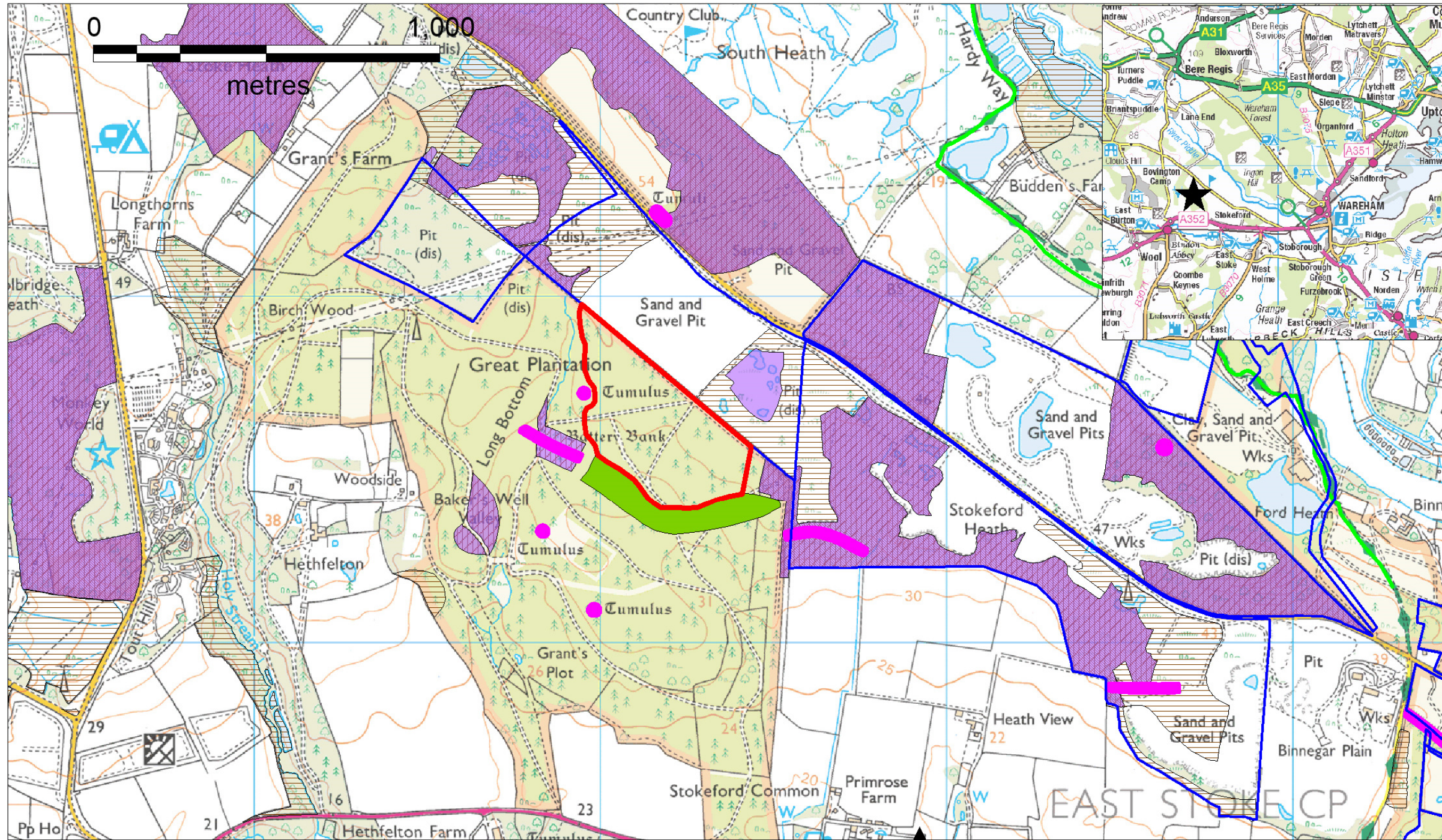


Bournemouth, Dorset and Poole Draft Mineral Sites Plan

Site Assessment of AS06 – Great Plantation



AS06 - Great Plantation

- Nominated site
- Mitigation Corridor
- Permitted Mineral Site

- Public Right of Way - Footpath
- Public Right of Way - Bridleway
- Scheduled monument
- Listed building
- SSSI + SPA + SAC + Ramsar

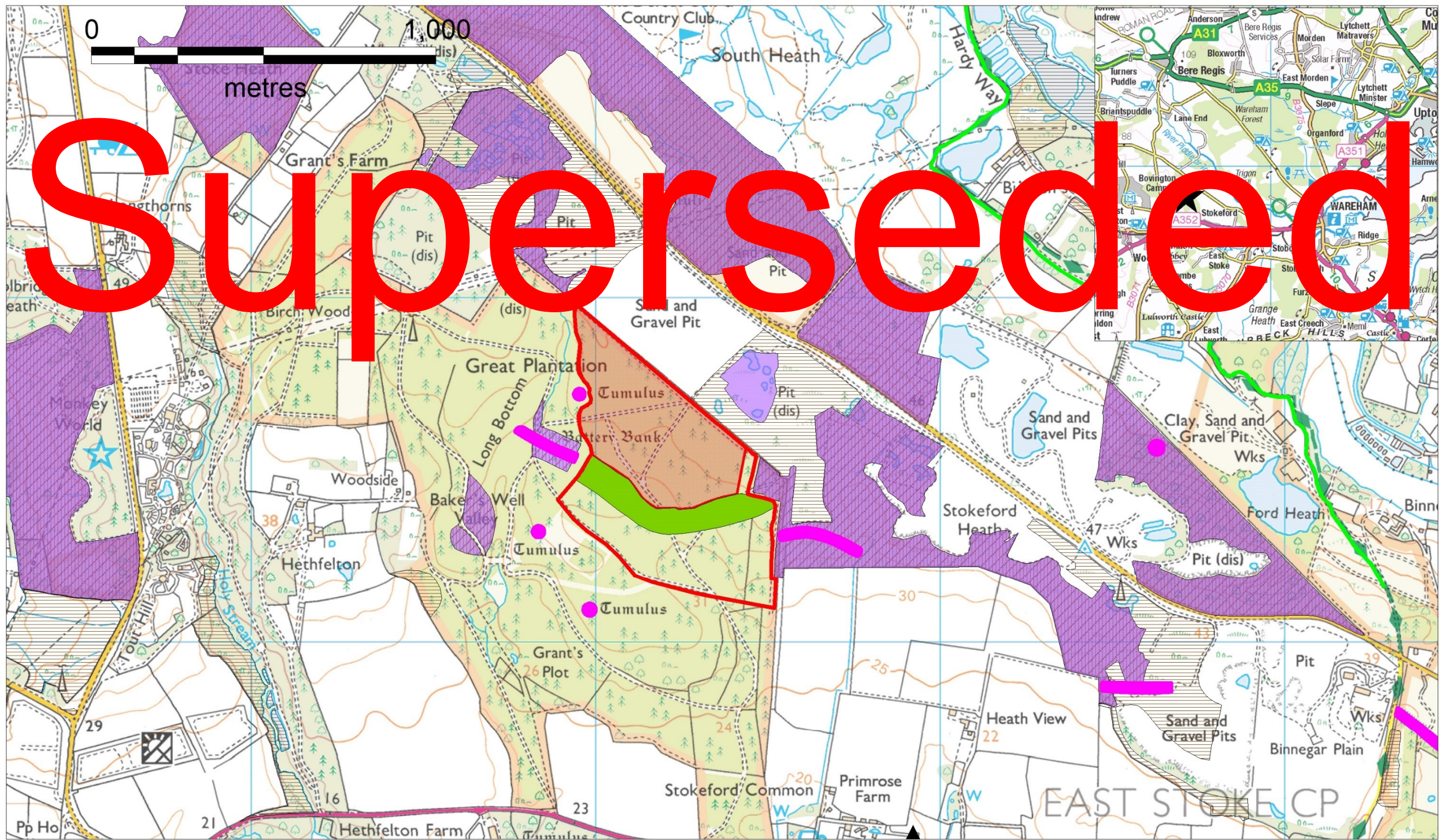
- SSSI
- SPA
- SNCI
- SAC
- Ramsar

★ Site location on Inset Map

GEOGRAPHICAL INFORMATION SYSTEMS











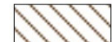
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AS06 - Great Plantation

-  Nominated site
-  Extraction area
-  Mitigation corridor

-  Public Right of Way - Footpath
-  Public Right of Way - Bridleway
-  Scheduled monument
-  Listed building
-  SSSI + SPA + SAC + Ramsar

-  SSSI
-  SPA
-  SAC
-  Ramsar

 Site location on Inset Map

GEOGRAPHICAL INFORMATION SYSTEMS



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Site Assessment of AS06 – Great Plantation

Site Information

Site Location	Great Plantation - land to the south of Puddletown Road, adjacent Hyde Pit, Puddletown Road, Stoke Heath, Wareham, Dorset Grid Reference: SY 860 884
District/Borough	Purbeck District Council
Parish/Town Council	East Stoke CP
Site Nominee/Owner Landownership issues? Any Mineral Operator interest	Nominees: Hanson and Forestry Commission Landowner: Forestry Commission Site is promoted by Hanson.
Mineral Planning History Is the site an extension to existing site? Has it been considered for minerals development in the past? Partly worked?	Part of the site was identified as a Preferred Area for sand and gravel extraction in the 1999 Minerals and Waste Plan. Not previously worked.
Legal or time-related constraints	None known.
Access to markets?	As for current Hyde Pit – access directly onto Puddletown Road.
Does the sequential test for flooding indicate that the site is appropriate for the proposed use?	Yes, site is entirely within Flood Zone 1.
Agent	SLR Consulting
Is there geological evidence of the presence and viability of the mineral?	Yes, site has been drilled.
Development proposed	Sand and gravel extraction - extension to adjacent Hyde Pit quarry Sites area is approximately 14.6 ha, and total resource is approximately 2,000,000 tonnes Estimated annual output will be around 200,000 tpa. Expected life of operation will be around 10 years Restoration will be to heathland and forestry, at a lower level
Description of Site	Site is currently commercial conifer woodland with some heathland.
Summary of Site Designations/Constraints	There are no designations on the area proposed for extraction, although there are European and RAMSAR site in close proximity. There are also Scheduled Monuments in close proximity Site is Dedicated Access Land.
Relevant Local Planning Policy	Planning Purbeck's Future – Purbeck Local Plan Part 1 – Adopted November 2012 Policy BIO – Internationally Important Nature Conservation Sites Policy BIO – Sites of Special Scientific Interest Policy DH – 400m Heathland Buffer Zone
Residential properties and other land uses in the vicinity of the site	Closest properties are approximately 500m distant, with others within 1000m. Sites is relatively remote and screened from the properties.
Traffic Generation & Access Considerations	Site is adjacent to Hyde Pit, which is where the extracted aggregate will be processed, before being distributed via the Puddletown Road. It is expected that Great Plantation will be worked after Hyde/Hines are completed, so will not in itself lead to any intensification in traffic. Traffic will be mainly coming from/going to the A35/A31, at Bere Regis. Traffic movements would be expected to be approximately 80 movements per day.

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Site Assessment of AS06 – Great Plantation

Appraisal of Site – Using Site Assessment Criteria as set out in The Bournemouth, Dorset and Poole Minerals Strategy 2014

In Appendix 1 (p. 242) of the Minerals Strategy a methodology for assessing sites nominated or identified for consideration as future quarry sites is set out. Each site is assessed against 25 criteria, C1 to C25, reflecting the potential environmental, economic and social impacts/benefits of its development. Assessment is qualitative, and each criterion is given a score as a colour, representing its expected impact, with or without mitigation. These criteria and their responses are set out below, along with further comments from relevant consultees.

Topic: Biodiversity.

SA Objective: To maintain, conserve and enhance biodiversity.

Criterion C1 - Impact on European/international designations.	A
Mineral extraction from within the proposed area may lead to effects on European/international designations from proximity and displacement of recreation. There may also be effects on species typical of European sites (including smooth snake, sand lizard, Dartford warbler, nightjar and woodlark) and for these reasons the site will need further assessment under the Habitats Regulations at the point when planning consent is sought. The revised site boundary will undoubtedly lead to smaller potential effects but these still cannot be discounted. Dorset County Council 30/10/17	
Possible Mitigation: Mitigation should include an offsite heathland support area to provide compensatory habitat for Annex 1 birds which may be functionally linked to the Dorset Heathlands SPA. Restoration will also be key and the emphasis should lie on creation of heathland rather than replanting for forestry.	
Criterion C2 - Impact on areas used by Annex 1 bird species.	A
The area supports Annex 1 birds which contribute towards the function of the adjacent Dorset Heathlands SPA. Although the new area is much smaller than the original proposed, further assessment of the proposals under the Habitats Regulations will be needed. Dorset County Council 30/10/17	
Possible Mitigation: Risk based approach essential here. Provision of an offsite heathland support area will compensate for effects on Annex 1 birds. Restoration to heathland (rather than forestry plantation) will also ensure potential benefits to Annex 1 birds are realised after mineral extraction is complete.	
Criterion C3 - Impact on national designations.	A
The area is likely to support a rich invertebrate assemblage in the existing rides which contributes to the maintenance of populations of these species within the adjacent SSSI. Ecological assessment (Phase 2 invertebrate surveys) will be needed to fully assess the impacts of mineral extraction to ensure the proposals do not lead to unacceptable impacts. Dorset County Council 30/10/17.	
Possible Mitigation: Restoration to heathland rather than forestry plantation will be key in mitigating effects on species linked to the SSSI. If the overall area of open heathland is increased there is potential to increase key invertebrate populations.	
Criterion C4 - Impact on protected species.	A
The revised site boundary will reduce impacts on protected species, but impacts are still likely. These species include EPS reptiles, Annex 1 birds, and many NERC priority species/UK protected species of bird, reptile and invertebrate. Full assessment of effects on all these species will be needed to ensure proposed mitigation is adequate. Dorset County Council 30/10/17	
Possible Mitigation: Restoration to heathland rather than forestry plantation will be key in mitigating effects on protected species, but may not be enough to fully mitigate effects on European species as discussed in Criterion C1.	
Criterion C5 - Impact on local recognitions/designations, including ancient woodland and veteran trees.	A
There are possible adverse implications for the Stokeford Heaths SNCI to the north of the proposed area. This SNCI has an important role in supporting the species and habitats of the adjacent European and UK sites. Full assessment of the effects on the SNCI will be needed. Dorset County Council 30/10/17	
Possible Mitigation: Through assessment it should be possible to avoid adverse effects on the Site of Nature Conservation Interest	

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Site Assessment of AS06 – Great Plantation

Topic: Geodiversity

SA Objective: To maintain, conserve and enhance geodiversity.

Criterion C6 - Impact on geodiversity.	D
<p>No specific scientific gains or geodiversity enhancements are likely but the exposures may be of interest to the quaternary and tertiary research associations.</p> <p>Dorset County Council 24.10.2013</p>	
<p>Possible Mitigation: none specifically required, but provision should be made so that it will be possible to arrange such visits on request.</p>	

Topic: Landscape

SA Objective: To maintain, conserve and enhance the landscape, including townscape, seascape and the coast.

Criterion C7 – Impact on designated landscapes.	B	C
<p>Less Significant adverse impact</p> <p>Dorset County Council 23 October 2013 6 November 2017</p>		

Criterion C8 – What is landscape capacity to accommodate proposed development.	A	C
<p><i>It is considered that there may be an issue regarding cumulative landscape and visual impacts in relation to the existing workings in the area and in this well used and sensitive part of the AONB.</i></p> <p><i>The site is enclosed by woodland on all sides apart from its eastern edge. Development would not significantly affect the local landscape and visual context (outside the site), but would affect views from the Purbeck Hills; it would extend the extent of quarrying onto the south facing side of the ridge of land running along Puddletown Road, extending the potential visibility of quarries in this area to a wide area of landscape to the south, including the AONB.</i></p> <p><i>Dorset County Council 26.11.2012</i></p> <p><u>The site is spread across a south facing slope, with a total variation of approximately 20m. The scale of excavations, in combination with the orientation of the slope, mean that operations will be visible from elevated locations, such as the Purbeck Hills. From here the development may have adverse effects, when considered individually, as well as cumulative adverse effects in combination and sequence with existing sites. However, the reduced scale of the allocation and proposed landscape buffer along the southern boundary are considered to reduce the potential landscape and visual impacts to an acceptable level. The impact on the open access land will need to be assessed and appropriate mitigation measures built into a comprehensive package.</u></p> <p><u>Dorset County Council 6 November 2017</u></p> <p>Possible Mitigation: <i>If the developer can provide modified proposals that do not cause significant harm to views from the Purbeck Hills, and evidence to demonstrate the effects on these views, the capacity of this site could potentially be increased. Full landscape visual assessment will be required.</i></p> <p><u>Full assessment will be required, demonstrating that working the site would not have an unacceptable impact on the monuments and their settings, and restoration would improve the setting of the monuments.</u></p>		

Criterion C9 – Impact on historic landscapes.	C
<p>Much of the site, with the possible exception of the lower part of Baker's Well Valley, would have been heathland before the woodland was planted. This heathland formed part of the setting of the Scheduled Monuments is referred to in C11. Unsympathetic extraction and quarrying could have a significant negative impact on the setting of these Monuments, but there is the potential for an improvement in that setting through restoration to heathland.</p> <p>Dorset County Council 4/11/2013</p>	
<p>Possible Mitigation: Full assessment will be required, demonstrating that working the site would not have an unacceptable impact on the monuments and their settings, and restoration would improve the setting of the monuments.</p>	

Topic: Cultural Heritage

SA Objective: To maintain, conserve and enhance the historic environment (including conservation areas, historic parks and gardens and other locally distinctive features and their settings).

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Site Assessment of AS06 – Great Plantation

Criterion C10 – Impact on historic buildings.	C
<p>The nearest listed building is Heath View which appears to have a view of the site across fields. Dorset County Council 22/10/2013</p>	
<p>Possible Mitigation: Restoration of the site should restore landscape texture and qualities thus the impact is time limited on this building. Assessment C (Less Significant Adverse Impact) – time limited.</p>	

Criterion C11 – Impact on archaeology.	A	B	C
<p>Four scheduled monuments lie within the boundary of the proposed site. They are located approximately in a line that is oriented north to south. From the north they are SM28379 (a bowl barrow), SM28382 (a section of Battery Bank), SM28380 (a bowl barrow) and SM28381 (another bowl barrow).</p> <p>The three barrows are set on the ridge that runs to the east of Baker's Well Valley. It is assumed that they would have been deliberately placed in these prominent positions at a time when the land cover would have been heathland rather than woodland. The barrows would have been clearly visible from the valley as well as other vantage points in the wider landscape. There is also a water course that runs through the valley and it is likely that the barrows would have been deliberately placed overlooking this. To the east of the barrows, the land is level with no clear edge to the ridge.</p> <p>Since a major part of the setting of the barrows essentially comprises the ridge and the valley to the west, it is important to preserve these landscape elements</p> <p>A section of Battery Bank is also present within the valley. Whilst the section to the east of the track appears well-preserved, the section to the west appears to have been lost. Battery Bank is thought to have consisted of sections historically to act as markers separating the Frome Valley from land to the north. It is unclear whether this section of Battery Bank was placed alongside the barrows deliberately or not.</p> <p>Dorset County Council 4/11/2013</p> <p><u>The proposed quarry would have a major impact on the settings and significance of three scheduled monuments: a Bronze Age round barrow and two sections of the Battery Bank linear earthwork. These three heritage assets are 'landscape monuments' intended by their builders to have a distinctive topographical and visual presence in the landscape. The landscape setting of the monuments is of key importance to an understanding and appreciation of these heritage assets and is a fundamental and significant component of their heritage significance and public value. 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 major adverse changes to the landform and landscape which provides the primary context and setting of the monuments. We consider that these proposals would result in substantial harm to the significance of these designated heritage assets.</u></p> <p><u>We consider that there may be scope for extraction in the area to the north of the Battery Bank and east of the barrow, but the proposals would need significant modification in order to reduce the level of harm to the affected heritage assets to a level where it would be acceptable. 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 in order to restore as far as possible their visual landscape settings.</u></p> <p><u>Historic England 31st January 2018</u></p> <p><u>With appropriate mitigation the impact could be reduced to 'C' Less Significant Adverse Impact; as currently proposed, the impact is likely to be 'B' Significant Adverse Impact.</u></p> <p><u>Dorset County Council 30th April 2018</u></p> <p>Possible Mitigation: Theoretically, extraction that destroyed the Scheduled Monuments would be category A (Very Significant Adverse Impact), but the protection afforded to them and their setting means that much or possibly all the site should be excluded from such quarrying. In my opinion, serious consideration needs to be given to whether any quarrying here is feasible – through assessment and evaluation that considers the Scheduled Monument and their settings and also the impact on other below-ground archaeology. Continuing dialogue with English Heritage is also important.</p> <p>If a compromise can be determined that allows some quarrying within a fraction of this site, the impact could perhaps drop to category C (Less Significant Adverse Impact).</p> <p>Full Heritage Assessment will be required <u>demonstrating that working the site would not have an unacceptable impact on the monuments and their settings, and restoration would improve the setting of the monuments.</u></p>			

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Site Assessment of AS06 – Great Plantation

Topic: Water

SA Objective: To maintain, conserve and enhance the quality of ground, surface and sea waters and manage the consumption of water in a sustainable way.

Criterion C12 -Impact on hydrogeology or groundwater.	A	C
<p>Stream rises within the brought forward area—a score of 'A' applies. Environment Agency—27 February 2013—Dorset County Council—16 October 2013</p> <p><u>Watercourse within 500m of proposed site allocation, as amended. Further assessment required.</u> <u>Dorset County Council 30 April 2018</u></p>		
Criterion C13 – Impact on surface waters.	A	C
<p>There are watercourse(s) running through the site—score of 'A' applies. Environment Agency—27 February 2013</p> <p><u>Watercourse within 500m of proposed site allocation, as amended. Further assessment required.</u> <u>Dorset County Council 30 April 2018</u></p>		
Criterion C14 - Impact on flooding or coastal stability.	E	
<p>Entire site and surroundings is outside of FRZ 2 and 3. No impact from or on flooding score of 'E' applies. Dorset County Council 16 October 2013</p> <p>Possible Mitigation: Full hydrogeological assessment will be required. Developers will have to identify potential impacts on hydrology – ground and surface water - and demonstrate how they could be mitigated.</p>		

Topic: Soil

SA Objective: To maintain, conserve and enhance soil quality

Criterion C15 - Impact on existing soils or land type (including BMV land).	D
<p>The site is not classified as agricultural land. Dorset County Council 16 October 2013</p>	

Topic: Air Quality

SA Objective: To protect and improve air quality and reduce the impacts of noise

Criterion C16 – Impact on AQMAs.	D
<p>No direct impact on AQMAs, score of 'D' (Less Significant Adverse Impact) applies. Dorset County Council 16 October 2013</p> <p>Possible Mitigation: Noise mitigation will be addressed at the planning application stage, with appropriate mitigation to be included in the development of the site.</p>	

Topic: Material Assets (Economic development)

SA Objectives:

- To conserve and safeguard mineral resources.**
- To promote the use of alternative materials**
- To encourage sustainable economic growth**
- To provide an adequate supply of minerals to meet society's needs.**

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Criterion C17 - Impact on economic development.	D
<p>As a relatively large aggregate site, this site nomination would provide significant on-going benefits to the local and wider economy; it will maintain local employment during working and the restoration to forestry/heathland will have some on-going benefits also. It is uncertain whether working would have negative effects on the local economy.</p> <p>Score of 'D' (Less Significant Adverse Impact).</p> <p>Dorset County Council 16 October 2013</p>	
<p>Possible Mitigation: An Environmental Impact Assessment will be carried out as part of any planning application, identifying potential impacts and appropriate responses and mitigation. Appropriate mitigation will be required as part of any site development. This will be identified in the Development Considerations within the Plan. No further action considered necessary at this stage.</p>	

Topic: Social Considerations - Human Health and Amenity, Airport Safety and Cumulative Impacts

SA Objectives: To sustain the health and quality of life of the population

Criterion C18 - Impact on Sensitive Human Receptors.	D
<p>Closest residences approximately 500m to the west, others within 1000 m around site, including Hethfelton House. Site is relatively isolated from residences and has the potential to be well screened.</p> <p>Dorset County Council 16 October 2013</p>	
<p>Possible Mitigation: With further mitigation (noise attenuation and visual screening bunds) impacts on surroundings should be minimal. Dust should not be an issue, and lorry traffic will not have any particular impact on these properties.</p>	

Criterion C19 - Impact on existing settlements.	D
<p>Stokeford lies within approximately 400m of the site, while Wool and Bovington Camp are over 1km distant. The site is unlikely to have any impact on any of these sites. Lorries would travel northwards to the A35 and in so doing may have some impact on Bere Regis. Transport impact is considered separately. A score of 'D' (Less Significant Adverse Impact) is considered appropriate.</p> <p>Dorset County Council 16 October 2013</p>	
<p>Possible Mitigation: if developed, site would be a follow-on from workings at Hyde Pit and intensification is likely to be resisted. A Transport Assessment would be required, identifying possible impacts and appropriate mitigation.</p>	

Criterion C20 - Impact on airport safety	E
<p>Site is over 25 km from Hurn Airport and is to be worked and restored dry. No impact on airport safety.</p> <p>Dorset County Council 16 October 2013</p>	

Criterion C21 - Cumulative impacts.	B
<p>The proposed site would be an extension to current Hanson workings. If the development of the site were timed such that it acted as a replacement for current operations, it would not represent an intensification and would be rated 'B' (Significant Adverse Impact) as it is located in an area of mineral extraction and waste management. If it is to be worked concurrently with other Hanson operations it would be rated 'A' (Very Significant Adverse Impact) as an intensification.</p> <p>The potential for cumulative landscape/visual impacts exists, as the Hyde Pit site would remain open while Great Plantation was worked. This issue should be addressed through the planning application, seeking mitigation such as screening.</p> <p>There are no significant housing or employment allocations in the Purbeck Local Plan Part 1 (adopted Nov 2012) within 5km of the proposed site.</p> <p>Dorset County Council 16 October 2013.</p>	

Topic: Social Considerations – Carbon Emissions

SA Objectives: To adapt to and mitigate the impacts of climate change

Criterion C22 - Impact on carbon emissions	B/C
<p>Although conveyors might be used on the site to move material to the processing plant, all material would be removed from the plant by road.</p> <p>Dorset County Council 16 October 2013</p>	

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Site Assessment of AS06 – Great Plantation

Topic: Social Considerations

SA Objectives: To enable safe access to countryside and open spaces

Criterion C23 – Impact on recreational land	B
<p>Although there are no formal rights of way or formal recreational uses on the site, as Forestry Commission land the site is available for public access. This would be negatively affected during working but after restoration the site could be open to public access again. .</p> <p>Dorset County Council 16 October 2013</p>	
<p>Possible Mitigation: During working alternative arrangements for public access would have to be made available, of a standard and in a location that would not deter current users of the site.</p>	

Criterion C24- Impact on public rights of way	B
<p>There are no public rights of way over or adjacent to the site, but there would be impacts on open access land. This would be negatively affected during working but after restoration the site could be open to public access again.</p> <p>'B' (Significant Adverse Impact) during working, but this would be expected to be temporary</p> <p>Dorset County Council 16 October 2013</p>	
<p>Possible Mitigation: Developer would be required to provide alternative appropriate public access during working, and to ensure access is available again after working.</p>	

Topic: Social Considerations – Vehicular Access

SA Objectives: To minimise the negative impacts of waste and minerals transport on the transport network, mitigating any residual impacts

To support and encourage the use of sustainable transport modes, imposing no unmitigated negative impacts on them.

Criterion C25 - Are the access proposals acceptable	C	B
<p>(all comments made on the understanding that this site would be worked as a follow-on from extraction/sales in Hyde Pit (including Hines Pit sand), using the processing plant and access established to serve that site).</p>		
<p>This proposal is for a large extension to an existing operation south of Puddletown Road. It is expected that an existing access would be used although it may be possible to provide a new access as long as it met the required visibility, geometry and surfacing requirements. Access to the strategic network is gained via the C6 and Bere Regis to the west or via the A352 and A351 to the East. It is expected that the proposed extraction will follow cessation of other work on neighbouring sites and that the estimated 120 trips per day will therefore not be an increase over existing trip generation.</p> <p>If the proposed site comes into operation after other works cease so that there is negligible increase in traffic then the site would have a C rating. However, should the site come forward in parallel with current operations, there will be increased impact and the site would be considered to have a B rating. When the site comes forward, detailed traffic information will need to include vehicle routing and a consideration of impact along those routes.</p> <p>Site rating if started following cessation of other extraction: C (Less Significant Adverse Impact) Site rating if operated in parallel with existing extraction: B (Significant Adverse Impact) (Dorset County Council 29 October 2013)</p> <p>Extension to existing quarry. Access unchanged and continuation acceptable (Dorset County Council - 31 January 2017).</p>		
<p>Possible Mitigation: If developed, site would be a follow-on from workings at Hyde Pit and intensification is likely to be resisted. A Transport Assessment would be required, identifying possible impacts and appropriate mitigation.</p>		

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Public Rights of Way

DCC Rights of Way

In 2008 comments received noting the site is open access, and Rights of Way had no comment.
Consulted on 31 October 2016; John Williamson responded 1 November 2016 but did not include comments on AS06 Great Plantation;
Consulted again 5 April 2017 to check they really do not have any comments.

Highways England (22 December 2016)

- We note that this is expected to be a follow-on of the working of the existing Hyde and Hines Pits. The information provided states that this would result in no additional traffic given the follow-on nature of the operations.
- We presume that the level of extraction, operating hours and load per HGV will remain the same. Otherwise there is the potential that additional traffic could be generated.
- We note from the Sustainability Appraisal that a Transport Assessment is to be produced.

Comments from Natural England

2008 Comments

The site should not be taken forward as it is presented. A much smaller allocation together with a wider heathland restoration plan could be considered.

The site is heavily constrained. At the very least the central section of the site would need to be excluded from the working area. It includes Dorset Heath SAC and SPA and a number of tumuli, the setting of which should be preserved. There are also nightjar and populations of protected reptiles and quarrying would have impacts on these species. To mitigate, much larger permanent open heathland areas need to be established within the current area of plantation for these species. Thus if the site is considered for aggregates this should be in the context of an overall nature conservation plan for the forest block, so that the quarried areas were set within heathland rather than forestry. The proposal could be further explored on this basis together with a very much smaller area of mineral winning.

The mix of quarries and heathland along the Puddletown Road has high biodiversity value and if this could be reproduced within Great Plantation following extraction then the restoration would have a high biodiversity value. However, virtually all quarried areas have long term management problems particularly with invasion of gorse. And of course the current restoration proposal includes forestry that would lessen the value of the restoration. There would also be a significant loss in naturalness with the original landforms and hydrology that are so characteristic of heathland being lost.

2014 Comments

We commented on this potential site in 2008. However there have been changes in circumstances since then such that we now doubt that that mitigation would be able to cancel the negative effects of any scheme so that it would be compliant with the Habitats Regulations and with the Minerals Core Strategy.

The changes are firstly those concerned with Annex 1 birds outside of SPAs where we provided advice on the implications of the Rufford case (letter of 27/09/2011) in our comments on the revised Draft Minerals Core Strategy. These comments apply particularly to this site and are reflected in the Site Assessment Pro Forma comment under criterion C2. The second change concerns developments in case law on the European Protected Species issue as explained above.

The precise nature of the main Habitats Regulations issues would depend on the extent of working. I have assumed below that direct effects would be avoided since otherwise, as stated in the Pro Forma under C1, adverse effects on site integrity are inevitable. Apart from any direct effects therefore the main Habitat Regulation issues here would be:-

Displacement of recreation: whilst the use of the site may be low compared with some other FC areas this does not mean that it is not a critical issue. Even in the event that it was not considered significant alone there would still be an 'in combination' test (both in relation to all, and specific parts of the Site Allocation Plan and potentially at application stage) as explained above.

Species: functional links between species using SAC/SPA areas in the vicinity of any mineral working and the area of the development itself are highly likely for birds, reptiles and invertebrates. For example, Nightjar use the wider heath/forest area as well as the SPA so it is hard to see how 'SPA birds' would not be adversely affected by mineral working in this area. Similarly, typical species of the SAC – rare reptiles, invertebrates – will have both populations and individual ranges that transcend the designated site boundaries again making it difficult to see how working in the wider heath/forest area would not be detrimental particularly as the two small SSSI/SAC/SPA fragments would be vulnerable to being isolated.

Proximity: this is potentially an issue depending on the exact area worked.

The issues involving the separate Habitat Directive/Regulations tests for EPS are particularly relevant here given the potential widespread distribution and abundance of sand lizards and smooth snakes in the general area. Thus Articles 12 and 16/Regulations 41/53 need to be considered in relation to any allocation in the Minerals Sites Plan.

For Annex 1 bird species, in addition to likely functional links with the SPA, we would agree with the need for a risk based approach as stated in the Pro Forma under Criterion C2.

The restoration potential of the site without minerals working needs to be considered.

In the light of all of the above constraints it is hard to see how this site could be progressed without breach of Minerals Core Strategy policy, with statutory tests being met and without major detriment to biodiversity.

2015 Comments

Natural England are concerned about this proposal but find it difficult to make useful comment because of the uncertainty about what is being proposed. The plan accepts that the area shown within the red line cannot be the full extent of any allocation in the Plan if indeed any allocation here is to be progressed at all. We find this a strange state of affairs since we, and other consultees, first raised serious concerns about this proposed allocation in the consultation in 2008 and these were repeated in 2014.

These comments from 2008 and 2014 still apply and I will not repeat those here but would add that the Environmental Damage Regulations 2009 are also relevant in that they apply both to SSSIs, Annex 1 habitats and the habitats of birds listed on Annex of the Birds Directive.

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Site Assessment of AS06 – Great Plantation

We have tried to tailor our comments more specifically to the possibility of a smaller allocation in the northern part of the large allocation area. Any assessment of impacts also needs to take account of dynamic nature of the distribution of habitats and species within the area with significant changes continually taking place, driven mainly by the cycle of felling and replanting.

Direct loss of SAC/SPA/Ramsar/SSSI. We assume that any reduced area would not include any of parts of these designated sites so there would no longer be any effect.

Hydrological effects. Neither of the two small SSSI units within Great Plantation itself support mire or wet heath although the unit It is unlikely therefore, provided there was a relatively small buffer, that there would be a major hydrological issue for these areas. Mires within other parts of the SSSI and SAC to the north are further away but possible working areas could still be within their catchments depending on the movement of groundwater. Also significant might be the part of the SSSI to the north east (unit 7) which is not part of the international sites but does support an area of wet exposed peat supporting a rare plant – marsh clubmoss - that is one of the SSSI interests. Negative hydrological effects would be possible from new working adjacent to this area.

Displacement of recreation. This could be either a shift in the pattern of use within Great Plantation so that areas around the designated sites are more heavily used or a shift of use to other more designated heathland sites elsewhere. It is of course the case that a reduced area in the northern part of the site (further away from access points) would lessen the effect from this mechanism and that overall Great Plantation is not heavily used by the public. Nevertheless displacement is likely to be a permanent impact, not limited only to the period of operation, since disused workings are likely to be less attractive for recreation than the current situation. We note also that the HRA has determined that 'in combination' effects are not relevant when in fact, for this issue, the 'in combination' test is particularly relevant. This is because there have been, and continue to be, numerous development proposals (mainly residential development) that could increase recreational and other pressures on these designated heaths. In order for these to meet the Habitats Regulations tests, policy is in place so that cumulatively there is no significant effect and this is achieved by ensuring there is no net increase from each individual development (either through mitigation and avoidance measures or through refusing the application). Since displacement of recreation has a similar effect of increasing recreation pressure in our view the in combination test applies and as a result, similar policy requirements also apply. In theory, mitigation of a similar type to that required in the heathlands SPD is possible (eg off-site SANGs) to avoid any adverse effect.

Habitats regulation and species issues related to protected sites. Functional links between species using SAC/SPA areas in the vicinity of any mineral working and the area of the development itself are highly likely for birds, reptiles and invertebrates. Through this mechanism working outside the SAC/SPA is likely to effect the integrity of the European sites themselves. For example, Nightjar use the wider heath/forest area as well as the SPA (8 nightjar territories were recorded in and around the Great Plantation allocation area in the most recent national survey in 2004; each of the three small SSSI areas held a nightjar territory in a 2010 survey). Similarly, typical species of the SAC – rare reptiles, rare invertebrates – will have both populations and individual ranges that transcend the designated site boundaries. Reptiles will use rides and open areas linking sites again making it difficult to see how working in the wider heath/forest area would not be detrimental particularly as the two small SSSI/SAC/SPA fragments would be vulnerable to being isolated.

Protected species issues. We have previously commented on this issue in some detail. Essentially for European Protected Species in the event of breeding sites and resting places being damaged or destroyed by a development (for rare reptiles it is likely to be difficult to find any substantial allocation in Great Plantation where this would not be the case) then planning authorities must determine whether the proposed development meets the requirements of Article 16 of the EC Habitats Directive (and equivalent in the Habitat Regulations) before planning permission is granted. In considering whether a site should be taken forward in the Minerals Site Plan we would therefore recommend that the MPA needs to consider themselves the likely outcome of the application of these tests. We would be happy to advise on the application of these tests if a more specific allocation site is considered.

Annex 1 (Birds Directive) birds outside the Dorset Heathlands SPA. We have previously commented on this issue and provided advice on the implications of the Rufford case (letter of 27/09/2011) in our comments on the revised Draft Minerals Core Strategy. The Core Strategy includes reference to the need to consider this issue (paras 16.32 and 33). Moreover, habitats of Annex 1 birds outside the SPA are covered by the Environmental Damage Regulations (see Schedule 1). In the light of the widespread distribution of nightjar in particular through Great Plantation this issue is very relevant to any possible allocation there.

Restoration Potential Great Plantation is a heath/forest area that has high potential for the restoration of priority heathland habitats from forestry without the need for aggregate extraction. An analysis of the potential for heathland restoration in Dorset by RSPB and NE has indicated that Dorset presents perhaps the best opportunity nationally for this type of habitat gain. Restoration of priority habitats of this type is supported by Government policy (When to convert woods and forests to open habitat in England: Government policy. March 2010).

For several reasons we do not consider that heathland establishment after minerals working is an adequate substitute for this restoration. Establishment of wet heath and mire – a critical part of the heathland mix - has not so far been successfully achieved although certain elements of dry heathland systems are easier to establish and some suites of species will undoubtedly benefit. Success in restoring dry heath has been variable and is not guaranteed and it is almost inevitable that to maintain the wildlife interest after quarrying, long term management costs will be much greater. Finally there is inevitably a loss of naturalness – an important criterion in the evaluation of nature conservation sites – and in particular for a heathland system loss of the mosaic of different habitats reflecting hydrology and the natural geology.

In conclusion, the net effect of all of the constraints discussed above is that it will be extremely difficult to find an area within Great Plantation where aggregate extraction would not be in conflict with NPPF policy, Minerals Core Strategy policy and Habitats Regulation tests, both for habitats and species and we would therefore question how it is concluded that it is expected to be a sustainable option.

The condition of the areas in the north of Great Plantation, adjacent to the existing Hyde Pit, does not suggest an easy answer in this regard. This land includes permanent heathland links between different parts of the SAC/SPA, other heathland rides providing significant habitat links, areas of fairly recently felled forestry with many open areas with heathland vegetation, as well as areas of mature trees due to be felled in the next few years. Incidentally the allocation map is incorrect in its depiction of the state of play of existing planning permissions in areas north of Great Plantation as it takes no account of Modification Orders or other agreements/unilateral undertakings associated with new permissions that have altered the position. Nevertheless there remains one existing heathland area which does still have a valid planning permission and in this respect we would support the intention to consider any new development in conjunction with these (this issue should also be included within the development consideration in the Appendix).

2016 Comments

Site not consulted on in 2016

Historic England Comments

2014

This site contains a number of nationally important Bronze Age barrows and it does not appear that substantial harm to their significance can be avoided.

2015

Numerous designated assets and their settings are directly affected.

Bournemouth, Dorset and Poole Draft Mineral Sites Plan

Site Assessment of AS06 – Great Plantation

Historic England Comments

Historic England suggests the text is more precise in expressing the relevant heritage considerations particularly the potential restoration enhancements. The Site Assessments and Sustainability Appraisal highlight the critical heritage considerations to be met to satisfy the Minerals Strategy and its development management policies. Could these matters be précised and their source cross referenced in the 'Development Considerations' section in the Appendix? At present they don't appear to correlate.

The Site Assessment states "... protection afforded to them and their setting means that much or possibly all the site should be excluded from such quarrying. In my opinion, serious consideration needs to be given to whether any quarrying here is feasible – through assessment and evaluation that considers the Scheduled Monument and their settings and also the impact on other below-ground archaeology. Continuing dialogue with English Heritage is also important. (Criterion C11 – Impact on archaeology, Dorset County Council 4/11/2013). Is the LA able to provide an update and response to this critical matter?

Bullet point number 4 in the 'Development Considerations' section of the Appendix states "Impacts on heritage/archaeology are a key issue, to be assessed and appropriate mitigation identified and implemented". This criterion is inconsistent with national planning policy for the historic environment and the adopted Dorset Minerals Strategy.

In addition to the suggested précises of the specific heritage considerations referred to in the SA and the Site Assessments the following generic text could be used:

"Heritage and archaeology matters are important considerations. The significance of the affected heritage assets and their setting must be understood to ensure their significance is safeguarded".

2016

Site not consulted on.

Environment Agency Comments

2015 Comments

No objection to proposals and no further comments over and above those previously made in earlier consultations, which are provided below (18 September 2015)

Environmental Constraints:

- Flood Zone 1
- Area of SSSI/ SPA/ SAC/ Ramsar in site
- Ordinary watercourses running through site

June 2014

Studies required and issues to consider

- Hydrogeological assessment – at planning application stage.
- Ecological study – at planning application stage.
- Flood Risk Assessment – at planning application stage.
- Protect and enhance water features in site.

Flood Risk

Detailed FRA for all work phases including restoration is required at (or before) planning application stage. The prior written Land Drainage Consent is required from the LLFA (DCC) for works that could affect the flow of an ordinary watercourse.

January 2014

No objection.

Our previous comments provided on the 12 Dec 2008 and 27 Feb 2013 are still relevant. However, we wish to make the following additional comments.

We are aware that an SEA is being prepared but urge the applicant to ensure that the following issues are included: -

- Proposals which maximise the wetland restoration opportunities at each site
- Water Framework Assessments (WFD) as necessary and will contribute to the relevant River Basin Plan objectives.
- Proposals should maximise the overall wetland gains.
- EIA/Restoration proposals should incorporate gain of wetland features which will contribute to the aspirations of the England Biodiversity Strategy.

We agree with the criteria classification C12, C13 and C14 for this site, which is given in the supporting documents.

November 2013

Not included in list of minerals sites, so no comments provided.

February 2013

No objection

EA 12/12/2008 response still relevant, together with the following additional comments:

Sections of Stokeford Heaths SSSI, which is a component of the Dorset Heaths SAC, Dorset Heathland SPA /Ramsar lie within the proposed site and an Appropriate Assessment may be required

Large development with potential for significant impact on SSSI and water features. Will require hydrogeological assessment. Isolation of SSSI pockets will potentially dewater these 'islands' – so will impact any wet heath / mires in these areas.

EA estimate of assessment criteria

C12 – A. Stream rises within the brought forward area, so presumably Criterion A applies.

C13 – A. Watercourse(s) running through the site.

Bournemouth, Dorset and Poole Draft Mineral Sites Plan

Site Assessment of AS06 – Great Plantation

Environment Agency Comments

December 2008

No objection provided areas of SSSI/ SPA/SAC/Ramsar are excluded from the extraction activities.

Lead Local Flood Authority (LLFA) Comments

No grounds for objection, subject to detail:

The site falls entirely within Flood Zone 1 (low risk – fluvial flooding) according to the Environment Agency's relevant flood modelling. However it is shown to be at some theoretical risk of surface water flooding, by relevant mapping, which indicates well defined overland flow paths, aligned approximately north-south, during severe rainfall events (1:100/1000yr).

Surface water runoff would appear to gravitate south towards a principle receiving (Ordinary) watercourse, which is conveyed beneath the A352 west of Stokeford, at Hethfelton Hollow.

A site specific strategy of surface water management should be requested that does not increase rates of runoff or generate off site worsening. As such the proposed activity should comply with the recommendations of the NPPF.

Prior Land Drainage Consent may be required from DCC as relevant LLFA, for any works offering an obstruction to flow within a channel with the status of Ordinary Watercourse (21 December 2016).