

# Draft Mineral Sites Plan Pre-Submission Consultation 2017-2018

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## Summary of Issues Raised

### The Draft Mineral Sites Plan – Issues Raised that don't relate directly to specific sites

#### **Aerodrome Safeguarding**

- Bournemouth Airport identify four criteria they request added in to the Plan, to be considered as part of any application.

#### **Consultation Statement**

- Does not provide enough detail of objections including level of objection to the Plan proposals
- DCC needs to provide list of Omission Sites, explaining why some sites were dropped

#### **Heritage Issues**

1. Historic England have set out the key statutory and policy tests to be applied to the Plan
2. Historic England note:
  - *Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm.*
  - *It will be important for you as the local authority to be satisfied that sufficient evidence has been gathered to show that there is a clear understanding of how the historic environment and heritage assets may be affected and to what extent (the degree of harm the significance of the asset).*
  - *It will then be important for you to clearly indicate that a positive approach to the historic environment has adopted and how the key statutory and national policy obligations have been applied.*

#### **Biodiversity**

- Habitats Regs appraisal process has not been properly followed – Appropriate Assessment has not been carried out, and should be carried out at the current stage, not at a later stage

#### **New Forest National Park**

1. Plan does not take into account the New Forest National Park properly.
2. Assessment of Roeshot (AS-13) proposals should include...
  - impacts on designated sites in New Forest National Park, and biodiversity of the Park;
  - traffic impacts on New Forest National Park
  - impacts on special quality of landscape of the Park
3. Ensure no effect on SANG provision required for the housing being built to the south of the proposed Roeshot site..

## **General Issues**

1. Plan does not make explicit reference to the need for proper protection from mineral impacts; need for proper/prompt reinstatement
2. Draft Mineral Sites Plan does not take into account the Dorset National Park
3. Contribution of recycled aggregate and marine dredged is not taken into account – could be used to offset need for land-won sand and gravel
4. Why export aggregate outside Dorset ?
5. Desktop assessments not adequate, detailed assessments needed now.
6. Development of the sites around Moreton-Crossways will lead to significant cumulative impacts.

## **Timing of site development**

1. Not all the proposed allocations will necessarily be developed during the Plan period, therefore not all are needed, and AS25 or AS26 could be dropped

## **Non-compliance with Mineral Strategy 2014**

1. Sites Plan not compliant with Mineral Strategy 2014 in a number of areas
2. The necessary assessments (e.g. Heritage) have not been carried out in the appropriate level of detail – the detailed assessment work has been back-loaded to the planning application stage and this is unacceptable

## **Aggregate provision**

1. Draft Mineral Sites Plan over-provides for River Terrace aggregate and under-provides for Poole Formation aggregate – non-compliant with national and local policy
2. Draft Mineral Sites Plan does not split the aggregates landbank into River Terrace/Poole Formation, or differentiate between sites producing primarily Poole Formation and River Terrace
3. Over-supply of aggregate is proposed – this is unnecessary
4. No account is taken of recycled aggregate – number of sites could be reduced if this was included in aggregate supply
5. Aggregate provision is not high enough – should be higher
6. It is appropriate to over-provide
7. Supply of sand and gravel in Dorset is 'restricted/fragile' – case for using a lower annual output figure to calculate landbank.
8. Given the potential future lack of sand and gravel resources, there is a case for not allocating AS25 Station Road, and possible AS26 Hurst Farm, at this time.
- 9.

## **Transport**

1. Plan should require rail transport for future extraction of 'large quantities' of sand and gravel
2. Transport Assessment work (MSDCC-35 and 36) already done – Dorset County Council need to review this, how does it deal with Affpuddle etc. and Bere Regis impacts?

3. There will be cumulative impacts along the C7 (Wareham to A35 road) if AS12 Philliol's Farm, AS15 Tatchell's and BC04 Trigon Hill Extension are developed – affecting road surface/verges – need to upgrade whole length of road
4. The Traffic Impact Assessment for Moreton-Crossways (MSDCC-35 and 36) does not seem to have been prepared 'in cooperation with' Purbeck District Council. May have led to inaccuracies. Similarly does not seem to include West Dorset District Council and Weymouth/Portland, or Moreton/Crossways Parish Councils – therefore not sound.
5. Recommended that AS25 Station Road is removed and AS26 Hurst Farm developed in its place.

### **MS-1 Production of Sand and Gravel**

1. Natural England have the following comment

"The potential for significant public benefits from a wetland restoration is explained in the restoration vision but in our view this text does not fully capture the significance of the multiple public benefits that could be achieved. We would recommend that these restoration opportunities are better reflected and encouraged by the Plan through the addition to Policy MS-1 suggested below."

*Any proposal for the development of any of these allocations must address the development considerations set out for each site in Appendix A **and work towards achieving public benefits within the restoration vision**, as well as **addressing** any other matters relevant to the development of each proposed allocation, and **demonstrating** that any adverse impacts will be mitigated to the satisfaction of the Mineral Planning Authority*

2. There is a risk Policy MS-1 will not deliver the relevant annual amount of sand and gravel, therefore not meeting objectively assessed need.

### **MS-2 Area of Search**

1. Objection to the spatial extent of the Area of Search in the vicinity of Lower Stockley Farm and Philliol's Farm in the Piddle valley to the south east of Bere Regis (cf AS12 Philliol's Farm proposal). The Area of Search should follow the recognisable and defensible boundary of the River Piddle, i.e. to not extend to the north of the River Piddle in the vicinity of Lower Stockley Farm and Philliol's Farm
2. Leads to lack of certainty, openness
3. Amend policy wording to allow unallocated sites that may be more suitable to come forward in favour of allocated sites, provided the allocated site is not yet permitted (See representation PSD MSP 53 Trevor Poole)
4. Area around Organford/Slepe should be removed – not suitable for aggregates development; same for Stour Valley, east of Wimborne
5. Amend the policy to say 'may be permitted' ( see representation PSD-MSP159 East Dorset FoE)
6. Avoid extraction along riverbeds
7. The minerals inside/outside the AoS have not been objectively assessed and may not be delivered sustainably. The output is not justified by any supporting documentation and/or is not an accurate picture of either the resources or the constraints. The AoS should be withdrawn or more broadly drawn. If withdrawn, a criteria based policy should be put in place. See representation PSD MSP 364.

8. It needs to be made clear that proposals must be in accordance with the development plan for the area including adopted Core Strategies and Local Plans. It is recommended that the following amendment is made: *i) The proposals are in accordance with the development plan including adopted Local Plans and Core Strategies.*

### **MS-3 Crushed Rock**

1. Ensure no significant increase in vehicle movements

### **MS-6 Purbeck Stone**

1. Plan provides for over-supply of stone; this should be reduced, by removing a site or sites – on the basis of sites having greatest effect on amenity
2. Ensure no significant increase in vehicle movements
3. Restoration – could include pond creation for Great Crested Newts (Wildlife Trust)
4. The objective of the restoration vision for this sites should not just be for limestone pasture but for limestone pasture of conservation interest (e.g. species-rich limestone pasture). Some areas should be left to naturally revegetate as early successional limestone habitats are particularly valuable. In addition the restoration vision should include provision for the establishment of bat roosts (Natural England)
5. Broadmead Field PK19 and Gallows Gore PK21 are wrongly described in terms of their location. Both these sites contribute to cumulative impacts of numbers of quarries in proximity to houses in the Gallows Gore area of Purbeck.

### **MS-8 Puddletown Road Area**

1. Why does this policy (and other policies) only address issues relating to natural environment (Historic England)
2. Suggest that this policy is amended to include and refer to waste sites as well
3. Future of quarrying will continue to provide opportunities at landscape scale to develop heath/forest habitat – should be recognised in the policy
4. Consider allowing extraction up to ownership boundaries, avoid creating network of causeways
5. Landscape design on larger scale – e.g. removing Puddletown Road itself.

### **MS-9 Safeguarding**

1. Point x. of the list of development exempt from consultation should be strengthened as follows:
  - x. Applications for temporary permission of up to five years other than Classes C1, C2, C2a, C3, C4, or D1 .
2. Point vi. within the aforementioned list should include applications for prior approval where these relate to Classes C1, C2, C2a, C3, C4, or D1. If this is not the case, the appropriate text should be instated (see rep PSD MSP 232)

### **Implementation and Monitoring**

1. It is suggested that an additional indicator be included to aid in the implementation of Policy MS-2. The indicator should seek to assess the impact of the area of search on non-minerals development to ensure that the residential and employment growth much needed in the area is not prevented or held up.
2. Suggested indicator: the number of non-minerals developments delayed or prevented as a result of Policy MS-2.

**Omission Sites – sites proposed during the Pre-Submission Consultation**

1. AS08 Clump Hill, Eastern Section – justification for inclusion is set out (see rep PSD MSP 298)
2. Westford Park Farm – proposed extension to Chard Junction Quarry (see rep PSD MSP 365-367)
- 3.

**The Sustainability Appraisal (MSPSD-03) – Issues Raised**

**General** (but many relating to site proposals AS19 Woodsford; AS25 Station Road and AS26 Hurst Farm)

1. Will increased public access following mineral working really be achieved? How?
2. Benefits of development are assumed – no proper cost-benefit analysis has been done.
3. No evidence of nitrates entering water from these sites. Flocculants may be used on site, and could also enter the water. Will landowners agree to these wetlands?
4. Will the site boundaries (AS19, AS26) be pulled back? Put the wetlands north of workings??
5. How best to manage cumulative impacts? AS19/AS26 not working together, AS25/AS26? Can the necessary phasing be made explicit?
6. The Transport Assessment (MSDCC – 35 and 36) undertaken - has not taken into account restrictions in the B3390 north of Moreton. Does not take into account – cumulative traffic impacts on Bere Regis.
7. Cannot assume impacts on heritage assets by AS-25 can be addressed.

**Cumulative impacts**

1. The Sustainability Appraisal does not refer to the additional housing proposed at Crossways/Moreton, and this needs to be included and taken into consideration
2. Cumulative impacts on 'noise, dust, traffic, pollution, tranquillity, loss of farmland and the environment' must be considered

## AS-06 Great Plantation – Key issues Raised

### **General:**

1. Site is in East Stoke PC, not Bere Regis PC – needs to be corrected
2. No evidence neighbouring parishes been consulted – Duty to Cooperate issue
3. Proposal substantially changed, not enough time to assess it
4. Could not find the Pre-Submission Consultation Plan online, or correct site assessment
5. Yield does not justify impact of working – site has remained when other similar sites with better yields have been removed.
6. Consultation website difficult to access, could not find current site assessment
7. Site should be removed from the Plan before submission
8. Site assessment should be updated to reflect revised proposal; especially for heritage comments
9. Number of further assessments required prior to submission
10. Environment Agency has identified the necessary studies to be undertaken and permits required.
11. Inaccuracies in how the proposal is presented, as already noted above i.e. location is not in Bere Regis; some confusion over the extent of the site.

### **Biodiversity:**

1. Biodiversity impacts, including on European and national designations – habitats and species
2. No information on mitigation
3. Further assessment required, the outcome of which is unknown
4. Generally, much info is missing and formal assessments need to be carried out
5. Amend Policy MS-1 to make reference to HRA and mitigation measures (Natural England)

### **Public Access impacts:**

1. Loss of public access land – particularly important with new built development proposed in the area
2. Displacement of recreation – into neighbouring designated areas
3. No detail on proposed alternative provision/mitigation – should provide detail on what is expected of developer
4. If site is allocated, the level of alternative provision of public access must be of high quality.

### **Heritage:**

1. Heritage impacts possible – further assessment required, outcome not known (Historic England)
  - *The present proposals, both in the position and extent of the quarry and also in the landform created in the post-extraction restoration scheme, would bring permanent*

## AS-06 Great Plantation – Key issues Raised

*major adverse changes to the landform and landscape which provides the primary context and setting of the monuments...*

- *The area of extraction would need to be significantly smaller than that currently proposed, and designed so as to retain sufficient historic landform around and between the monuments to maintain the integrity of their landscape setting.*
- *Similarly, the present quarry restoration scheme would need to be significantly modified so that it would reinstate ground surfaces at, or close to, the existing historic ground levels within the primary settings of the monuments (Historic England)*

### **Site Working:**

1. Should not be concurrent with working existing sites (Hines/Hyde Pits, worked by Hanson)
2. Access to/from A352 to the south should not be allowed
3. Impacts of vehicle movements within and around the site not clear
4. How will mitigation corridor be used?
5. Unlikely that site can be restored to original levels.

## AS-09 Hurn Court Farm – Key Issues

### **General:**

1. Site is not needed, there is a surplus of aggregate for the Plan period
2. Assessments have not been undertaken, so impossible to accurately predict effects, identify mitigation.

### **Amenity**

1. Impacts on amenity of residents, and businesses

### **Heritage:**

1. Impacts on heritage assets, Listed Buildings, need to be fully addressed and mitigated.
2. Dales House (Listed Building to the south of the site) needs a buffer of at least 65m

### **Site Working:**

1. No concurrent working with existing Hurn Court Farm site – or Avon Common

### **Aerodrome Safeguarding**

1. Aerodrome Safeguarding, ensure no bird strike risk

### **Hydrology**

## AS-09 Hurn Court Farm – Key Issues

1. Ensure no contamination of Stour, or increased flood-risk

### **Highways/Traffic Impacts**

1. Traffic assessment is to include the New Forest National Park area, as well as Dorset areas
2. Roads infrastructure struggling to cope with current traffic flows, before this site and waste proposals – assessment should be carried out at the current stage
3. Transport Assessment has not been undertaken – not clear if the proposal is effective/deliverable
4. Transport assessment is required at the plan-making stage

### **Landscape/Visual Impacts**

1. Visual impacts on the local area
2. Impacts on neighbouring theme park

## AS12 Philliol's Farm – Key Issues

### **General:**

1. Uncertainty over the amount of gravel available
2. Various detailed assessments needed, have not been carried out – including biodiversity, hydrology, local transport, amenity, recreation, agricultural land, and loss of agricultural land – detailed assessments should be carried out prior to development, at site allocation stage
3. Previously rejected by Planning Inspector in 1996 – no justification to change this decision
4. Plan over-allocates gravel provision
5. Development Guidelines need more detail on the specific mitigation needed, etc.
6. Structural impacts on buildings
7. Review/select alternative sites – aggregate needs can be met from other sites
8. No site operator
9. Proposed restoration not clear

### **Biodiversity:**

1. Biodiversity impacts within and around the site – including on endangered and/or protected species (e.g. fairy shrimp)
2. Biodiversity impacts associated with haul road, including recreational displacement
3. Haul road impacts on the heathland to the north
4. Protect nearby designated sites - Bere Stream SSSI and Philliols Coppice SNCI



## AS12 Philliol's Farm – Key Issues

5. Environment Agency - No objection provided ephemeral ponds and Fairy shrimp (*Chirocephalus diaphanous*) in the vicinity are assessed and not impacted from the proposals

### **Fisheries**

1. Impacts of sedimentation from quarry workings on the rivers; impacts on riverbed spawners, decline in fish populations. Need much bigger standoff to rivers.

### **Landscape/Visual**

1. Landscape and visual impacts – difficult/impossible to mitigate
2. Misrepresented as 'Heath/Forest Mosaic' – is intimate river valley landscape

### **Hydrology**

1. Hydrology impacts – effects of quarrying on the Piddle; increased likelihood of flooding
2. Restoration to wetland area – is there access to the river from the site? how can access be achieved?

### **Public Access impacts:**

1. Haul road impacts on users of the forest/heath – including rights of ways
2. If the haul road remains inside the forest/heath area it will either exit onto the C7 within a few yards of the bridleway exit or it will cross the bridleway, or the bridleway will have to be diverted to the east. None of those are desirable for walkers or cyclists. They are particularly undesirable for horse riders and horses especially as incoming traffic will either be waiting to turn right into the haul road at the exit point, or just past the exit point before coming back across the bridleway, or (if the bridleway is diverted to the east) the riders will have to ride along the C7 to reach the next bridleway on the north side opposite the existing exit. I regard the drivers of big lorries as generally pretty careful and courteous around horses but not all horses are comfortable near them and this is putting them into close proximity next to other traffic.

### **Amenity**

1. Significant impact on local amenity, including dust, noise, visual, traffic
2. Number of residences in close proximity or within site

### **Heritage:**

1. Impacts on the Listed Buildings at the centre of the site – including structural impacts following quarrying
2. And on other heritage assets in/around site
3. Impacts on setting of heritage assets

### **Site Working:**

1. Impossible to return site to agriculture

## AS12 Philliol's Farm – Key Issues

2. No operator identified – is site economically viable?

### **Aggregate Supply**

Availability of recycled aggregate has not been taken into consideration.

### **Economic**

1. Impacts on local economy, due to loss of amenity – especially tourism and tourism related businesses
2. Haul road will itself affect recreational enjoyment of this area, with economic impacts
3. Loss of farming land, farming capacity
4. Much of the site is BMV land

### **Restoration**

1. Restoration to heathland/grassland/scrub is very important
2. The current restoration vision for the site is not appropriate since although the allocation is with the Forest/Heath Mosaic Landscape Type this is a broad landscape description and the site itself has not been heathland for a very long time if ever and is more directly associated with the river valleys. A wetland restoration (as mentioned under other considerations) with the wetlands hydrologically linked to the Bere Stream and/or the River Piddle would be more appropriate and deliver better public benefits.

### **Traffic/Transport**

1. Impacts on local roads, including C7 and further away – traffic to avoid Cold Harbour/Trigon if possible
2. Safety issues for other road users
3. Local roads will struggle to cope with non-lorry site traffic
4. Needs a cumulative assessment of impacts on C7 – at current stage (Highways England)
5. Make access route along western edge of the forest – to minimise impacts

### **Rights of Way**

1. Point where haul road meets C7 has potential to affect the crossing of the bridleway over to the other side

## AS13 Roeshot Quarry – Key Issues

### **General:**

1. Site is not needed, there is a surplus for the Plan period
2. Ensure no impacts on provision of SANG required for the North Christchurch Urban Extension – south of the site

### **Biodiversity:**

1. Potential for impacts on Southern Damselfly, Mude Valley Site of Nature Conservation Interest – already addressed through Hampshire proposal
2. Buffer strips along Mude needed
3. Biodiversity assessment to include consideration of designated sites in New Forest National Park and Hampshire area

### **Aerodrome Safeguarding**

1. Ensure this is fully assessed/addressed

### **Amenity**

1. Ensure noise, dust, visual, light and odour impacts are properly mitigated

### **Hydrology/Flood Risk**

1. Hydrology impacts, impacts on Mude and watercourses – ensure fully assessed, mitigated
2. Potential impacts on Christchurch Harbour
3. Flood risk assessment also needed
4. EA strongly advises a sequential approach be adopted within the site boundary to ensure only water compatible development is permitted within the floodplain, and all other development is restricted to that part of the site that falls within Flood Zone 1.
5. The required width of the buffer zone will need to be determined subject to the provision of further site information. No activities associated with any stage of the mineral extraction must occur in this buffer zone, including light spill (EA)

### **Site Working:**

1. No concurrent working with Hampshire side of site
2. Give consideration to rail link to remove aggregates
3. Oil pipeline passes through allocation

### **Economic**

1. Impacts on tourism

### **Highways/Traffic Impacts**

1. Traffic impacts – including cumulative impacts with housing to south of railway

## AS13 Roeshot Quarry – Key Issues

2. Traffic assessment is required - to include the New Forest National Park area, as well as Dorset areas – include cumulative impacts
3. No intensification of traffic
4. Roads infrastructure struggling to cope with current traffic flows, without this site being added
5. HGV ban on some roads required
6. Consider developing/using a rail connection to minimise HGV numbers

### **Landscape/Visual Impacts**

1. Visual impacts on the local area – ensure mitigation

## AS15 – Tatchell's Extension – Key Issues

### **Highways/Traffic Impacts**

1. Traffic impacts – including cumulative impacts – on the C7, damaging surface/verges
2. Dangerous for other users – whole road should be upgraded
3. Cumulative impact assessment of this site and Philliol's/Trigon on the C7 required.

## AS19 Woodsford Extension – Key Issues

### **General:**

1. Cumulative impacts, when considered along with AS25 and AS26 – especially the length of time working will take and on amenity of local residents
2. How best to handle the phasing/timing of AS19/AS25 /AS26 to minimise cumulative impacts, ensure not working together?
3. Woodsford Quarry not properly managed, expect same for AS-19
4. Impacts have not been properly assessed – necessary studies have not been carried out
5. Site is not needed due to size of landbank
6. National Grid high voltage line crosses the site

## AS19 Woodsford Extension – Key Issues

### **Biodiversity:**

1. Biodiversity impacts – both on-site and off-site, including on European and national and local designations
2. Support for wetland restoration scheme
3. Loss of hedgerows/trees
4. HRA not adequately carried out, does not properly assess impacts on nearby European designated sites
5. Impacts on biodiversity of site, including protected species, possible...

### **Hydrology**

1. Hydrological impacts – relationship with river will be affected – impacts on drainage systems
2. Necessary/appropriate assessment has not been carried out
3. Cannot say "Site has no possible pathway to international nature conservation designations" – need to revise the assessment
4. Hydrological impacts – relationship with river will be affected – impacts on drainage systems
5. Risk of flooding following working and restoration not properly assessed. Drainage across site will be destroyed
6. Potential for contamination of river, European designations due to linkages with river – release of Fe<sup>+</sup>, silt

### **Heritage:**

1. Heritage assets in the vicinity and within the site – there will be impacts
2. Not all relevant heritage assets are mentioned
3. Links to Thomas Hardy and the landscapes he referred to – will be lost
4. Historic landscape – water meadows – will be lost
5. Potential for Palaeolithic archaeology within the site

### **Site Working:**

1. Proposal is not sustainable – costs outweigh benefits
2. No reference to the need for flocculants – how will silt be managed
3. Need proper evidence that nitrates will be reduced
4. Impacts of site working – noise,
5. No guarantee that site will be restored in a timely manner
6. No processing, bunds, storage – to be in Flood Zone 2/3
7. Air quality impacts – PM<sub>10</sub>

### **Economic**

### **AS19 Woodsford Extension – Key Issues**

1. Impacts on tourism – including Sculpture by the Lakes to the north
2. Impacts on local economy, especially tourist economy, dairy farming,
3. Loss of agricultural land, damage to soils

#### **Fisheries**

1. Impacts of sedimentation from quarry workings on the rivers; impacts on riverbed spawners, decline in fish populations. Need much bigger standoff to rivers.

#### **Landscape/Visual**

1. Impacts on local landscape, including cumulative

#### **Economic**

1. Impacts on local economy, especially tourist economy
2. No assessment of Dorset National Park, or detailed assessment on Sculpture by the Lakes or similar

#### **Loss of BMV Land/Soils**

1. Impacts on soils, loss of some BMV land

#### **Traffic/Transport**

1. Cumulative impacts – of AS25, AS26 and AS19 – along with traffic from proposed housing
2. Impacts of traffic generation, along the B3390 including north of Waddock Cross – latter roads are not suitable for HGVs. Need a 'defined and acceptable' routeing policy for AS25,26 and 19, for accessing the A35

#### **Amenity**

1. Impacts on Sculpture by the Lakes – economic/tourism, biodiversity, hydrology
2. Impacts on residences within/around site

### **AS25 Station Road – Key Issues**

#### **General:**

1. Cumulative impacts, when considered along with AS19 and AS26 – especially the length of time working will take and on amenity of local residents
2. No proper cumulative impact assessment – with housing proposals
3. How best to handle the phasing/timing of AS19/AS25 /AS26 to minimise cumulative impacts, ensure not working together?

## **AS25 Station Road – Key Issues**

4. Both AS25 and AS26 can't be worked during life of the Plan – one should be removed
5. Plan over-provides for aggregates and does not consider other sources of aggregate, apart from land-won. Can drop AS25 and/or AS26, and still meet need
6. Necessary assessments haven't been carried out
7. Impacts on Employ My Ability charity at the Moreton Walled Garden – impacts on staff with disabilities
8. Station Road (The Avenue) – is the 'gateway' to Moreton village

### **Biodiversity:**

1. Biodiversity impacts – both on-site and off-site, including on European and national designations
2. Habs Regs assessments have not been properly carried out – proximity to heaths, European sites
3. Loss of hedges, trees
4. Impact on Frome SSSI – not properly assessed

### **Public Access impacts:**

1. Injury risk for people walking from Moreton Station to Moreton village

### **Amenity**

1. Impact on local residents – including noise, loss of tranquillity, dust – will be very significant
2. Screening of trees not effective in winter – bunds not effective, no proper buffer zone
3. Noise will carry into the village
4. Significant impacts on local amenity of developing this site – not properly taken into consideration.

### **Heritage:**

1. Impacts on adjacent heritage assets (Conservation Area, Listed Buildings, Lawrence's grave) and their settings; impacts on setting not properly assessed;
2. Impacts on heritage assets within the site proposal; non-designated and designated sites
3. Heritage assets have not been properly considered, impacts properly assessed
4. Historic England note and endorse the Purbeck District Council Conservation Officer objections to this proposal; identification of impacts on heritage assets; and proposed mitigation
5. Interference with an individual resident's ability to appreciate heritage-significance in views is considered contrary to the general public interest
6. Potential for Palaeolithic archaeology within the site

## **AS25 Station Road – Key Issues**

7. Certain relevant viewing points that are currently inaccessible to the general public should also to be included in the present appraisal, in particular, those involving potentially affected views outwards from heritage assets.
8. Screening along Station Road is reduced especially in winter

## **Site Yield**

1. Yield from site is questioned – it appears to be too high

## **Fisheries**

1. Impacts of sedimentation from quarry workings on the rivers; impacts on riverbed spawners, decline in fish populations. Need much bigger standoff to rivers.

## **Hydrology**

1. Risk of flooding – not properly assessed. Drainage across site will be destroyed
2. Hydrology impacts – including on the Frome - have not been assessed
3. Cannot say "Site has no possible pathway to international nature conservation designations" – need to revise the assessment

## **Site Working:**

1. Not possible to restore the site
2. Query lorry numbers
3. Inappropriate to vary site boundary at this stage – could lead to unnecessary sterilisation. When detailed EIA is carried out, the boundary of the application will be finalised

## **Economic**

1. Impacts on local economy, especially tourist economy, farming – not properly considered
2. Loss of agricultural land, damage to soils
3. Development of this quarry would have a significant impact on the local (Moreton) tourist industry – Plan does not specifically reflect this. AS25 Station Road should be removed from the Plan.

## **Landscape/Visual**

1. Impacts on local landscape, including cumulative
2. Visual impacts for local residents not possible to mitigate
3. Loss of traditional landscape

## **Traffic/Transport**

1. Impacts of traffic generation, along the B3390 including north of Waddock Cross – latter roads are not suitable for HGVs.



## AS25 Station Road – Key Issues

2. Constraints of B3390 – listed/narrow bridge, bends, narrow points -
3. Need a 'defined and acceptable' routeing policy for AS25,26 and 19, for accessing the A35
4. Increase risk of accidents – access has not been properly assessed
5. Assessment does not include Silverlake homes; or aggregate recycling lorries – does not recognise cumulative impacts of proposed housing
6. Query number of lorry movements - the number is assessed at 40 in and 40 out movements per day but, if these figures are for the lorries transporting material between the sites (which would be the same), then where are the figures for the lorries transporting material from AS26 Hurst Quarry to the wider county and beyond?
7. DCC Traffic Impacts Assessment – flawed for various reasons
8. Reduce lorry movements at peak times
9. Location of access will be dangerous – to motorists and pedestrians

## AS26 Hurst Farm – Key Issues

### **General:**

1. Cumulative impacts, when considered along with AS19 and AS26 – especially the length of time working will take and on amenity of local residents
2. No proper cumulative impact assessment – with housing proposals
3. How best to handle the phasing/timing of AS19/AS25 /AS26 to minimise cumulative impacts, ensure not working together?
4. Both AS25 and AS26 can't be worked during life of the Plan – one should be removed
5. Plan over-provides for aggregates and does not consider other sources of aggregate, apart from land-won. Can drop AS25 and/or AS26, and still meet need
6. Necessary assessments haven't been carried out
7. National Grid high voltage line near the site

### **Biodiversity:**

1. Support for wetland restoration scheme
2. Biodiversity impacts – both on-site and off-site, including on European and national designations, protected species
3. Habs Regs assessments have not been properly carried out – since impacts uncertain, precautionary principle should be applied
4. HRA not adequate, does not properly assess impacts on nearby European designated sites

## AS26 Hurst Farm – Key Issues

### Heritage:

1. Impacts on heritage assets ( Listed Buildings, listed bridge) and their settings around the site – no indication whether impacts can be mitigated
2. Impacts on heritage assets within the site – including water meadows, Thomas Hardy links – not properly considered
3. Impacts, including structural impacts possibly, on the Listed Buildings
4. Neglect/damage during working
5. Impacts on setting
6. Historic England note and endorse the Purbeck District Council Conservation Officer objections to this proposal; identification of impacts on heritage assets; and proposed mitigation
7. Restoration cannot properly restore the landscape – possible loss of hedgerows, can't be replaced
8. Potential for Palaeolithic archaeology within the site

### Site Yield

1. Yield from site is questioned – it appears to be too high
2. Philliol's Farm aggregate could be secured from other parts of the county

### Amenity

1. Impacts on neighbouring (adjacent or nearby) properties, including Sculpture by the Lakes - economic/tourism, biodiversity, hydrology
2. Dust, dirt from working of quarry
3. Loss of tranquillity

### Site Working:

1. Proposal is not sustainable – costs outweigh benefits
2. Need proper evidence that nitrates will be reduced
3. Air quality impacts – PM<sup>10</sup>
4. It is suggested that this site is worked after AS19 to avoid cumulative impacts, and further, the alternative of this mineral being taken to Woodsford Quarry, should also be encouraged.
5. Recommended change to 'Development Guidelines' , under 'Other', second paragraph:  
*In order to avoid cumulative impact with other mineral working in this area, the site will be developed after the Woodsford Extension site (AS19). In order to reduce any highway impacts, the option to convey mineral to Woodsford Quarry should be fully explored. Impacts on existing/proposed housing must be taken into consideration.*

### Economic

## AS26 Hurst Farm – Key Issues

1. Impacts on local economy, especially tourist economy, farming,
2. Loss of agricultural land, damage to soils

### **Hydrology**

1. Contamination risk – for river – release of Fe<sup>+</sup>, silt
2. Cannot say "Site has no possible pathway to international nature conservation designations" – need to revise the assessment
3. Necessary assessment has not been carried out
4. Hydrological impacts – relationship with river will be affected – impacts on drainage systems
5. Risk of flooding following working and restoration not properly assessed. Drainage across site will be destroyed
6. Potential for contamination of river, European designations due to linkages with river – release of Fe<sup>+</sup>, silt

### **Fisheries**

1. Impacts of sedimentation from quarry workings on the rivers; impacts on riverbed spawners, decline in fish populations. Need much bigger standoff to rivers.

### **Landscape/Visual**

1. Impacts on local landscape, including cumulative
2. Not clear that impacts could be mitigated

### **Traffic/Transport**

1. Impacts of traffic generation, along the B3390 including north of Waddock Cross – latter roads are not suitable for HGVs.
2. Constraints of B3390 – listed/narrow bridge, bends, narrow points -
3. Need a 'defined and acceptable' routing policy for AS25,26 and 19, for accessing the A35
4. Increase risk of accidents – access has not been properly assessed
5. Query number of lorry movements - the number is assessed at 40 in and 40 out movements per day but, if these figures are for the lorries transporting material between the sites (which would be the same), then where are the figures for the lorries transporting material from AS26 Hurst Quarry to the wider county and beyond?
6. Assessment does not include Silverlake homes; or aggregate recycling lorries – does not recognise cumulative impacts
7. DCC Traffic Impacts Assessment – flawed for various reasons
8. B3390 not suitable for lorries

## BC04 Trigon Hill Extension – Key Issues

### **Biodiversity:**

1. Impact on wildlife/plant life, including protected species.
2. Ensure protection measures listed in HRA report are implemented.
3. Adequate mitigation against possible impacts on adjacent SNCI

### **Hydrology**

1. Excavations affect drainage patterns

### **Heritage:**

1. Current scheme would bring 'permanent, major adverse changes'. There is potential for some extraction, but proposals need to be amended

### **Amenity**

1. Noise, traffic, odour,
2. Vehicle numbers too high – cumulative impacts with landfill

## RA01 Whites Pit - Key Issues

### General:

1. Site has affected residents of Arrowsmith Road – not considered appropriate for permanency, should not be included in the Draft Mineral Sites Plan

### Biodiversity:

1. Potential impacts on Canford Heath and other designated sites

## PK16 Swanworth Quarry Extension – Key Issues

### General:

1. Fails to conserve or enhance the natural and historic environment
2. Extensions have twice been rejected – nothing has changed, why has the proposal come forward again
3. Wait until after LGR process
4. Sustainability – if Portland quarries picked up the loss of Swanworth Quarry, would be a 100% increase in output – emissions, lorry numbers, journey times, costs would increase.
5. Impact on tranquillity of the area – noise, industrial activity
6. No exceptional circumstances to allow aggregate quarrying in AONB – alternative sources of crushed rock are available – not in public interest
7. Current crushed rock landbank is adequate – no new sites needed
8. More detailed assessments should have been carried out on the impacts at the current stage
9. Site promoters have mineral rights over a larger area – this will set precedent
10. Project did not secure community involvement
11. The allocation would be contrary to the primary purpose of the Area of Outstanding Natural Beauty - conservation and enhancement of the natural beauty of the designated area. Also contrary to NPPF – paragraph 144
12. Contrary to NPPF policy – planning authorities should provide for the maintenance of landbanks of non-energy minerals from outside Areas of Outstanding Natural Beauty and World Heritage sites
13. NPPF 115 - Great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty..."

## PK16 Swanworth Quarry Extension – Key Issues

14. NPPF section 116 states that: "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest
15. The proposal would be contrary to the Council of Europe Diploma for the Conservation of Protected Areas

### **Soundness/Sustainability Appraisal**

1. The proposed site fails the soundness test, as it is unlikely to be deliverable, given the policy protection for AONBs in NPPF and Minerals Strategy.
2. The SA fails to adequately consider alternatives
3. Need to assess the degree that landscape mitigation might reduce harm to the AONB – this has not been done.
4. Need to assess the degree to which landscape mitigation might reduce harm to the AONB
5. Specific issues where clarification/modification is needed are:
  - Length of time quarry will remain operational
  - Availability of inert fill and how this could affect progress
  - Working the proposed extension in relation to cessation/restoration of existing – potential cumulative impacts on AONB
  - Clear link needed between guidelines and Policy MS-3
  - Potential mitigation measures such as different screening options, phasing and early restoration should be evaluated in the Development Guidelines with appropriate corresponding changes made to Policy MS-3 as necessary
  - Mitigation considerations should include the quality and condition of landscape features which, where appropriate could be enhanced/restored
  - Need to explain the tunnel proposals properly – potential impacts of artificial structures on the AONB
  - Is a tunnel required? Or is proposal acceptable without one?
  - Small area to be removed
  - Within the allocation site at present the natural element of the AONB is not well represented, apart from the landform itself. There is an opportunity therefore for enhancement as part of the restoration.
  - Compensatory environmental enhancements likely to be required - at present the Plan only refers to mitigation and as such does not provide an adequate basis for provision of the necessary enhancements. The Plan should be amended to address this point through a new a specific policy requirement to this effect in MS-3 together with details about the mechanism of implementation within the Development Guidelines.

### **Biodiversity:**

1. Potential impacts on nearby designated sites

## PK16 Swanworth Quarry Extension – Key Issues

### **Visual/Landscape Impacts:**

1. Development of the site will cause visual/landscape impacts, including on the AONB and Heritage Coast
2. Permanent visible impacts
3. Impacts on World Heritage Site, Corfe Castle
4. Difficult to screen, highly visible from roads, paths
5. Should not be developed for aggregate use unless exceptional circumstances justify – none in this case.
6. No proper assessment of the bridge over Purbeck Way – visual and other impacts
7. Contrary to policies of Dorset AONB Management Plan

### **Public Access impacts:**

1. Bridge over the Purbeck Way – strong visual impact on this promoted route

### **Heritage:**

1. Potential for impacts on Bronze and Iron Age field systems, and other heritage interests including Scheduled Monuments
2. In summary, the threatened area has a unique and significant archaeological potential because it encapsulates a piece of landscape at the interface between ritual practices and a very particular way of domestic life. Over time, as this domestic shift intensifies, this subsoil must have recorded the effects of shifting tensions between these two domains of perception and action. This potential is too significant to destroy. If this archaeological potential is recognised it needs to be dealt with by experts.

### **Site Working:**

1. No concurrent site working with original site
2. Will delay restoration of the current site
3. This is not an extension, is a new proposal
4. Noise impacts

### **Supply of crushed rock**

1. Reference to Portland firms not being able to increase production to meet shortfall should be removed
2. Current landbank more than enough to meet demand for crushed rock
3. Take account of the fact that Portland could increase output
4. Quality of the output
5. Market for the crushed rock is primarily East Dorset.

## PK16 Swanworth Quarry Extension – Key Issues

6. Are alternatives sources of supply – Dorset (Portland) and Mendips, and railway link exists between the Mendips and Poole, used for importing crushed rock aggregate
7. Alternative products are available – growing supplies of recycled aggregate as substitute
8. No sudden/marked change in supply/demand to justify new quarry

### **Economic**

1. It will damage the vitality of town centres as heavy traffic is pushed through villages like Corfe Castle
2. Endangers a prosperous rural economy built on tourism – tourism employs far more people than the quarries
3. Employment generated will not be local
4. Is an unsustainable use of minerals.
5. Availability of stone from other parts of the country – rail importation
6. Significant impacts on tourism and the local economy
7. Swanworth Quarry offers employment diversity in Purbeck – which is over-reliant on tourism.

### **Traffic/Transport**

1. Increase in lorry traffic – or, if no intensification, will be temporal increase over roads already getting more congested due to increased tourism use
2. There should be no intensification of traffic – need a reduction in traffic levels, which closure would achieve.
3. Local infrastructure cannot stand increase in traffic – impacts on small rural roads
4. The large lorries are hazard to other road users – particularly on narrow rural roads – also on historic buildings
5. Corfe Caste not suitable for heavy lorries – increased risk to other users
6. Road access to/from Portland much improved, yet slow out of Purbeck especially in summer.
7. Site shape implies permission may be sought for access from/to the north onto B3069
8. Benefits of using existing rail link to the Mendips, alternative sources

### **Amenity/Public Health**

1. Children in Corfe Castle affected by additional lorry exhaust fumes
2. Amenity of residents close to quarry, and further away including along the roads in/out of Purbeck would be affected
3. Loss of tranquillity
4. Noise of blasting, heavy machinery - dust

### **Hydrology**

1. Potential impacts on Kingston water supply – risk of contamination



## PK16 Swanworth Quarry Extension – Key Issues

### **Restoration**

1. Needs to be finalised – restoration to agriculture, or to more natural features, dry coombe?

## PK02 Blacklands Extension – Key Issues

### **Landscape/Visual**

1. Impacts on AONB and on World Heritage Site

### **Biodiversity:**

1. Impacts on wildlife

### **Public Access impacts:**

1. Very close to Priests Way – affecting users of the track

### **Amenity**

1. Close to residences at Blacklands – potential for noise, dust impacts, diesel fumes

### **Site Working:**

1. Increased use of heavy equipment

## PK15 Downs Quarry Extension – Key Issues

**Already permitted – to be removed from Draft Mineral Sites Plan**

## PK17 Home Field – Key Issues

### **Public Access impacts:**

1. Potential impacts on Priest's Way

### **Amenity**

1. Impacts on nearby residences

## PK18 Quarry 4 Extension – Key Issues

### **Landscape/Visual**

1. Impacts on AONB and on World Heritage Site

### **Biodiversity:**

1. Impacts on wildlife

### **Public Access impacts:**

1. Very close to Priests Way – affecting users of the track

### **Amenity**

1. Close to residences at Blacklands – potential for noise, dust impacts, diesel fumes

### **Site Working:**

1. Increased use of heavy equipment

## PK19 Broadmead Field – Key Issues

### **General:**

1. Site is in Worth Matravers, should be identified as such.

### **Biodiversity:**

1. Maintain buffer between site and adjacent SNCI

### **Amenity**

1. Working this site will lead to noise, dust, visual, pollution and traffic impacts

## PK19 Broadmead Field – Key Issues

2. Excessive overburden would lead to visual impacts, which could be cumulative
3. The Plan does not make explicit reference to the need to provide proper protection against the impacts of mineral working

### **Site Working:**

1. There are existing water mains and abandoned water tanks at the south of the site - these should be retained and relevant provisions provided in the development guidelines.

### **Cumulative Impacts**

1. Designating this site would lead to cumulative impacts, with PK21 and service yards in the vicinity.

### **Amenity**

1. Significant impacts caused by this and other sites on the local amenity
2. There are a number of households in close proximity – will be affected, including cumulative impacts

## PK21 Gallows Gore – Key Issues

### **General:**

1. Proposal is blighting the neighbouring properties, and affecting their sale
2. A phased quarrying approach is suggested, to minimise impacts especially cumulative impacts
3. No need for all the quarries in this area – where is the justification?
4. Site is in Worth Matravers, label as such.
5. There are other more suitable options for Purbeck Stone supply
6. Reservoirs/water mains to the north
7. Why was PK08 Quarr Farm removed while Gallows Gore remains?

### **Biodiversity:**

1. Impact to verges of Haycrafts Lane
2. Impacts on wildlife

### **Amenity**

1. Impacts on local residences – noise, dust, visual impacts
2. Relatively high level of impact due to number of properties adjacent or in the vicinity of the site

### **Landscape/Visual**

1. Impact on AONB - Dorset AONB Team considers that the use of Gallows Gore is likely to produce adverse effects of on the natural beauty of the AONB
2. Residual impacts could be harmful to the character and appearance of the AONB, due to the visibility of the sites along and across the Corfe Valley and from the Purbeck Ridge. This is because development within the site area would notably extend the existing pattern of Purbeck Stone quarries along the upper slopes of the Valley and into a relatively exposed location on the north facing upper slopes, resulting in relatively widespread visual impact
3. Visual impacts of a quarry

### **Heritage:**

1. Historic underground stone extraction parts of the site, **possibly** – risk of damage to nearby houses

### **Site Working:**

1. Specific criteria identified by Wessex Water to ensure no impact on critical infrastructure including reservoirs and trunk mains, also distribution mains located within the access

## PK21 Gallows Gore – Key Issues

highway, which may require protecting from any construction loadings and temporary works. To be referred to in Development Guidelines

- provision of in-depth details of proposals
  - detailed pre-assessment of risks
  - working method statements identifying required protection measures and buffer/no-work areas
  - vibration monitoring
  - possible indemnity
2. Working this site will lead to noise, dust, visual, pollution and traffic impacts
  3. Excessive overburden would lead to visual impacts, which could be cumulative
  4. The Plan does not make explicit reference to the need to provide proper protection against the impacts of mineral working
  5. May not be able to mitigate impacts
  6. Mitigation – standoffs – reduces the mineral to be extracted
  7. Site working taking 16 years just extends the problems
  8. Mitigation – bunds – are also visual impacts on neighbouring residents

### **Traffic/Transport**

1. Developing this site will cause impacts on Haycrafts Lane, and on other users of the road – horses, pedestrians, caravans, motor-homes
2. Mud/dirt on the road will cause hazards
3. Not suitable for heavy vehicles
4. Damage to verges
5. Haycrafts Lane narrow, not a good access. Previously ruled out as access, so inappropriate to propose it again.
6. Access to Landers would cross Wessex Water main

### **Cumulative Impacts**

1. Designating this site would lead to cumulative impacts, with PK21 and service yards in the vicinity.

### **Hydrology**

1. Increased risk of flooding
2. Water flows down Haycrafts Lane

### **Amenity**

1. Significant impacts caused by this and other sites on the local amenity
2. There are a number of households in close proximity – will be affected

### PK21 Gallows Gore – Key Issues

3. Cumulative impacts, due to number of quarrying operations in the area, due to number of quarrying operations in the area
4. Loss of property value

#### **Economic**

1. Impacts on local tourism-based businesses
2. Loss of value for properties around the site

### BS05 – Whithill Quarry – Key Issues

#### **Biodiversity:**

1. Ecological assessment required to ensure no impacts on Honeycombe Wood SNCI