

Bournemouth, Dorset and Poole Mineral Sites Plan Examination Statement  
by Dorset County Council

**MSPHD ...**

**Issues 1 to 41 - Questions 1 to 269**

**Bournemouth, Dorset and Poole Mineral Sites Plan Examination**

**STATEMENT BY DORSET COUNTY COUNCIL ON BEHALF OF  
BOURNEMOUTH BOROUGH COUNCIL AND THE BOROUGH OF POOLE  
(THE MINERAL PLANNING AUTHORITIES )**

**September 2018**



Bournemouth, Dorset and Poole Mineral Sites Plan Examination Statement  
by Dorset County Council

**Background Documents**

1. Excerpt from the Environmental Statement accompanying the Hampshire County Council Roeshot site application considering options for rail transport
2. Transport Statement accompanying the Hampshire County Council Roeshot site application
3. Further information on the SANGs associated with the Hampshire County Council and Dorset County Council Roeshot site/proposed allocation.

**Statements of Common Ground**

1. *To be added*

**For further information, and to see documents referred to, go to the Examination Website at:**

<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/dorset-county-council/minerals-planning-policy/mineral-sites-plan/mineral-sites-plan.aspx>

## Issue 1 - Legal Compliance

### A) Duty to Co-operate

#### **1. Has the duty to co-operate been met with respect to all relevant prescribed bodies in Regulation 4 of the 2012 Local Plans Regulations?**

For the Mineral Sites Plan, the Duty to Cooperate Statement MSPSD 06 sets out how the Duty to Cooperate has been met for this Plan.

The MPA consider that Duty to Cooperate has been complied with regarding the relevant bodies set out in Regulation 4. All relevant bodies have been consulted at each stage.

The level of engagement that the MPA has had with these bodies has varied depending on the relevance of the Mineral Sites Plan to those bodies. Engagement has been most extensive with Natural England, Historic England, Highways England and the Environment Agency.

#### **2. In a few paragraphs give a brief summary of how the duty to co-operate has been met. Amongst other relevant matters, include how the South West Aggregates Working Party, the South East Aggregates Working Party and any other relevant Aggregates Working Party have been involved.**

The Mineral Sites Plan is primarily intended to identify and allocate the specific sites required to deliver the various strategies for mineral provision, as set out in the Bournemouth, Dorset and Poole Minerals Strategy 2014 (MSDCC – 54). Issues such as level of provision of the various mineral types and general spatial locations of mineral provision over the life of the Plan are covered in the Minerals Strategy, which was adopted in 2014.

For the Mineral Sites Plan, complying with the Duty to Cooperate has included:

- Four public consultation exercises, 2013/14, 2015, 2016 and 2017/18, offering local authorities in/around Bournemouth, Dorset and Poole the opportunity to engage.
- MPAs around Bournemouth, Dorset and Poole also had the opportunity to engage.
- Various meetings/discussions with local authorities within Dorset - recorded in Appendix 4 of the Duty to Cooperate Statement MSPSD 06.
- The MPA being represented on the South West Aggregates Working Party.
- Establishment of a Joint Working Group, covering the Moreton/Crossways area of Dorset, with Members and Officers of Dorset County Council, West Dorset District Council, Purbeck District Council and Moreton and Crossways Parish Councils. Further detail is provided in the Duty to Cooperate Statement MSPSD 06.
- Undertaking an exercise in August 2017 contacting all MPAs that Dorset County Council either exports aggregate to or receives aggregate from (as identified in the 2014 national Aggregate Minerals Survey) to inform them of the preparation of the Draft Mineral Sites Plan, set out the level of export/import with Dorset County Council and invite comments. Results are in Appendix 3 of the Duty to Cooperate Statement MSPSD 06.
- This exercise included specifically consulting the South East Aggregates Working Party and the London Aggregates Working Party. Exchanges with other AWP's are very limited and the MPA did not consider that specific consultation with any other AWP's was required.

The MPA is not aware of any outstanding Duty to Cooperate objections. Further information on the Duty to Cooperate and how it has been met is set out in the Duty to Cooperate Statement MSPSD 06.

### **3. How have the Councils determined what a strategic minerals matter is?**

Paragraph 20 of the National Planning Policy Framework (July 2018) states that '*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: ...the provision of minerals and energy (including heat)*'. The adopted Minerals Strategy sets out the spatial strategy for minerals. By implication in the NPPF minerals are a strategic matter and, at the higher level, sites are required to deliver a level of need that has been quantified (including a 7-year land bank for aggregates). Some sites will be more significant than others in terms of their importance to delivering strategic needs, but even small sites contribute to this, for example in the case of Purbeck Stone which is delivered almost exclusively from a suite of small sites. The significance strategically of any individual site will be considered based upon its potential reserve and monitored through the Local Aggregates Assessment.

The roles of the Mineral Sites Plan are:

- Allocations of sites for future development for sand and gravel, crushed rock, ball clay, Purbeck Stone and other building stone.
- Designation of an Aggregates Area of Search (based on the Aggregates Resource Blocks designated through the Minerals Strategy 2014 (MSDCC – 54).
- Designation of the Puddletown Road Policy Area
- Safeguarding of mineral sites

The MPA consider that at identification of future mineral development sites, and other spatial mineral designations, can be considered a strategic matter. The MPA has engaged with District, Borough and Parish/Town Councils, as required.

In terms of levels of provision of minerals and mineral supply, the MPA consider that these are strategic matters but were addressed during the preparation and adoption of the Minerals Strategy 2014 (MSDCC – 54). The Mineral Sites Plan is now seeking to deliver these agreed and adopted strategies.

Although the strategy for aggregates supply has already been agreed, the MPA considered that as this issue is specifically monitored through the annual Local Aggregates Assessment, it justified specific engagement with relevant MPAs to seek their views on the outworking of the agreed aggregates strategy, and carried out a specific engagement in August 2017 to MPAs to whom Dorset County Council exported aggregates. These MPAs were specifically asked whether they considered the levels of movement strategic, and whether they had any comments on the proposals of the Draft Mineral Sites Plan. No objections on Duty to Cooperate grounds were received.

The MPA does not consider that any other mineral provision/supply was sufficiently strategic to consult on site allocation issues beyond the consultations referred to in Question 2.

### **4. Are there any outstanding objections relating to the duty to co-operate and its fulfilment by the Councils? If so, please give details?**

Although there are outstanding objections to some of the proposed site allocations, the MPA is not aware of any other objections on Duty to Cooperate matters.

## Issue 2

### B) Legal issues

#### **5. Has the Mineral Sites Plan (MSP) been prepared in accordance with the Councils' Local Development Schemes?**

Yes, the Mineral Sites Plan has been prepared in accordance with the relevant version of the Local Development Scheme (MSDCC 31) up to the point of the Submission milestone, with Publication in December 2017 and Submission during March 2018.

The LDS proposes adoption in December 2018, although this was based upon an assumption that the Plan's hearings would begin in June. As these are taking place in late September/early October it is likely that the LDS milestone for adoption will need to be amended. The MPA intends to keep the LDS milestones under review and update to reflect any need to amend dates as soon as is practicable.

#### **6. Was consultation on the MSP carried out in compliance with the Councils' Statements of Community Involvement?**

The preparation of the Mineral Sites Plan has complied with the Dorset County Council Statement of Community Involvement (MSDCC 32). Further details are provided in the Mineral Sites Plan Consultation Statement (MSPSD 05).

Bournemouth and Poole Councils have their own SCIs (MSDCC 33 and MSDCC 34). Dorset County Council has liaised with Bournemouth and Poole Councils to ensure that consultation on Plans covered by their SCIs are up-to-date with the two authorities' own SCI commitments, where appropriate. In many cases, the MPA has gone beyond the minimum requirements set out in the SCI. For example, neighbour notification letters were sent and site notices were displayed at later consultation stages on site options.

#### **7. Were all relevant community groups provided with an adequate opportunity to comment on all aspects of the MSP?**

The MPA are satisfied that relevant community groups have had an opportunity to comment.

Appendix 1 of the Dorset County Council Statement of Community Involvement (MSDCC 32) indicates the likely bodies that will be consulted. It also describes how they will be consulted. The MPA are satisfied that the SCI has been complied with.

The Mineral Sites Plan Consultation Statement (MSPSD 05 - paragraph 1.8) provides more information on the consultation/engagement process, setting out for each of the separate consultation exercises:

- Who the MPA invited to comment?
- How they were invited to comment?
- What the main issues raised were, and
- How those issues were addressed?

In the interests of being inclusive, the MPA has gone beyond the requirements of the Statement of Community Involvement, taking steps such as arranging public exhibitions during consultation periods, putting up site notices around proposed allocation sites and undertaking neighbour notification.

**8. In general terms, is the MSP consistent with the Minerals Strategy 2014 (MS) and does it reflect its vision, objectives, spatial strategy and policies?**

The Minerals Strategy 2014 (MSDCC – 54) has a Vision that 'an adequate and steady supply of Dorset's minerals will have been secured efficiently and in environmentally acceptable ways'. This is supported by Objectives, including the steady supply of minerals and protection of mineral sites, and particularly reflected in the Spatial Strategy.

Q. 3 above sets out the roles of the Mineral Sites Plan:

- Allocations of sites for future development for sand and gravel, crushed rock, ball clay, Purbeck Stone and other building stone.
- Designation of an Aggregates Area of Search (based on the Aggregates Resource Blocks designated through the Minerals Strategy 2014 (MSDCC – 54).
- Designation of the Puddletown Road Policy Area
- Safeguarding of mineral sites

The MPA is satisfied that these are consistent with the Minerals Strategy 2014 (MSDCC – 54) and reflect the relevant aspects of the vision, objectives, spatial strategy and policies.

The first two bullet points address the issue of identification of future mineral development sites to maintain the supply of minerals - Objectives 1-3 of the Minerals Strategy. The third bullet point is particularly relevant to Objective 4, maximising opportunities for environmental enhancement through restoration of mineral sites. The fourth bullet point is relevant to Objective 6, mineral site safeguarding.

Other aspects of the vision, objectives, spatial strategy and policies not specifically delivered through the Mineral Sites Plan are delivered through the Minerals Strategy itself.

**9. Are there any parts of the MSP which depart from the MS and, if so, what is the justification for this?**

The MPA is satisfied that the Mineral Sites Plan, in identifying sites for maintaining the supply of minerals, seeking comprehensive and long-term restoration/management of mineral sites and improving/clarifying the approach to safeguarding mineral sites, is in compliance with and contributes to the delivery of the Minerals Strategy.

There are areas where the Mineral Sites Plan is silent - for example, there are no proposed allocations for Portland Stone. This reflects the approach to site selection on which the Mineral Sites Plan is based. The MPA considered that the approach of issuing 'Calls for Sites', inviting site nominations (e.g. see Appendix 1 of the Duty to Cooperate Statement MSPSD 06) supported by a willing landowner was the most effective way to identify viable minerals sites. On Portland there was one proposed mining allocation. This recently received planning permission, so no longer features in the Mineral Sites Plan.

**10. Does the MSP replace any development plan policies?**

Yes, these are set out in the *Extant Plan Policies of the Dorset Minerals and Waste Local Plan 1999 to be replaced by Mineral Sites Plan* document MSPSD 10. There are five extant policies from the 1999 Dorset Minerals Plan which were not replaced by the Minerals Strategy, but will be replaced on adoption of the Mineral Sites Plan - the details of these policies are set out in MSPSD 10.

It is proposed that this Schedule of policies will be included within the Mineral Sites Plan as 'Appendix C: Policies Replaced' under modification **MM-AC.1** as set out in the Schedule of Modifications MSDCC 70.

**11. Is the Development Plan as a whole in compliance with Section 19(1A) of the *Planning and Compulsory Purchase Act 2004* (as amended), which requires development plan documents to include policies designed to secure that the development and use of land in a local planning authority's area contribute to the mitigation of, and adaptation to, climate change? Does the MSP contribute to meeting this requirement?**

The MPA are satisfied that the Development Plan is compliant as required.

Compliance is primarily delivered through Policy CC1 of the Minerals Strategy 2014 (MSDCC – 54), requiring proposals for mineral development to be supported by an assessment of how climate change mitigation and adaptation measures have been incorporated in the design and operation of the proposed development, along with energy, material and water efficiency and minimisation of vehicle emissions. Other policies of the Minerals Strategy e.g. DM-1 and DM-3 address the issue of flood prevention, and DM-8 seeks to minimise road transport. However, Policy CC-1 of the Minerals Strategy 2014 (MSDCC – 54) is considered to fully address this requirement.

The Mineral Sites Plan (paragraph 2.7) notes that the Plan is subject to all the relevant policies of the Minerals Strategy 2014 (MSDCC – 54) and (paragraph 2.8) should be read along with the Minerals Strategy.

The specific allocation policies of the Mineral Sites Plan (i.e. MS-1, MS-3 to MS-7) all require a developer to fully address all relevant development guidelines, and note that adverse impacts will be mitigated to the satisfaction of the MPA. Although this does not specifically identify mitigation of climate change, it would cover climate change matters if there was a specific identified need.

**12. Does the MSP have regard to the purpose of conserving biodiversity in accordance with section 40 of the *Natural Environment and Rural Communities Act 2006*?**

The duty to conserve biodiversity has been taken into account throughout the preparation of the Mineral Sites Plan and the MPA consider it complies with section 40 of the Natural Environment and Rural Communities Act 2006.

The implications for and opportunities regarding biodiversity have been considered in the identification and allocation of sites for future minerals and waste development and areas of search for minerals extraction.

- Each site assessment (e.g. MSDCC 11- MSDCC 30) has considered biodiversity impacts/issues - through Criteria C1 to C5.
- The Sustainability Appraisal (MSPSD 03) includes 'To maintain, conserve and enhance biodiversity' as one of the Sustainability Objectives, traced back to the requirements of the SEA Directive and reflected in the relevant criteria of the Site Assessments.
- Assessment under the Conservation of Habitats and Species Regulations, 2017 (MSPSD 07) has been carried out for the Mineral Sites Plan, subject to further assessment to take into account the recent ECJ ruling. The HRA Assessment has made various recommendations to ensure compliance with the Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna, the 'Habitats Directive'.
- Each of the site allocation policies of the Mineral Sites Plan (e.g. MS-1 to MS-8) includes a specific clause intended to ensure the protection of the integrity of European and RAMSAR sites.

The Mineral Sites Plan (paragraph 2.7) notes that the Plan is subject to all the relevant policies of the Minerals Strategy 2014 (MSDCC – 54) and (paragraph 2.8) should be read along with the Minerals Strategy. Policy DM-5 of the Minerals Strategy sets out the protection for biodiversity, from local to European designations, and the Mineral Sites Plan complies with this policy.

### **13. In broad terms, is the Sustainability Appraisal (SA) adequate overall?**

The SA is considered to be adequate with regard to meeting relevant legislative requirements, the process followed, and the outcomes of the SA process in how it has considered the likely significant effects of the Plan with regards to environmental, economic and social impacts factors.

The SA Report MSPSD 03 outlines the process followed in more detail, including the SA stages undertaken:

- An outline of the contents, the methodology and description of the SA/SEA process and the specific SA/SEA tasks undertaken
- A review of other plans and programmes and their relationship to Bournemouth, Dorset and Poole (Sustainability Appraisal Scoping Report MSDCC 66)
- A description of the environmental and sustainability context (known as the baseline information)
- A summary of key sustainability issues
- The SA/SEA Framework which sets out the SA/SEA objectives for assessing the Minerals and Waste Local Plan
- A review of the options considered (including site options) and the preferred options selected

It is also supported by a Health Impact Assessment (section 9 of SA Report MSPSD 03) and an Equalities Impact Assessment (section 10 of SA Report MSPSD 03).

In the recent Pre-Submission Consultation 2017-18 Natural England (rep PSD MSP 336-340) provided further comments on the need for further work in the Sustainability Appraisal on crushed rock and the proposed allocation of Swanworth Quarry. The MPA have amended the Sustainability Appraisal (MSPSD-11) to add further information, as requested by Natural England (PSD MSP 336-340).

### **14. Does the MSP comply with all relevant legal requirements, including those in the 2004 Act (as amended) and the 2012 Regulations?**

Yes, the MPA consider that the Mineral Sites Plan complies with all relevant legal requirements. The Legal Compliance Checklist (MSDCC 44) sets out how the Mineral Sites Plan complies with the relevant legal requirements.

## **Habitats Regulations**

### **15. I understand that the Councils are preparing a refreshed Habitats Regulations Assessment (HRA) as a result of [People over Wind, Peter Sweetman v Coillte Teoranta](#) so that avoidance and reduction measures are not taken into account at the screening stage but rather at the Appropriate Assessment stage. Would the Councils confirm that Natural England and any other relevant nature conservation bodies are being consulted with respect to this refreshed document?**

In compliance with Regulation 105(2) of the Conservation of Habitats and Species Regulations, 2017, Natural England have been consulted at all stages of the preparation of all iterations of the assessment carried out under this regulation. This includes the Appropriate Assessment of the Mineral Sites Plan Pre-Submission Draft (prepared in response to People Over Wind, Peter Sweetman v Coillte Teoranta), August 2018 (MSPSD - 12). Natural England provided initial advice on the format of the assessment over a series of meetings and discussions in May and June 2018, and were then consulted on the final report via email and at a meeting on 3<sup>rd</sup> August 2018. A letter confirming approval of the AA was sent via email from Dr Andrew Nicholson, Senior Advisor at NE, on 6<sup>th</sup> August 2018 (MSPSD-13).



**16. The November 2017 HRA Screening Report identified sites (AS-06, AS-12, AS-13, BC-04) and policies (MS-1, MS-2, MS-3, MS-4, MS-5, MS-6, MS-8) as requiring mitigation to enable a conclusion of no likely significant effects to be made. Do the Councils want to put forward any main modifications to these sites/policies as a result of the refreshed report?**

Appendices 2 and 3 of the HRA Screening Report (Nov 17) set out the mitigation required to enable a conclusion of no likely significant effects to be made. All of the mitigation in Appendix 3 is included within the Policies of the Plan. All of the mitigation relating to insertion of site specific wording into the Policies of the Plan from Appendix 2 is also already included. However, mitigation in Appendix 2 relating to specific works/design features at AS-06, AS-12, AS-13 and BC-04 was not included in the Plan and this is now proposed as a series of main modifications. These are:

- AS-06 Great Plantation (see **MM-AS06.1**):
  - Design of a network of walks/paths around the remainder of the site to ensure walkers are directed away from areas adjacent to the European site
  - Phasing of works, with restoration to high quality heathland/grassland habitat taking place as soon as a phase is finished
  - Enhancement of areas within the original site boundary (land controlled by the operator) to create additional habitat for Annex 1 and Annex 2 species
- AS-12 Philliol's Farm (see **MM-AS12.1**):
  - Routing the haul road through existing forestry plantation, avoiding existing walking routes and habitat used by Annex 1 birds
  - Creating a haul road entrance which is separate from the existing ride entrance, to ensure continued parking/access for recreational use
- AS-13 Roeshot (see **MM-AS13.2**):
  - Creation of a buffer strip along both banks of the river Mude
  - Improvements to existing southern damselfly habitat within or adjacent to the allocated site
  - Careful management of water resources to ensure natural flow levels and water quality are maintained in the river Mude
  - Phasing of works alongside the HIOWCC allocated site to ensure only one side of the river is affected at any time.
- BC-04 Trigon Hill (see **MM-BC04.1**):
  - Creation of a buffer between the allocated site and the adjacent European sites
  - Phased working to enable restoration of high quality heathland/acid grassland habitat immediately each extraction phase is complete. This is to mitigate any potential effects on Annex 1 birds.

**17. The November 2017 HRA indicates that for some of the allocated sites there is no certainty of securing mitigation, but indicates that this can be left to the application stage. Does this comply with the Conservation of Habitats and Species Regulations 2017 (Habs Regs)?**

The November 2017 HRA Screening Report acknowledges that, at the Plan stage, it is not always possible to secure site specific mitigation, as this level of detail must necessarily be addressed at the individual site application stage. However, the report also states that, in all these cases, discussions between the operator, NE and the mineral planning authority have established that the proposed mitigation is possible and that it must take place. To provide certainty within the Habs Regs Assessment process, this detailed mitigation is included in the Development Guidelines for each site allocation (see answer to Q17 above) and each relevant Policy states that the Development Guidelines must be addressed. In addition, policies state clearly that development will not be considered if it leads to adverse effect on the European and Ramsar sites and, where relevant, policies also refer to the need to address specific concerns within particular sites (AS-06, AS-12, AS-13, BC-04). Consultation with Natural England supports the conclusion that these measures provide sufficient certainty to comply with the Conservation of Habitats and Species Regulations, 2017.

**18. Are there any other allocations that, but for mitigation measures, are likely to have significant effects on European or internationally designated nature conservation sites?**

All allocations which are judged likely to have significant effects on European or internationally designated nature conservation sites are fully discussed within the November 2017 HRA Screening Report. Earlier iterations of this report, produced to accompany earlier iterations of the Draft Mineral Sites Plan, did identify other sites where LSE would occur and mitigation was needed. However, these sites have either been dropped from the Plan or modified during later iterations of the Plan, or re-assessed in discussion with the operators and Natural England, enabling the sites to be excluded from the Nov 2017 Report or to be included but with a conclusion of no LSE. For clarity, these sites are discussed in Section 7.4 of the November 2017 Screening Report, which summarises the processes leading to the conclusion of no LSE in each instance.

**19. Does the HRA process take account of the Wealden judgement (Wealden V SSCLG [2017] EWHC 351 Admin) and potential "in combination" air quality impacts of traffic flows on relevant designated areas?**

Using the Natural England/Dept of Transport vehicle movement threshold of 200 HGV movements per day, it was ascertained that none of the allocated sites within the Draft Mineral Sites Plan would lead to vehicle movements exceeding this threshold. In addition, the total predicted vehicle movements associated with all the allocated sites within the Draft Mineral Sites Plan were compared with the total vehicle movements associated with the current sites, and this showed that there is likely to be an overall reduction in daily vehicle movements during the Plan period. This is based on current understanding of how/when sites will be brought forward in relation to existing sites.

This was not included in the Habs Regs Screening Report, but has been discussed with Natural England.

**20. Overall, have the requirements of the Conservation of Habitats and Species Regulations 2017 been met?**

Yes, it is the conclusion of the Mineral Planning Authority, in consultation with Natural England, that the Draft Mineral Sites Plan meets the requirements of the Conservation of Habitats and Species Regulations, 2017.

**Issue 3: Whether the allocations provide a sufficient supply of economically viable minerals, and whether an appropriate balance between the economic, social and environmental roles of plan making has been achieved.**

**C) Soundness**

**Matter 1 - Proposed Mineral Sites**

**i) General**

**21. In broad terms, how have mineral sites been assessed for allocation in the MSP? In a few paragraphs, please provide a brief overview including the methodology, how constraints and opportunities have been considered, and how allocations have been chosen over omission sites.**

When the Minerals Strategy 2014 (MSDCC – 54) was prepared and adopted, it included 25 Site Selection Criteria. These were set out in Appendix 1 of the Minerals Strategy, and as paragraph 5 of that Appendix noted, they were developed from the Sustainability Objectives derived from the Sustainability Appraisal Scoping Report for the Minerals Strategy and were intended to cover all aspects of sustainable development.

There were generally 5 options for the response to each criterion, ranging from A - Very Significant Adverse Impact to E - Positive Impact. Responses to each criterion were assigned a colour, with 'A' responses being red, 'B' orange, 'C' yellow, 'D' light green and 'E' darker green.

The traffic light system is intended to give an indication of the potential significance of potential impacts associated with each allocation as a means of flagging up the need to consider such impacts accordingly for example in relation to the scope/need for avoidance, mitigation, or compensatory measures. Parameters for responding to each criterion were also set out in Appendix 1 - for example, Criterion 3 is copied below. It was intended that the site assessment work carried out for each site allocation would feed directly into the Sustainability Appraisal report.

<b>A</b>	<p>Very significant adverse impact</p> <ul style="list-style-type: none"> <li>Site contains or has potential for direct or indirect effects <sup>(59)</sup> on a Site of Special Scientific Interest (SSSI<sup>(60)</sup>); and</li> <li>Full mitigation of effects is not possible, resulting in significant residual loss of biodiversity.</li> </ul>
<b>B</b>	<p>Significant adverse impact</p> <ul style="list-style-type: none"> <li>Site contains or has potential for direct or indirect effects on a Site of Special Scientific Interest (SSSI); and</li> <li>Full mitigation of effects is possible, and there would be no significant residual loss of biodiversity.</li> </ul>
<b>C</b>	<p>Less significant adverse impact</p> <ul style="list-style-type: none"> <li>Site supports species of a designated site</li> </ul>
<b>D</b>	<p>No significant or negligible impact</p> <ul style="list-style-type: none"> <li>Site contains no national nature conservation designations</li> </ul>
<b>E</b>	<p>Positive impact</p> <ul style="list-style-type: none"> <li>Site has potential for strategic nature conservation gain through restoration</li> </ul>

The MPA used these 25 criteria as a preliminary information collecting exercise. For each site nominated, a site assessment pro-forma was prepared and circulated to those with relevant expertise in the topic - i.e. within Dorset County Council, professional input was received from ecology, archaeology, landscape, traffic/transport; earth sciences, historic buildings; input was also sought from the Environment Agency and Natural England. Other criteria were completed by MPA planning policy officers.

The resultant documents were called Site Assessments (e.g. MSDCC 11 to MSDCC 30) and set out the results of the preliminary data collection work, the information collected from the site assessments, with background site information and in some cases discussion of options for impact mitigation.

The information obtained from this preliminary data collection work was then applied in the separate Sustainability Appraisal site assessments, as set out in Appendices A, B and C of the Sustainability Appraisal Main Report MSPSD 03. Each proposed allocation is assessed against 18 Sustainability Objectives, derived from the Sustainability Appraisal Scoping Report (MSDCC 66). For the Sustainability Objectives, potential impacts/benefits during site preparation and working are considered, along with impacts/benefits during restoration and afteruse. These intensity/severity of these impacts are represented by symbols and colours:

### Impact Assessment Scoring

-	Strong Negative Impact	-	Minor Negative Impact	+	Minor Positive Impact	++	Strong Positive Impact	0	Negligible or No Effect	?	Uncertain
---	------------------------	---	-----------------------	---	-----------------------	----	------------------------	---	-------------------------	---	-----------

Each Sustainability Objective includes a written commentary, including mitigation, as shown in the example below. The timescales for impacts are also considered, with impacts during Preparation and Working (**P/W**) and Restoration and After-Use (**R/A**) assessed separately.

### Timescales for effects:

**P/W:** Preparation and Working

**R/A:** Restoration and Afteruse

Sustainability Objectives	Effects		Commentary	Mitigation
	P/W	R/A		
1. To move waste management up the waste hierarchy	N/A	N/A	<ul style="list-style-type: none"> <li>This Objective is not relevant to this site nomination.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
2. To maintain, conserve and enhance biodiversity	?	+	<p><b>European/International Designations</b></p> <ul style="list-style-type: none"> <li>Extraction from this site could facilitate restoration to open ground including public open space for informal recreation to mitigate against effects of human pressures on the heaths.</li> <li>There are records of Southern Damselfly from the Mude River on the eastern boundary of the site and the effects of extraction on this rare species would need to be fully understood and mitigated.</li> <li>It is expected that any effects should be avoided through providing for a suitable stand-off from the river.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that part of the site is designated as a SANG</li> <li>Any possible impacts on Damselfly and their habitat to be fully assessed, and all necessary mitigation implemented.</li> <li>Ecological surveys required, with appropriate mitigation identified.</li> <li>Restoration to include appropriate habitats for these species.</li> <li>Appropriate buffer around Mude to be left to protect Damselfly habitat.</li> </ul>

Constraints and opportunities for each site are identified through the process of data collection/comments received (the site assessments); they are further considered through the Sustainability Appraisal Main

Report site reviews (Appendices A, B and C). Each site has a separate summary of 'Overall Benefits' and 'Overall Constraints' with a final summary and recommendation.

Through this process the mineral sites which in the opinion of the MPA and based on the process of site assessment/Sustainability Appraisal are the most suitable for development are proposed for allocation in the Mineral Sites Plan. Sites considered unsuitable have at this stage been rejected. Appendices B and C of the Sustainability Appraisal Main Report set out the assessment process for rejected sites, including why they have been rejected.

**22. As sites have been assessed against both the Minerals Site Assessment Criteria in Appendix 1 of the MS and against SA objectives, please briefly explain the inter-relationship of the two processes, including how SA table 8 has been used in practice.**

Question 21 describes the two stage assessment process that each site nomination has gone through, including the preliminary data collection exercise (based on the Site Selection Criteria of Appendix 1 of the Minerals Strategy) and the application of the data collected in this way to the Sustainability Appraisal (assessing each site nomination against the Sustainability Objectives and recommending inclusion or rejection as an allocation in the Mineral Sites Plan).

The adoption of the Minerals Strategy 2014 (MSDCC – 54) in 2014 established the site selection criteria which were applied in the preliminary data collection exercise. The Sustainability Appraisal Scoping Report (MSDCC 66) describes how the Sustainability Objectives used in the Sustainability Appraisal were selected.

Since a two stage process was being applied, the MPA considered it important to clearly demonstrate the linkage between the two stages. Further, the MPA wanted to demonstrate the linkage back to the SEA Directive, and the Issues identified in that document.

Table 8 of the Sustainability Appraisal Main Report (MSPSD 03) is intended to link Tables 4, 5 and 6 of the Sustainability Appraisal Main Report (which demonstrate that the Sustainability Objectives can be traced back to the SEA Directive Issues) and Table 7 of the Sustainability Appraisal Main Report (which demonstrates that the Sites Selection Criteria of the Minerals Strategy used in preliminary data collection are directly linked to the SEA Directive Issues) and it demonstrates the linkages from the SEA Directive through the Sustainability Objectives to the Site Selection Criteria.

The MPA is satisfied that information collected using the Site Selection Criteria can be linked through to and used in the site assessments of the Sustainability Appraisal Main Report, and they can be used to demonstrate compliance with the SEA Directive.

**23. Some allocations appear to have differences in grading between Site Criteria and SA objectives covering similar matters. In general terms, briefly explain how this is justified.**

As described in Question 21 above, the Site Criteria set out in Appendix 1 of the Minerals Strategy are appropriate for collecting data for site assessment, compliant with the requirements of the SEA Directive. However, the way the data collected had to be recorded was found to be too rigid for use in a Sustainability Appraisal.

Data collected was recorded as required by Appendix 1 of the Minerals Strategy. When this data was used in preparing the site assessments for each site through the Sustainability Appraisal, the MPA took into consideration other matters such as possible mitigation to be applied, which in some cases justified a difference in grading between the site assessments (i.e. MSDCC 11 to MSDCC 30) and the assessments carried out through the Sustainability Appraisal and presented in Appendices A to C of the Sustainability Appraisal Main Report.

In some cases the severity of the impacts - or benefits - will not be fully known until more detailed assessment is carried out, usually at the planning application stage. The Sustainability Appraisal

assessments have more flexibility in representing this, so are in some cases presented differently to the Site Criteria data collection reports.

The site Criteria are essentially representations of data collection, with information on potential impacts or benefits. The Sustainability Appraisal assessments are more subjective and inclusive in how this data is recorded and applied.

**24. Are the reasons for selecting allocated minerals sites over reasonable alternatives made clear in the SA? Have all reasonable alternatives been assessed in the SA and are reasons for rejection set out?**

Appendix A of the Sustainability Appraisal Main Report comprises the individual site assessments for the sites received as site nominations and, following assessment, proposed as allocations in the Draft Mineral Sites Plan.

Appendix B comprises the sites that are not proposed as allocations, but neither have they been withdrawn or permitted.

Appendix C comprises the sites that were nominated and have either been withdrawn from consideration, or permitted or found to be unacceptable, and are no longer under consideration.

In each site assessment, the impacts and benefits are summarised and there is a reasoned assessment as to why a site is considered acceptable, or rejected, followed by an overall recommendation.

The MPA is satisfied that all reasonable alternatives have been considered. The MPA, as described in the Consultation Statement (MSPSD 05 - paras 3.2 and 5.7) has issued more than one 'Call for Sites' to invite nomination of sites for future minerals development. The MPA consider that this is the most appropriate approach for use in site identification, as it identifies sites with a landowner willing to see the site developed for minerals use.

All sites nominated in this way have been assessed through the two stage process described above, (i.e. in Question 21) which has included assessment through the Sustainability Appraisal process. The results are set out in Appendices A, B and C of the Sustainability Appraisal Main Report MSPSD 03, and include reasons for rejection or approval in each case.

The chart on pp. 12-14 of the Consultation Statement MSPSD 05 sets out the sites nominated, assessed and the stages at which some were rejected.

**25. Some allocated sites have scored "A" - "Very significant adverse impacts" against one or more MS criteria in the Site Assessments, and/or "Strong Negative Impact" in the SA objectives (obs). Generally, in broad terms what steps/assessments have the Councils undertaken to ensure that, in principle, these substantial negative impacts can be mitigated to an acceptable level in the balancing exercise, thereby ensuring the sites are deliverable?**

The presence of a 'red' Very Significant Adverse Impact or Strong Negative Impact does not mean that there is no option for mitigation or that mitigation is impossible. The SA seeks to flag up potential impacts in the first stage assessment, allowing for more detailed consideration to be given to the scope for mitigation in the second stage.

The MPA consider that the Sustainability Appraisal is intended to identify, often in general terms, the risks/threats that could be posed to ecological/social/economic interests through the development of specific sites for mineral provision. It identifies where the risks are, and where further and more detailed assessment will be required at the appropriate stage. What the appropriate stage for further assessment is will vary. The MPA consider that, again in general terms, it would be unreasonable to expect a detailed assessment of all the possible risks/impacts associated with the development of a quarry on its surroundings - especially one of the larger sites such as an aggregates quarry - in advance of an

application when more detail will be known. To identify all possible threats with any degree of certainty, along with appropriate mitigation, would require detailed (often time-specific or seasonal) survey or investigative work which relies upon having a detailed proposal, and in many cases an Environmental Impact Assessment (EIA) to be carried out. The MPA consider that this is more appropriate at the planning application stage.

However there are some cases where the MPA considered it would be impossible to include a site in the Plan without further information. This is particularly true for sites in sensitive locations, such as the proposed Swanworth Quarry Extension PK-16, where further assessment was requested particularly for possible hydrological impacts and landscape and visual impacts. For the proposed allocations in the Moreton-Crossways area, further work was required on heritage impacts, and this was commissioned and been carried out. These additional studies have provided the necessary information to allow the MPA come to a view on the suitability of the relevant sites for allocation.

In addition to assessments commissioned by the MPA or by the site promoter, in some cases further assessment has been undertaken by relevant professional disciplines within Dorset County Council, such as the Traffic Impact Assessment - Moreton-Crossways-Woodsford MSDCC 35 and 36. Work is also being undertaken to assess cumulative traffic impacts on the C7 road north of Wareham.

The MPA have in relevant cases worked closely with the statutory consultees, to identify impacts and appropriate mitigation. For example, Natural England has been closely involved with the proposed allocation process for Great Plantation AS06, advising the MPA regarding impacts and mitigation. Historic England have also been involved in developing the detail of this proposed allocation.

The MPA is satisfied that an appropriate and proportional level of assessment has been carried out, given the stage of the site identification process - allocation in a Plan. The MPA is satisfied that an adequate level of assessment has been carried out to identify 'show stopper' constraints, that would absolutely prevent the development of a site. Further constraints, with appropriate mitigation, will be identified at the planning application stage.

The Development Guidelines for each site allocation either flag up specific issues that must be addressed at the planning application stage, or where appropriate set out specific measures to be implemented to address identified constraints. The MPA consider that there is adequate policy protection, through the development management policies of the Minerals Strategy 2014 and through national policy, to refuse a planning application if constraints cannot be adequately mitigated.

In such a case, this would lead to a site being undeliverable and could lead to mineral supply issues for the MPA as a whole. Annual review and monitoring of the Plan, through the Annual Monitoring Report and for aggregates through the Local Aggregates Assessment, will allow the MPA to determine whether an issue with overall mineral supply arises. The MPA would then be able to come to a view as to whether a review of the Plan, or part of it, was justified.

## **26. In general, has landscape and visual impact been adequately assessed for the allocated sites?**

The MPA is mindful that the level of assessment should be proportionate to the stage of site development, namely allocation in a plan, and is satisfied that for the various sites assessed landscape and visual impact has been adequately assessed.

As explained in Q. 21, each site has undergone two stages of assessment, a data collection stage and assessment through the Sustainability Appraisal. The first stage assessment includes two criteria on landscape/visual assessment, Criterion C7 – *Impact on designated landscapes* and Criterion C8 – *What is landscape capacity to accommodate proposed development*. Each nomination has been assessed against these criteria by DCC Landscape Services.

The information was then used in the Sustainability Appraisal assessment of each site, with each site being assessed against Sustainability Objective 7 - *To maintain, conserve and enhance the landscape, including townscape, seascape and the coast.*

Proposed site allocations within the Dorset AONB are additionally assessed by the AONB landscape architect, and comments returned. Natural England have also returned comments on landscape issues for Swanworth Quarry Extension within the Dorset AONB.

The MPA is satisfied that landscape and visual impact assessment of sites has been adequately carried out. Site proposals that were subject to significant constraints that could not be satisfactorily mitigated have not been taken forward. The MPA is satisfied that in cases where constraints have been identified and the site is proposed for allocation, this has been picked up through the Development Guidelines and the constraints will be more fully assessed at planning application stage and appropriate mitigation identified and implemented.

If on further assessment it is found that the landscape/visual impacts cannot be satisfactorily mitigated, the MPA is satisfied that adequate protection exists to prevent the development of the site, through Policy DM4 *Protection and Enhancement of Landscape Character and the Countryside* of the Minerals Strategy 2014 (MSDCC – 54) and national policy.

**27. In general, has adequate transport evidence been obtained for the allocated sites, both individually and in combination with other developments? Are the transport implications of the allocations sufficiently understood? Has account been taken of the Bournemouth, Poole and Dorset Local Transport Plan 3 and work undertaken through the A35 Route Management Study? Is the evidence base compliant with Department for Transport Circular 02/2013?**

The MPA is mindful that the level of assessment should be proportionate to the stage of site development, namely allocation in a plan, and is satisfied that adequate transport evidence has been obtained, individually and in combination with other developments.

As explained in Q. 21, each site has undergone two stages of assessment, a data collection stage and assessment through the Sustainability Appraisal. The first stage assessment includes a criterion on transport/access issues, Criterion C25 - *Are the access proposals acceptable.* Each nomination has been assessed against this criterion by the DCC Transport Development Management.

The information was then used in the Sustainability Appraisal assessment of each site, with each site being assessed against Sustainability Objective 15 - *To minimise the negative impacts of waste and minerals transport on the transport network, mitigating any residual impacts.* Sustainability Objective 16 - *To support and encourage the use of sustainable transport modes, imposing no unmitigated negative impacts on them* is also relevant.

Highways England has been consulted at each stage of plan preparation, and has commented and requested further information where appropriate. The MPA has also met with Highways England at various stages to discuss proposals. Their representation to the Pre-Submission Consultation indicated they were satisfied with the site proposals, subject to further assessment on an area of potential cumulative impact and inclusion of certain modifications.

Additional assessments have been commissioned where considered appropriate, such as *the Traffic Impact Assessment - Moreton-Crossways-Woodsford* and the *Traffic Impact Assessment (AM Peak) - Moreton-Crossways-Woodsford* MSDCC 35 and 36. These considered the potential cumulative impacts of minerals and housing developments in the Moreton/Crossways, with potential impacts on the A35. The studies found that the roads can accommodate the proposed development.

In terms of compliance with the Local Transport Plan, Figure 29 of the Minerals Strategy 2014 (MSDCC – 54) shows the Strategic Route Network and Primary Network, and promotes the use of these routes where possible.



The MPA is satisfied that adequate transport evidence has been collected. The MPA is satisfied that in cases where constraints have been identified and the site is proposed for allocation, the constraints will be more fully assessed at planning application stage and appropriate mitigation identified and implemented.

If on further assessment it is found that the transport impacts cannot be satisfactorily mitigated, the MPA is satisfied that adequate protection exists to prevent the development of the site, through Policy DM8 *Transport and Minerals Development* of the Minerals Strategy 2014 (MSDCC – 54) and national policy.

**28. With respect to ecology/biodiversity, for those sites indicating “Strong Negative Impacts” in the SA or “Very significant adverse impacts” in the Site Assessments, have any ecological assessments been undertaken? If not, should they be undertaken at the plan-making stage to ensure that the relevant sites are deliverable?**

As described in Q.s 26 and 27, every site nomination has undergone two stages of ecological assessment. Some sites were found to have the potential to result in 'Very Significant Adverse Impacts' ecologically, a finding that was translated through to the Sustainability Appraisal.

In some cases e.g. Great Plantation AS06 or Swanworth Quarry PK16 ecological assessment has been carried out. Such assessments only remain valid for around 2 years. The MPA has found it more helpful, for sites with significant impacts, to liaise with Natural England to consider whether the impacts are capable of mitigation and what form such mitigation should take. The DCC County Ecologist has also provided advice, often in conjunction with Natural England.

In response to input from Natural England and the County Ecologist, sites have either been withdrawn (e.g. Moreton Plantation AS10 - see Appendix C Sustainability Appraisal (MSPSD 03) or modified (e.g. Great Plantation AS06 was significantly reduced in area).

It is a duty under the Conservation of Habitats and Species Regulations 2017 (the Habs Regs) for DCC to undertake an assessment of the implications of the Mineral Sites Plan for habitats and wildlife designated at a European level, known as a Habitats Regulations Assessment (HRA). The HRA assesses the effect of the plan on the conservation objectives of the relevant European sites. The relevant European sites are: Special Areas of Conservation (and candidate SACs), Special Protection Areas (and potential SPAs) and Ramsar sites which may be affected by the plan (MSPSD 07 and 08).

Natural England has contributed to the preparation of the HRA, and has made a series of suggestions for modifications to the Mineral Sites Plan to ensure protection of habitats and wildlife, and to ensure compliance with the Habitat Regulations.

The MPA is satisfied that all necessary and appropriate ecological assessments have been undertaken, and for the sites where ecological impacts are identified, further input from relevant bodies has been received and provides reasonable certainty that the proposed allocations are deliverable. In cases where constraints have been identified and the site is proposed for allocation, this has been picked up through the Development Guidelines and the constraints will be more fully assessed at planning application stage and appropriate mitigation identified and implemented.

**29. With respect to hydrology, for those sites indicating “Strong Negative Impacts” in the SA or “Very significant adverse impacts” in the Site Assessments, have any hydrological assessments been undertaken? If not, should they be undertaken at the plan-making stage to ensure that the relevant sites are deliverable?**

As described in the response to Q.21, for the Mineral Sites Plan there have been two stages to site assessment. The first stage, based on the Site Selection Criteria set out in Appendix 1 of the Minerals Strategy 2014 (MSDCC – 54), requires specific responses in responses to the local conditions affecting any site nomination under consideration. For hydrology/hydrogeology, a 'red' Very Significant Adverse Impact

is triggered if, for example, there is surface water within the site or within 50m of the boundary. Many of the nominations considered fall under this category.

Many potential mineral sites have surface water within or around them, and hydrological issues can be dealt with as part of preparation for working, or working. The MPA have taken the results of the first stage assessment forward to further assessment through the Sustainability Appraisal. In addition to the factual/rigid results of the Site Selection Criteria, the MPA sought the input/advice of the Environment Agency. The Environment Agency have confirmed in their Pre-Submission Consultation representation (PSD MSP 545-566) that they have no objection to the sites proposed for allocation, subject to the Development Guidelines requiring appropriate hydrogeological assessment.

There were two sites assessed where the MPA did have concerns over possible hydrogeological impacts of development. These were Swanworth Extension PK16 (see Appendix A Sustainability Appraisal Main Report and Sturminster Marshall AS14 (see Appendix C Sustainability Appraisal Main Report). In the opinion of the MPA, development of the former could have impacted the water supply for Kingston village to the north-west of the site; development of the latter could have impacted the Source Protection Zone 1 (SPZ1) of Corfe Mullen public supply well, as the site is within this.

The MPA requested further information, a hydrogeological risk assessment, in both these cases,. These were received and passed to the EA for their comment. The EA indicated they were satisfied, having reviewed both documents, that the Swanworth Extension PK16 could be allocated in the Draft Mineral Sites Plan. However they maintained an objection to the Sturminster Marshall AS14 site, and as a result the site promoter withdrew the site.

In each case, for the sites that are allocated, further hydrological/hydrogeological will be required. If these indicate impacts that cannot be satisfactorily mitigated, the MPA is confident that any proposed development could be refused. The MPA consider that Policy DM3 *Managing the Impact on Surface Water and Ground Water Resources*, along with national policy, provide the necessary protection and could be used to refuse inappropriate development.

**30. Are any of the allocations likely to result in significant adverse impacts that could not be adequately mitigated and if so, which ones? In general terms, for these allocations, what mechanism has been used to demonstrate how the benefits of allocation outweigh the harm in the balance?**

The MPA consider that the majority of the proposed allocations will not result in significant adverse impacts that cannot be mitigated - in most cases the impacts will be mitigated.

As explained in the response to Q.21, due to the nature of the assessment criteria and their application, a number of sites have been identified as having 'Very Significant Adverse Impacts'. These sites and potential impacts have undergone further assessment and the MPA has either come to the view that when these are considered in more detail, it is generally the case that the impacts are capable of mitigation through modification of the proposals (e.g. Great Plantation AS06). If not capable of mitigation, the sites have not been taken any further (e.g. AS10 Moreton Plantation - Appendix C Sustainability Appraisal Main Report).

The Sustainability Appraisal is intended to identify likely or potential impacts, where more detailed assessment is required, but does not mean that the sites will be developed. The Sustainability Appraisal points to sites, or specific aspects of the development of a site, where further assessment and appropriate mitigation is required. The MPA is confident that the protection of development management policies (DM1 to DM11) of the Minerals Strategy 2014 (MSDCC – 54) together with national policy, will ensure sites with significant impacts will not be allocated, or developed.

The Minerals Strategy 2014 (MSDCC – 54) in paras. 16.27 and 16.28 refers to provision of ball clay and the invocation of IROPI - imperative reasons of over-riding public interest - in seeking permission for ball clay sites. The MPA is still in discussion over potential impacts from proposed allocation Trigon Hill Extension

BC04. If development of this site was to ultimately lead to impacts not considered capable of appropriate mitigation, and IROPI was used to justify approval, this could see development of a site with impacts not fully mitigated. However, this mechanism, applying IROPI, does not form part of the overall planning balance for site allocation, and the MPA does take the view that if significant impacts were found to not be capable of mitigation, the site would not be allocated.

Swanworth Extension PK16 should also be mentioned. The MPA is proposing the allocation of this site, for the provision of crushed rock in the Dorset Area of Outstanding Natural Beauty. There are a number of policy objections to this allocation, primarily on landscape/visual impact grounds, but the MPA is mindful of the benefits of maintaining a source of crushed rock supply outside of Portland, and close to the Bournemouth & Poole conurbation. There are significant sustainability benefits on transport grounds to be realised, and for this reason the MPA consider the consideration of this site through the Examination is justified.

Should the decision be taken to allocate the site, there could be significant impacts. In this case, Policy DM4 of Minerals Strategy 2014 (MSDCC – 54) notes that:

*Development which affects the landscape will only be permitted if it can be demonstrated that any adverse impacts can be:*

*i. avoided; or*

*ii. where an adverse impact cannot be avoided, the impact will be adequately mitigated;*

*or*

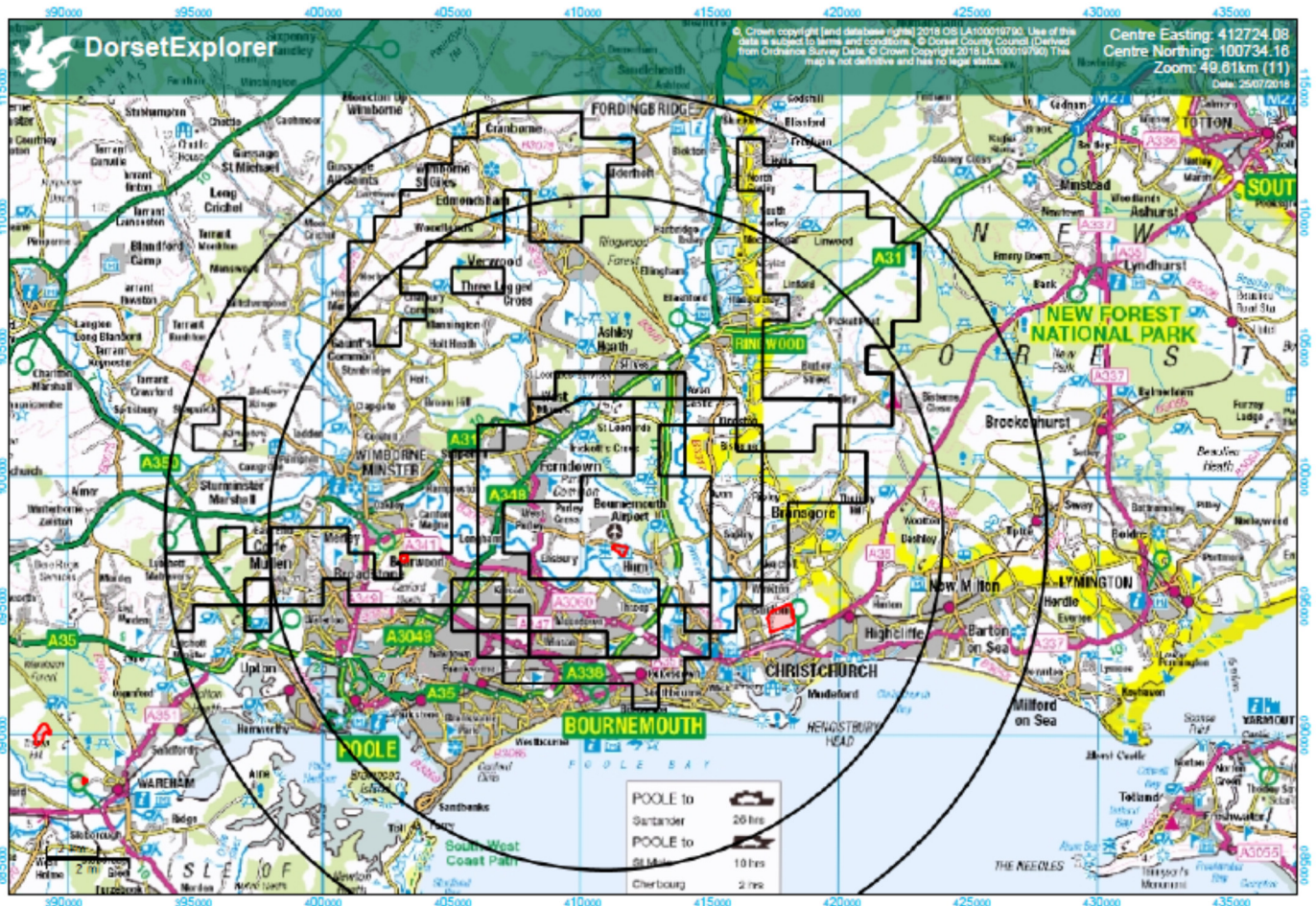
*iii. where adverse impacts cannot be avoided or adequately mitigated, compensatory environmental enhancements will be made to offset the residual landscape and visual impacts.*

The MPA consider that it is likely that some form of compensation for impacts would be required.

**31. Have the Development Guidelines in MSP Appendix 1 (DGs) for all sites in the vicinity of Bournemouth Airport or under its flight path dealt with the potential for an Aviation Impact Assessment covering impacts of bird strike (need for wildlife strike risk assessment), lighting on sightlines from Air Traffic Control, site radios on airport communication equipment, and tall structures? What sites are in this category?**

The Bournemouth Airport Aerodrome Safeguarding Map indicates that 2 of the proposed allocations are within the safeguarded area - Roeshot AS13 and White's Pit RA01 - as shown below:

Bournemouth, Dorset and Poole Mineral Sites Plan Examination Statement  
by Dorset County Council



**The Hurn Court Farm AS09 allocation which was adjacent to the airport has now been permitted and is withdrawn from the local plan site allocation process.**

Whites Pit RA01 is already working under a current permission. Roeshot AS13 is in an area where the airport must be consulted on development over 90 metres in height.

In the Pre-Submission Consultation, Bournemouth Airport (PSD MSP 226) set out four key criteria that should be examined as part of any Aviation Impact Assessment:

*Wildlife Strike Risk*

*The extraction of minerals and associated restoration plans will create habitats that will encourage hazardous species of wildlife to the site which will have a direct impact on safety at Bournemouth Airport. As a result of this we would expect to see a wildlife strike risk assessment and mitigation plan as part of any initial scoping document submitted to Dorset County Council. It should also be noted that there are risks that sometimes cannot be overcome and as a result an objection would be raised.*

*ATC*

*As part of any major project it is recognized that lighting will feature in the operational phases. All lighting should be examined to ensure that there is no impact on sightlines from ATC or aircraft operating from or in the vicinity of Bournemouth Airport.*

*Air Traffic Engineering*

*Developments such as this commonly include the use of radio communications for site wide coordination. When radios are operating in close proximity to the airport the applicant should*

*provide Bournemouth Airport with details as required to ensure no interference with critical equipment or communication frequencies.*

*Obstacle Limitation Surfaces*

*Within 15km of an airport there are a series of protected surfaces that should be kept clear of any upstanding non-frangible obstacles to ensure the safe operation of aircraft. This not only includes permanent structures but also temporary structures and tall plant such as cranes and excavators. We would expect all equipment and structures of this type to be advised to Bournemouth Airport in advance so we can ensure that these surfaces remain clear of obstacles.*

The MPA propose to include these four criteria at the start of Appendix 1: Site Allocations of the Mineral Sites Plan through modification **MM-AA.1**.

Specific references to the need for an aviation impact assessment will be included in the Development Guidelines of the two sites named above, through proposed modifications **MM-AS13.4** (Roeshot) and **MM-RA01.1** (Whites Pit). The MPA consider that this will adequately cover the need to ensure engagement with Bournemouth Airport in the relevant cases.

In addition, the Aggregates Area of Search proposed through Policy MS-2 of the Mineral Sites Plan will also make reference to the need to consider the aerodrome safeguarding, and the need to undertake an Aviation Impact Assessment where appropriate. Modifications **MM-AOS.3** and **MM-AOS.4** are proposed.

#### **Issue 4**

##### **ii) Mineral Site Clusters (as shown on Fig 4 of the SA)**

##### **32. In general terms, do the SA and the Site Assessments adequately deal with cumulative impacts?**

The MPA consider that cumulative impacts are adequately addressed through the Site Assessments and Sustainability Appraisal.

Each Site Assessment contains a separate criterion, C21, which specifically considers cumulative impacts.

The Sustainability Appraisal Main Report MSPSD 03 contains a section, within Chapter 8, which considers all the site allocations and potential cumulative impacts, through looking at clusters of sites. Each separate site assessment (Appendices A, B or C of the Sustainability Appraisal Main Report) contains a separate section considering cumulative impacts as they relate to that site.

The MPA is satisfied that the potential cumulative impact impacts have been satisfactorily identified and addressed.

##### **33. In order to effectively consider potential cumulative impacts at application stage in accordance with MSP policies, should the overall Policies Map show the various land designations superimposed over the allocations? This might include Areas of Outstanding Natural Beauty (AONBs), World Heritage Sites, European and international nature conservation designations?**

The MPA agrees that it would be helpful for developers to be able to consider these constraints, although there is the potential that the resultant map could be confusing to look at and to interpret.

The Policies Map will be modified to include these constraints, along with aerodrome safeguarding areas. Modification number **MM-PM.1**, Areas of Outstanding Natural Beauty, the Dorset and East Devon World Heritage Site, SPAs, SACs and RAMSAR sites to be added to the overall Policies Map.

## Issue 5

### **Cluster 1 – Other Building Stone Sites: BS-02 Marnhull Quarry, BS-04 Frogden Quarry, BS-05 Whithill Quarry**

#### **34. Given that these sites form a loose cluster in the north of Dorset, are they likely to create any significant cumulative effects?**

The MPA do not consider that these three sites, Cluster 1 of Figure 4 of the Sustainability Appraisal Main Report, are likely to create significant cumulative effects. These allocations are all extensions of existing quarries with relatively low outputs. The MPA is not aware of any cumulative impacts due to the operation of the current quarries, and does not expect any impacts should the proposed allocations be developed.

#### **35. Should the DGs for each site make reference to this cluster?**

As noted in Q.34 the MPA does not consider that the development of these allocation will lead to cumulative impacts, and therefore the Development Guidelines for these allocations do not need to specifically refer to cumulative impacts.

Further, Policy DM-1 (j) of the Minerals Strategy 2014 (MSDCC – 54), which is one of the policies that would be applied in the determination of a planning application for quarry development, specifically refers to the avoidance of cumulative impacts.



## Issue 6

### **Cluster 2 – C7 Wareham to A35: AS-12 Philliol's Farm, AS-15 Tatchell's Quarry, BC-04 Trigon Hill Quarry Extension**

#### **36. What evidence is there to demonstrate that cumulative traffic impacts of these sites in the Wareham area could be made acceptable?**

A traffic cumulative impacts assessment for the C7 and specifically looking at the impacts of developing these allocations is currently being prepared as requested by Highways England. The MPA will provide further comment when it has been finalised, which is expected to be before the Hearings.

Two of these three quarry operations are currently operational. Although the Sustainability Appraisal Main Report referred to the current Tatchell's site as being inactive (e.g. paragraph 8.19, Sustainability Appraisal Main Report MSPSD 03), it is now active again. The Trigon Hill site is also currently operational, producing ball clay. The proposed allocations Tatchell's Extension AS15 and Trigon Hill Extension BC04 would both be follow-on operations, with no intensification of traffic movements and therefore their development would not lead to cumulative traffic impacts.

Philliol's Farm AS12 would be a new development. Through the DGs it would be possible to require that it not be developed while both Trigon Hill Extension and Tatchell's, either current or extension, were operational unless it can be clearly demonstrated that the highway network has the necessary capacity. This is proposed through modification **MM-AS-12.3**.

It is expected that as two sites are currently operational, this establishes that the C7 Wareham to A35 can accommodate the traffic generated by two quarries. The MPA is satisfied that this is evidence that it is appropriate to allocate the three sites along the C7, with only two being operational at any one time unless it can be proven that there is adequate highway capacity to support all three sites operating simultaneously.

Development of any of these allocations would require the production of a Transport Impact Assessment, which would provide detailed information on traffic impacts.

#### **37. The SA refers to housing and employment allocations at Wareham. Have these been taken into account?**

Yes. They are flagged up in the Sustainability Appraisal and therefore will be taken into consideration when cumulative impacts are considered through a planning application. Policy DM-1 (j) requires that cumulative impacts are taken into consideration:

*Proposals for minerals development should support the delivery of social, economic and environmental benefits whilst any adverse impacts should be avoided or mitigated to an acceptable level.*

*In order to achieve this, all proposals for minerals development must demonstrate that all the following criteria have been addressed satisfactorily:*

*j. avoidance of cumulative impacts resulting from minerals or other development, whether current or proposed;*

Future planning applications for any of these sites will include Environmental Impact Assessment/Transport Assessments and it is expected these will take into account allocations at Wareham.



**38. Should a cumulative traffic assessment, as suggested by Highways England, be obtained at the plan-making stage so that it can be established whether there is likely to be a significant impact on the Strategic Road Network?**

DCC's Transport Development Management team ~~are currently carrying~~ have carried out an assessment on the C7 and its capacity for carrying the traffic associated with AS-12 Philliol's Farm, AS-15 Tatchell's Quarry, BC-04 Trigon Hill Quarry Extension.

The report is available on the Examination website under reference MSDCC 77.

**39. Should the DGs for Tatchell's Quarry and Philliol's Farm specify that the two sites should not be worked simultaneously unless it could be clearly demonstrated that the highway network could safely accommodate the increase in traffic? If so, how would this work in practice?**

As described in Q. 36, two of the three quarries proposed for development along the C7, Tatchell's Quarry and Trigon Hill, are currently in operation. The proposed extensions to these are not expected to lead to intensification of traffic flows.

Should a planning application for any of the three proposed allocations be submitted, the accompanying EIA would include a Transport Assessment which would assess the capability of the C7 for carrying traffic serving the minerals sites. If the Transport Assessment indicated that the C7 did not have capacity to serve three mineral sites simultaneously, the MPA would need to have the ability to restrict development to just two at any one time.

A modification is proposed (**MM-AS12.3**) preventing extraction at Philliol's Farm while Trigon (BC04) and Tatchell's (AS15) are operational - unless it can be demonstrated that the highway network has the necessary capacity to support all three sites.

**40. Should the DGs for each site make reference to this cluster?**

The MPA accept that the DGs for each of the three sites Philliol's Farm, Trigon Hill Extension and Tatchell's Extension would benefit from making reference to the cluster, in the context of cumulative impacts, given the proximity of the sites and the fact that all are accessed via the C7 road.

The following three modifications **MM-AS12.4**, **MM-AS15.1** and **MM-BC04.2** are proposed to achieve this.

## Issue 7

### **Cluster 3: AS-09 Hurn Court Farm Quarry, AS-13 Roeshot**

**NB: the AS09 Hurn Court Farm site has been permitted, and no longer forms part of the site allocation local plan process.**

#### **41. How has the MSP taken account of the eastern part of the Roeshot site, located in Hampshire, when considering the cumulative effects of these allocations located in the Christchurch area of Dorset?**

As noted in the Development Guidelines for AS13 Roeshot, Appendix 1: Site Allocations Mineral Sites Plan, the MPA expect that the Dorset Roeshot site will be worked as an extension of the Hampshire side of the site. The access road will be within Hampshire, as will the processing plant. The MPA understand that extraction will begin in Hampshire, move into Dorset and then back into Hampshire to complete.

There will be no simultaneous extraction in Hampshire and Dorset. A modification **MM-AS13.3** is proposed to the DGs in Appendix 1 of the Mineral Sites Plan to make this explicit. This will ensure there is no intensification of traffic movements or other impacts on amenity.

There is potential for intensification of landscape/visual impacts. It is expected that restoration of the Hampshire land will be timely - as required by NPPF 2012 paragraph 144 bullet point 6, but the MPA accept that some of the Hampshire land will be unrestored while the Dorset land is developed.

#### **42. I understand that traffic levels are high in this area and that additional traffic will result from the Christchurch Urban Extension south of Roeshot. Has this been adequately assessed?**

As part of the assessment of the Christchurch Urban Extension carried out by the Transportation Modelling Team of Dorset County Council, traffic levels anticipated to be generated by the Roeshot quarry (Hampshire or Dorset sides) have been factored in to the assessment, and included in the modelling work carried out. The findings of the modelling and assessment work is that the road system in the area can accommodate the traffic expected to be generated by the Christchurch Urban Extension and the Roeshot Quarry development.

The MPA is satisfied that adequate assessment has been carried out. Further detail can be provided if required.

#### **43. Has the potential traffic impact on the New Forest National Park been considered and potential air quality impacts on Lyndhurst, which I understand is an Air Quality Management Area?**

Hampshire County Council are currently considering a planning application for the development of the Hampshire side of the Roeshot Quarry. This included an EIA, with a Transport Statement (see: <https://planning.hants.gov.uk/ApplicationDetails.aspx?RecNo=17204>) Paragraph 1.7 of the Transport Statement noted that "*This TS therefore concludes that the proposed development will have no material impact on the safety or operation of the adjacent highway network.*"

The Transport Statement did not specifically address impacts on the New Forest National Park, or the air quality of Lyndhurst. However, the MPA consider that the majority of the vehicular traffic generated by the development of the Roeshot Quarry will turn westwards on leaving the site, to supply the Bournemouth, Poole and Christchurch conurbation. Some traffic will turn eastwards towards Highcliffe, New Milton and Lymington, via the A337. Few lorries, apart from those making specific deliveries would be expected to travel through the New Forest National Park along the A35, towards Lyndhurst.

The MPA is satisfied that, at the stage of a planning application for the Dorset side of Roeshot, the Transport Statement that would be prepared could assess impacts on the New Forest National Park and Lyndhurst. Such a detailed assessment is not required at the current stage.

A modification is proposed (**MM-AS13.1**) to make an addition to the Development Guidelines of Appendix 1 of the Mineral Sites Plan for the Roeshot allocation, to ensure that impacts on the New Forest National Park and air quality in Lyndhurst are included in any Transport Statement prepared as part of a planning application.

**44. Is there potential for local rail sidings to be used to facilitate transport by rail? Could the following be used: rail sidings at Hamworthy (Furzebrook), Wareham and Wool or facilities at Totton, the Fawley branch line or Brockenhurst?**

The issue of using rail to access the quarry, to remove aggregate from a quarry at Roeshot and thereby reduce vehicle movements was considered as part of the application to Hampshire County Council. The relevant extracts are included with this Statement. It was concluded that creation of a dedicated rail siding would not be a viable option for removing aggregate from Roeshot.

In terms of the general use/development of rail sidings, Policy AS4 of the Minerals Strategy 2014 (MSDCC – 54) encourages the development of new mineral handling rail depots where the need for the facility can be demonstrated. No proposals have been received, and no assessment has been undertaken.

Hamworthy is an existing rail depot within the urban area of Poole, and receives crushed rock from a quarry in the Mendips. Sidings at Wool were used to export sand to London during preparation for the Olympics in 2012. The status of the Furzebrook and Wareham sidings are not known. The other sites are outside Dorset and the MPA has no jurisdiction over them.

The MPA is satisfied that Policy AS4 of the Minerals Strategy adequately facilitates and promotes the development of rail depots. The MPA itself is not promoting the development of any depots, and nor have any nominations for allocation of depots in the Mineral Sites Plan been received from any owners/developers. As a result, it was not considered necessary to carry out any assessments on existing, former or potential future sites.

**45. Should the DGs make clear that transport assessments submitted with applications should take account of any traffic impacts on the New Forest National Park?**

The MPA consider that it would be appropriate for the DGs to set out this requirement. A modification covering this is proposed (**MM-AS13.1**) for the Roeshot site in Appendix 1: Site Allocations in the Mineral Sites Plan.

**46. Highways England suggests that the cumulative traffic impacts on the Strategic Road Network of these sites and other development in the area be assessed at the plan making stage in conjunction with Highways England. Has any cumulative impact assessment been done?**

No cumulative impact assessment specifically considering Hurn Court Farm and Roeshot has been undertaken. A number of other studies have been undertaken, which consider traffic issues associated with these sites, and the MPA is satisfied that a proportionate evidence base exists to allow these sites to be allocated, subject to further detailed studies at the time of a planning application.

Hurn Court Farm is now approved and no longer forms part of the plan allocation process. The EIA produced in support of this application included a Transport Statement. There were no constraints, including traffic issues, considered not capable of mitigation.

As noted in the response to Q.42, the Christchurch Urban Extension has been assessed by DCC Highways, including looking at cumulative impacts and taking into account the development of the Roeshot Hill site for quarrying, and it was considered that the quarrying would not add an unacceptable traffic loading to the road network.

On 22nd December 2016, Highways England in correspondence with the MPA noted that they had reviewed the Transport Statement prepared as part of the planning application for the Hampshire part of the Roeshot site and noted that given the information submitted, they did not consider that the site would have a significant impact on the operation of the Strategic Road Network. As the Dorset side of Roeshot would be a 'follow-on' operation, with no intensification, their comments were taken to apply to both the Dorset and Hampshire parts of the overall site.

In their Pre-Submission Consultation response, Highways England did not mention Roeshot or Hurn Court Farm.

**47. I note that there is reference in the supporting evidence to a traffic assessment for the eastern, Hampshire Roeshot site being relied upon. Is this the case and what does that evidence say about cumulative traffic impacts? Can the Hampshire site traffic assessment be properly relied on for the Dorset sites?**

Hampshire County Council are currently determining an application for the development of the eastern/Hampshire part of the Roeshot site. An EIA was prepared in support of this application, including a Transport Assessment. The findings of this Transport Assessment include that:

- This report has assessed the suitability of the adjacent highway network to accommodate the level and type of traffic expected to be generated by the proposed mineral workings.
- This analysis concludes that the existing highway infrastructure is adequate to cater for existing traffic flows and that no further off-site improvement works are necessary as a result of the development.

The Transport Assessment did not specifically reference cumulative impacts, but did include the findings that the highway network could accommodate the level and type of traffic expected to be generated from the re development in Hampshire.

This is a significant finding as the access to the Roeshot site, both for the Hampshire and Dorset sides, is within Hampshire. The point being made, as referred to in the question, is that if the access and highway network is considered suitable for the Hampshire site, it is expected that it will be suitable for the Dorset site as well, given that there will be no intensification and no simultaneous working.

It does not imply that the Transport Assessment done for the Hampshire site will apply to the Dorset side as well, at the planning application stage for that site. a full and up-to-date EIA will be required for the Dorset site, including a Transport Assessment looking at cumulative impacts.

In addition, as noted earlier, traffic modelling has been carried out by Dorset County Council as part of the assessment of the Christchurch Urban Extension. This included quarry traffic, and it was found that the highway network was capable of handling the additional traffic.

There is the option, for the Dorset side of the site, of requiring the operator to hold back quarry traffic during AM and PM peak hours, to minimise traffic impacts.

Highways England has not objected to this site proposal.

The MPA is satisfied that there is sufficient transport evidence to justify including the Dorset Roeshot site as an allocation.

**48. The HRA indicates potential “in combination effects” of the western and eastern Roeshot sites situated on opposite banks of the River Mude with respect to the Southern Damselfly. It states that cross border timing of mineral extraction should ensure that working does not occur at the two sites at the same time. How would this be achieved in practice? Has this been adequately addressed in the DGs?**

Although the MPA has no control over the Hampshire side of the Roeshot site, the Mineral Sites Plan, through the Development Guidelines proposed for the AS13 Roeshot site, will require that the Dorset Roeshot site not be worked simultaneously with the Hampshire site. This is proposed as modification **MM-AS13.3**.

At the stage of a planning application for the Dorset Roeshot site, this would be achieved by means such as a conditional requirement of no simultaneous working or a legal agreement undertaken by the operator/owner.

**49. Should the DGs for each site make reference to this cluster?**

The MPA does not consider that this cluster has the potential to produce strong cumulative impacts, to the extent that it needs to be specifically referred to in the Plan.

The Hurn Court Farm site is already permitted.

## Issue 8

### **Cluster 4 - Moreton Area of Dorset: AS-19 Woodsford Extension, AS-25 Station Road and AS-26 Hurst Farm**

#### **50. Given their close proximity to each other, have these sites' potential cumulative effects been adequately assessed including traffic impacts, harm to landscape, residents' visual and other amenity, and the historic environment?**

It is accepted that the proximity of these proposed allocations to each other increases the potential for cumulative impacts.

The MPA considers that there is an adequate policy basis to ensure, at planning application stage, that cumulative impacts can be properly addressed and mitigated. Policy DM-1 (j) of the Minerals Strategy 2014 (MSDCC – 54) specifically requires that proposals for minerals development avoid cumulative impacts. Policy DM-2 addresses impacts on amenity.

For the purposes of allocation in the Mineral Sites Plan, the MPA has carried out a proportionate level of assessment. On the basis of this assessment, the MPA is satisfied that any cumulative impacts which may arise are capable of mitigation. Should the planning application fail to demonstrate they are not capable of mitigation, the MPA is satisfied that the planning application could be refused.

Assessment has included:

**Traffic impacts:** these have been assessed through the preparation of a Traffic Impact Assessment for Moreton-Crossways-Woodsford (MSDCC 35 and 36), which takes into account traffic generated by potential future residential development as well as current and future quarry development. The TIA found that the roads were capable of accommodating the expected traffic levels.

In addition, one of the currently operating quarries (Moreton Pit on Redbridge Road, accessed from the B3390) will be ceasing extraction at the end of 2018, and will be restored by the end of 2022. This will result in a reduction in current traffic levels.

If necessary and appropriate, quarry traffic can be restricted during peak hours, to reduce traffic loading on the highway network at the busiest times.

Highways England were satisfied that the junctions with the A35 were adequate to handle the expected traffic levels.

AS25 and AS26 will not be operating simultaneously.

**Landscape/visual and amenity impacts:** each of the three sites has undergone landscape/visual assessment as part of the allocation process, and it is expected that any impacts can be mitigated. As noted above, the Minerals Strategy contains policies to address landscape/visual impacts and cumulative impacts.

**Historic Environment:** Heritage Impact Assessments have been undertaken for the Moreton sites, AS25 and AS26. They ~~draft versions~~ indicate that provided that certain mitigation is undertaken, primarily leaving adequate offsets, heritage impacts are mitigated to acceptable levels. Working the sites individually also provides mitigation.

[These documents are available on the Examination Website, see references MSDCC 73 and MSDCC 74.](#)

Cumulatively, AS25 and AS26 will not be worked simultaneously, and there is limited inter-visibility between the two. The processing plant is likely to be located in the south-eastern part of AS26, and may potentially be inter-visible with working as at AS25. The plant would be expected to be sunk down below ground level, with visual and noise screening around the plant site.

The proximity of AS19 and AS26 is considered to provide the greatest potential for landscape/visual impacts. Existing screening will be retained and new screening provided where appropriate. To minimise impacts, the two sites should not be worked simultaneously. The difficulty comes through being unable to



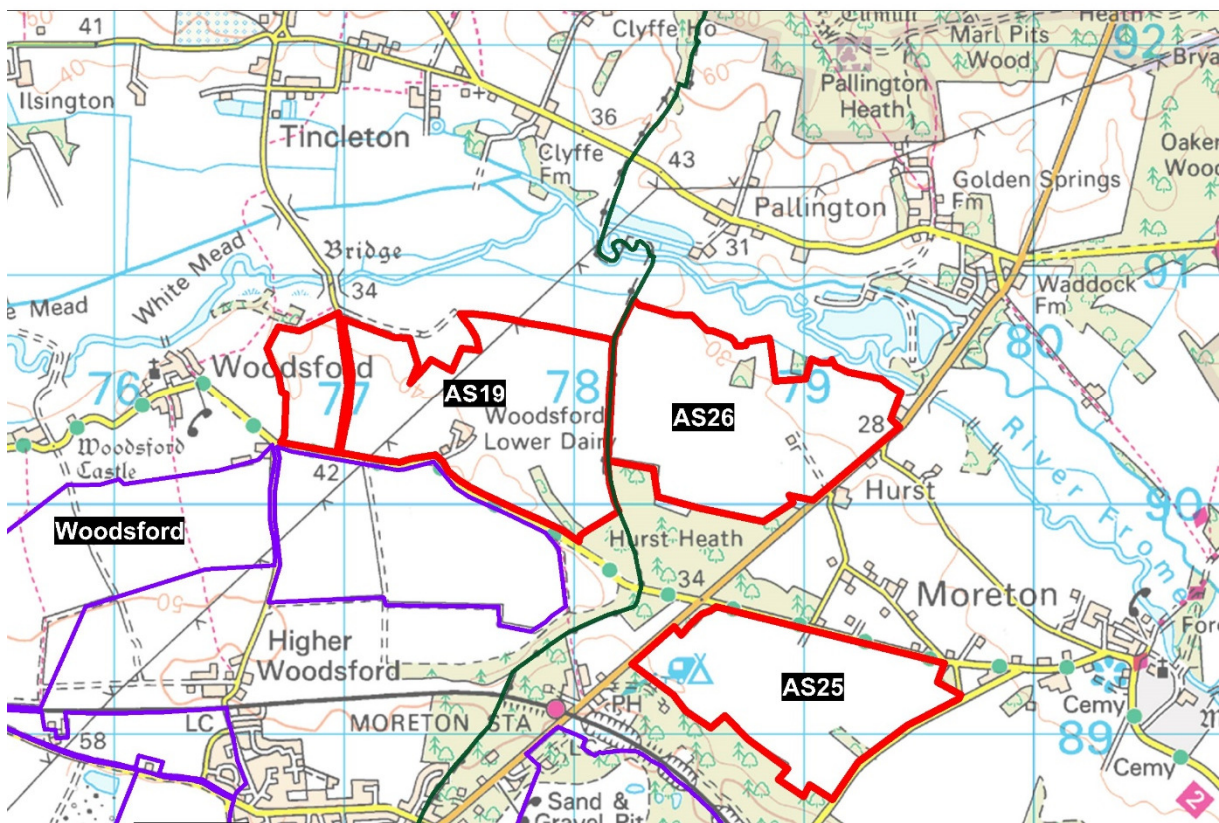
predict when the two sites might be developed, along with the fact that AS19 is not a stand-alone site but will be integrated into the working scheme for the current Woodsford Quarry.

AS25 and AS26 are in the same ownership while AS19 is in a different ownership. Given the proximity of the sites (AS19 and AS26) and the different ownerships, it is necessary to ensure that the site developers have taken into account the development timescales of the neighbouring sites.

It is expected that AS19 might be developed between 2022 and 2032. If this was to happen in this time scale, then of the two sites AS25 and AS26, AS25 Station Road could be worked first, during the timescale for development for AS19 Woodsford Quarry. Apart from the location of the processing plant, AS26 would remain undeveloped during this timescale, thus minimising cumulative impacts.

Including both AS25 and AS26 as allocations, even though both will not be worked during the lifetime of the Mineral Sites Plan therefore provides maximum flexibility in terms of options for working of the three sites.

As noted, the MPA consider that adequate policy protection exists to minimise cumulative impacts to acceptable levels. At the planning application stage for either of these sites, the applicant would have to demonstrate to the satisfaction of the MPA that cumulative impacts have been appropriately addressed and mitigated.



Moreton/Crossways Sites

The MPA has sought to ensure both that cumulative impacts are within acceptable levels and also that (for AS19 and AS26) the development of one of the sites does not unnecessarily and unfairly delay the development of the other.

Options for addressing this latter issue includes the following:

- Of the two Moreton Estate sites, AS25 and AS26, AS26 to be allocated and to have processing plant on it, but not to be worked before AS25 Station Road.
- AS19 is expected to be worked between 2022 and 2032 approximately.
- Delaying the start of AS26 until after AS25 is completed - around 2032 approximately - will allow AS19 to be completed or almost all completed.
- The AS19 area will be worked before the remaining, eastern part of the existing Woodsford Quarry. If AS19 is to be the final part of Woodsford Quarry to be worked, there will be no restriction on the working of AS26.
- When AS19 is worked, the operator would be required to work the northern and eastern parts of the site first, to ensure that by the time AS26 is starting, even if AS19 is not finished, the adjacent parts of the two sites would not be worked simultaneously.
- Similarly, it may be possible for AS26 to begin operations while AS19 is still being worked/restored - but the operator of AS26 will be required to begin working on the eastern side of the site.
- The operator of the Woodsford Quarry and AS19 would not be permitted to proceed to the (permitted) remainder of the quarry until AS19 is completed and in restoration.
- For both AS19 and AS26, there could be an absolute requirement, to be established through the proposed phasing for each site at planning application stage and achieved through a legal agreement signed by both developers, that the eastern part of AS19 and western part of AS26 will not be simultaneously worked.

The MPA will add these requirements to the relevant Development Guidelines, through proposed modifications (**MM-AS19.2; 19.3; 25.1; 25.3; 26.1** and **26.2**)

**51. Should more direction be given in the DGs on mitigating cumulative effects to an acceptable level?**

Modifications (**MM-AS19.2, MM-AS25.1** and **MM-AS26.1**) are proposed, which address the points raised in Q. 50, ensuring that cumulative impacts, especially between AS19 and AS26, are addressed and mitigated.

**52. The SA indicates that the main areas of cumulative traffic impact are likely to be along the B3390 and particularly the two narrow Hurst Bridges and the Waddock Cross junction, where there has previously been an accident problem. Does the transport assessment adequately consider and resolve these potential impacts taking account of all minerals and other built development in the area?**

The Traffic Impact Assessment (MSDCC 35 and 36) considered traffic numbers and flows, and does not consider that the Hurst Bridges and Waddock Cross are an unmitigatable constraint. It is considered that there is adequate signage in the road and other information.

Traffic levels along the B3390 used to be higher, when Warmwell Quarry (adjacent to Crossways) was operating, generating some 140 movements per day. Warmwell has now closed, and Moreton Pit on Redbridge Road will also be finishing at the end of 2018, leading to a reduction in traffic.

Mineral extracted from the AS19 Woodsford Quarry Extension, although adjacent to AS26 Hurst Farm, will be taken to the western end of the quarry by conveyor to be processed and then most lorry movements from Woodsford Quarry are towards the west, accessing the A35 via the West Stafford bypass.

The MPA is satisfied that the B3390 can accommodate traffic flows, of quarry and other traffic, that are likely to arise.

**53. Do any of the Highways Authorities have any outstanding issues?**

The MPA is not aware of any outstanding issues from the Dorset County Council Highway Authority.



**54. I note that the traffic modelling in the Moreton/Crossways/Woodsford Traffic Impact Assessments 2016 appear to be based on a SATURN model of the Crossways area created in 1999, although the network was audited and the model altered to reflect current conditions. How have changes in development between then and the 2016 base year been taken into account within the assessment?**

The MPA can confirm that the traffic modelling in the Moreton/Crossways/Woodsford Traffic Impact Assessments 2016 is based on a SATURN model of the Crossways area created in 1999.

The new model covers a smaller, more contained area focusing on Moreton, Crossways and Woodsford. It is not intended to be a WebTAG compliant model for variable demand / economic assessment but a tool to assess traffic movements.

Changes in traffic are based on observed traffic data rather than taking into account developments at specific locations. Although some development has taken place between 1999 and 2016, the major changes to traffic in the area are due to the opening of the Weymouth Relief Road in March 2011. Traffic using the A352 and B3390 has reduced significantly as more long distance traffic now travels via the A35/A354 to the north and west of the area.

**55. In its Site Assessment comments on AS-25 and AS-26, Highways England refers to traffic modelling only being inter-peak period. Has this now been resolved to include all peak periods?**

Yes, the Traffic Impact Assessments (MSDCC 35 and 36) cover both peak and inter-peak flows.

**56. Also Highways England refers to the conclusion that there will be less traffic on the network as only two sites will be operating in the future and it asks for clarification. Would the Councils please clarify?**

At the time the Traffic Impact Assessments were prepared, there were three quarries operating in the Moreton/Crossways area - Warmwell, Woodsford Quarry and Moreton Pit on Redbridge Road. It was known that Warmwell would close early in 2017, and Moreton Pit is due to finish extraction by the end of 2018.

Woodsford Quarry will continue operation, but most of the lorry and other traffic it generates does not use the B3390.

Should one of AS25 or AS26 come on stream in the future, there will just be two quarries operating where at the time of the preparation of the Traffic Impact Assessments there were three.

**57. I understand from representations that there is a proposal to designate a Dorset National Park within the lifetime of the MSP and that it would include the area covered by these three sites. What is the position with this proposal and does it need to be referenced in the MSP?**

The MPA is aware that there is local and perhaps wider interest in designating a Dorset National Park.

There is a dedicated website which notes "In June, the government announced details of the Review of Designated Landscapes to be led by Julian Glover. The National Park Team welcomes this important development and looks forward to working with Julian Glover and the Panel, DEFRA and Natural England and to welcoming the Panel to Dorset. .... A Dorset NP will be considered as part of this review."

The MPA is not aware of firm proposals to designate a Dorset National Park and Natural England has not raised the issue of a Dorset National Park in any of its representations.

The MPA take the view that it is unlikely that a Dorset National Park will come into existence prior to a review of the Plan, and do not propose to reference it in the Plan.

**58. The DGs indicate that AS-25 and AS-26 will not be worked simultaneously. How is this likely to work in practice and does it have implications for working the two sites within the Plan period?**

Both AS25 and AS26 are in the same ownership. The Development Guidelines (modifications **MM-AS25.1** and **MM-AS26.1**) will specify that both sites are not to be worked simultaneously, and this will be taken into consideration should a planning application be received for either of the sites. A legal agreement could be signed by the landowner, committing to this approach.

This would mean that both sites would not be worked during the Plan period. However, as explained in Q. 50 above, including both AS25 and AS26 as allocations in the Plan provides maximum flexibility for working AS19, AS-25 and AS26 and justifies the inclusion of both AS25 and AS26, even if both are not to be worked during the life of the Plan.

As noted, a processing plant could be located at AS26, to process material removed from AS-25 and AS26. AS25 could be worked first, while AS19 was being worked, and when AS25 and AS19 were both complete (or AS19 largely complete, it would be possible to begin working AS26.

**59. According to the Halletec site investigation of June 2018 the sand and gravel resource for AS-25 and AS26 appears to be present throughout the whole site and includes both Poole Formation and River Terrace sand and gravel of commercial quality. I understand that the figures represent an increase of about 30% over previous estimates, which did not show the Poole Formation resource.**

- a) **Should MSP Policy MS 1 be modified to reflect the increase and subdivision of resource?**
- b) **Do the DGs require any modification as a result of this investigation?**

a) Policy MS-1 already reflects the potentially increased reserve at these sites. The MPA are aware that following the Hearings the resource may decrease to accommodate various mitigation requirements, especially for mitigation of heritage issues.

The MPA propose modifications to Policy MS-1, through **MM-SG.6**, to clarify this.

b) The MPA do not propose to revise the Development Guidelines at this stage.

**60. Should the DGs for each site make reference to this cluster of three?**

Yes, given the way they are likely to be worked and the importance of avoiding cumulative impacts, modifications (**MM-AS19.3**, **MM-AS25.3** and **MM-AS26.2**) are proposed to the Development Guidelines for these three sites that refers to this cluster

## **Issue 9**

### **Cluster 5: As for Cluster 4 plus AS-06 Great Plantation**

**61. The SA considers these sites together due to potential traffic impacts on the road network and on a school situated on one of the HGV traffic routes. Does the traffic impact assessment for Cluster 4 include Great Plantation and does it resolve cumulative impacts? What is the position with the school?**

The Traffic Impact Assessments (MSDCC 35 and 36) do include the route to the A35/A31 through Bere Regis, and do not flag up that there will be a problem on this route.

There will be no cumulative traffic impacts from Puddletown Road, as the Great Plantation site will replace the existing operations by Hanson's at Hyde and Hines Pits.

The school that was located right on the C6 south of Bere Regis has now moved to a site that is further away from the C6. As noted, there will be no change in quarry traffic, so no increased impact on the school.

**62. Should these potential impacts be referenced in the DGs?**

As there are no specific impacts identified, and no expected cumulative impacts, the MPA do not consider that it is necessary to reference them in the Development Guidelines.

**63. Should the DGs for each site make reference to this cluster?**

As noted above, no specific impacts are expected, and the MPA do not propose to refer to this cluster.

## Issue 10

### **Cluster 6 - Purbeck Stone Sites: Allocations listed in Policy MS-6 (PK-02, PK-10, PK-15, PK-17, PK-18, PK-19 and PK-21) and MS-3 Swanworth Quarry Extension (PK-16)**

**NB: the Gallows Gore site PK21 has been withdrawn from the local plan site allocation process, and no longer forms part of it.**

#### **64. Have the potential main cumulative impacts of sites in the Dorset AONB been adequately assessed?**

All the Purbeck Stone proposals are extensions, so are not expected to lead to cumulative traffic impacts.

In terms of landscape/visual impacts, these have been taken into consideration. Purbeck Stone quarrying is a historic aspect of the Purbeck Plateau landscape, and is required for stone for repairs to historic buildings, local buildings and for new buildings. Workings are generally small-scale and well screened, and all are located within the Purbeck Stone Area of Search identified in the Minerals Strategy 2014 (MSDCC – 54).

There is potential for cumulative impacts on amenity in some areas e.g. around the Blacklands/Quarry 4 areas. Again best practice, such as screening, will be employed.

Swanworth Quarry PK16 is a site which is not expected to lead to cumulative traffic impacts, but will have some cumulative landscape/visual impacts, as part of the current quarry will remain unrestored as the proposed extension is worked. The MPA take the view that the limited cumulative visual impacts are acceptable, given the benefit of maintaining a supply of crushed rock from this part of the MPA area.

#### **65. How is it envisaged the cumulative effects of these sites on the Dorset AONB will be mitigated to an acceptable level?**

As noted above, cumulative traffic impacts are expected to be minimal if at all.

Cumulative landscape/visual impacts will be mitigated through best practice means - including working small areas, visual screening, timely restoration (**MM-PKS.1**).

#### **66. Is there sufficient direction given in the DGs on the mitigation of adverse effects on the AONB?**

The MPA consider that the Development Guidelines provide enough guidance, particularly flagging up that further assessment is needed at planning application stage, with mitigation to be identified. Reference to the AONB can be added if this is felt to be necessary.

#### **67. Should the DGs make reference to potential cumulative impacts?**

+

#### **68. Should the DGs for each site make reference to this cluster?**

Given the potential for cumulative impacts, and the sensitivity of the landscape, the Development Guidelines for each of the remaining Purbeck Stone sites will include reference to potential cumulative impacts, including the existence of the cluster of sites.

Modification **MM-PKS.4** explains that, in the Development Guidelines for all Purbeck Stone proposed allocations, there will be a reference to including conservation grade limestone grassland in the restoration, considering providing for bat roosts in restoration and referring to the clustering of Purbeck Stone sites.

## Issue 11

### **iii) Sand and Gravel MS-1: Production of Sand and Gravel** **General Questions**

#### **69. Has the most appropriate methodology been used to assess aggregate demand? Are there any outstanding issues with the assessments?**

The MPA relies on the annually produced Local Aggregates Assessment (see MSDCC 46 to 51) to assess and determine aggregate demand. The primary method used is a rolling average of the previous 10 years supply, taking into other factors, as required in National Planning Practice Guidance.

Every year the Local Aggregates Assessment has been submitted to the South West Aggregates Working Party, who review it and make suggested comments, which are taken on board by the MPA.

The MPA is not aware of any outstanding issues with the LAAs up to the 2016 LAA; the 2017 Local Aggregates Assessment is still in preparation.

#### **70. MS Policy AS2-Landbank Provision requires the maintenance of separate landbanks for Poole Formation and River Terrace sand and gravel. Should the updated shortfall calculations in the MSP be broken down into Poole Formation and River Terrace estimates so as to reflect and deliver the MS provisions?**

Paragraph 7.52 of the Minerals Strategy notes that at the end of 2011, the landbank comprised approximately 64% Poole Formation sand and 36% River Terrace gravel. Historically, the split in aggregate types was approximately 2/3 Poole Formation and 1/3 River Terrace sand and gravel.

However, this is changing over time as the Poole Formation resource remains tightly constrained by European biodiversity designations, heritage designations and landscape. The Mineral Sites Plan notes in the shortfall calculations that reserves at the end of 2016 were 13.6 tonnes. This can be broken down to 55.8% Poole Formation and 44.2% River Terrace.

If reserves continue to fall, as estimated, to 10.78 million tonnes at the end of 2018 and they fall in a proportionate ratio, this would give approximately 6.01 million tonnes Poole Formation and 4.76 million tonnes River Terrace.

The question becomes, if the MPA has to provide for 22.65 million tonnes of sand and gravel during the Plan period to 2033, should we assume that the split will remain at 55.8% Poole Formation and 44.2% River Terrace? These proportions are likely to change again, as reserves continue to be used and new permissions come through.

The MPA could, if required, apply such a split or even use the most recent data for 2017 (2017 Local Aggregates Assessment still in preparation but expected to be ready by the Examination) but there is no certainty regarding the relative proportions of River Terrace and Poole Formation.

For this reason, the MPA prefers to use a single figure for aggregate, as the shortfall calculations in the Mineral Sites Plan do. Policy AS1 of the Minerals Strategy 2014 (MSDCC – 54) is considered by the MPA to be the key policy regarding provision of aggregate in Bournemouth, Dorset and Poole, and it refers to 'sand and gravel' and does not break it down to component River Terrace and Poole Formation parts.

The MPA consider that Policy AS2 of the Minerals Strategy essentially relates to the monitoring of relative levels of supply of Poole Formation and River Terrace aggregate, as is done through the Local Aggregates Assessment. If one or the other type of aggregate is falling year on year, this is indicative of the need to increase supply if possible. However, this relies on market forces, and new sites coming forward for development.

When the Minerals Strategy is reviewed, this will be an opportunity to consider whether Policies AS1 or AS2 need to be re-assessed and/or revised.

**71. The MS states that past trends show that about two thirds of provision consists of soft sand from the Poole Formation (Bedrock) and about one third comes from River Terrace or Plateau sharp sand and gravel deposits (Superficial). It goes on to indicate that every effort will be made to ensure an appropriate split in provision. With this in mind, should the MSP indicate the type of sand and gravel supplied from the identified sites in MS-1?**

Proposed modification **MM-SG.6** as set out under Q. 59 already proposes this change.

**72. Should figures be set out for both Poole Formation and River Terrace/Plateau sand and gravel to demonstrate how the sites overall provide an appropriate split between each of the identified types?**

As noted above, historically the split of Poole Formation to River Terrace aggregate was approximately two thirds to one third. This is changing as Poole Formation reserves drop and River Terrace reserves increase and it may not be possible to maintain this 2/3 to 1/3 split in the future.

It is possible to estimate the split in provision for each site, but it must be stressed that this would be no more than an estimate.

The MPA will set this out as a proposed modification **MM-SG.9**.

**73. Have the site assessments accounted for the demand for the different main types of sand and gravel?**

The site assessments do not specifically take into account the demand for the different main types of sand and gravel.

In Dorset, where all the proposed allocations are, the sand and gravel resource tends to be concentrated in the south-east of the county. This area is very constrained in mineral extraction terms, with international biodiversity constraints, heritage, tourism, landscape and demands for built development.

As noted, the MPA have used the approach of issuing 'Calls for Sites' to identify potential allocations which have the greatest potential of being allocated and developed. The nominations received included River Terrace and Poole Formation sites. The MPA have considered and assessed all the nominations, and have selected those considered most appropriate and least environmentally damaging for inclusion in the Mineral Sites Plan.

Of the selected nominated sites, some provide Poole Formation sand, but there is a greater proportion of those providing River Terrace aggregate. It is not the case that the MPA has the option of choosing sites that provide a certain proportion of Poole Formation to River Terrace - the MPA acknowledges the increased level of constraint over Poole Formation bearing areas. It also acknowledges the changing levels of sales/supply of Poole Formation and River Terrace, with Poole Formation currently declining and River Terrace currently increasing.

The MPA has selected sites that will deliver the quantum of aggregate - sand and gravel - as specified by Policy AS1 of the Minerals Strategy.

It will seek to maintain separate landbanks of River Terrace and Poole Formation as stated in Policy AS2 of the Minerals Strategy, but if numbers of nominations for Poole Formation sites, or applications for such sites are not there, one or the other separate landbank could dip below 7 years. The MPA would then be able to give greater priority to sites which supply Poole Formation.

**74. Do the allocated sites appropriately match the demand for each type of sand and gravel, and are they as far as reasonably practicable, appropriately located geographically?**

In identifying sites for allocation, including aggregate sites, the MPA has taken the approach of issuing 'calls for sites' e.g. see MSPSD 05 the Mineral Sites Plan Consultation Statement. This was considered preferable to other means, such as identifying relatively unconstrained areas of mineral bearing land, identifying the owners, and approaching them regarding allocating their land.

The response to a 'call for sites' identifies land with mineral reserves and willing landowners, making it more likely to ultimately be developed.

However, this does not necessarily produce potential site allocations with the preferred/desired proportions of mineral need. Much of the Poole Formation sand is within the areas of Dorset which are subject to significant constraints, particularly European biodiversity constraints and heritage constraints. Historically, as the reserves along the Puddletown Road were being developed, there was an excess of Poole Formation sand and less River Terrace gravel. This situation is currently reversed.

Policy AS1 of the Minerals Strategy refers to the provision of sand and gravel. The Mineral Sites Plan does allocate sites for the provision of sand and gravel, but at present the supply is more of River Terrace. The Minerals Strategy will be due for a 5 year Review, and the issue of the level of supply of River Terrace and Poole Formation aggregate can be reviewed at that time.

Minerals must be worked where they are found. The majority of the sand and gravel reserves are in south east Dorset, and the proposed allocations are generally between Dorchester and the Poole/Bournemouth conurbation, where the demand is.

**75. Do the proposed allocations sit within the sand and gravel resource areas/blocks from which the MS indicates that new sites should be identified? Should this be made clear in the MSP?**

The proposed allocations are within the sand and gravel resource blocks, and this will be clarified in the MSP through proposed modification **MM-SG.5**.

**76. For effectiveness, should the resource blocks be superimposed on Fig 1 (Sand and Gravel site allocations)?**

The MPA agree this would be helpful, and will be achieved through proposed modification **MM-SG.10**.

**77. Natural England suggests that reference be made in Policy MS-1 to the range of mitigation measures required for sand and gravel sites as listed in Appendix 2 of the HRA Screening Report so as to give this mitigation the weight of policy. Should these mitigation measures be set out in MS-1 to provide more certainty that they would be met?**

The MPA will follow the advice of Natural England, and make reference in Policy MS-1 as this will provide the level of certainty of protection of European designations as required by Natural England.

A modification, **MM-SG.3**, is proposed to cover this.

**78. Alternatively, would it be as effective to reference these mitigation measures in the DGs as opposed to committing them to the body of Policy MS-1?**

The MPA prefer to put them in the policy, as suggested by Natural England, for the greatest level of certainty.

**79. As suggested by Natural England, should Policy MS-1 make reference to “work[ing] towards achieving public benefits within the restoration vision”**

The MPA will include this reference in MS-1.

It is proposed as modification **MM-SG.2**.

**80. The MS at paragraph 7.44 states that no sites will be brought forward for sand and gravel that are likely to affect European or internationally designated nature conservation sites and that detailed ecological and hydrological assessments are required for potential allocations close to such sites before they are taken forward into the MSP. Have these assessments been done for any allocations that come within the scope of paragraph 7.44? Please identify any such sites.**

The HRA (MSPSD 07) and further Appropriate Assessment (MSPSD-12) have ensured that none of the sites proposed for allocation are likely to affect European/international designations, so no further detailed assessments are required at the current, plan allocation, stage.



## Issue 12

### Silica Sand

**81. The MS states (paragraph 13.19) that: *Continued production of industrial sand will be investigated through the site allocations process, and Policy IS1-Industrial Sand commits to an appropriate contribution to the national requirement for silica sand. Do any of the Poole Formation (Bedrock) sites in MS-1 provide industrial Silica Sand and, if so, should this be made clear?***

The Poole Formation sand in Dorset has a relative high silica content, but the level of purity and colour of the sand limits its use. It has been used in the past in brickmaking or as foundry sand, and is currently used for equestrian purposes or for animal bedding.

Given these relatively low-value uses, the Dorset Poole Formation sand does not make a significant contribution to the national requirement for silica sand and there is no site that provides sand exclusively for industrial/non-aggregate purposes.

In 2017, on a nearby Poole Formation site, the amount of sand sold for non-aggregate use was approximately 10% of the amount sold for aggregate purposes.

There is no set amount of sand sold for non-aggregate/industrial purposes - if there is a market for this type of sand, it will be sold.

A reference will be made in the Plan to the fact that some of the sand may be used for non-aggregate purposes, through proposed modification **MM-SG.7**.

**82. If Silica Sand is to be produced for industrial purposes at any of these sites, should the MSP indicate how this contributes to providing a stock of reserves to support relevant industry? (NPPF paragraph 146 3rd bullet)**

As noted above, there is no firm commitment or intention for any of these sites to produce sand for industrial purposes, and there is no particular relevant industry that is supported.

The use for equestrian purposes or animal bedding probably reflects the grain size/shape more than the fact that it is silica sand.

If there is a market for non-aggregate uses, these sites have the potential to provide sand to meet it.

The MPA consider that proposed modification **MM-SG.7** adequately covers this point.

## Issue 13

### **Site Specific Questions for allocations within Policy MS-1: Production of Sand and Gravel**

**83. For each of the allocations, the Councils should indicate whether any statutory regulatory bodies have any outstanding concerns about the sites, other than what has already been identified in the questions. If so, these concerns should be set out along with how they have been addressed in the MSP.**

**Environment Agency:** in their submission to the Pre-Submission Consultation, the Environment Agency stated that they do not have any objections to the proposed allocations.

**Natural England:** the MPA understand that provided the recommendations made by Natural England to the Mineral Sites Plan Pre-Submission Consultation are included in the Plan, along with the specific requirements identified in the HRA and Appropriate Assessment, Natural England do not have any outstanding concerns.

**Highways England:** Highways England have requested an assessment of cumulative impacts on the C7 Wareham to the A35 road, which is being produced. Their concern is that three sites, BC04 Trigon Hill (ball clay), Tatchell's and Philliol's Farm could be gaining access onto the C7 and over-loading it. The MPA is addressing this by ensuring, through references in the Development Guidelines, that Tatchell's and Philliol's Farm will not work simultaneously. There are currently two sites - Trigon and Tatchell's - accessing the C7.

**Historic England:** There are a number of sites which Historic England still have concerns about, including:

Great Plantation - Historic England and Hanson have agreed a Statement of Common Ground ([see SCG 01 on the Examination Website](#)) which has addressed the issues.

Station Road - concerns over potential impacts on setting of heritage assets, including the Moreton Conservation Area and Listed Buildings; historic landscapes.

A Heritage Assessment Report has been prepared, and it recommends steps to be taken to minimise impacts. The MPA and Historic England are in discussion over this.

Hurst Farm - concern over the potential impacts on setting of listed buildings; historic landscapes

A Heritage Assessment Report has been prepared, and it recommends steps to be taken to minimise impacts. The MPA and Historic England are in discussion over this.

Philliol's Farm - concern over the potential impacts on setting of listed buildings; historic landscapes. A Heritage Assessment Report has been prepared, and it recommends steps to be taken to minimise impacts. The MPA and Historic England are in discussion over this.

**Dorset LEP** - no outstanding issues.

## Issue 14

### **AS-06: Great Plantation, Puddletown Road, Bere Regis**

**84. Can the Strong Negative Impacts identified in the SA (ob. 2 – biodiversity) and the “Very significant adverse impact” (Category A) identified in the Site Assessment on biodiversity (Criteria C1-C5) be adequately mitigated, particularly for i) European/International Designations, ii) National Designations (e.g. SSSI) and iii) Protected species?**

Yes - the site area has been significantly reduced, and other measures have been agreed (see proposed modification **MM-AS06.1**) which have allowed Natural England to remove their objections to the site.

**85. Have all significant matters been properly taken into account in these assessments and, if not, what matters require further consideration?**

The issues that have repeatedly been raised for Great Plantation - impacts on biodiversity, particularly international and national designations; impacts on protected species using the site; impacts on recreational users of the site have been taken into consideration and have been addressed through measures such as the reduction in the size of the site; provision of alternative recreational routes; other off-site benefits, to offset impacts.

These issues have all been addressed to the satisfaction of Natural England.

**86. Natural England's comments within the Site Assessment say " ...it will be extremely difficult to find an area within Great Plantation where aggregate extraction would not be in conflict with NPPF policy and Habitats Regulation tests, both for habitats and species..." What are the Councils' views on this?**

That comment was made to a previous consultation, when a larger site area was under consideration. With the reduction in the site area, and the other measures agreed, Natural England have removed their objections.

Their representation to the Pre-Submission Consultation noted:

*"...the proposal has been considerably reduced in scale and addition mitigation has been introduced so that in our view, providing the proposed mitigation is implemented in full, at this stage it is reasonable to expect that a planning application would be able to meet the relevant tests within the Habitats Regulations/Directive.*

*Within the Sites Plan itself we would recommend that a better link is made between the Habitats Regulations Assessment Screening Report (HRA) and plan policy for some of the detail about the nature of the mitigation is within the HRA rather than the development guidelines. This would ensure that the requirement for specific mitigation is enshrined within Policy rather than only being within supporting documents; the change is therefore important in allowing the Plan itself to meet the relevant tests in the Habitats Regulations/Directive."*

The MPA propose a modification **MM-AS06.1** as suggested by Natural England to better make the link between the HRA and the Mineral Sites Plan.

**87. Dorset Wildlife Trust is concerned about the impact on European Sites and protected species including Smooth Snake, Sand lizard and Nightjar. Can the nearby SPA, SAC and SSSI be adequately protected?**

The Dorset Wildlife Trust response to the Pre-Submission Consultation noted:

"Provided that all of the measures outlined in the HRA screening report are adhered to and that any planning proposal for mineral extraction in this area is shown to have reduced biodiversity impacts on European Sites and their associated species to non-significant levels before planning permission is granted, then we will not retain an objection to its inclusion within the Plan."

Natural England are not objecting to this site, now that it has been reduced.

The MPA is of the view that the various biodiversity designations and species can be appropriately protected.

**88. As the site is entirely on Open Access Land, could there be negative impacts due to the displacement of recreational users of this land?**

The developers are proposing alternative access during quarrying/restoration to offset negative impacts from the loss of access land. Natural England are satisfied with what is proposed.

**89. Is this a case for consideration of Imperative Reasons of Overriding Public Interest?**

The MPA is satisfied that, as the proposal has been significantly reduced in size and Natural England have removed their objections, there is no need to consider IROPI for this site.

**90. Is this allocation in conformity with the MS, which states at paragraph 7.44 "No sites will be brought forward for sand and gravel which fall within and/or are likely to affect European or internationally designated nature conservation sites"?**

Yes it is -- the HRA ensures that none of the proposed allocations will affect European/Internationally designated sites. The MPA is satisfied that with the proposed modification requested by Natural England (Q.86) the Mineral Sites Plan is in conformity with paragraph 7.44 of the Minerals Strategy.

**91. The Site Assessment also identifies category "A" "Very significant adverse impact" for C8 – landscape capacity, C11 – archaeology, C12 - hydrogeology/groundwater, C13 – surface waters; the SA identifies Strong Negative Impacts for historic environment (ob. 6), landscape (ob.7), and access to countryside (ob.18). Are there reasonable prospects of these harms being adequately mitigated?**

As already noted the proposed allocation has been significantly reduced in scale, and the impact in landscape capacity/landscape terms is now considered to be acceptable.

Archaeology/historic environment - is dealt with in more detail in Q.92 below, but again with the reduced scale of the proposal the developer and Historic England have come to an agreement as to a further reduction, with the detail to be finalised at planning application stage, which allows Historic England to remove their objection.

Surface waters - this was identified as a strong adverse impact since, with the original larger proposal, the boundary of the proposal was closer to a seasonal drain to the west. The Environment Agency have confirmed they have no objections to the proposal to allocate Great Plantation in the Mineral Sites Plan.

The developers will provide alternative access land for use during working. Natural England is satisfied that the proposed alternative routes are acceptable, and have removed their objections to the loss of open access land, and the risk of recreational displacement.

**92. Historic England indicates that there are numerous designated assets and their settings that would be directly impacted. In particular concern is raised about permanent major adverse changes to the landform and landscape, which would impact on three Scheduled Monuments: a Bronze Age round barrow and two sections of the Battery Bank linear earthwork. The Heritage Assessment (Context One) refers to numerous heritage assets. Can the harm to the significance of these assets be adequately mitigated?**

The reductions in size of the proposed site have provided mitigation for some of Historic England's concerns. The developer and Historic England have been in discussion, and have agreed the principle of a further standoff from the Scheduled Monuments which meets Historic England's remaining concerns about adequate mitigation.

A modification (**MM-AS06.3**) is proposed to address this issue, and a Statement of Common Ground has been prepared and signed by all parties, setting out the agreement reached.

**93. Would the Councils explain how the balancing exercise has been carried out in weighing harms against benefits and reaching a conclusion to allocate?**

The MPA is satisfied that the reduction in size of the proposed allocation site is enough to address the concerns of the statutory consultees, and the MPA's own specialist advisors, to the point that although concerns still exist, it is considered that they can be appropriately mitigated.

There are no outstanding objections from the statutory consultees.

This, in combination with the fact that the Great Plantation site will provide primarily Poole Formation sand which is more in demand than River Terrace sand and gravel, and is a follow-on from existing workings, makes this site a reasonable option for inclusion in the Mineral Sites Plan as an allocation.

**94. Should the DGs provide more direction on the mitigation measures required for nature conservation and other identified category "A" effects or Strong Negative Impacts?**

Previously the most significant impacts included biodiversity, landscape, heritage and water.

The reduced size of the proposed allocation, in some cases with additional discussion, has addressed all of these issues.

The MPA do not consider any further additions to the Development Guidelines are required.

**95. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA is not aware of any further issues.

## Issue 15

### **AS-09: Hurn Court Farm Quarry, Hurn, Christchurch**

The Hurn Court Farm Extension has been permitted, and will be removed from the Mineral Sites Plan as it is no longer a potential site allocation.

The MPA propose a modification **MM-AS09.1** to achieve this.

- ~~96. The Site Assessment identifies category "A" "Very significant adverse impact" for C10 – historic buildings, C11 – archaeology, C13 – surface waters. The SA shows Strong Negative Impacts for historic environment (ob.6), and quality of life (ob.17). The Heritage Assessment (Context One) refers to extensive heritage assets being impacted. Are there reasonable prospects of these harms being adequately mitigated?~~
- ~~97. Have all significant matters been properly taken into account in these assessments and, if not, what matters require further consideration?~~
- ~~98. There are residential and business properties in close proximity to the site. How is it envisaged residential amenity will be protected?~~
- ~~99. Should the DGs provide more direction on the mitigation measures required for identified Category "A" effects and Strong Negative Impacts?~~
- ~~100. — Given that the site is located adjacent to Bournemouth Airport and within the airport's consultation zone, can bird strike and other impacts on the airport be adequately mitigated?~~
- ~~101. — Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?~~

## Issue 16

### **AS-12: Philliol's Farm, Hyde**

- 102. Can the "Very significant adverse impact" (Category A) identified in the Site Assessment on criteria C1-C3 & C5 - biodiversity, C11 – archaeology, C12 hydrogeology/groundwater, C13 – surface waters, and Strong Negative Impacts identified in the SA on biodiversity (ob.2), historic environment (ob.6), landscape (ob.7), quality of life (ob.17) and access to countryside (ob.18), be adequately mitigated?**

A full detailed assessment will be required as part of a planning application once specific details of a proposal are known.

Based on the assessment carried out to date the MPA considers there is sufficient certainty that a viable mineral resource is capable of being worked sufficient to justify allocation.

The MPA consider that if significant and unmitigatable impacts are found at application stage, there is adequate protection through the policies of the Minerals Strategy and national planning policy and a proposal can be refused if necessary.

**Biodiversity** - Natural England is satisfied, provided the requirements of the HRA are clearly linked to the Plan ( see proposed modification **MM-AS12.1**). The Environment Agency have no objections to the site.

**Archaeology/Heritage** - a Heritage Impact Assessment has been commissioned and is still awaited. The MPA is aware that there are heritage constraints to be addressed, but consider that these can be addressed..

**Hydrology/groundwater/surface water** - the Environment Agency have no objection to the proposal, provided the ephemeral ponds and the Fairy Shrimp are properly protected. This is already specifically referred to in the Development Guidelines.

**Landscape** - the MPA is aware it is an intimate landscape, with potential for local impacts. Use of bunding/screening will minimise impacts, and there will be no processing plant on site, as set out in the Development Guidelines, proposed through modification **MM-AS12.5**.

**Quality of life** - along with amenity/access to the countryside, this will be affected but it is expected this can be managed and mitigated as required - again with screening/bunding/working hours

**Access to the countryside** - Natural England require that the haul road from the site to the C7 public road avoids the public right of way, and does not impact on it.

- 103. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?**

The key currently outstanding issue is the extent of the setting of the agricultural buildings in the middle of the site and how this will affect the area that can be worked. Further Heritage Assessment of that heritage asset has been commissioned is expected to provide more information on this.

~~When t~~This work is received the information will be made available has been completed and can be seen on the Examination Website under reference MSDCC 75.

- 104. There are residential properties in close proximity to the site (within 50m). How is it envisaged residential amenity will be protected?**

It is expected that there will be an appropriate buffer - the Minerals Strategy (paragraph 16.6 (a)) refers to a stand-off of 100m; there are other options, of screening/bunding, to be combined with stand-offs. There will also be no processing plant on site, reducing the noise impacts from the development. The haul road to the C7 will not go directly past residential properties.

The development management policies of the Minerals Strategy, especially DM-1 and DM-2, are intended to ensure that matters of amenity are addressed and mitigated appropriately.

**105. How is it envisaged the potential harm identified in the HRA to the Fairy Shrimp and other protected species will be mitigated?**

Further and more detailed assessment will be required at application stage, but it is envisaged that the ephemeral ponds would be excluded from the working area, with whatever buffer is considered appropriate included.

The water management regime would be agreed with the Environment Agency, but would have to include whatever where appropriate necessary to ensure that the ponds did not dry out permanently.

**106. The Environment Agency commented on possible impacts to the River Piddle and Bere Stream SSSI and Natural England says that hydrological impacts on Bere Stream SSSI should be avoided. How is it envisaged the potential harm to the River Piddle and Bere Stream SSSI would be mitigated?**

The Environment Agency would provide further advice on methods to be used, but it is expected that a buffer would be required, and whatever protection is needed to ensure no contamination of the rivers or effects on fisheries.

There is potential for creation of wetlands which, depending on design, would assist in removing nitrates from the river and groundwater, with benefits to Poole Harbour and the international designations there.

**107. How is it envisaged impacts on Philliol's Coppice Site of Nature Conservation Interest would be mitigated?**

The MPA would expect an appropriate buffer would be required, and implemented.

**108. The Heritage Assessment (Context One) refers to a number of heritage assets in the area. Does the Heritage Assessment adequately cover the potential impacts on the significance of all heritage assets?**

Following the heritage assessment the MPA has commissioned some additional work. The [work has been completed and can be seen on the Examination Website under reference MSDCC 75. MPA will provide more information when the Assessment is received.](#)

**109. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?**

As noted earlier, the MPA would prefer to identify the relevant issues, subject to the findings of the additional heritage work.

**110. Can the potential harm to these assets and particularly the Listed Buildings in the centre of the site be adequately mitigated?**

The MPA has taken the view that there is scope to mitigate this subject to more detail at a planning application stage. However, to provide additional certainty on this matter further heritage assessment work has been commissioned which should provide more information on this matter. The report is expected early in September.



**111. Historic England indicates that this allocation does not reflect the MS or national policy or legislation. What is the Councils' response these matters?**

It is possible that Historic England is referring to the fact that Policy MS-1, for example, makes specific reference to biodiversity and nature conservation interests, but not to any other specifically named interests.

The MPA does not favour this approach, but Natural England specifically require the policies to make reference to biodiversity matters, and especially international designations. It does not mean that the MPA values biodiversity matters above any others, or that other matters are not considered.

The MPA is satisfied that all relevant matters have been taken into consideration.

**112. Would the Councils explain how the balancing exercise has been carried out and how harms have been weighed against benefits to reach a conclusion to allocate?**

The National Planning Policy Framework (2012 - paragraph 144) refers to the 'great weight' to be given to the provision of minerals. The importance of a sufficient supply of minerals follows through in the 2018 National Planning Policy Framework. The framework maintains that 'great weight should be given to the benefits of mineral extraction...' (Para 204 and 205).

The MPA considered that this site was required to ensure that the MSP was providing for adequate supplies of aggregate during the life of the Plan.

There is potential for securing funding through the mineral extraction to provide for the maintenance of the Listed Buildings at the centre of the site.

There is potential to create a designed/engineered wetland adjacent to the Piddle/Bere Stream, to benefit Pool Harbour through removal of nitrates from the river/ground water.

Natural England have confirmed that they have no objections to the proposed haul road to the C7 public road, provided certain conditions are met, as set out in the HRA and MSP (proposed modification **MM-AS12.1**).

The Environment Agency have confirmed no objections, provided certain criteria are observed e.g. protection of the ephemeral ponds and the Fairy Shrimp.

Against these are set the impacts on amenity; the impacts on the intimate landscape; the potential impacts on the C7 - still under investigation but capable of mitigation in the opinion of the MPA; impacts on heritage (especially the setting of the central Listed Buildings).

The MPA considers that these should further be capable of mitigation.

The heritage issues will be informed by the receipt of the supplementary work commissioned.

**113. Should the DGs provide more direction on the mitigation measures required for identified Category "A" effects and Strong Negative Impacts?**

The MPA prefers to leave the detail on mitigation measures to the planning application stage, after detailed assessment has been carried out through Environmental Impact Assessment. The Development Guidelines will flag up the issues requiring assessment and mitigation, but the detail will be left until later.

If any issues have been left out of the Development Guidelines, the MPA is happy to consider them and where appropriate to add them in.

However the MPA would be prepared to provide more mitigation direction, but on specific impacts, rather than all Category A/Strong Negative effects. Heritage might particularly benefit from further guidance.

**114. Natural England indicates that the main issue involving internationally designated sites concerns the proposed access road. Therefore, should the DGs provide more direction on the mitigation measures required for this?**

The MPA consider that proposed modification **MM-AS12.1** covers this.

**115. Natural England suggests that the DGs Restoration Vision to a heathland is not appropriate and a wetland restoration would be better. Should the DGs be modified to reflect this?**

Revision the Restoration Vision has been proposed through modification **MM-AS12.2**.

**116. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA considers that all necessary matters are already included.

## Issue 17

### **AS-13: Roeshot Quarry Extension, Christchurch**

- 117. Could the “Very significant adverse impact” (Category A) identified in the Site Assessment on criteria C5 – biodiversity designations, C11 – archaeology, and C13 –surface waters, and the Strong Negative impacts identified in the SA on water (ob.4), and the historic environment (ob.6) be adequately mitigated?**

The potential significant adverse impacts on biodiversity designation refers to the presence of the Southern Damsely on/around the site. It is considered that impacts can be mitigated. Reference to surface water - and ground water - refers to the fact that the River Mude flows through the site. It is considered that impacts can be addressed by leaving an adequate, unworked buffer and by ensuring careful water management during working. The Environment Agency will advise on these matters.

The reference to archaeology is to potential archaeology under the ground - this will be addressed through means such as establishing an archaeological watching brief during key stages such as soil stripping.

The MPA consider that appropriate mitigation can be identified and implemented.

- 118. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?**

The MPA is satisfied that the key issues have been identified.

- 119. The Heritage Assessment (Context One) refers to a number of heritage assets in the area. Should the DGs provide more direction on the mitigation measures required for these and other identified Category “A” effects and Strong Negative Impacts?**

The MPA prefers to leave the detail on mitigation measures to the planning application stage, after detailed assessment has been carried out through Environmental Impact Assessment. The Development Guidelines will flag up the issues requiring assessment and mitigation, but the detail will be left until later.

The MPA would be happy to consider an additional Development Guideline if this would be considered appropriate to ensure protection of heritage assets.

The site assessment (MSDCC 14) notes there is high archaeological potential at this site. Until more detailed assessment has been carried out at the planning application stage, it is difficult to specify what specific mitigation is required. However, the policies provide the necessary scope to ensure appropriate mitigation is provided.

- 120. Does the Plan adequately address potential impacts on designated sites in the New Forest National Park? Has sufficient assessment been undertaken of the Burton Common SSSI, the New Forest SPA, the New Forest SAC and Ramsar Sites?**

The Development Guidelines will be amended (proposed modification **MM-AS13.1**) to specifically make reference to the New Forest National Park, including the need to take it into account in traffic assessment work and designated sites. At the planning application stage for the Dorset Roeshot site, these issues will then be fully assessed.

The Dorset Roeshot proposal has been put forward as a follow-on site from the Hampshire workings. These issues will have been addressed through the Hampshire application, and will be assessed again for the Dorset site. by the time the Dorset site is considered as a planning application, the Hampshire side will have been permitted and working for some years.

- 121. The Environment Agency indicates that, due to its location partly in Flood Zone 3, a Sequential Test is advised to determine whether there are any other sites with lower flood risk. The Strategic Flood Risk Assessment of December 2017 (SFRA) indicates that the Sequential Test should be carried out before allocation (paragraph 9.10). Has this been done and with what outcome? (I note the comments in SFRA Appendix A Parts 1 and 2 on site AS13 but this does not make clear whether the Sequential Test has been applied).**

Paragraph 9.9 of the Strategic Flood Risk Assessment (MSPSD - 09) notes ' *The Minerals and Waste Planning Authority should seek to avoid inappropriate development in area at risk of flooding by directing development away from areas at highest risk of flood and ensuring that development does not increase risk and where possible can help reduce risk from flooding to existing communities and development.*' The MPA take the view that the Sequential Approach to selection of actual sites is more relevant to built development - sand and gravel extraction is fully compatible with the functional flood plain, provided that buildings and storage are located out of the floodplain.

Alternative sand and gravel sites that have been considered and rejected (e.g. Appendix C or D of the Sustainability Appraisal MSPSD 03) were rejected on other grounds apart from flood risk. There are no other sand and gravel sites, currently unallocated, that are at lower risk of flooding.

Only parts of the site are within the floodplain, and the MPA consider it is more appropriate to develop the site on a sequential approach, ensuring that no storage or built development is proposed within the floodplain, as is referred to in the Development Guidelines for the allocation.

- 122. Has the Exception Test been carried out and, if so, with what result?**

The MPA do not consider it necessary to carry out an Exception Test. The proposed allocation, as sand and gravel extraction, is appropriate development in this area, provided that no buildings or storage are located within the floodplain.

- 123. How much of the site would be required for use as a Western Suitable Alternative Natural Greenspace (SANG) for the North Christchurch Urban Extension and would this impact on the quantity of sand and gravel that could be excavated?**

The western SANG is 8.33ha in area and lies to the west of Hawthorn Road (the western boundary of the site) - so outside the proposed allocation.

The Central SANG is within Dorset, west of the Mude. This Dorset area is designed as follows: the part of the Central SANG Area that lies to the west of the Mude has been specifically sized to allow for its potential to be exchanged with land located on the east bank of the Mude once gravel extraction activities have reached sufficient maturity. Consequently, there is potential for part of this SANG Area to be temporary. Therefore it can be worked for minerals as its use for SANG will only be temporary until it is needed for extraction.

- 124. I understand that part of the site is on land allocated for the SANG in Christchurch's local plan which is needed to satisfy Habitats Regulation requirements. Is there any conflict with this local plan?**

There is no conflict with the Christchurch local plan - the SANGs have been designed to accommodate the gravel extraction and the need for SANG for Habitats Regulations purposes. The need for part of the site to function as SANG is acknowledged in the Development Guidelines.

**125. I understand that an Eastern SANG is to be provided for Christchurch Urban Extension and that there is potential conflict with this SANG and the proposed haul road for AS-13. Can this conflict be avoided and should it be addressed in the DGs?**

No conflict is expected - the haul route runs north of the SANG and has been considered in SANG design. This area is in Hampshire and Dorset County Council has limited control over it..

**126. Is there a need for the Western and Eastern SANGS to be co-ordinated and how would this be done in practice?**

The western and eastern SANGs will be coordinated.

The SANG Delivery Strategy is now on Christchurch Borough Council's website <http://planning.christchurchandeastdorset.gov.uk/plandisp.aspx?recno=103328> and forms part of the approved planning application for the Christchurch Urban Extension (8/16/0381/FUL) documents referred to in the conditions. The application has been approved subject to a s106 agreement that is in its final stages.

A plan is attached (Appendix 2) showing the phased implementation of Roeshot SANG with the triggers for dwelling occupations.

The central SANG shown in green as phase 2 and is triggered before 400th residential occupation. The SANG delivery strategy allows for this to be 'mobile SANG' in paragraph 3.11 of SANG Delivery Strategy

"That part of the Central SANG Area that lies to the west of the Mude has been specifically sized to allow for its potential to be exchanged with land located on the east bank of the Mude once gravel extraction activities have reached sufficient maturity. Consequently, there is potential for part of this SANG Area to be temporary."

The SANG links are shown as the long thin areas adjacent to the railway - see phasing plan. Local mineral recovery could take place during under grounding of overhead lines. See also 3.15-3.16 of SANG delivery strategy:

SANG Links:

3.15 The SANG corridor provides links between the three SANG Areas. It is located between the railway embankment and what will become the outer boundary of mineral extraction. The mineral extraction is phased and will not all be worked at once; active areas will be screened by bunds located within the mineral extraction site boundary during extraction and restoration. This corridor also accommodates 33KV overhead power lines and an easement for a water main.

3.16 The objectives for the SANG Links are to:

- Link the three SANG sites for extended linked circular walking opportunities (see Figure 2);
- Provide safe off-lead dog walking area (appropriately fenced) with good inter-visibility so that dog walkers can monitor their own and other dogs;
- Provide buffer to minerals workings;
- Planting to provide screening to minerals and add visual interest; and
- Planting to provide biodiversity enhancement.

**127. Given that the site is located in the vicinity of Bournemouth Airport and within the airport's consultation zone, can bird strike and other impacts on the airport be adequately mitigated?**

Hampshire County Council are currently determining an application for the Hampshire side of the Roeshot site, and it is understood that bird strike is not an issue. The development would be carried out in consultation with Bournemouth Airport, and bird strike is not expected to be an issue.

The MPA is proposing to add criteria, as suggested by Bournemouth Airport (PSD MSP 226), to Appendix A of the Mineral Sites Plan - these set out the issues to be considered as part of any Aviation Impact Assessment, and are proposed through modification **MM-AA.1**. These criteria will be applied in any assessment, and the site would be developed in close consultation with Bournemouth Airport. This would include consideration of working methods and restoration, to ensure that these do not attract birds.

Any application would also need to comply with Policy DM9 'Extraction and restoration within airfield safeguarding areas' of the Minerals Strategy (2014). This policy requires proposals to demonstrate that extraction, restoration and afteruse will not give rise to new or increased hazards to aviation.

**128. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA consider that the necessary detail is included.

## Issue 18

### **AS-15: Tatchell's Quarry Extension, Wareham**

**129. Can the “Very significant adverse impact” (Category A) identified in the Site Assessment on criterion C13 – surface waters be adequately mitigated?**

Yes - this criterion only returned a 'Very Significant Adverse Impact' response because of the way the response categories are set out in Appendix 1 of the Minerals Strategy. Because there is water collected in the bottom of the adjacent former quarry workings, the assessment of the proposed Tatchell's site allocation shows up as a 'Very Significant Adverse Impact'.

The MPA is satisfied that there is no threat to this water, and the Environment Agency and Natural England have made no objections.

The MPA consider that restoration of the existing quarried area and the proposed allocation can be achieved.

**130. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider that all significant matters have been taken into account.

**131. Should the DGs provide more direction on the mitigation measures required for this category “A” impact?**

The MPA does not consider there is a need to provide more direction, but this can be added if this is considered necessary.

**132. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA does not consider that any other details are required.

## Issue 19

### **AS-19: Woodsford Quarry Extension, Woodsford**

**133. Can the “Very significant adverse impacts” (Category A) identified in the Site Assessment on criteria C9–historic landscape, C11 – archaeology, and C13–surface waters be adequately mitigated?**

The site assessment notes for C9:

*The impact on the watermeadow systems in particular needs to be assessed and evaluated (see criterion C11). Only when this has happened would the impact on the historic landscape be understood – at present it could be anywhere from category A (Very Significant Adverse Impact) to category D (No Significant or Negligible Impact).*

In the absence of a strategic survey and assessment of water meadows in the Frome Valley and their significance, the MPA will rely on site-specific survey and assessment work as part of a planning application.

It is considered that these potential impacts can be satisfactorily mitigated, but further assessment will be needed at planning application stage.

Selection of which, if any, of the water meadows to schedule could also have an influence on the designed and engineered wetlands favoured by the Environment Agency and Natural England to reduce the level of nitrates in the ground and river water.

**134. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

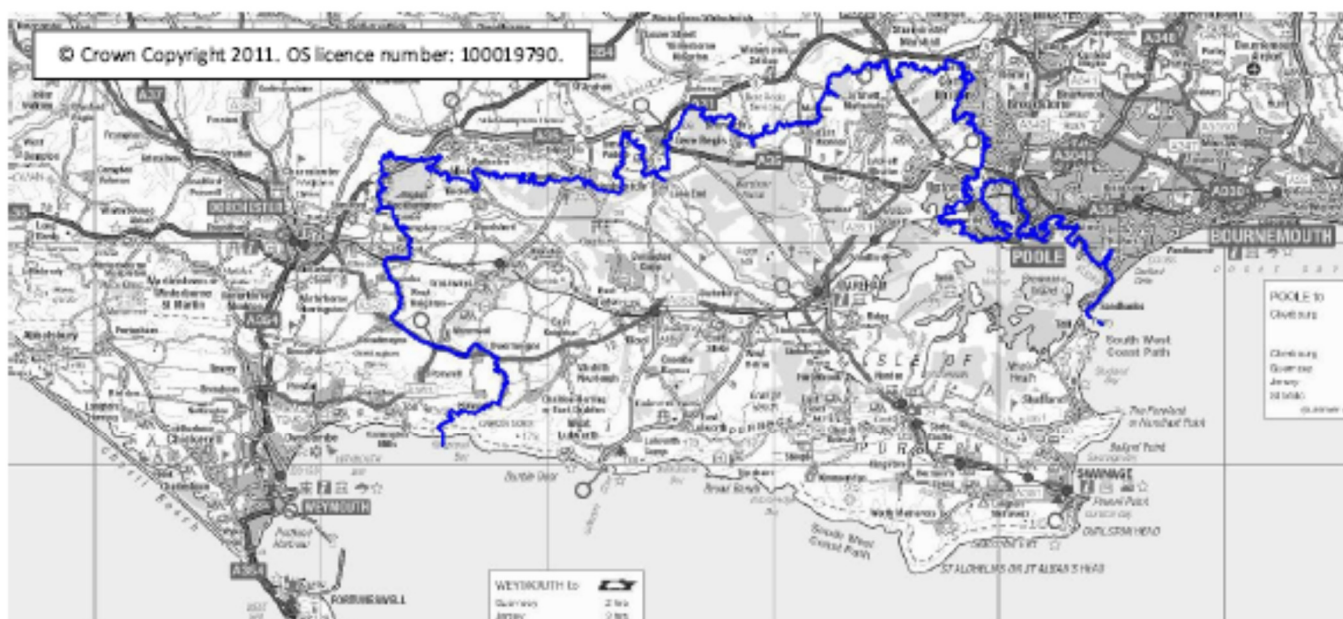
The MPA consider that all significant matters have been taken into consideration.

**135. Has the potential impact on “Sculpture by the Lakes”, been taken into account? I understand that this is a cultural heritage site, which is also a Nature Improvement Area, adjacent to the allocation, and is an important arts venue for the county that relies on tranquil surroundings.**

The MPA is satisfied that the potential impact on Sculpture by the Lakes has been taken into consideration.

This former gravel extraction area, now used for the display and sale of sculpture, is within the Wild Purbeck Nature Improvement Area. Nature Improvement Areas have been established by Defra to deliver a new approach for wildlife restoration and management. They are intended to achieve significant enhancements to ecological networks by improving existing wildlife sites, building ecological connections and restoring ecological processes. The Purbeck NIA is extensive in area, as shown below.





Sculpture by the Lakes is a relatively small part of the Purbeck Nature Improvement Area. The MPA do not consider that the proposed allocation of AS19 will affect the contribution that Sculpture by the Lakes makes to the overall Nature Improvement Area.

It is not accurate to say the allocation is adjacent to Sculpture by the Lakes - at its closest point the allocation is actually some 350m south, across the Frome. The Minerals Strategy - paragraph 16.6 (a) - refers to a buffer of a minimum of 100m from the nearest sensitive receptors - significantly less than the standoff that would exist.

Mineral extraction is a temporary use of the land, and will be restored - potentially to a wetland area. Any loss of tranquillity will be temporary, and working could be timed to a period of the year when visitor numbers are lowest.

Further screening can be applied if considered appropriate, following more detailed assessment at planning application stage.

**136. The Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Does the Heritage Assessment adequately cover the potential impacts on the significance of all heritage assets?**

The site promoter has carried out further archaeological and heritage assessment, covering the potential impacts for the site allocation stage. The MPA is satisfied that the assessment carried out has addressed the potential impacts.

**137. Should the DGs provide more direction on the mitigation measures required for the potential harm to these heritage assets and other category "A" impacts?**

The MPA prefers to leave the detail on mitigation measures to the planning application stage, after detailed assessment has been carried out through Environmental Impact Assessment. The Development Guidelines will flag up the issues requiring assessment and mitigation, but the detail will be left until later.

If any issues have been left out of the Development Guidelines, the MPA is happy to consider them and where appropriate to add them in.

**138. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?**

As set out in the answer to Q.137 above, the MPA prefers to leave the detail to subsequent assessment and the planning application stage. If required guidance can be provided.

**139. Has the potential impact on the River Frome SSSI been adequately assessed?**

A detailed assessment is yet to be undertaken - this would normally be at the planning application stage. Natural England and the Environment Agency have been consulted at various stages on this site allocation, and have not objected. Both these agencies are supporting a wetland restoration of the area around the river, to reduce nitrate level in the water flowing to Poole Harbour.

The current Woodsford Quarry, of which this site will be an extension, already has a managed/monitored output to the Frome.

The MPA is satisfied that, for allocation purposes, potential impacts on the Frome have been adequately assessed.

**140. As suggested by Natural England, should more direction be given in the DGs on the range of potential public benefits, such as nitrogen reduction inputs to Poole Harbour, flood alleviation, biodiversity gain and recreational opportunities?**

The MPA agree that the Plan would benefit from a clearer explanation of the benefits of restoration to a designed/engineered wetland, and will add this in to the Development Guidelines as a proposed modification.

**141. From the Site Assessment it appears that the Environment Agency originally objected on the basis that water voles and other protected species (otter) may be present in the watercourses within the site. Were any such species found and should more detailed mitigation measures be set out in the DGs for their protection?**

The MPA is not aware of any assessment of on-site drains, including assessment of voles and otters.

The Environment Agency is not currently objecting to the proposed allocation, nor is Natural England.

The assessment that would accompany a planning application would assess this information in detail, with impacts identified and mitigation recommended.

**142. Highways England indicates that the surrounding highway network is tortuous and narrow and there would probably be a strong highway objection if these local roads were to be used. Whilst the DGs say that access will be via the existing access, for effectiveness, should they make clear which roads must not be used? Should the need for a conveyor system back to the existing site facility be set out in the DGs?**

The MPA is happy to make reference in the Development Guidelines to the need to avoid the use of specific local roads by quarry traffic, and to state that mineral extracted must be transported to the processing plant via routes within the quarry. This is proposed by modification **MM-AS19.4**.

The MPA would prefer not to specify exactly how, i.e. by conveyor, to enable full consideration of available options at the planning application stage.

**143. The SFRA Appendix A Part 1 states that the site is partly within Flood Zones 2 and 3 but Part 2 states that it is entirely with Flood Zone 1. Could this be clarified? The Environment Agency's comments in the Site Assessment say it is partly in flood zones 2 and 3. Does the Sequential Test need to be carried out before allocation (paragraph 9.10)? If so, has this been done and with what outcome?**

This is due to an error - the northern boundary of the proposed AS19 Woodsford Quarry extension used to come further north. It was pulled back to the line as shown in the Appendix 1 of the Mineral Sites Plan, primarily to minimise impacts on Sculpture by the Lakes.

The current boundary means that the site allocation is within Flood Zone 1 - as stated in the Strategic Flood Risk Assessment Part 2, by the Lead Local Flood Authority.

The SFRA Part 1 analysis is based on the earlier version and makes reference to Zones 2 and 3 - which is incorrect.

The MPA is, in any case, satisfied that the proposed use of the site for sand and gravel extraction means that this use is compatible with the functional flood plain, provided there are no structures or storage within the floodplain.

The Sequential Test is therefore more relevantly applied within the site rather than to other sand and gravel sites - other sites not allocated have been rejected on grounds other than flooding risk.

**144. Is there a need for an exception test and, if so, has this been done and with what outcome?**

The MPA do not consider that there is any need for an Exception Test.

**145. It appears from the National Grid comments that the site is located in the vicinity of National Grid infrastructure and, in particular, high voltage overhead lines. Should the DGs make reference to this and the need for safety clearances and consultation with National Grid?**

Yes, the Development Guidelines will be amended to make reference to this, through proposed modification **MM-AS19.5**.

**146. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA is not aware of any other details to be added.

## Issue 20

### **AS-25: Station Road, Moreton**

#### **147. Can the “Very significant adverse impact” (Category A) identified in the Site Assessment on criterion C13 –surface waters, and the SA identified Strong Negative Impact on the historic environment (ob.6) be adequately mitigated?**

The 'Very Significant Adverse Impact' reference to surface waters reflects the way that the criteria of Appendix 1 of the 2015 Minerals Strategy are set out. There are surface drains on/around the AS25 site, and this flags up a Very Significant Adverse Impact response.

The Environment Agency have not objected, and it is expected that the hydrogeological assessment that would be carried out as part of a planning application would set out the necessary mitigation to offset impacts on the ground and surface water flows.

As regards the historic environment, a Heritage Assessment has been carried out (see MSDCC 37 and 41) and has identified the heritage assets.

A more detailed Heritage Assessment has been carried out ([MSDCC 74](#)) looking at heritage assets in the area, particularly the Moreton Conservation Area and the Listed Buildings to the north of Station Road. It has identified a number of mitigations that could address these impacts - these include:

- Given the historic nature of the system of boundaries within 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, it would be desirable to maintain as much of these as possible through;
  - Reinstating those which have to be removed after completion of extraction.
  - Employing parcel by parcel extraction, leaving the hedgerow and tree boundaries intact as far as possible;
- Avoidance of tall spoil heaps or stockpiles on the site during the extraction process to reduce the appearance of a scarred landscape;
- It is particularly desirable to avoid the worst of any impacts at the eastern end of the Site. In order to mitigate impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, it would be beneficial to move the north-eastern boundary back to the next field boundary to the south, which incorporates a line of mature trees;
- Further detailed consideration should be undertaken with respect to these aspects as part of a planning application process;
- A full photographic and topographic survey should be considered in advance of the extraction to record the existing landscape and facilitate the restoration. Restoration plans should take this into account and be agreed in order to provide some compensative mitigation.

The MPA consider that measures such as these would mitigate the long-term effects on setting, even if the landform is permanently altered and would be essentially a reconstruction. Many aspects of the likely impacts will be temporary in nature and limited to the period of active extraction, albeit that this may last for some years, if not decades. However, these will not create permanent change to setting, while changes to the current land form would be permanent, although this could be remedied with respect to the visual impact by sympathetic restoration.

This approach would address many of the concerns raised in the Purbeck District Council Conservation Officer's unofficial comments (See MSP EXT 05). The MPA has already noted in other places that the preference is for the Development Guidelines to remain as guidelines, and not be made overly prescriptive. This preference still applies to this site.

However, given the sensitivities of the historic environment, if it is considered more appropriate to provide some form of specific guidance through the Development Guidelines of Mineral Sites Plan, the MPA would consider such guidance to address potential heritage impacts. A modification would be proposed to address this.

**148. Should the DGs provide more direction on the mitigation measures required for these identified Category "A" effects and Strong Negative Impacts?**

The answer to Q 147 above provides some more information.

Employ My Ability at the Walled Garden property in Moreton, and the Walled Garden itself with café and garden, rely on the stream that flows from the west through its grounds.

It is very important that this water flow is not interrupted or affected, and this will be specified in the Development Guidelines. Modification **MM-AS25.4** is proposed to achieve this.

**149. Have all significant matters been properly taken into account in these assessments and, if not, what matters require further consideration?**

The MPA consider the necessary matters have been properly taken into account.

**150. Has the impact on the nearby community been adequately assessed and, in particular, on "Employ My Ability", the college catering for people with learning disabilities?**

Yes - the Walled Garden where this facility is located is well removed from the site and should not be impacted by its development.

The same is true for the village of Moreton - the majority of the village is well removed and will have minimal impacts.

**151. The Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Does this Heritage Assessment adequately cover the potential impacts on the significance of all heritage assets, including features and buildings associated with TE Lawrence?**

The further Heritage Assessment work referred to earlier does cover these potential impacts, and suggests approaches to minimise impacts on the heritage.

**152. Can the potential harm to the significance of the Moreton Conservation Area and Listed Buildings adjacent to the site be adequately mitigated?**

The MPA consider that the approaches suggested, particularly pulling back the north-east boundary further, will provide adequate mitigation.

**153. Should more direction on mitigation of potential harm to heritage assets be given in the DGs?**

As noted in Q147, assessment work carried out has identified mitigation approaches, and these could be included if this would be helpful. A Development Guideline will be drafted, and proposed through a modification.

**154. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?**

As noted in Q.147 above, the further heritage assessment work ([MSDCC 74](#)) suggests maintaining the historic field boundaries, including trees and hedgerows. If considered appropriate, the MPA would be prepared to include a Development Guideline to this effect, through a proposed modification.

**155. Has the potential impact on nature conservation/biodiversity been adequately addressed and in particular any potential effects on the River Frome SSSI?**

Yes - the MPA consider it has been adequately addressed. The EA and Natural England do not have any objections. Detail of how impacts will be addressed will come as part of a planning application including any requirement for Environmental Impact Assessment.

**156. Are any issues relating to bats, the River Frome SSSI and/or Poole harbour Ramsar site capable of mitigation to an acceptable level?**

Taking the fields out of agriculture, even for a temporary period, will benefit Poole Harbour.

Issues such a mitigation of impacts on bats and the River Frome will be addressed through the EIA of a planning application - the fact that the EA and Natural England have not objected leaves the MPA satisfied that these issues have been appropriately addressed for the purposes of allocation in the Plan.

**157. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA do not consider there are any other issues.

## Issue 21

### **AS-26: Hurst Farm, Moreton**

**158. Can the “Very significant adverse impact” (Category A) identified in the Site Assessment on criteria C9 – historic landscape, C11 – archaeology, C13 - surface waters be adequately mitigated?**

**Historic Landscape/Archaeology:** the MPA has commissioned a Heritage Assessment ([MSDCC 73](#)) for the Hurst Farm site, given the sensitivities identified in the previous heritage assessment (e.g. MSDCC 37 and 42). It identifies various forms of mitigation to minimise the impacts at Hurst Farm during the extraction phase, including:

- Moving the eastern site boundary to the west;
- Consideration of parcel by parcel extraction and retention of the historic hedged boundaries and mature trees, which both screen and signify the historic arrangement of the landscape;
- Avoiding visually intrusive stock piles/spoil heaps during the extraction;
- Maintaining as much of the existing boundary system as possible, and reinstating those which have to be removed or damaged after completion of extraction. This would mitigate the long-term effects on setting, even if the landform is permanently altered;
- This retention would also mitigate any changes to the middle and longer distance visual setting of the Listed buildings at Pallington, and from the Scheduled barrows on the edge of the escarpment on Pallington Heath, should this become possible by removal of the plantation forestry.
- Restoration plans to take this into account, identify areas where the greatest remaining ground level reduction is least visually evident and explore potential for enhancing the legibility of the landscape to a wider audience
- Appropriate evaluation and mitigation in relation to the archaeological potential of the Site may provide the opportunity for greater understanding of both the post-medieval estate development, but in particular the water meadows which are partly represented in the north-west of the Site.
- The routing of additional heavy traffic up the B3390 could have a potential impact on Hurst Bridge in particular and possibly on other roadside assets. This was considered to constitute less than substantial harm to Hurst Bridge, which could be mitigated by detailed structural recording, examination by a structural engineer and on-going monitoring.
- Consideration to be given to the extraction methodology and the location and design of the processing facility to identify the optimum location to reduce its intrusion to the settings and thereby adversely affecting the significance of the Listed buildings at Hurst and Pallington, the scheduled barrows and the Moreton Conservation Area.

The MPA consider that application of measures such as these would allow the satisfactory mitigation of impacts and the extraction of some mineral from this site.

The preference of the MPA remains that the issue of heritage impacts and the need to address these as part of the development of the site is flagged up in the Development Guidelines, as it is, but the detail of what specifically needs to be done will be determined through further and more detailed assessment at the planning application stage. However, if necessary, some further detail could be included in the Development Guidelines, and proposed through a modification.

**Surface Waters:** as noted elsewhere, the proximity of surface water (the Frome) requires this level of response to the relevant criterion in the Site Assessment. The EA and Natural England have not objected to

this proposal, and indeed are proposing that the land nearest the river is restored as designed wetland to reduce nitrate in the water travelling to Poole Harbour.

**159. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?**

The MPA consider that the necessary significant matters have been taken into consideration.

**160. The Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Does this Heritage Assessment adequately cover the potential impacts to the significance of all heritage assets, including features and buildings associated with Thomas Hardy and TE Lawrence?**

The further Heritage Assessment work carried out by Context One ([MSDCC 73](#)) with outcomes as noted in Q.158 above does, in the opinion of the MPA, adequately cover potential impacts to the significance of all heritage assets.

**161. Should the DGs provide more direction on the mitigation measures required for these heritage assets and other Category "A" impacts?**

Further guidance regarding heritage mitigation, along the lines of the bullet point in Q. 158 above can be included in the Development Guidelines if required, but as noted the preference of the MPA is that the detail of this be left for the planning application stage, and more detailed assessment

**162. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?**

The MPA prefer to flag up the more general issues/approaches in the Development Guidelines, such as the need to assess and conserve historic features, and leave the detail of the mitigation measures to the planning application stage, following detailed Environmental Impact Assessment.

**163. Has the potential impact on nature conservation/biodiversity been adequately addressed and in particular any potential effects on the River Frome SSSI?**

The MPA consider that the potential impacts on nature conservation have been adequately assessed for the purposes of allocation in the Mineral Sites Plan. The EA and Natural England have not raised an objection, but instead see this development as an opportunity to reduce nitrate levels in the water flowing to Poole Harbour.

**164. As suggested by Natural England, should more direction be given in the DGs on the range of potential public benefits, such as nitrogen reduction inputs to Poole Harbour, flood alleviation, biodiversity gain and recreational opportunities?**

These points are generally already covered in the Restoration part of the Development Guidelines, but have been clarified further through proposed modification **MM-AS26.3**.



- 165. The SFRA Appendix A Parts 1 and 2 indicates that the site lies partly within Flood Zones 2 and 3 and, therefore, the Sequential Test should be carried out before allocation (paragraph 9.10). Has this been done and with what outcome? (I note the comments in SFRA Appendix A on site AS-26 but this does not make clear whether the Sequential Test has been applied).**

Paragraph 9.9 of the Strategic Flood Risk Assessment (MSPSD - 09) notes ' The Minerals and Waste Planning Authority should seek to avoid inappropriate development in area at risk of flooding by directing development away from areas at highest risk of flood and ensuring that development does not increase risk and where possible can help reduce risk from flooding to existing communities and development.'

The MPA take the view that the Sequential Approach to selection of actual sites is more relevant to built development - sand and gravel extraction is fully compatible with the functional flood plain, provided that buildings and storage are located out of the floodplain.

Alternative sand and gravel sites that have been considered and rejected (e.g. Appendix C or D of the Sustainability Appraisal MSPSD 03) were rejected on other grounds apart from flood risk. There are no other sand and gravel sites, currently unallocated, that are at lower risk of flooding.

Only parts of the site are within the floodplain, and the MPA consider it is more appropriate to develop the site on a sequential approach, ensuring that no storage or built development is proposed within the floodplain, as is referred to in the Development Guidelines for the allocation.

- 166. Has the Exception Test been carried out and, if so, with what result?**

The MPA do not consider that there is any need for an Exception Test.

- 167. It appears from the National Grid comments that the site is located in the vicinity of National Grid infrastructure and, in particular, high voltage overhead lines. Should the DGs make reference to this and the need for safety clearances and consultation with National Grid?**

Yes, this will be added to the Development Guidelines through proposed modification **MM-AS26.4** will make a reference to this point.

- 168. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA consider that all relevant points have been added.

## Issue 22

### **iv) Policy MS-2: Sand and Gravel Area of Search**

#### **169. In Policy MS-2 should criterion i distinguish between Poole Formation and River Terrace sand and gravel?**

The MPA accept that it could be helpful to seek to 'focus' the supply of aggregate from unallocated sites on to the specific need for either River Terrace or Poole Formation and specify that the unallocated sites coming forward should meet a specific shortfall in either River Terrace or Poole Formation. However, this presents some challenges due to the fact that Poole Formation underlies River Terrace in many parts of Dorset, and the sites generally provide both types of aggregate, though in most cases they provide more of one or the other.

This poses a difficulty if, for example, the Poole Formation landbank was low and an unallocated site provided a small amount of Poole Formation but mostly River Terrace.

Despite this lack of certainty/clarity, the MPA agree that there is merit in seeking to focus supply towards the type of aggregate in shortest supply. The most recent Local Aggregates Assessment would supply information on relative landbank levels. A modification, **MM-AOS.4** - is proposed to seek to encourage supply from unallocated sites which favour the type of aggregate in shortest supply.

#### **170. Should MSP paragraph 3.13 (relating to the potential grant of permission to unallocated sites) make clear that it is permitted sand and gravel reserves of the *same specific type of aggregate* in the vicinity that are to be considered?**

The MPA agree that this would provide greater clarity.

In addition, in light of the suggestion in Q.170, the second sentence of paragraph 3.13 has been removed, and moved into Policy MS-2 itself.

A modification is proposed, **MM-AOS.5**, to make this change.

#### **171. Does paragraph 3.13 set out another criterion that should go in Policy MS-2 itself rather than the supporting text? i.e. *The Mineral Planning Authority (MPA.) will need to be satisfied that there are no permitted sand and gravel reserves capable of being worked but not currently being worked in the vicinity of a proposal through Policy MS-2, that could be used to meet the identified shortfall. (It seems to say something different to MS-2, criterion iv.a).***

The MPA have reviewed the issues raised through this question, and as a result:

- i. The second sentence of paragraph 3.13 is deleted, as noted in Q.169 above;
- ii. In Policy MS-2, a new section iv. b is proposed through modification **MM-AOS.6**.

This is felt to clarify the policy, seeking to ensure that there are not any allocated sites that would be affected by the development of an unallocated site and also that there are not any permitted sites in the vicinity that are currently not being worked, that could be developed to meet any shortfall.

#### **172. Identifying the main points within the Sand and Gravel Area of Search Background Paper briefly explain how the Area of Search was determined and what the primary considerations were.**

The Introduction explains the reasoning behind the preparation of the Area of Search (AOS) - to demonstrate that the Mineral Sites Plan has the flexibility to maintain a supply of sand and gravel, even if any of the proposed allocations may not be developed.

The basis for the AOS is the superficial and bedrock resource blocks designated through Policy AS-1 of the Minerals Strategy 2014 (MSDCC – 54). Acknowledging that these blocks will contain a range of constraints, including landscape and biodiversity constraints, the MPA is seeking to identify the areas within the resource blocks with the least constraints and most likely to be developed.

The AOS does not restrict the potential for development within the resource blocks - it is still possible to apply for aggregates development anywhere within the blocks. The AOS is intended to direct potential developers to the areas where they are more likely to have success with an application.

The resource blocks have been assessed by Dorset County Council ecologists/landscape architects and the areas of greatest constraint were been removed from the resource blocks. Existing quarries, and worked out quarries, are also removed along with European biodiversity designations (SACs, SPAs, RAMSAR sites), and UK (national/local) designations (SSSIs, National Nature Reserves, Sites of Nature Conservation Importance, Country Parks).

In terms of landscape, the methodology of the impact assessment is derived from the 'Guidelines for Landscape and Visual Impact Assessment 3rd Edition' (Landscape Institute and Institute of Environmental Management and Assessment, 2013). The main aspects considered in this assessment include:

- Impacts on landscape resources, mainly the landscape character of the area, a range of international, national and local designations, European protected and Biodiversity Action Plan species, ancient woodland and other important habitats.
- Impacts on visual resources, based on the sensitivity of some representative viewpoints where people are likely to see changes.

When the assessment was complete and the relevant areas were 'cut out' of the Area of Search, Natural England then reviewed the remaining areas proposed for inclusion in the Area of Search, and removed still further areas which, although not necessarily specifically designated, were sensitive enough to justify removal.

The resulting areas compromised the Area of Search with the least landscape and biodiversity constraints, and where the MPA is encouraging sand and gravel developers to focus attention.

It seemed most relevant to concentrate on landscape and biodiversity constraints, as these can be relatively easily assessed and removed. Other constraints still remain within the Area of Search, and development proposals within the Area of Search still have to go through the normal planning process.

For any future sites it is recommended that mitigation should be based on all, or a combination of, the following measures:

- The retention, protection, enhancement and management of key landscape/ecological features to help screen/integrate development;
- positive ongoing landscape and ecological enhancement measures;
- ongoing and phased restoration and extraction to reduce cumulative impacts;
- ongoing restoration based on landscape ecology and an agreed restoration plan;
- minimising the bulk, scale and heights of storage/stockpile areas;
- prompt appropriate landscape treatment of exposed cut faces of excavations/storage/stockpile areas;
- minimising the bulk, scale and heights of any required bunds;
- minimising the scale, height, bulk of any plant/infrastructure;
- minimising noise/traffic generation and the overall scale, size and duration of operations.

Ecological mitigation will include a range of enhancement measures and specifically in the Poole Basin opportunities to create/extend heathland type habitats. Other opportunities appropriate to soil type, post extraction as part of phased site restoration will also be sought to linking fragments of habitat.

Mitigation of cumulative impacts will include the timely ongoing restoration of all existing mineral areas in the area, and the implementation of the recommended revised area of search.

**173. Should other considerations have been taken into account?**

The MPA considered that other constraints (e.g. heritage, transport, amenity) were not so readily identified and removed at this strategic scale. Landscape and biodiversity constraints could be more readily identified and mapped, as was done for the Area of Search. Other constraints, such as heritage assets, are more subjective and require focused surveys of specific assets and their setting. This would not be practical for a high level area of search.

At the strategic plan level, the MPA consider it is appropriate to restrict the assessment and removal of constraints to landscape and biodiversity. Other constraints will be identified and mitigated at the planning application stage, when identified by the more detailed Environmental Impact Assessment process. The Minerals Strategy contains a suit of development management policies to protect all aspects of the environment.

**174. In general and in broad terms, is there potential to adequately overcome the main constraints within the Area of Search?**

A proposal coming forward through this policy, within the Area of Search, would essentially be like any other planning application - there are constraints to be overcome, and a policy stance that both protects the environment and amenity and encourages new development provided constraints can be acceptably addressed. The MPA consider that within the Area of Search there is potential to overcome the main constraints. However, every proposal is considered separately and on its own merits.

All proposals for development within the Area of Search are subject to planning application assessment and Environmental Impact Assessment processes. These will identify any remaining constraints, with indications of how best to mitigate these constraints.

There is no certainty that a proposal within the Area of Search will be successful, or that it will be successfully developed. Although the main biodiversity and landscape constraints are removed, other constraints will remain e.g. heritage.

As with any development proposal, developers are encouraged to discuss proposals with the MPA at an early stage, to get advice on whether any site within the Area of Search proposed for development is in fact further constrained, and whether these constraints are likely to be overcome.

The development management policies of the Minerals Strategy provide the policy basis to consider such applications and ensure the protection of the environment and amenity.

**175. MSP paragraph 3.11 refers to a landscape and ecological assessment of the Resource Blocks, which appears to be the Landscape & Ecological Assessment Feb 2015, revised Feb 2018 within the Background Paper. Please confirm.**

The MPA can confirm that is the assessment referred to in paragraph 3.11.

**176. How have reasonable alternatives been assessed?**

The starting point - the resource blocks - are considered the most appropriate basis, as these have been designated by the Minerals Strategy.

Reasonable alternatives are taken to refer to the removal of more constrained land from the AOS area - why were ecological and landscape constraints removed, but not any others?

Other constraints could include:

- Geodiversity
- Heritage/archaeology
- Transport/traffic
- Amenity/economic impact
- Water/flooding
- Soils/ soil quality
- Airport safety
- Cumulative impacts

These have been considered for application/removal from the Area of Search, but it was felt that these constraints were better applied when a specific proposal was known. Landscape and nature conservation seemed the only constraints that could be addressed/removed on a wider scale, hence these were the focus of the preparation of the Area of Search.

The MPA is aware that it will not be possible to present land that is free, or relatively free of constraint. Every proposal still needs detailed assessment through the planning application process. However, it is considered that the approach taken does guide potential developers to those areas of the county which are relatively unconstrained and where an aggregates proposal is more likely to be successful.

**177. Is the Area of Search the most appropriate area?**

The MPA consider that the Area of Search as proposed is the most appropriate, having considered which constraints should be removed, and having had the further input of Natural England in reviewing the proposed area.

## Issue 23

### **v) Crushed Rock: Policy MS-3 PK-16 Swanworth Quarry Extension**

**178. The MS Spatial Strategy (p35 paragraph ii – supply of aggregates) indicates that, due to the adequacy of the existing landbank (stated to be about 48 years in 2011), no new sites for crushed rock will be identified unless exceptional circumstances can be demonstrated. MS Policy AS3 (Crushed Rock) reflects this and gives a short non-exhaustive list of exceptional circumstances. Are there exceptional circumstances for allocating Swanworth Quarry Extension so as to comply with the Spatial Strategy and Policy AS3?**

Policy AS3 of the Minerals Strategy states:

*New sites for the processing and production of crushed rock will only be permitted within the Plan period in exceptional circumstances including but not limited to:*

- a. where development would enable a sustainable supply of minerals close to the market;*
- b. where an existing more sensitive site will be relinquished.*

The MPA agree, as stated in the Minerals Strategy 2014 (MSDCC – 54), that there is **potentially** an adequate landbank of crushed rock to maintain supply for well beyond the life of the Mineral Sites Plan. However, the MPA also take the following factors into consideration:

- i. The crushed rock landbank, apart from remaining reserves in the current Swanworth Quarry, is entirely located on Portland. The MPA is aware that the focus of the quarrying operations is on production of dimension stone and crushed rock is essentially a by-product, with stone not suitable for dimension stone, or the deeper Cherty layers, being crushed and sold. The MPA is concerned that decisions made by the Portland operators could influence the amount of Cherty or unusable stone available for crushing - e.g. the former 'Jurassica' museum, now called 'The Journey', proposed for Bower's Quarry, or various proposals for housing requiring the creation of no-working or no-blasting buffer zones.
- ii. Apart from Swanworth, the only source of crushed rock in Bournemouth, Dorset and Poole is from Portland. To supply the Bournemouth, Poole and Christchurch market as Swanworth Quarry does requires lorries to travel out of Portland and across to the Bournemouth, Poole and Christchurch area.
- iii. The alternative for crushed rock is to have lorries travelling down from quarries in the Mendips, a significantly longer journey.
- iv. Swanworth Quarry currently provides approximately half of the annual production of crushed rock in Dorset. It is acknowledged that the Portland suppliers of crushed rock could increase their output if required, and as the response to [Q.119 Q193](#) below states, paragraph 3.26 is misleading as it is not evidence based, and will be removed from the MSP. However, the MPA remains unconvinced that the output of crushed rock from Portland could be doubled, and if it was, there could be transport related impacts. There is merit in retaining two sources of crushed rock in Dorset, one of which is relatively close to the Bournemouth, Poole and Christchurch market.

In terms of transport sustainability the Swanworth Extension does comply with part a. of Policy AS3 and in the opinion of the MPA justifies the proposal for allocation.

**179. Could the “Very significant adverse impact” (Category A) identified in the Site Assessment on criteria C9 – historic landscape, and the SA identified Strong Negative impact on landscape (ob.7) be adequately mitigated?**

The MPA acknowledge that the development of the Swanworth Extension would lead to significant adverse landscape/visual impacts, including on the Dorset AONB and the Purbeck Heritage Coastline.

Dorset County Council's Landscape Architect advises that the impacts of the development, particularly given its location, are unlikely to be capable of full mitigation.

The MPA have balanced this view against the transport sustainability benefits mentioned in ~~Q.101~~ **Q178**, and have taken the view that allocation in the Draft Mineral Sites Plan is justified.

Given the views of its landscape adviser, the MPA do not intend to dispute the fact that the proposal would have a landscape/visual impact, but remain mindful of the benefits of the proposed extension. The site nominee and operator of the existing quarry, Suttles, have proposed measures to reduce the impacts on landscape/historic landscape (see MSP EXT - 08 on <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/dorset-county-council/minerals-planning-policy/mineral-sites-plan/mineral-sites-plan.aspx>).

**180. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?**

The MPA have amended the Sustainability Appraisal in light of specific comments made by Natural England at the 2017/18 Pre-Submission Consultation (see rep PSD MSP 341-342), and consider that significant matters have been taken into consideration.

The amended Sustainability Appraisal can be seen on the MPA's website (MSPSD-11).

**181. Historic England have concerns over the potential for substantial harm to Barrows in particular and the Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Should more direction on mitigating potential harm to heritage assets be given in the DGs?**

The MPA understand that Historic England have requested the following specific references in the Development Guidelines for Swanworth Extension.

- no working in sightline between the two barrows
- access to extension lowered below eyeline when viewed from either barrow, or between barrows
- exclusion of working in the barrow field itself leading to a buffer of >150m from extraction area
- restoration to current ground levels

Given the level of constraint in the area, the MPA agrees that including these specific additions, to be proposed as a modification **MM-PK16.4**, will be helpful.

**182. What impact, if any, would there be on the significance of Corfe Castle and its setting?**

The MPA do not consider that there will be any visual impacts on the significant of Corfe Castle and its setting.

There is no inter-visibility between the proposed extension and Corfe Castle, and the proposed extension will not be worked simultaneously with the current quarry, so there will be no increase in traffic numbers travelling through Corfe Castle.

**183. What impact, if any, would there be on the Jurassic Coast UNESCO World Heritage Site?**

The MPA do not consider there will be any impacts on the World Heritage Site. It is over 1 km distant, with limited inter-visibility if any.

**184. Is there any likelihood of the water supply to Kingston being impacted and, if so, should this be assessed? I understand that it is sourced from the area of Coombe Bottom and Hill Bottom, in close proximity to the site.**

In response to the risk of impacts on the Kingston water supply, Suttle Stone Quarries (operator of current quarry and developer of proposed extension) commissioned a Preliminary Hydrological and Hydrogeological Risk Assessment in 2016. This was sent to the Environment Agency in December 2016, who made the following response (29 December 2016):

*'Having read the above Preliminary Hydrological and Hydrogeological Risk Assessment, we have **no objection** to the proposed site extension being included in the Bournemouth, Dorset and Poole Mineral Sites Allocation Plan. Obviously detailed information and conditions may be required at the planning application stage, but we can discuss that when further details become available.'*

The EA have no objection, on hydrological/hydrogeological grounds, to the allocation of the proposed extension in the Mineral Sites Plan. However, at the planning application stage more detailed hydrogeological assessment will be required.

**185. The SA indicates strong negative impacts on the Dorset AONB and the Heritage Coast. Natural England and the Dorset AONB Team are concerned that the impacts on the AONB are likely to be highly significant and they question the ability of the site to meet the AONB protections within the MS and the NPPF. With this in mind, please consider the following:**

- a) **Whilst the Site Assessment indicates that full assessments will be carried out at application stage, is there sufficient evidence to justify the principle of development at this plan-making stage or should further assessment be undertaken?**

+

- b) **Specifically, has sufficient landscape and visual impact assessment been carried out?**

Suttle Stone Quarries, the promoter, have commissioned landscape/visual assessment of the proposed quarry extension in support of the proposed allocation. The work that has been done can be seen at: <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/dorset-county-council/minerals-planning-policy/mineral-sites-plan/mineral-sites-plan.aspx> - see MSPEXT 08.

As noted in **Q.102 Q179**, the MPA acknowledges that its landscape adviser's view is that there will be landscape/visual impacts from the development of the proposed extension that cannot be fully mitigated. However, in weighing this against the benefits of maintaining a source of crushed rock outside Portland and close the Bournemouth, Poole and Christchurch market, the MPA take the view that it is appropriate to allocate the site.

In light of Natural England's response to the Pre-Submission Consultation, the Sustainability Appraisal has been amended, with new information added in Section 6 - Crushed Rock; Appendix A: PK16 Swanworth Quarry and Appendix E: Swanworth Quarry - Further Information. These additions contain further information on impacts and benefits, and mitigation proposals - see MSPSD-11 on the Examination Library website.

- c) **In broad terms, how is it envisaged mitigation measures will lower identified impacts to an acceptable level to justify the allocation?**

Further information is provided in the Revised Sustainability Appraisal in Appendix A: PK16 Swanworth Quarry and in Appendix E: Swanworth Quarry - Further Information.

Mitigation measures will include:



- Only the lower parts of the three fields would be extracted.
- Extraction will be in a sequence moving northwards to minimise visual impacts.
- Progressive restoration would be undertaken of the western higher slopes (particularly the in-situ overburden slopes) at the earliest opportunity.
- The creation of low small linear bunds along the northern and eastern boundaries to reinforce the existing wall, fence and hedgerow structure. These bunds are to be rough grassed and scrub and are designed not to be visually intrusive but rather reflect the character of the existing coombe slopes
- A bridge using gabion basket abutments would be built to cross the Purbeck Way linking the consented quarry with the proposed extension and providing the means of access for transportation of excavated material.
- An access cut would be created which will contain vehicle movements and reflect the character of nearby coombes with its native herb/shrub/tree planting on its upper levels/slopes.
- The proposed extraction area would be progressively filled to existing contours to remove completely any long term/permanent landscape or visual impact. Potential post-restoration land use is expected to be a combination of agricultural and habitat creation for nature conservation.

There is the further requirement, as stated in Policy DM4 of the Minerals Strategy 2014 (MSDCC – 54), that if adverse impacts cannot be adequately mitigated, compensatory environmental enhancements will be made to offset residual visual impacts.

**186. Would the Councils briefly explain the balancing exercise they have undertaken in allocating this site?**

The balancing exercise is set out in ~~Q.101~~ [Q178](#).

**187. Should the DGs give more direction on mitigation measures to reduce identified Category A effects and Strong Negative Impacts?**

The MPA prefers to leave the detail on mitigation measures to the planning application stage, after detailed assessment has been carried out through Environmental Impact Assessment. The Development Guidelines will flag up the issues requiring assessment.

The reference to the tunnel will be removed through proposed modification **MM-PK16.1**, as it is no longer proposed.

The MPA is, however, willing to include more information if this is considered appropriate - such as a summary of the bullet points as set out in ~~Q.111~~ [Q185](#), with reference to compensatory environmental enhancements.

**188. Should the DGs give direction on managing the cumulative effects of Swanworth Quarry Extension and the existing Swanworth Quarry?**

The MPA accept that the Development Guidelines currently make no reference to cumulative impacts, and some reference to these and to minimising these would be helpful.

As the proposed extension will not be worked simultaneously with the current operation (apart from the fact that processing will continue in the current quarry, and restoration will be ongoing) cumulative impacts are expected to be limited and will primarily be visual impacts.

A reference to the need to address cumulative impacts will be included under the 'Other' section of the Development Guidelines, through proposed modification **MM-PK16.5**.

**189. Should the Restoration Vision require early phased restoration to minimise visual impact on the AONB?**

The MPA acknowledge that, given the sensitivity of the area and the importance of restoration to ground level as quickly as possible, it would be helpful to make reference in the Development Guidelines to the importance of early phased restoration.

The 2012 National Planning Policy Framework makes reference to timely restoration:

*143. In preparing Local Plans, local planning authorities should:*

- *put in place policies to ensure worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place*

as does Policy RS-1 of the Minerals Strategy.

To further emphasis this point the MPA make a reference to timely and phased restoration in the 'Restoration Vision' section, through proposed modification **MM-PK16.6**, given the importance of achieving early restoration in this location.

**190. With reference to Natural England's comments, should the Restoration Vision include the creation of limestone pasture of conservation interest and natural re-vegetation to encourage successional limestone habitats, and is the inclusion of new copses in open landscape appropriate?**

The MPA agree that it would be helpful to set out the desired end-state of the restoration, and this will be done through a proposed modification, **MM-PK16.3** to the 'Restoration Vision' section.

The MPA also agree that reference to planting of copses in this landscape is not appropriate - this was added in error and is proposed to be removed through the same modification.

**191. Where landscape impacts cannot be avoided or adequately mitigated, MS Policy DM4 requires compensatory environmental enhancements to offset residual landscape and environmental impacts. Is it likely that Swanworth Quarry Extension will need to provide such compensatory enhancements? If so, should this be set out in Policy MS-3 and should the DGs also address this point?**

The MPA agree and propose amendments to make this point clearly through the Development Guidelines (proposed modification **MM-PK16.7**, and the wording of Policy MS-3 will be amended to clarify the link between it and the Development Guidelines (proposed modification **MM-PK16.8**)

**192. Although no other crushed rock sites have come forward, have all other reasonable alternative options been considered in the SA?**

The MPA, in the light of comments made by Natural England, have revised the Sustainability Appraisal. The section on crushed rock in Chapter 6 has been supplemented and Table 9 appraising options for crushed rock supply from areas other than Portland has been added.

The MPA consider that all reasonable alternatives have now been considered.

**193. Is MSP paragraph 3.26 misleading? Representations state that Portland stone firms are capable of doubling production.**

There is no evidence to suggest that Portland operators could double output to meet the shortfall when Swanworth Quarry closes, or that they would have any economic imperative to do so when their business is focused principally upon primary stone production. Nevertheless, there is theoretical scope to increase production so the MPSA proposes to remove paragraph 3.26, through proposed modification **MM-CR.1**.

**194. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA consider that all relevant details have been included in the Development Guidelines.

## Issue 24

### **vi) Recycled Aggregate MS-4: Site for the provision of recycled aggregate**

#### **RA-01: White's Pit, Poole**

- 195. For effectiveness, should Policy MS-4 state that Site RA-01 is actually allocated? MS-4 just says it is suitable for aggregates recycling.**

Yes, a modification will be put forward to clarify that the site is currently operating on a temporary permission.

- 196. The DGs for this site indicate that it is operating under a temporary permission. In order to provide direction on mitigation measures to consider in any future planning application, should the DGs provide more detail, particularly with respect to Site Assessment on criterion C13 – surface waters, which indicates a potential “Very significant adverse impact” (Category A) on a drain within the site boundary.**

As noted elsewhere, if there is surface water within a certain distance of a proposed (or existing) site then it may require a Category A response (see Appendix 1 Minerals Strategy 2014 (MSDCC – 54)).

The MPA will flag up that there are drains in the vicinity, through proposed modification **MM-RA01.2**

- 197. To what extent are there likely to be adverse impacts on nearby residents, including those along Arrowsmith Road, and can these impacts be adequately mitigated?**

The Borough of Poole as Minerals and Waste Planning Authority has permitted this site, so presumably considered that the impacts can be successfully mitigated.

Methods such as noise screening and limiting hours of operation could be used to minimise impacts.

- 198. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider that all significant matters have been taken into consideration.

- 199. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA does not consider there are any other details to be added.

## Issue 25

### vii) Ball Clay MS-5: Site for the provision of ball clay

#### BC-04: Trigon Hill Extension, Wareham

**200. The MS Spatial Strategy and the Ball Clay section of the MS indicate that extraction will be directed towards the "Areas of Less Environmental Sensitivity", although to ensure an adequate and steady supply of the range of clays, sites will also be required within the wider Ball Clay Consultation Area. To ensure consistency with the MS, should the Ball Clay section of the MSP say whether the Trigon Hill Extension is within an identified Area of Less Sensitivity and if not, how it is justified in terms of contributing to a range of clay supply?**

The proposed Trigon Hill Extension is located within one of the ball clay 'Areas of Less Environmental Sensitivity'. A modification is proposed, **MM-BC04.3**, to make this point clear.

**201. For clarity and effectiveness should Figure 5 (Ball Clay Allocation) show the Areas of Less Environmental Sensitivity and the wider consultation area relative to site BC-04?**

The MPA prefer to keep the Figure 5 map at its current scale, but within this scale will show the Areas of Less Environmental Sensitivity and note the presence of the ball clay Consultation Area. Proposed modification **MM-BC04.3** also relates to this proposed change.

**202. Will there be any extraction of sand and gravel as a secondary product to the Ball Clay at the proposed Trigon Hill Extension and, if so, should this be set out in Policy MS-5 and/or Policy MS-1 (Production of Sand and Gravel)?**

The MPA have been informed by the developer that although some sand and gravel may be extracted as part of the ball clay extraction, there is no proposal to sell the aggregate or take it offsite, as it is expected to be required for restoration.

**203. Could the "Very significant adverse impacts" (Category A) identified in the Site Assessment on criteria C1 to C4 biodiversity, C11–archaeology, C12 - groundwater, and C13 – surface water and the SA identified Strong Negative Impact on landscape (ob.7) be adequately mitigated?**

Regarding these constraints, the developers have submitted a planning application, which is currently being considered, while progressing the site as an allocation in the MSP.

Some of the issues are being addressed through the planning application, as described below.

**Biodiversity:** it is expected that these impacts, flagged up as potentially Category A, can be addressed and mitigated. Natural England have no objection, provided the requirements of the HRA are incorporated into the MSP itself. The EA have not objected.

**Archaeology:** this is an issue which is being discussed between the MPA and Historic England, in the context of the planning application. It is expected that more information will be available by the time of the Hearings.

**Ground and surface water:** the EA have not objected, and the MPA expect that these issues will be addressed and mitigated.

**Landscape:** the MPA is still discussing this issue with the promoter, in the context of the planning application, and more information should be available by the time of the Examination

It is not yet clear that the impacts on the heritage/archaeology can be mitigated.

**204. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider that all significant matters have been considered through the SA and Site Assessment.

**205. Historic England indicates that the allocation would have a substantial impact on the setting and significance of the scheduled Bronze Age round barrow monument on Trigon Hill. How is this to be addressed?**

This issue is still under discussion between the MPA, the site developer and Historic England, in the context of the planning application rather than the MSP allocation.

Ball clay is recognised as a nationally important mineral, and the MPA need to give this point great weight in the 'planning balance'.

However, no decision has yet been reached. For the purposes of the plan the site's allocation would need to demonstrate that it was capable of adequately overcoming the constraints.

**206. Have the identified Category A effects and Strong Negative Impacts been adequately assessed?**

They have been adequately assessed for the purposes of allocation in a Plan. Some of these, particularly heritage and landscape impacts, are currently being debated in more detail following the submission of the planning application. This is ongoing.

**207. Should the DGs provide more direction on the mitigation measures required for these Category "A" effects and Strong Negative Impacts?**

The answer to Q.203 sets out the Category A and Strong Negative Impacts.

There is no objection from the Environment Agency, so the MPA do not propose to include further reference to this.

The Development Guidelines for Natural Environment already address this issue.

The Development Guidelines for Historical/Cultural Environment and Landscape/Visual will be amended (proposed modification **MM-BC04.4**) to include a similar stance.

**208. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA does not consider any further details need to be added.

## Issue 26

### **viii) Purbeck Stone MS-6: Sites for the provision of Purbeck Stone**

#### **General Questions**

- 209. Should this section of the MSP state whether Policy MS-6 is aimed at meeting the committed provision in the MS (Policy PK1- Provision of Purbeck Stone) of at least 20,000 tonnes per annum on average of saleable Purbeck Stone (excluding Burr and Purbeck Marble)?**

The MSP makes it clear (Chapter 2, paras 2.5 to 2.8) that it complies with and delivers the Minerals Strategy and is intended to be read alongside the Minerals Strategy. However, the MPA agrees that for ease of reference it would be helpful to set out the basis of the planned provision. Modification **MM-PKS.3** is proposed to address this.

- 210. As there is a demand for a range of Purbeck stones from the different Purbeck Stone beds, should Policy MS-6 state the type of Purbeck Stone available at each site?**

There are a wide range of Purbeck Stone beds, and these vary by location. It is not always known at the plan allocation stage which beds lie under the various sites, what the quality of the stone is and how much stone could reasonably be delivered from which site.

For some of the proposed allocations, adjacent/near to existing quarries, it is possible to get an indication of what the proposed allocation is likely to yield but there is no certainty.

Given the lack of certainty, the MPA do not propose to require the developers/site nominees to identify the types of stone each site is expected to yield.

- 211. As suggested by Natural England, should the DGs' Restoration Vision for the Purbeck Stone sites include limestone pasture of conservation interest and provide for some areas to naturally re-vegetate to encourage successional limestone habitats?**

Yes, the MPA is happy to take Natural England's advice and this change will be proposed as modification **MM-PKS.4**.

- 212. As bat roosts are an important feature of old abandoned quarries in this area, should the Restoration Vision for the sites include the provision for the establishment of bat roosts?**

The MPA is aware that it may not be possible to provide a bat roost(s) in all cases, but the Development Guidelines will require that the establishment of bat roosts be required as part of restoration unless there is a demonstrable reason why this will not be possible. This will be included in proposed modification **MM-PKS.4**.

## Issue 27

### Site Specific Questions

#### PK-02: Blacklands Quarry Extension, Langton Matravers

The MPA would like to draw attention to the fact that a planning application at Blacklands Quarry has recently been approved. The following excerpt is taken from the Committee report for the proposal:

*The main application (ref 6/2018/0301) is for the extraction of Purbeck stone from an area within the existing site used at present for the site access and the stockpiling of finished product. The site footprint is not proposed to be extended beyond the existing permitted operational areas of the quarry. The two subsidiary applications (ref 6/2018/0303 & 6/2018/0304) apply to vary the conditions that cover other parts of the site (s73 applications) to:-*

- i) accommodate the replacement access and stocking area,*
- ii) to extend the life of the site allowing for the additional reserve,*
- iii) to increase the operating hours in line with the other quarries in the area.*

*The main proposal is to extract between six and eight thousand tonnes of saleable stone from 0.25ha area over a ten-year period. There are various horizons / stone beds extracted from Blacklands quarry. The existing extraction operations are consented until January 2020, although the actual reserve is sufficient to last a few years longer. Whilst there is still several years life of reserve available from the existing quarry all the higher beds of stone are exhausted from the existing southern area. The new reserves are needed now so that the quarry can continue to supply the full range of Purbeck Stone to fulfil customer requirements. At present the quarry produces about 2,200 tonnes per annum of saleable product. This is not anticipated to change substantially.*

*The applications propose an extraction period of ten years to allow for further extraction in the existing quarry in the southern area of the site while at the same time extracting the higher beds from the new quarrying area. The output from the new area will contribute to about half the annual output with remainder coming from the existing extraction area.*

Further information is presented under Q.227.

**The site nominee has confirmed that they do not wish to withdraw the proposal, and are submitting a revised proposal, which will be included as a proposed modification, MM-PK02.1, when it is received.**

#### **213. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before they are destroyed by mineral extraction.



**214. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA considers that all significant matters have been taken into consideration.

**215. Should the DGs provide more direction on the mitigation measures required for this category "A" impact?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

**216. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA is not aware of any other details.

## **Issue 28**

### **PK-10:Southard Quarry, Swanage**

#### **217. Could the potential “Very significant adverse impact” (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before they are destroyed by mineral extraction.

#### **218. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA considers that all significant matters have been taken into consideration.

#### **219. Should the DGs provide more direction on the mitigation measures required for this category “A” impact?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

#### **220. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA does not consider there are any other details to be added.

**Issue 29**

**PK-15: Downs Quarry Extension, Langton Matravers**

**221. I understand that this site has planning permission and, therefore, the Councils wish to remove it from the MSP by way of main modification. Please confirm.**

The MPA confirms that this site has received planning permission, and is to be removed from the MSP. A modification to this effect is proposed as **MM-PK15.1**

## Issue 30

### **PK-17: Home Field, Acton**

**222. Could the potential “Very significant adverse impact” (Category A) identified in the Site Assessment on criterion C11–archaeology, and the Strong Negative Impact identified in the SA on water (ob.4) be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before they are destroyed by mineral extraction.

The issue with water relates to nearby springs, which need to be protected. At the planning application stage the associated investigation would include hydrological assessment, to assess possible impact and identify appropriate mitigation. The MPA is satisfied that policy DM3 of the Minerals Strategy provides the necessary protection, and if necessary justification for refusal of a planning application. This approach is considered appropriate for the stage of allocation in a Plan.

The Environment Agency have not objected to this proposed allocation.

**223. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider that all the significant matters have been taken into account.

**224. Should the DGs provide more direction on the mitigation measures required for these category “A” effects and Strong Negative Impacts?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

**225. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA are not aware of any other details to be added to the Development Guidelines.

## Issue 31

### **PK-18: Quarry 4 Extension Acton**

#### **226. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before mineral extraction.

#### **227. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider that all significant matters have been properly taken into account.

#### **228. Has sufficient account been taken of the potential impact on residential properties in the hamlet of Blacklands and the surrounding area?**

The MPA is aware of the potential for impacts on the amenity of Blacklands, and has taken it into account.

A permission was recently issued by Dorset County Council (PL\2311\18 (6/2018/0301) permission issued 18 July 2018) at the Blacklands site immediately to the west of Quarry 4. This permission extended the working area nearer to Priests Way, and therefore nearer to the Blacklands hamlet.

The Committee report included the following assessment of amenity impact:

*It is proposed to increase the reserve and the duration of operations. However, no increase in the relatively low output is proposed. Whilst extraction operations would be closer to the nearest properties at Blacklands, the stockpile area and access to the site would move further away. Extraction operations are seasonal and once the overburden has been removed would last for only a few weeks of the year. The masonry works and associated service area operates the whole year around and the stockpiling operations are proposed to move further away from the nearest properties at Blacklands and from Priest's Way. It is proposed to provide additional noise and landscape mitigation measures by creating a screen with large blocks of "Rag", a product that occurs in thick beds for which there is little call. These large blocks would reflect noise from the processing operations away from the sensitive receptors.*

*There is also a proposal to further insulate the primary saw shed by blocking an opening that faces towards the sensitive locations, which will also help to reduce noise levels from at the nearest sensitive receptors. It is not considered that the increase in duration or operating hours will significantly increase the impacts on the amenity of the area.*

Similar mitigation measures could be applied to Quarry 4, and the output of Quarry 4 is taken off-site to be processed elsewhere.

The MPA is satisfied that it will be possible to satisfactorily mitigate any impacts on amenity that may arise.

**229. Should the DGs provide more direction on the mitigation measures required for this category "A" impact?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

**230. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA does not consider that there are any further details to be added.

## **Issue 32**

### **PK-19: Broadmead Field, Langton Matravers**

#### **231. Could the potential “Very significant adverse impact” (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before mineral extraction.

#### **232. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider that all significant matters have been properly taken into account.

#### **233. Should the DGs provide more direction on the mitigation measures required for this Category “A” impact?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

#### **234. Should the DGs include reference to existing water mains and abandoned water tanks on site as suggested by Wessex Water?**

Yes, the MPA agree that a reference to the Wessex Water infrastructure would be helpful, and a modification **MM-PK18.2** is proposed to achieve this.

#### **235. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA is satisfied that all necessary details have been added.

### Issue 33

#### **PK-21: Gallows Gore, Harman's Cross**

The MPA have been advised by the site owner and prospective developer that this proposed allocation is to be withdrawn from the Mineral Sites Plan. The MPA will put this forward as proposed modification **MM-PK21.1**.

Proposed modification **MM-PK21.2** makes the appropriate change to Policy MS-6.

- ~~236. Could the potential "Very significant adverse impacts" (Category A) identified in the Site Assessment on criteria C11-archaeology, and C18-sensitive human receptors, and the Strong Negative Impact identified in the SA on quality of life (ob.17) be adequately mitigated?~~
- ~~237. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?~~
- ~~238. Has the potential impact on residential receptors been adequately assessed and can this impact be mitigated to acceptable levels?~~
- ~~239. Have the potential traffic impacts been assessed and is the access route to the site acceptable?~~
- ~~240. The Dorset AONB Team considers that PK-21 is likely to produce adverse effects on the natural beauty of the AONB. Has this been adequately assessed? Is there scope to mitigate this impact to acceptable levels?~~
- ~~241. Should the DGs provide more direction on the mitigation measures required for these Category "A" effects and Strong Negative Impacts, and the effect on the AONB?~~
- ~~242. Given Wessex Water's concerns over the potential impact on their adjacent reservoirs and water main, should the DGs provide more direction on mitigation?~~
- ~~243. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?~~



## Issue 34

### **ix) MS-7: Sites for the provision of other building stone (excluding Portland and Purbeck stone)**

#### **General Questions**

#### **244. Do the sites set out in MS-7 meet the criteria in MS Policy BS1-Building Stone Quarries?**

The MPA is satisfied that the quarries do meet these criteria. Confirmation has been supplied by the site promoters that the stone serves local markets.

#### **245. Should MS-7 state the type of building stone to be excavated at the three identified site extensions (presumably the same type of stone as the existing associated quarry set out under MSP paragraph 3.65)?**

Yes, the MPA agree that it would be helpful to identify the type of stone to be extracted from these proposed extensions. The changes to Policy MS-7 will be put forward as proposed modification **MM-OBS.1**.

#### **246. Does the wording of MS-7 reflect the intention to allocate the identified extensions in that it says "The following extensions to existing sites are allocated, provided that the applicant can in each case demonstrate....." (My emphasis). Does this need re-wording so that the allocation is not conditional, but rather any planning application is conditional?**

Yes the MPA agree that the wording should be consistent with other policies in the Plan.

The MPA propose modification **MM-OBS.2** to amend this.

## Issue 35

### Site Specific Questions

#### **BS-02: Marnhull Quarry, Marnhull**

**247. Please confirm whether Marnhull Quarry, Marnhull, is the same as Whiteways Lane Quarry, Marnhull?**

Yes, it is - these are different names for the same site.

**248. Could the potential “Very significant adverse impact” (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before mineral extraction.

**249. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA is satisfied that all significant matters have been taken into consideration.

**250. Should the DGs provide more direction on the mitigation measures required for this Category “A” impact?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

**251. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA do not consider that there are any other details to be added to the Development Guidelines.

**Issue 36**

**BS-04: Frogden Quarry, Osborne**

**252. Are there any significant outstanding issues with this allocation?**

The MPA do not consider that there are any sign outstanding issues with this allocation.

**253. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA is satisfied that all significant matters have been taken into consideration.

**254. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA do not consider that there are any other details to be added to the Development Guidelines.

## **Issue 37**

### **BS-05: Whithill Quarry, Lillington**

#### **255. Could the potential “Very significant adverse impacts” (Category A) identified in the Site Assessment on criteria C11–archaeology, and C13-surface waters be adequately mitigated?**

The Site Assessment notes there is high potential for archaeological remains, but the presence/quality of the archaeology will not be known until more detailed assessment is undertaken. The level of further assessment required would normally be undertaken at planning application stage.

The MPA is satisfied that Policy DM7 of the Minerals Strategy provides the necessary protection that, should the planning application need to be refused on heritage grounds following the assessment, the MPA will be able to do so.

It also provides, along with national policy, the necessary basis to ensure the protection of any assets on or around the site, or to ensure that assets are properly recorded before mineral extraction.

The issue with water relates to a nearby watercourse. At the planning application stage the associated investigation would include hydrological assessment, to assess possible impact and identify appropriate mitigation. The MPA is satisfied that policy DM3 of the Minerals Strategy provides the necessary protection, and if necessary justification for refusal of a planning application. This approach is considered appropriate for the stage of allocation in a Plan.

The Environment Agency have not objected to this proposed allocation.

#### **256. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?**

The MPA consider they have been properly taken into account.

#### **257. Should the DGs provide more direction on the mitigation measures required for these Category “A” impacts?**

Until the assessment has been undertaken and more detail is known about the archaeology present, it is difficult to be specific. The MPA is satisfied that the Development Guidelines flag up the need for assessment and appropriate mitigation.

#### **258. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?**

The MPA does not consider that any further details need to be added.

### **Issue 38**

**Matter 2: Whether the remaining Plan policies promote sustainable development and make adequate provision for monitoring**

#### **i) Policy MS-8: Puddletown Road Area**

**259. Historic England question why this policy only addresses issues relating to the natural environment. Is there any merit in extending the scope of the Area Policy to include Heritage issues, or would this detract from its purpose?**

This policy refers to the natural environment at the express requirement of Natural England, who consider a direct reference in the policy itself is necessary to ensure proper protection of the international designations.

The MPA tends to agree with Historic England that, as worded the policy appears to elevate biodiversity and nature conservation issues to a higher level than other considerations,

The MPA would prefer not to make any further additions of this nature to the policy which could potentially detract from it, but would welcome guidance from the Inspector on this matter.

## Issue 39

### ii) Safeguarding

#### **Policy MS-9: Preventing Land-Use Conflict**

- 260. Should the safeguarding of mineral sites (including sites allocated through the MSP) and infrastructure as listed in Appendix B and illustrated in Figure 9 be set out in policy rather than supporting text (MSP paragraph 5.6)? (Although such a policy would reference Appendix B and Figure 9, which would only be accurate at the time of adoption, the policy could explain how changes would be dealt with over time.)**

The MPA agrees that this would be helpful, clarifying through policy exactly what is safeguarded and allowing for more explanation of how safeguarding would work.

A modification **MM-AB.1** is proposed to address this point.

- 261. In MS-9:Preventing Land-Use Conflict is the 250 metre consultation area around safeguarded mineral sites and infrastructure the most appropriate distance? Explain very briefly how this distance has been chosen?**

In the 2015 Mineral Sites Plan Consultation Draft, a specific question was included:

*What is a reasonable size for a buffer? Should it be 250 metres, or more, or less?*

*Should buffer zones vary according to the type of facility? For example, should a sand and gravel quarry have a bigger buffer than an aggregates wharf or rail siding?*

Seventeen responses were received to this question, with most respondents suggesting that the buffer should be individually identified, one wanting it larger and four accepting that 250m was a reasonable distance.

The purpose of the buffer is not to create a zone of no development around the proposed site, or a minimum distance from existing built development. It is in fact a zone within which the MPA should be consulted should certain types of non-mineral development be received that could potentially sterilise mineral reserves.

The MPA takes the view that it would be impracticable for the buffer, as it is proposed to be used, to be individually decided in each case. It has to be a set distance, that local planning authorities can apply equally across the MPA area and apply it to new permissions granted following during the life of the Mineral Sites Plan.

A larger buffer, say up to 400m was suggested in one case, would require additional input from the local planning authorities and the MPA, in dealing with the greater level of consultations. It was considered excessive.

A smaller buffer e.g. 50m to 100m, was considered too small, and could allow non-minerals development to encroach upon otherwise viable mineral assets without the MPA being able to consider such impacts.

The figure of 250m was considered reasonable, and the application of a single, standard buffer across all types of mineral development was considered to be preferable to a varying range of buffers depending on mineral type.

The figure of 250m was selected and put in the Draft Mineral Sites Plan. There were no objections. The MPA consider that this is the most appropriate distance.

**262. How should applications for prior approval be treated in relation to safeguarding?**

A similar issue comes up when the MPA is consulted regarding development proposals within safeguarded areas, and the need for prior extraction.

When the MPA is consulted by a local planning authority over a development proposal in an area safeguarded for minerals, the response returned (depending on the mineral type) may specify the need for prior extraction, and set out how this prior extraction would be achieved (i.e. the developer to carry out an assessment, and based on this the MPA, with the developer and LPA, will decide how much mineral should be removed by prior extraction, prior to built development).

It is assumed that most prior approval applications are directed to a LPA, who would be expected to consult the MPA if the proposed development for prior approval involved mineral safeguarded land. It is likely that in most cases the area of land involved in a prior approval application would be too small to justify prior extraction of any safeguarded mineral, although the developer could be required to reuse some of the mineral on site, if this were possible.

If the application for prior approval was directed to the MPA, the MPA would determine the appropriate response depending on the mineral type and proposed development, and require that as part of the prior approval.

If the proposal came in as a consultation from a LPA, the MPA would return comments setting out what the LPA should require as part of the prior approval issued.

**263. Are all exemptions set out in MSP paragraph 5.9 justified and is the list comprehensive in that it includes all development that should be exempt?**

The MPA consider that these exemptions are justified, and the list is comprehensive. The MPA does not consider that there are any other types of development that should be exempt.

**264. Should these exemptions have the force of policy and be included in the body of MS-9?**

The MPA prefer to keep these exemptions as supporting text, but would be willing to add them into the policy if this is most appropriate.

**265. Are all relevant railheads listed for safeguarding? (Railfuture's representation indicates that they might not be )**

Railfuture referred to Gillingham Shell Star siding; Maiden Newton ACE siding; Weymouth Jersey sidings and Quay; Dorchester South yard and Winfrith Siding as sidings that should be included for safeguarding. It also referred to sidings outside the MPA area, up to 50 miles away.

The MPA cannot list sidings outside the Bournemouth, Dorset and Poole area, as it has no jurisdiction over them.

The other sidings mentioned are unlikely to be needed for mineral trans-shipment. They are either not in areas where economically viable reserves of minerals are found, or have not been used for mineral trans-shipment for a long time, if ever.

The MPA do not consider them viable options for potential mineral rail depots.

## Issue 40

### iii) Implementation and Monitoring

**266. Are the provisions for implementation and monitoring effective and do they identify appropriate triggers for review?**

The MPA considers that they do.

**267. In MSP Tables 2 to 9, to be effective should there be a column for the action required if the monitoring trigger is met?**

The MPA agree it could be helpful to have an indication as to possible actions to be taken in the event of Monitoring Triggers being reached. The MPA will make reference to this in the Tables.

This change is proposed through modification **MM-IM.1**

**268. Should there be an additional indicator to assess any impact of the Area of Search on non-minerals development including its potential delay?**

Yes this would be helpful. An indicator will be added, through proposed modification **MM-IM.2**

**269. MSP paragraph 6.12 says "it is expected that it will be reviewed...". The Town and Country Planning (Local Planning)(England)(Amendment) Regulations 2017, regulation 4 "Review of local development documents" states that reviews of local plans must be completed every five years, starting with the date of adoption of the local plan. This regulation came into force on 6 April 2018. Should paragraph 6.12 be modified to reflect this?**

Yes, it will. An indicator will be added through a proposed **MM-IM.3**



**Issue 41**

**Any Other Business: Omission Sites**

Aggregate Industries; Omission Site - Chard Junction Quarry at Westford Farm, Chard

Mr Large: Extension to AS08 Wedgehill Farm