground levels. This would minimise the extent of land taken for quarrying and would minimise the length of overburden face or limestone face exposed at any time. Infilling would also ensure there was no long-term landscape and visual impact from the development.
- 3.1.12 Infilling with inert material would continue for approximately five years following completion of extraction. The duration of operations within the extension area would be in the region of 20 years in total from initial development to final restoration.
- 3.1.13 Access to the extension area would be via an inclined road from the existing quarry, across the incised valley on a gabion bridge and in a cutting, northwards through the southernmost field to the extraction area. The use of a cutting would help to reduce the visibility of vehicles travelling between the extension area and the existing quarry. Drawings of the bridge and cutting are provided (**Bridge and New Access Plan and Elevations**). The sides of the cutting could be treated (hydroseeded/planted) to reduce visual impact.

Quarry Design

- 3.1.14 The accompanying development plans show the following detail:
- **Advanced Landscape Establishment Phase** – shows the extent of the new access road and Phase 1 extraction area forming the southern part of the

extension extending as far north as an existing stone wall. Soils and overburden would be stripped from the extraction and access area to be used to create screenbanks along the northern, eastern and southern boundaries to improve visual screening. The screenbanks would then be seeded and planted. A suggested woodland planting mix and woodland edge planting mix is shown that could be used primarily along the eastern boundary of the extension.

- **Extraction Phase 1** – shows the extent of overburden removal and limestone extraction. Overburden would be used to in the restoration of the existing quarry. Limestone extraction would be undertaken below the level of the graded/seeded overburden slope and to the full depth of the deposit (two benches). The plan does not show a cut and cover tunnel in place for the access cutting. The provision of a tunnel was previously proposed but the landscape and visual impact assessment has concluded that the landscape benefits of a tunnel are limited and would minimise only part of some southerly views, consequently the provision of a tunnel is no longer proposed.
- **Extraction Phase 2** – shows the extraction area gradually progressing in a northerly direction. Soils and overburden would be used in the restoration of the previous phase. Any surplus material would be stored in the existing quarry for later use. Infilling would commence in the south of the extension area and progress in a northerly direction. Any areas restored to agriculture at original ground levels would be seeded and managed.
- **Extraction Phase 3** – shows extraction reaching the northern limit of the extension area. Infilling would be progressed behind extraction and would restore to original ground levels along the western part of the extension. A narrow access route within the extraction area would remain unfilled along the floor of the quarry on the eastern side.
- **Restoration Phase** – shows the extraction area and access being infilled back to original ground levels and returned to agricultural use. Some of the screenbanks would be removed and used in restoration although the shallow eastern screenbank would remain. It is also proposed to provide a new public right of way from the Purbeck Way westwards across the restored extension area towards the existing lane/right of way between Kingston and Chapman's Pool.

4.0 PRE-SUBMISSION DRAFT MINERAL SITES PLAN 2017

- 4.1.1 The Pre-Submission Draft Minerals Plan identifies and designates site allocations for future mineral development based on a comprehensive process of site assessment and selection, in accordance with the adopted Minerals Strategy (2014). The document has been produced following extensive consultation and evidence gathering undertaken since 2008.
- 4.1.2 The Pre-Submission Draft Minerals Plan deals with Crushed Rock in Section 3.2.
- 4.1.3 Section 3.2 identifies that the majority of sites that produce crushed rock for aggregate use are located on Portland and that these sites primarily produce dimension stone. Crushed rock is produced as a by-product or by exploiting the Cherty Series Limestone which underlies the dimension stone beds (paragraph 3.19).
- 4.1.4 There are five sites on Portland listed as producing crushed rock aggregate (paragraph 3.2.3) although these sites are controlled by only two companies.
- 4.1.5 Swanworth Quarry is the only source of limestone aggregates within Dorset which lies outside Portland.
- 4.1.6 Paragraph 3.22 recognises that the supply of important construction materials should not be constrained to a single source and states:

There are benefits in having more than one source of crushed rock within the Plan area, and in recognition of this, Policy AS3 of the Minerals Strategy permits new sites in exceptional circumstances for the processing and production of crushed rock, including where development would enable a sustainable supply of mineral close to the market.

- 4.1.7 With regard to the future provision of crushed rock the importance and sustainability of Swanworth is acknowledged in paragraph 3.25 which states:

Swanworth Quarry in Purbeck supplies crushed rock to south-eastern Dorset, Bournemouth and Poole. It is an important source of crushed rock, supplying approximately half of the Dorset annual total. It provides an alternative source of crushed rock to the Portland quarries or Mendip quarries. In terms of reducing distances travelled, it is considered to offer a more sustainable source of construction aggregate for the Poole and Bournemouth markets.

- 4.1.8 The location of Swanworth within the Dorset AONB is clearly identified in paragraph 3.27 and in paragraph 3.28 reference is made to the various benefits associated with Swanworth as follows:

The Mineral Planning Authority has taken into consideration the great weight given in national policy to the conservation of landscape and scenic beauty along with the economic, spatial and sustainability benefits provided by this quarry and the great weight also given in the National Planning Policy Framework to the benefits of the mineral extraction, including to the economy.

- 4.1.9 An extension to Swanworth is identified in **Policy MS-3** in order to contribute to the continued adequate and steady supply of crushed rock. which states:

An extension to Swanworth Quarry in Purbeck (PK16 – see Submission Policies Map – Inset 11) is allocated to contribute to the adequate and steady supply of crushed rock.

Any proposal for the development of this allocation must address the development considerations set out for the site in Appendix A with particular emphasis on landscape and visual impacts on the Area of Outstanding Natural Beauty as well as any other matters relevant to the development of the allocation, and demonstrate that any adverse impacts will be mitigated to the satisfaction of the Mineral Planning Authority.

This proposed development will only be considered where it has been demonstrated that possible effects (including those related to hydrology, displacement of recreation, species, proximity, land management and restoration) that might arise from their development would not adversely affect the integrity of European and Ramsar sites, either alone or in combination with other plans or projects.

- 4.1.10 The allocation of the extension area is supported by development guidelines in Appendix A which identify a range of issues that would need to be addressed at the planning application stage. Mitigation measures would be expected to be included in development proposals to prevent adverse impacts arising and compensation measures may be required to balance unavoidable adverse impacts.
- 4.1.11 It would be the intention to work closely with Dorset and planning consultees to agree the scope of the planning assessment and the detail of mitigation or compensation measures as appropriate.

5.0 NATIONAL PLANNING POLICY

5.1 Introduction

5.1.1 It is fully understood that the Swanworth Quarry extension area lies within the Dorset AONB and that the National Planning Policy Framework (NPPF) published in March 2012 by the Department for Communities and Local Government requires that **exceptional circumstances** are demonstrated to support such a development and that the proposals should be in the public interest.

5.1.2 Paragraphs 115 of the NPPF states:

Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

5.1.3 In considering development proposals in designated areas exceptional circumstances need to be demonstrated. Paragraph 116 outlines the extent of exceptional circumstances in three tests:

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent that could be moderated.*

5.1.4 The British Geological Survey publication titled “Aggregate Resource Alternatives: Options for future aggregate minerals supply in England” published in 2008 contains a large amount of information on aggregate minerals located within environmental designations including National Parks and AONBs throughout England.

5.1.5 The report identifies that in 2005 over 16% of all aggregate production in England came from sites located within National Parks and AONBs, over 22 million tonnes in total (Table 6 on page 25). Furthermore in 2005 the consented reserves of aggregate within National Parks and AONBs amounted to almost 25% of all the aggregate reserves in England, a total of almost 1 billion tonnes (Table 7 on page 27).

5.1.6 It is likely that a large number of these aggregate permissions were granted many years ago, perhaps before the designations were established, however there are likely

to have been numerous planning permissions granted since the designations came into effect which have presumably been able to demonstrate exceptional circumstances.

- 5.1.7 A list of recent examples of planning permissions or major planning applications for aggregate development in National Parks and AONBs made during the last five years is provided in **Appendix 2**. The list contains aggregate development in designated areas around the country. The three tests for exceptional circumstances will have needed to be met in each of these cases.
- 5.1.8 There are other examples of mineral developments in designated areas that include an element of aggregate extraction which have not been included in this list as the aggregate extraction only formed part of a development for the extraction of other minerals such as silica sand, slate or building stone.
- 5.1.9 The tests for exceptional circumstances of need/economy, alternatives and environment are considered in more detail in the following sections specifically in relation to the Swanworth Quarry extension.

5.2 Exceptional Circumstances Test 1 – Need and Economy

Swanworth Contribution to Dorset Crushed Rock Supplies

- 5.2.1 The crushed rock used in Dorset is provided by quarries within Dorset or by importation, primarily from Somerset, either by road or rail.
- 5.2.2 The historic sales of crushed rock in Dorset are identified in the Bournemouth, Dorset and Poole Local Aggregates Assessment (LAA). The most recent LAA covers the period from 2006 to 2015 and was published in May 2017.
- 5.2.3 Annual sales of locally won crushed rock are set out in **Table 1** below in terms of crushed rock won in Dorset since 2012, the data has been taken from the LAA. Crushed rock sales from Swanworth are also shown as a comparison. It can be seen that sales of locally won crushed rock over recent years have varied between 150,000 tonnes and 280,000 tonnes per year, the figures being largely dependent on the general level of economic activity. Sales from Swanworth amounted to approximately 50% of the crushed stone annually produced in Dorset during the same time period.
- 5.2.4 The first full year that Suttle Stone Quarries operated Swanworth Quarry was 2012 when sales amounted to only 62,000 tonnes due to the effects of the economic downturn and the new entry into the crushed rock business. Sales have gradually increased as the Suttle Stone Quarries business became more mature and integrated with the recycling operation at Mannings Heath. Sales remained restricted however, due to the limitations of the quarry processing plant inherited from Tarmac.
- 5.2.5 In order to address the processing limitations Suttles invested £1 million in new processing equipment in 2014 which allowed for more efficient crushing and screening of stone and a greater production of premium limestone products.

- 5.2.6 Sales have risen as a consequence of the improved processing operations and the improving economy from 104,000 tonnes in 2014 to 120,000 tonnes in 2015 and have remained between 120,000 to 130,000 tonnes since then. It is not anticipated that sales will increase beyond 130,000 tonnes per year in the future.

	2012	2013	2014	2015	2016	2017
Dorset locally won crushed rock sales (from 2015 LAA)	150,000	160,000	280,000	240,000	Not yet published	Not yet published
Swanworth sales	62,000	80,000	104,000	120,000	123,000	129,000
Swanworth sales as % of Dorset sales	41%	50%	37%	50%	???	???

Table 1 Crushed Rock Sales 2012 - 2017 (figures in tonnes)

- 5.2.7 Crushed rock has been imported into Dorset by rail from Whatley Quarry in the Mendips in Somerset at varying levels up to 160,000 tonnes per year (2004 – LAA Table 1) although the most recent 10 year average level of imports is only 50,000 tonnes per year as there have been no imports between 2012 and 2017. Only limited imports took place in 2017 and it is understood that the operator is soon to vacate the site due to the economics of the operation.
- 5.2.8 The LAA also identifies that road imports of crushed rock, primarily from Somerset, amounted to approximately 260,000 tonnes in 2014, equivalent to 49% of the 530,000 tonnes of crushed rock consumed (LAA paragraph 1.33). This level of road imports is likely to increase in the future if rail imports cease and also as the economy improves with an associated increase in demand for construction aggregates.
- 5.2.9 Swanworth clearly makes a crucial contribution to the local crushed rock requirements and provides a spatial and sustainable source of material compared to the sites in Portland and the Mendips.
- 5.2.10 The advice in the NPPF at paragraph 145 (7th bullet point) is that mineral planning authorities should ensure that large landbanks bound up in very few sites do not stifle competition and Swanworth effectively provides an alternative source to crushed rock supplies to those from Portland and the Mendips.
- 5.2.11 The different types of limestone product sold from Swanworth between 2012 and 2017 is shown in **Table 2** below.

Swanworth Quarry Sales Split	Percentage
2012 - 2017	
Type 1 sub-base	56
Single size chippings	25
Block stone/Gabion	8
Other	6
Agricultural limestone dust	4
Dimension stone	0.25

Table 2 Swanworth Historic Sales Split

- 5.2.12 Most products are sold within 30 miles of Swanworth. Stone is a heavy, bulky and relatively cheap product which makes the haulage element of the cost high and therefore the stone source needs to be as close as possible to the market. Longer transport distances, particularly for material such as Type 1 sub-base (the cheapest material in Table 2) are not desirable.
- 5.2.13 Some materials which have specialist use and can therefore command a higher price travel further, e.g. Gabion stone, single sized chippings for decorative use and rock armour for river/coastal defence and for rail infrastructure works.
- 5.2.14 Some limestone block stone from Swanworth, from the 'Freestone Beds', has been transported to California Quarry to be cut as dimension stone and has been used in the local area. This stone is the same material that is extensively worked on the Isle of Portland.
- 5.2.15 The quarry extension area has the potential to produce larger unfractured block which would help to supplement the availability of dimension stone from Portland. A summary report on the potential for dimension stone at Swanworth is included in **Appendix 3**.

Economics

- 5.2.16 Information regarding the Suttle family business and the importance of the Swanworth site are set out in detail in the accompanying Suttles Business Briefing Pack contained in **Appendix 4**. This document explains the integral relationship between Swanworth Quarry, the recycling depot at Mannings Heath, the Suttle Projects civil engineering business and the dimension stone quarry at California Farm.
- 5.2.17 The Mannings Heath recycling depot merchants a wide range of aggregates, including those sourced from Swanworth. It also acts as a major hub for the receipt and subsequent recycling of construction and demolition waste in the area. Builders and

contractors are able to deliver inert waste and collect aggregate products from the site. The provision of Type 1 sub-base and decorative products from Swanworth is key to its popularity with local traders and builders who can obtain all the products they need for a construction project.

- 5.2.18 The inert waste is recycled at Mannings Heath. The non-aggregate inert material remaining from the recycling operation is taken to Swanworth on returning HGVs for use in the recovery operation in site restoration.
- 5.2.19 The integrated relationship between Swanworth and Mannings Heath depot is very important in the success of both enterprises and is fundamental to the high percentage of “back haulage” utilised by the business where HGVs travel fully loaded in both directions taking Swanworth stone to customers or Mannings Heath and bringing inert waste materials back to Swanworth for restoration or recycling. Approximately 70% of Swanworth HGV movements use back haulage.
- 5.2.20 The annual turnover for Suttle Stone Quarries in 2016-2017 was almost £8 million with a similar turnover for Suttle Projects. Suttles strive to utilise local suppliers wherever possible. The document in **Appendix 4** identifies the extensive range of suppliers based in Dorset and the level of expenditure with each supplier.
- 5.2.21 There are almost 180 individual suppliers for the Suttle Stone Quarries business based in Dorset supplying a wide range of services and products. Annual expenditure during 2017 with individual Dorset suppliers ranged between £259,000 and £55. In addition Suttle Projects have over 90 individual Dorset based suppliers with annual expenditure levels in 2017 between £625,000 and £11 per supplier.
- 5.2.22 The total expenditure with Dorset suppliers in 2017 was £2.21 million by Suttle Stone and £2.07 million by Suttle Projects, clearly very substantial amounts.
- 5.2.23 Suttle Stone and Suttle Projects contribute significantly to the local and national economies. Further financial information is summarised below in **Table 3** below.

Suttle Stone Quarries	Financial year 2016 - 2017
Turnover	£7,949,792
Purchases and Tipping costs (Dorset)	£2,214,809
Employee Wages, Salary and NI	£1,829,920
Subcontract Haulage (Dorset)	£1,159,626
VAT	£750,337
Fuel Duty	£499,337

Aggregates Levy	£247,950
Corporation Tax	£162,414
Rates	£69,824
Road Fund Licences	£18,706
Suttle Projects	2016 - 2017
Turnover	£7,701,724
Employee Wages & Salary and NI	£1,108,553
Combined Turnover	£15,651,516
Suttle Stone Quarries/Suttle Projects	

Table 3 Suttles Business Summary Financial Figures**Employment**

- 5.2.24 Suttles employ a workforce that almost entirely consists of Dorset residents and are fortunate to have a loyal team with a low staff turnover. Currently Suttle Stone Quarries employs 52 and Suttle Projects employs 30. Currently all but five of the 82 Suttle employees reside in Dorset and 90% of the quarry based employees reside in Purbeck. The Suttles jobs are in general permanent, full time positions unlike some local jobs which are dependent on the seasonal nature of tourism.

5.3 Exceptional Circumstances Test 2 – Alternatives**Limestone**

- 5.3.1 There are no realistic opportunities to extend the existing quarry into immediately adjacent land. To the east the depth of overburden above the limestone is excessive, well over 15 metres deep, and the area would be particularly prominent from local viewpoints. To the south, beyond the restored quarry area, the land is open, overlooked from a number of viewpoints and lies closer to Worth Matravers village. Neither area is owned or controlled by Suttle Stone Quarries and consequently neither area has previously been promoted to Dorset as a potential extension area.
- 5.3.2 It is considered that the only opportunity to continue the existing quarry and associated business is to extend extraction operations into the area allocated in the Draft Mineral Sites Plan, PK-16, for which Suttle control the mineral rights and the ability to develop.

- 5.3.3 The alternatives to limestone extraction at Swanworth are limited. There is relatively little geological exposure of limestone within Dorset all of which lies within the AONB or on the Isle of Portland. The only other limestone crushed rock source in Dorset is on Portland, where two companies control the supply of material. Other sources of limestone crushed rock lie in the Mendip area of Somerset. Additionally there is a railhead at Hamworthy near Poole that has periodically been used for transporting crushed rock from the Mendips.
- 5.3.4 Portland crushed rock is produced either as a by-product of dimension stone production from quarry sites and underground mine operations or is produced by working the Cherty Series limestone bed which lies beneath the dimension stone beds. Stone extraction on Portland is controlled by a single extensive planning permission granted in 1951 although there are considerable landscape, ecological and amenity constraints with certain parts of the permission.
- 5.3.5 Portland is not considered as a sustainable source of crushed rock due its distance from the main market of Bournemouth and Poole which is almost twice as far as Swanworth. Swanworth lies approximately 22 miles from the main Bournemouth and Poole market. Portland is located some 42 miles away from this market area and the Mendip Quarries are 60+ miles away.
- 5.3.6 The supply of material to from Portland rather than Swanworth would result in almost twice the amount of road miles travelled by HGVs with consequent fuel consumption and engine emissions.
- 5.3.7 Swanworth also supplies 35,000 tonnes of limestone each year within the Purbeck District area, only a few miles from the quarry. Portland stone would be 20 miles further away.
- 5.3.8 The Mendips have substantial consented reserves of limestone and supply the majority of crushed rock imported by road into Dorset. The Mendip quarries are almost three times the distance from the Poole/Bournemouth market in comparison to Swanworth. It is not known whether back haulage occurs.
- 5.3.9 Mendips limestone is a purple/dark grey colour and not colour comparable to the stone used in Dorset.
- 5.3.10 The Dorset LAA estimates that road imports in 2014 amounted to approximately 260,000 tonnes of limestone, some 49% of the total crushed rock used in Dorset (LAA paragraph 1.33 and 1.69).
- 5.3.11 Crushed rock has previously been imported into the Hamworthy rail depot near Poole from Whatley Quarry on the Mendips. No imports were made between 2012 and 2017 and the limited operation undertaken in 2017 is to close during 2018 for economic reasons.

- 5.3.12 It is likely that the demand for crushed rock will continue at the current level and may well increase due to the number of proposed housing completions and employment development (LAA paragraphs 1.70 to 1.82).
- 5.3.13 The supply of crushed rock from Swanworth involves considerably less road miles, less fuel consumption and less associated engine emissions than supplies from Portland or from the Mendips.
- 5.3.14 Supplying crushed stone from Swanworth to the Bournemouth and Poole market would result in approximately 100,000 fewer HGV miles every year when compared with supplies from Portland and 200,000 fewer HGV miles every year when compared to supplies from the Mendips (calculation based on 100,000 tonnes supply annually from Swanworth with 20 tonne HGV load which would equate to 5,000 HGV loads per year).
- 5.3.15 These figures would double if the return HGV journey was included. Clearly Swanworth provides a sustainable source of crushed rock particularly when back haulage of material is considered.
- 5.3.16 Dorset estimate that the consented reserves on Portland, termed a landbank of permitted reserves, amount to 13 million tonnes although this figure will be substantially reduced as a consequence of the Review of Mineral Planning Permissions as required under the Environment Act 1995 and other significant environmental constraints as well as the trend towards underground mining. A hypothetical landbank of 13 million tonnes is sufficient to supply locally won crushed rock for 48 years at a rate of 270,000 tonnes per year.
- 5.3.17 The Planning Practice Guidance published October 2014 by the Ministry of Housing, Communities and Local Government, refers to the size of landbanks in paragraph 084 and states that:
- There is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank.*
- 5.3.18 There are many mineral planning authorities that have substantial landbanks of crushed rock aggregate that are more extensive than the Dorset landbank although a substantial landbank does not preclude the grant of new permissions for more aggregate in these areas. Planning decisions should be made following consideration of the merits of the proposals.
- 5.3.19 The Planning Practice Guidance paragraph 084 goes on to state that:
- There are a number of reasons why an application for aggregate minerals development is brought forward in an area where there exists an adequate landbank. These could include:*
- *Significant future increases in demand that can be forecast with reasonable certainty.*

- *The location of the consented reserve is inappropriately located relative to the main market areas.*
- *The nature, type and qualities of the aggregate such as its suitability for a particular use within a distinct and separate market.*
- *Known constraints on the availability of consented reserves that might limit output over the plan period.*

5.3.20 It is considered that several of these reasons are applicable to the allocation of the Quarry extension. The demand for crushed rock will continue at the current level and may well increase due to the predicted level of residential and employment development during the next 15 years. The alternative consented reserves of limestone in Portland are located considerably further from the main market and alternative aggregate types cannot match the characteristics and specifications of Swanworth products.

Alternative Aggregate – Sand and Gravel

5.3.21 Sand and gravel is not a comparable alternative for many of the products from Swanworth.

5.3.22 Sand and gravel is a conglomeration of smaller particles of other rocks which have been first eroded and then deposited as a result of water (fluvial or marine) or ice action (glaciers). Sand and gravel contains no large individual pieces and therefore cannot be used for applications where larger sizes materials are needed. By comparison limestone is a solid sedimentary rock which is formed in 'massive' deposits over a great depth. By comparison

5.3.23 Limestone is a solid mass and the size of the product can be controlled during the quarrying process to give sizes ranging from fine dust to say 5 tonne pieces measuring approximately 1.2 metre square.

5.3.24 Sand and gravel contains no cohesive properties whereas limestone has cohesive properties both through clay in its bedding planes, which can be processed out during production, or utilised as a benefit depending on the final application. The natural action of lime also acts as a basic cement.

5.3.25 Sand and gravel is largely composed of impervious silica and flint which are pH neutral whereas limestone is composed of more porous calcium carbonate which is alkali.

5.3.26 Sand and gravel is generally yellow/brown in colour with rounded particles whereas Portland limestone is white as evidenced by the walls, tracks, paths and buildings in the area with an angular/blocky shape.

Swanworth Product Range

5.3.27 Fine limestone dust from Swanworth has applications from agricultural use (treating acid soil types) through to mortar for heritage masonry restoration work. Its alkalinity

and its ability to be ground to a fine dust allow for these applications. Sand and gravel does not have these properties.

- 5.3.28 Limestone in 6mm, 10mm and 20mm chippings are used primarily for decorative and specialist use. These chippings are distinctively white in comparison to sand and gravel. An example of a specialist use is the supply of 6mm chippings nationally for use in resin bonded surface coatings to architectural stairs and walkways. Swanworth limestone has a porosity which is very compatible with this process. Gravel particles are impervious.
- 5.3.29 Limestone sub-base; 20mm to dust mix, Type 1 and open graded sub-base are used to build foundations for all forms of construction. It is the fine particles, produced by crushing, when mixed with larger angular particles that combine to give a material which gives a very stable, load bearing base on which roads, houses, etc, can be built. Limestone alkalinity makes it cementitious which helps the binding process during compaction. Importantly, these factors make a stable platform for the construction process as well as a strong component of the finished product. Sand and gravel lacks the angular particle characteristics and alkalinity to be used for this application.
- 5.3.30 Recycled aggregates can be used for some construction applications but the physical properties mean that they are not universally suitable and there is often a deficit in the quantity of recycling feedstock in comparison to demand particularly for construction sub-base.
- 5.3.31 Bulk fill materials are used to fill larger void spaces or the lower part of a construction profile which is then generally capped off with Type 1 sub-base.
- 5.3.32 Gabion stone is sized from 100mm to 200mm and is used in the creation of Gabion baskets. These are stone filled wire mesh baskets used to form a composite structural wall that is durable and visually attractive. Gabion baskets are used for coastal and inshore marine defence, retaining walls to highways and railway embankments, and also as a modern and attractive landscaping detail.
- 5.3.33 The largest particles of gravel are not compatible with the construction of gabion baskets, and without the angular nature of the particles the Gabions would lack the structural strength required.
- 5.3.34 Rock armour of all sizes is used for marine and inshore flood defence. Gravel products are too small for these applications.
- 5.3.35 Block stone can be produced at Swanworth in any size up to 8 tonnes and is used in many applications; art installations and architectural landscaping, defence against vehicle trespass and civic amenity. Gravel is not suitable for such applications.
- 5.3.36 It is important to note that an amount of the Swanworth Portland block stone has been used at California Quarry for cutting into dimension stone products and it hoped to increase production levels from the extension area. Again gravel is not suitable for such applications.

5.4 Exceptional Circumstances Test 3 – Environment

- 5.4.1 The potential impact on the environment, landscape and recreation would be assessed as part of a planning application and Environmental Impact Assessment (EIA) for the development of the extension area. The extent that any impacts could be moderated would also be determined as part of the EIA process although it is considered from the work that has already been carried out that unacceptable impacts could be mitigated.
- 5.4.2 In order to understand the potential level of impact and to demonstrate the necessary assessment work is fully understood, substantial preliminary work has been carried out on certain environmental aspects. Work has been undertaken on landscape, ecology, the water environment, cultural heritage and highways. The assessments are summarised below and where reports have been produced these are included in full in the Appendices.

Landscape

- 5.4.3 A Landscape and Visual Appraisal has been undertaken by David Jarvis Associates on the extension proposals which has considered the potential impacts in terms of impact on the character of the AONB and on viewpoints in the general area from properties, footpaths and public roads. The assessment is included as **Appendix 5**.
- 5.4.4 Much of Dorset is designated as AONB due to the quality and variety of the landscape. All AONBs/National Parks derive their identity in the first instance from their geology. The Dorset AONB is no exception. It is, among many factors, the rolling hills, ridges, coombes, cliffs, fossils which make people want to live here and visit. It is a living landscape. People have lived, farmed, travelled, worked and quarried here for millennia. While it is the geology and natural forces that have generally created the landform, it is this human activity that has created the land cover and land use.
- 5.4.5 The residents and visitors to the AONB and wider area require a supply of aggregates and essential building materials. These either have to come from within the AONB or from further afield.
- 5.4.6 If the aggregates do not come from quarries within the Dorset AONB then they must travel by road from such areas as Portland or the Mendips transferring any landscape and visual impacts elsewhere but with the unsustainable addition of significant lorry movements with their own visual and other impacts on the landscape.
- 5.4.7 Swanworth Quarry is a consented operational facility with its infrastructure already in place. With rare exception the plant and major activity is well-concealed. The upper slopes and faces are restored or being restored to an agreed plan. There are landscape and visual advantages in using an existing facility over introducing a new one into the AONB elsewhere. Swanworth Quarry has been providing material to the area for over 100 years and is, in itself and like other building stone quarries, part of the fabric and history of the area. The current Swanworth Quarry can be seen only from a very few limited viewpoints and, then, it is mostly the upper slopes and faces currently being restored.

- 5.4.8 The proposed extension area comprises three nearby fields. The proposed quarry and connection to the existing facility has been devised through numerous iterations and consultations to minimise landscape and visual impacts. To this end, it is only the lower parts of two fields which would be quarried with an access cut across the third field avoiding specific valued landscape elements. The proposed design utilises the strong field pattern with its walls/hedgerows/fences.
- 5.4.9 The access road cutting and gabion bridge combination have been designed and located to minimise landscape and visual impacts particularly of internal lorry movements.
- 5.4.10 There are very limited viewpoints from which any parts of the extension could be seen. Even these could be mitigated further at detailed design/application stage.
- 5.4.11 Directions of working and sequencing have been devised to minimise impacts and to maximise the infilling and progressive restoration.
- 5.4.12 All and any visual or landscape impacts are, in any event, temporary. The restoration of the whole proposed area to the original landform, land cover and land uses ensures this.
- 5.4.13 No landscape elements or features of any consequence are permanently lost.
- 5.4.14 There are no cumulative effects.
- 5.4.15 While there would be limited landscape impacts on the AONB and visual impacts to very restricted viewpoints in the AONB these would be temporary.

Ecology

- 5.4.16 In order to establish habitat types, their extent and provide a predictive assessment of their likely dependent fauna present ecologists Andrews Ecology were commissioned to undertake a thorough Phase 1 ecological survey.
- 5.4.17 The survey work covered a larger area than the currently proposed extension and was carried out before the final extension design had been determined, however the work demonstrated the limited ecological value of the agricultural land and identified the potential for a number of species to be present primarily in the adjacent valleys that would need further survey and assessment work as part of a full EIA. The detailed Phase 1 report is included in **Appendix 6**.
- 5.4.18 The Phase 1 survey comprised:
- A desk-study including a search for historical biological data relating to the site and a stratified radius performed by Dorset Environmental Records Centre.
 - Phase 1 habitat mapping to the method set out in the *Handbook for Phase 1 Habitat Survey: A technique for environmental audit* on 13th August 2014.

- An assessment of the conservation value of the habitats present against the criteria set for Priority Habitats within the UK Biodiversity Action Plan.
- A predictive assessment of the potential dependent legally protected and/or UK Biodiversity Action Plan (BAP) fauna using published scientific accounts.

5.4.19 The conclusions of the Swanworth Quarry Extension Phase 1 survey are as follows:

- The site has eight Statutory Wildlife Sites within a 2km radius comprising Isle of Portland to Studland Cliffs Special Area of Conservation (SAC), St Albans Head to Durlston Head SAC, Dorset Heaths SAC, Dorset Heathlands Ramsar, Corfe Common Site of Special Scientific Interest (SSSI), South Dorset Coast SSSI, Blashenwell Farm Pit SSSI and Dorset Area of Outstanding Natural Beauty (AONB).
- The site has 11 non-Statutory Wildlife Sites within a 1 km radius.
- The site holds 11 Phase 1 habitat types which encompass two Priority Habitats within the UK Biodiversity Action Plan comprising A1.1.1 – Woodland / Broadleaved / Semi-natural, which qualifies as ‘Lowland Mixed Deciduous Woodland’ within the UK BAP criteria and J2.1.2 – Miscellaneous / Boundaries / Intact Hedge / Species-poor, which qualifies as ‘Hedgerows’ within the UK BAP criteria.
- The site holds a moderately diverse flora but no legally protected and/or UK BAP Priority Species of plants were recorded.
- The site holds suitable habitat for 68 (38% overall county fauna) UK BAP Priority Species of invertebrates.
- The site holds no suitable habitat for any legally protected and/or UK BAP Priority Species of fish.
- The site holds suitable terrestrial habitat for two (67% overall county fauna) legally protected and/or UK BAP Priority Species of amphibian comprising great crested newt and common toad. Both species are listed as Priority Species within the UK Biodiversity Action Plan.
- The site holds suitable habitat for four (67% overall county fauna) legally protected and/or UK BAP Priority Species of reptile comprising slow-worm, common lizard, grass snake and adder. All four species are listed as Priority Species within the UK Biodiversity Action Plan.
- The site holds suitable habitat for 41 (41% overall county fauna) Schedule 1 and/or UK BAP Priority Species of birds.
- The site holds suitable habitat for six (75% overall county fauna) legally protected and/or UK Biodiversity Action Plan Priority Species of mammals

(excluding bats) comprising common dormouse, harvest mouse, brown hare, hedgehog, badger and polecat. Five of these species (i.e. excluding badger) are listed as Priority Species within the UK Biodiversity Action Plan.

- The site holds suitable habitat for all of Dorset's overall 16 bat species (100% overall county fauna) comprising barbastelle, serotine, Bechstein's bat, Brandt's bat, Daubenton's bat, whiskered bat, Natterer's bat, Leisler's bat, noctule, Nathusius' pipistrelle, common pipistrelle, soprano pipistrelle, brown long-eared bat, grey long-eared bat, greater horseshoe bat and lesser horseshoe bat. Barbastelle, Bechstein's bat, noctule, soprano pipistrelle, brown long-eared bat, greater horseshoe bat and lesser horseshoe bat are listed as Priority Species within the UK Biodiversity Action Plan.

5.4.20 The Institute of Ecology and Environmental Management (2006) suggest that a clear rationale should be given for deciding which features and resources should be subject to more detailed consideration within an ecological impact assessment. Taking a simplistic approach, and defining a trigger for survey as: "the potential for a legally protected species to occur within a site; and/or a minimum 50% of the total county UK BAP Priority fauna to occur within a site", in order to produce a robust assessment of the overall site detailed surveys and assessments would be required for great crested newts, reptiles, breeding birds, dormouse, badger and bats.

5.4.21 The necessary survey work would be undertaken following agreement of the scope and extent of the works with Natural England and the Dorset ecologist.

5.4.22 The provision of mitigation measures would be determined, as necessary, following the species survey work and assessment.

Water Environment

5.4.23 A preliminary hydrogeological and hydrological risk assessment was undertaken by BCL Hydrogeologists on the development of the extension area. The purpose of the assessment was to consider the potential impacts on the water regime and particularly on the nearby Encombe Estate water supply. The report is included as **Appendix 7** and contains preliminary findings on the following:

- Baseline characterisation of the local water environment.
- Evaluation of effects to date.
- Impact screening of the proposed extension upon that environment.
- Requirements for further information and assessment.

5.4.24 Collection and interpretation of published data, in conjunction with site specific information has facilitated the development of a preliminary conceptual model describing the nature of, and interactions between, the groundwater and surface water systems operating within the area.

5.4.25 The conceptual model has been employed to assist a screening exercise designed to identify the likely impacts of the proposed extension upon the water environment and determine requirements for further information. The assessment should therefore be viewed as an initial stage of the conventional EIA process. The key elements of the design of the proposed extension and its hydrogeological setting considered central to risk assessment are:

- Extraction of mineral within the proposed extension would be undertaken in the same manner as existing workings at the site.
- On the basis of the available information, the limestones to be worked as part of the proposed extension are free of groundwater, the underlying Portland Sands holding a piezometric surface c.10m below the base of the limestone units.
- There would be no workings beneath the level of groundwater, mineral extraction would be made dry using conventional drilling and blasting techniques without recourse to dewatering.
- Restoration to original ground levels within the proposed extension would be achieved by deposition of inert waste materials which would be undertaken progressively and concurrent with mineral extraction to minimise the duration of visual impact upon the local landscape.
- The deposit of inert waste materials for restoration would be subject to appropriate formal risk assessment as part of the Environment Agency (EA) permitting process, the risk assessment would assess the need for, and specifications of, any engineered containment and associated monitoring.
- Upon cessation of quarrying activities all plant and machinery would be removed and the restoration finalised to create a combination of agriculture and wildlife habitats.
- No part of the existing quarry or proposed extension lies within lands designated by the EA to be at risk of tidal, fluvial or surface water flooding.

5.4.26 The report confirms that the Upper Portland Group limestones of the current quarry and proposed extension do not appear to contain a watertable. Downward percolation of rainfall is made rapidly downwards through the fracture system of the limestones to recharge a watertable contained within the underlying Lower Portland Group Sandstones. On the basis of the available information, both the floor of the existing quarry and the proposed extension reside several metres above the local level of groundwater.

5.4.27 Groundwater movement within the Portland Sandstones appears to be made southwards, a substantial proportion of which discharges at several springs situated within the deeply incised valleys fringing the coastline. Groundwater flow north of the site is anticipated to be made northwards away from the site.

- 5.4.28 Spring flows within Quarry Combe and Westhill Combe to the south and south-west of the extension area emanate from the Portland Sandstone and constitute the single supply of water for a private distribution system, maintained by the Encombe Estate. The distribution system is extensive, and is thought to supply in the order of 70 properties that do not currently have benefit of a mains water alternative.
- 5.4.29 The results of a preliminary water sampling exercise, involving sampling of standing water within the site and spring flows feeding the Encombe Estate distribution system do not indicate any evidence of contamination of groundwater. Further, all tested determinands fell well within maximum permissible limits prescribed by regulation.
- 5.4.30 The available chemical information indicates the successful application of the measures observed at the site for the protection of groundwater quality (which include screening and testing of imported materials for deposition in restoration and fluids handling and storage protocols).
- 5.4.31 Mineral extraction within the proposed extension would proceed to the base of the economically workable Upper Portland Group limestones.
- 5.4.32 The current programme of importation and processing of inert wastes would be continued. A proportion of the processed wastes, in combination with indigenous waste stone, would be deposited within the void created by mineral extraction within the extension to restore the workings back to pre-quarrying ground levels. The risks posed to groundwater quality from accidental spillages or long-term undiscovered leakage of fuel, hydraulic or lubricating oils used at the site may be satisfactorily minimised by the adoption / continuance of fluids handling protocols.
- 5.4.33 The potential for contamination of groundwater resources and sources, including those utilised by the Encombe Estate, by unanticipated generation and escape of potentially polluting leachate associated with the deposition of imported inert wastes may be reasonably and satisfactorily mitigated by adoption and enforcement of the findings of formal risk assessment undertaken using nationally recognised protocols. Such risk assessments would ordinarily be anticipated at the planning application / permit application stage.
- 5.4.34 When taking into account the hydrological and hydrogeological setting of the Site, EA Position statement E1, which presents considerations relating to the location of prospective waste disposal / deposition operations, does not indicate any reasons for presumption against the infilling element of the proposed extension.
- 5.4.35 The full report was submitted to the EA as well as to Dorset in December 2016. The EA subsequently responded to the report confirming they had **no objection** to the proposed site extension being included in the Bournemouth, Dorset and Poole Mineral Sites Plan. A copy of the EA letter is included as **Appendix 8**.

Cultural Heritage

- 5.4.36 There are several Scheduled Monuments (tumuli) in the vicinity of the extension area and as a consequence a cultural heritage consultant, Andrew Josephs Associates, has

been engaged to advise on how best to minimise the potential impact of the extension area on features of cultural heritage in the area and the Scheduled Monuments in particular.

- 5.4.37 The initial extension design proposals have demonstrated that there is flexibility in the operation and restoration of the quarry, and further refinement during the planning process should result in an acceptable scheme being designed.
- 5.4.38 The extension area has been designed to avoid any physical disturbance of the Scheduled Monument. Shallow soil banks would be established on the boundary of the extension area to screen extraction operations.
- 5.4.39 Initial consultation with Historic England has been carried out and a site meeting held in March 2015 to discuss the potential impact of the extension on the Scheduled Monuments. At the meeting it was suggested by Keith Millar (Heritage England Ancient Monuments Inspector) that extraction should not occur in the southernmost field in which the closest Scheduled Monument is located and only access should be provided. Extraction should be restricted to the fields to the north of the Scheduled Monument. This advice has been taken on board in the final extension design.
- 5.4.40 In addition the proposals to restore the extension area to agriculture at original ground levels would ensure that there was no long-term impact on the Scheduled Monuments.
- 5.4.41 A series of site-based investigations and analysis of heritage and landscape setting issues would be required prior to determination of a planning application. This work would be carried out at the outset of the planning application process and would be coupled with ongoing consultation with English Heritage and Dorset Archaeologists to ensure that sufficient and appropriate work is carried out to allow an informed decision to be made.

Highways

- 5.4.42 The Hurlstone Partnership Limited was instructed to review the general acceptability of the proposed quarry extension in terms of highway matters. The review considered the conditions imposed upon the existing planning permissions which would, as far as highway matters are concerned, continue to be applied to the proposed extension. The transport statement is included as **Appendix 9**.
- 5.4.43 Effectively the proposed extension would result in a continuation of the existing activities at the site for an additional period of time. There would be no increase in traffic on a hourly, daily, weekly or annual basis when compared with the current situation.
- 5.4.44 A review of historic traffic data revealed that even when taking into account predicted traffic growth, the traffic flows between the quarry and the A351 corridor, along which the majority of site vehicles travel, would remain below the volumes previously accommodated on the route. It was also found that the proportion of development

traffic on the A35 trunk road, to which the A351 connects, would remain insignificant in the future.

- 5.4.45 The safety performance of the site access and the local road network to the A351/A35 was reviewed with reference to personal injury accident data obtained from Dorset County Council. It was found that the existing HGV activities at the site had not led to injury accidents.
- 5.4.46 In reviewing the proposed extension for the purposes of the Draft Mineral Sites Plan, Dorset Highways confirmed that the existing site access is adequate and the continuation of activities as a result of the scheme would be acceptable in terms of highway impact, awarding the site a rating of “Less Significant Adverse Impact”.
- 5.4.47 It is concluded that the proposed extension to Swanworth Quarry would be acceptable in terms of highway and transport matters taking the assessment work into account and the transport policy test imposed by paragraph 32 of the National Planning Policy Framework, which advises: “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”.

6.0 CONCLUSIONS

- 6.1.1 Suttle Stone Quarries operate the existing Swanworth Quarry which provides an important supply of limestone aggregate for the eastern half of Dorset and particularly to Purbeck District and the major market in Bournemouth and Poole. It is the closest source of limestone aggregates to these markets. Swanworth Quarry forms an integral part of the Suttles business which includes a recycling and merchandising depot, a dimension stone quarry and a specialised civil engineering contractor.
- 6.1.2 Suttles have over 30 employees based at Swanworth and employ another 50 people at different sites. The total expenditure at Swanworth amounts to over £4 million per year, a substantial amount of which directly benefits the local economy.
- 6.1.3 The quarry has very limited amount of remaining reserves and an extension is proposed which would provide 1.7 million saleable tonnes of limestone sufficient for between 13 and 14 years production. The extension area would be restored using inert infill back to agricultural use at original ground level ensuring there was no long-term impact on the AONB.
- 6.1.4 The quarry extension design has been produced by a landscape architect specifically to reduce landscape and visual impact from the development and to avoid the Scheduled Monument. Various mitigation measures have been incorporated to reduce visual impact.
- 6.1.5 The extension would be developed using the same extraction operations as used in the existing quarry and the existing quarry infrastructure would be used in the development of the extension area. The level of quarry output, site access and working hours would all remain the same.
- 6.1.6 Major development in AONBs are required to demonstrate exceptional circumstances. The three tests for exceptional circumstances of need/economy, alternatives and environment are considered in this submission. It is considered that there is a considerable weight of evidence to demonstrate that there are exceptional circumstances sufficient to justify the allocation of the Swanworth Quarry extension area in the Mineral Sites Plan.
- 6.1.7 The Mineral Sites Plan is regarded as being sound as it has been positively prepared, justified, effective and consistent with national policy. It is considered to be legally compliant.