

The Inspector for the Dorset
Minerals Plan
c/o Mrs Christine Self

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14/11/18

Dear Inspector Ord

RE: FRAME response to

(a) the Addendum Sustainability Appraisal (MSDCC-82) (“the Addendum SA2); and

(b) the two transport assessments which consider Cluster 4 (MSDCC 35 and 36)

Please find enclosed (1) a detailed response to both of these issues.

An overarching point we wish to make is that the Addendum SA screening document produced by the MPA uses the word “potential” 134 times when referring to risk, impact, effects etc. This is in itself an illustration of severe cumulative impact. In any event the MPA cannot claim that the Minerals Plan for Cluster 4 can be “robustly” defensible and therefore the plan is not sound and nor can it be made sound. Our enclosure provides evidence for this assertion.

Further, NPPF (2018) para. 32 reiterates the legal obligation to produce a sustainability appraisal and continues: “*Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued*”.

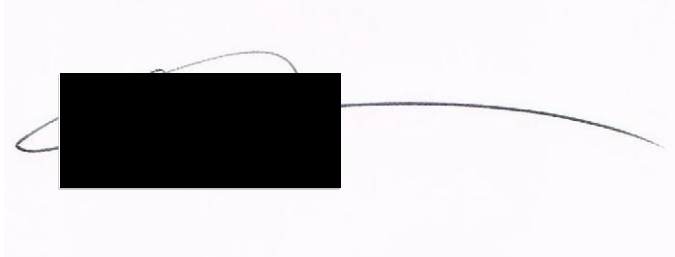
It is now clear from the Addendum SA that the MPA’s initial assessment of the adverse impacts arising from cluster 4 was incomplete – one need only look at the amount of additional impacts noted in the Addendum SA to realise this.

The further consequence is that there has been no assessment of alternative options in the context of the true harms arising from cluster 4; that is, in the context of the fuller picture of impact which we now have in the Addendum SA. As such, it cannot be said that the MPA have properly considered “*alternative options which reduce or eliminate such [adverse] impacts*” because they were starting from the wrong premises and using an incomplete assessment. In turn, you cannot be satisfied that cluster 4 represents the least harmful option in accordance with the NPPF.

Finally, a point raised by you during the examination hearing was about the status of the Dorset National Park proposal. FRAME has been made aware that a new draft prospectus has been produced. A copy is enclosed (2). We would invite you to

consider this and to consider how far the MSP is consistent with the values which the National Park proposal highlights, for example the cultural heritage of Thomas Hardy and Dorset's natural capital. In our view it is wholly inconsistent.

Yours Sincerely

A handwritten signature in black ink, which has been partially obscured by a black rectangular redaction box. The signature appears to be 'Clarice Wickenden'.

Clarice Wickenden
Chairman of FRAME

Two lines of contact information, likely a phone number and an email address, which have been completely redacted with black bars.

Enclosures:

1. FRAME's detailed response to the Addendum Sustainability Appraisal (MSDCC-82) ("the Addendum SA2) and the two transport assessments which consider Cluster 4 (MSDCC 35 and 36)
2. A prospectus for a Dorset National Park

Copy Addressee: Mineral Planning Authority, Dorset County Council.