



Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan

Modifications to the Pre- Submission Draft

Representation Form

This form should be returned by **5:00 pm** on **20th June 2019** to the address at the end of the form, or via email to mwdf@dorsetcouncil.gov.uk Additional copies of the form can be obtained from the Dorset Council website: www.dorsetcouncil.gov.uk/mineral-sites

Late representations cannot and will not be accepted.

- The Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan was previously known as the Bournemouth, Dorset and Poole Mineral Sites Plan.
- **All documents and copies of this form are available at** www.dorsetcouncil.gov.uk/mineral-sites
- **During this consultation you can comment on the modifications proposed to the Pre-Submission Draft Mineral Sites Plan.** The modifications are set out in the Schedule of Modifications and in the 'Modified Mineral Sites Plan'. They include main modifications necessary for the Mineral Sites Plan to be capable of being found 'sound' and additional modifications, which do not impact on whether the Plan is 'sound' or not. Main modifications are written in underlined red text and have the prefix 'MM' Additional modifications are written in underlined red italics and have the prefix 'AM'.
- If your representation does not relate to a modification it will not be valid.
- Please make it clear which modification your representation relates to – reference numbers can be found in the Schedule of Modifications and are written in brackets in the Modified Plan.
- A separate representation form should be provided for each modification commented on.
- You can also choose to comment on the sustainability appraisal and habitats regulations assessment
- The Planning & Compulsory Purchase Act 2004 (as amended) states that the purpose of the Examination is to consider whether the plan complies with legal requirements, the duty to co-operate and is 'sound'. Your comments on the modifications must therefore relate to these matters.

To be 'legally compliant':

Any comments which you wish to make on the way in which the Council has prepared the published plan must relate to matters of legal compliance, which include, in particular, whether the plan:

- ▶ has been prepared in accordance with the Local Development Scheme; the Statement of Community Involvement and the Town & Country Planning (Local Planning) Regulations 2012;
- ▶ has been subject to sustainability appraisal; and
- ▶ has had regard to national policy.

To be 'sound' a local plan should be:

- ▶ Positively prepared – Does the plan seek to meet objectively assessed needs for minerals; take account of unmet requirements from neighbouring/other authorities where it is reasonable to do so, and achieve sustainable development?
- ▶ Justified– Does the plan provide the most appropriate strategy when considered against reasonable alternative options?
- ▶ Effective – Do you think that the policies in the plan are capable of being delivered during the plan period?
- ▶ Consistent with National Policy – Does the plan enable the delivery of sustainable development in accordance with the National Planning Policy Framework?

This form has two parts:

Part A - Personal details (please only fill in Part A once);

Part B - Your representation(s) – Please fill in a separate sheet (Part B) for each representation you wish to make.

Please send in Part A and all representations together.

Part A – Respondent Details

	1. Personal Details	2. Agent's Details (for use only when using an agent)
Title	██████	
First Name	██████████	
Last Name	██████	
Job Title (where relevant)		
Organisation (where relevant)		
Address	████████████████████ ██████████████████ ██████████████	
Postcode	██████████	
Telephone	██████████████	
Email Address	██████████████████████████████	

Data Protection:

The information you provide will be used by Dorset Council for the purpose of preparing the minerals and waste local plans. It will only be retained for as long as required for that purpose.

Note that representations, including respondent details, will be forwarded to the Planning Inspector who has been appointed by the Secretary of State to examine the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan. Please be aware that all representations will be made available for public inspection, including on the council's website.

By submitting this form, you are consenting to its use as detailed and you are agreeing for your details to be added to our database. Further information about the use of personal information is available on our web site at www.dorsetforyou.com or by contacting the Council's Data Protection Officer by email at data.protection@dorsetcouncil.gov.uk or by post at RMU, County Hall, Dorchester, DT1 1XJ

Part B – PLEASE USE A SEPARATE FORM FOR EACH REPRESENTATION

1. Please state the modification you are commenting on
(Please complete one sheet per main modification or additional modification)

**Main modification
number:**

MM 2 Part 2 – 1.48mt
10 year rolling
average

**Additional
modification
number:**

AM

2. Do you support or object to the modification

Support

Object

3. If you object to a Main Modification, do you think it fails any of these statutory tests: (Please leave this blank if you are commenting on an Additional Modification)

Legal compliance



Soundness



Compliance with the duty to co-operate



No comment



3(a) If you are commenting on soundness, please indicate which test of soundness?

Positively prepared



Justified



Effective



Consistent with National Policy



4. Please use the space below to provide more detailed comments on the modification

1. MM2 Part 2 discussed the advantage of using 8 LAA 10 year rolling averages to calculate the quantity of aggregate to be produced by existing and allocated quarry sites.

2. MM2 Part 2 concluded that using multiple LAA 10 year rolling averages is better than just using the latest 10 year average which would not take account of variations in the output over a longer period of time.

3. This reflects the fact that quarries can operate for 20 years or more and therefore a longer term assessment would more accurately reflect the approach by site owners and developer in deciding whether to offer a site for extraction.

4. This MM2 Part 3 reviews the projected 10 year rolling averages which are likely from the combination of existing quarry outputs and the outputs of the allocated quarries. In particular this part reviews the validity of the statement in MM2 on the Modified Version of the Pre-Submission Draft Mineral Sites Plan, page 17 (Adobe 18), in the 'green box' that the Plan provides the:

....necessary flexibility should sales rise or allocations not come forward as expected

5. I have added to the chart in MM2 Part 2 with an additional section showing the projected 10 year rolling averages likely during the period 2019 to 2034, based upon my projections in my profiles of the existing and allocated quarry outputs in the chart I included in MM2 Part 1. I have repeated my quarry profiles chart after the 10 year rolling averages chart below..

10 year averages										Projected 10 year averages										
figures from Local Aggregates Assessments, except years 2017 and 2018 calculated										figures from M. N. Hill projection										
Number of years	2002	2003	2004	2005	2006	2007	2008	2009	2010	2019	2020	2021	2022	2023	2024	2025				
12 years	1.56	1.63	1.66	1.71	1.71	1.8	1.8	1.8	1.8	1.30	1.14	1.14	1.31	1.31	1.31	1.31				
2001																				
2002	1.56																			
2003	1.63																			
2004	1.66																			
2005	1.71																			
2006	1.8																			
2007	1.56	1.56	1.56	1.56	1.56	1.56	1.56	1.56	1.56	1.46	1.46	1.46	1.46	1.46	1.46	1.46				
2008	1.67	1.67	1.67	1.67	1.67	1.67	1.67	1.67	1.67	1.23	1.23	1.23	1.23	1.23	1.23	1.23				
2009	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.15	1.15	1.15	1.15	1.15	1.15	1.15				
2010	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.35	1.35	1.35	1.35	1.35	1.35	1.35				
2011	1.52	1.52	1.52	1.52	1.52	1.52	1.52	1.52	1.52	1.55	1.55	1.55	1.55	1.55	1.55	1.55				
2012	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.53	1.53	1.53	1.53	1.53	1.53	1.53				
2013	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.26	1.26	1.26	1.26	1.26	1.26	1.26				
2014	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.02	1.02	1.02	1.02	1.02	1.02	1.02				
2015	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	0.85	0.85	0.85	0.85	0.85	0.85	0.85				
2016	1.39	1.39	1.39	1.39	1.39	1.39	1.39	1.39	1.39	0.75	0.75	0.75	0.75	0.75	0.75	0.75				
2017	calculated to give 2008-2017 10 year rolling average of 1.49 on page 17 Modified MSP	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3											
2018	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26											
10 year totals	15.78	15.65	15.62	15.69	15.48	15.07	14.81	14.4	14.4	13.787	14.017	14.137	13.852	13.017	12.144	11.644				
10 year average	1.58	1.57	1.56	1.57	1.55	1.51	1.48	1.44	1.44	1.38	1.40	1.41	1.39	1.30	1.21	1.16				
	Average of 10 year averages 2002 to 2018 = 12.26 ÷ 8 = 1.53										Average of 10 year averages 2019 to 2034 = 9.2597 ÷ 7 = 1.32									
Difference between the last year's total and the associated 10 year average	-0.06	-0.14	0.04	0.16	-0.05	-0.12	-0.18	-0.18	-0.18	0.1718	0.1253	-0.16	-0.363	-0.452	-0.464	-0.209				
	Average -0.07 mt										Average -0.19 mt									
Difference as a % of the 10 year average (last year's total ÷ associated 10 year average)	-3.8%	-8.9%	2.6%	10.2%	-3.1%	-7.8%	-12.2%	-12.5%	-12.5%	12.5%	8.9%	-11.0%	-26.2%	-34.7%	-38.2%	-18.0%				
	Average -4.4% mt										Average -15.3% mt									
Variation Highest	1.8	1.8	1.8	1.8	1.8	1.8	1.67	1.73	1.73	1.61	1.61	1.61	1.61	1.55	1.54	1.54				
Lowest	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.11	1.11	1.14	1.02	0.85	0.75	1.02				
Difference	0.54	0.54	0.54	0.54	0.54	0.41	0.47	0.47	0.47	0.50	0.50	0.47	0.59	0.70	0.79	0.52				
	Average 0.51 mt										Average 0.58 mt									
Number of years	1	2	3	4	5	6	7	8	8	1	2	3	4	5	6	7				

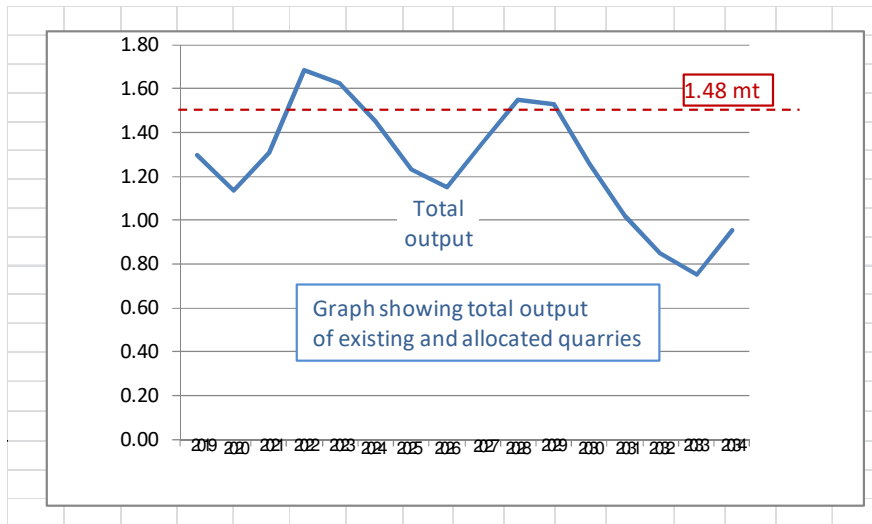
8. There are seven LAA 10 year rolling averages covering the period 2019 to 2034.
9. The average of the seven 10 year rolling averages is 1.3mtpa.
10. This is significantly lower than the average used in MM2 of **1.48** mtpa used in the 'green box' referred to in MM2.
11. The outputs used to calculate the 10 year rolling averages are derived by adding together the outputs of the existing quarries and the outputs of the allocated quarries.
12. The outputs of the allocated quarries are shown at the top of the page and are derived from the figures in the *Bournemouth, Dorset and Poole Draft Mineral Sites Plan Site Assessments*.
13. The output profile for the existing sites has been derived from analysis of existing individual site data and past LAA. I have included the new permissions **issued in 2018** for Hurn Court Extension (0.7mt) and Redman's Hill (0.1mt). I have included a reconciliation between the figures I have used for the existing quarries and the MPA's figures on page 17. The difference between the two was 2.47% and I have accordingly increased the existing site outputs by this amount on my quarry output profiles chart.
14. Increasing the existing sites by 2.47% raised the total output of the existing sites from 9.87mt to 10.12 mt.
- 15 With no change to the allocated sites, and the existing sites output total at 10.12 mt the 10 year rolling averages are shown in the table below:

Only above 1.48mt on 4 of the 16 years of the Plan period: ie only 25% of the Plan period

	2019	2020	2021	2022	2023	2024	2025	
	2028	2029	2030	2031	2032	2033	2034	
2019	1.30							
2020	1.14	1.14						
2021	1.31	1.31	1.31					
→ 2022	1.68	1.68	1.68	1.68				
→ 2023	1.62	1.62	1.62	1.62	1.62			
2024	1.46	1.46	1.46	1.46	1.46	1.46		
2025	1.23	1.23	1.23	1.23	1.23	1.23	1.23	
2026	1.15	1.15	1.15	1.15	1.15	1.15	1.15	
2027	1.35	1.35	1.35	1.35	1.35	1.35	1.35	
→ 2028	1.55	1.55	1.55	1.55	1.55	1.55	1.55	
→ 2029		1.53	1.53	1.53	1.53	1.53	1.53	
2030			1.26	1.26	1.26	1.26	1.26	
2031				1.02	1.02	1.02	1.02	
2032					0.85	0.85	0.85	
2033						0.75	0.75	
2034							0.95	
	13.79	14.02	14.14	13.85	13.02	12.14	11.64	Average
	1.38	1.4	1.41	1.39	1.3	1.21	1.16	1.32
	2019	2020	2021	2022	2023	2024	2025	
	2028	2029	2030	2031	2032	2033	2034	

Chart showing the 10 year rolling averages for the allocated and existing quarries over the Plan period

17. The 2019 – 2034 output graph is shown below:



18. The yearly profile of the output is shown below:

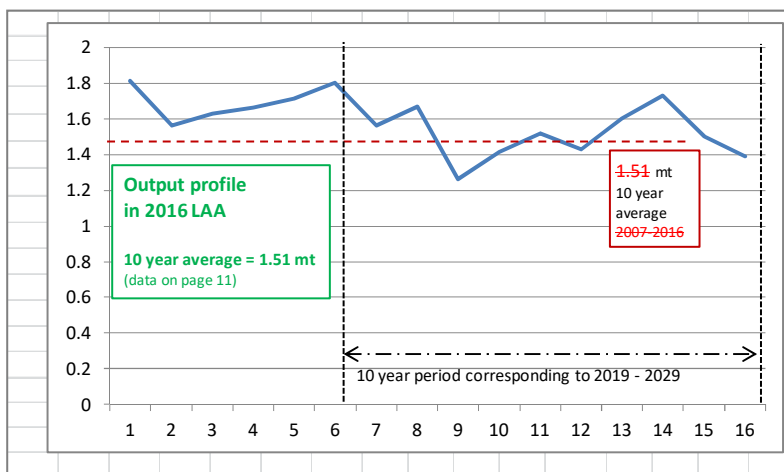
MSP period	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Total output	1.30	1.14	1.31	1.68	1.62	1.46	1.23	1.15	1.35	1.55	1.53	1.26	1.02	0.85	0.75	0.95
Amount below	-0.18	-0.34	-0.17			-0.02	-0.25	-0.33	-0.13			-0.22	-0.46	-0.63	-0.73	-0.53
<u>1.48</u> mt	←----- 10 year rolling average = <u>1.48</u> mt ----->															

19. The profile shows that for 7 of the 10 years the output will be below 1.48 mt. This 60% of the time.

20 The amount by which the output will be below 1.48 mt is shown below:

For the period 2019 -2028	
Amount below <u>1.48</u> mt =	-1.43 mt
total output =	13.79 mt
% of total below 1.49 mt =	-10.4%

21. For comparison the output profile given in the 2016 LAA is plotted below:



22. The yearly profile of the output is shown below:

MSP period	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Total output	1.81	1.56	1.63	1.66	1.71	1.8	1.56	1.67	1.26	1.41	1.52	1.43	1.6	1.73	1.5	1.39
Amount below									0.25	0.1		0.08				0.12
<u>1.51</u> mt	←----- 10 year rolling average = <u>1.51</u> mt ----->															

19. The profile shows that on only 4 of the 10 years the output was below 1.51 mt. This was 40% of the time.

20 The amount by which the output was below 1.51 mt is shown below:

For the period 2007 -2016	
Amount below <u>1.51</u> mt =	0.55 mt
total output =	15.07 mt
% of total below 1.49 mt =	3.65%

21. A comparison of the 10 years period before and after the Pre-Submission Draft Mineral Sites Plan is given below:

10 year period	Below the 10 year average		Amount in million tonnes below the 10 year average	
	years	%		
2007-2016	4 years	40%	0.55 mt	3.6%
2019-2028	7 years	70%	-1.4 mt	-10.4%

22. The table above shows that the Draft Minerals Sites Plan will produce a very poor aggregate output performance in comparison with the output performance in the period 2007-2016.

23 For 7 of the 10 years from 2019 to 2028 the output will be below the 10 year average and the output will be 1.4 million tonnes below the planned output.

24. The 1.4 million tonnes equates to a reasonable size quarry. At a quarry yearly output of 0.15 million tonnes, the quoted outputs of the proposed Station Road and Hurst Farm quarries, the quarry would be in operation for just over 9 years.

25. A further very important factor is that the chart on page 4 shows that the 10 year rolling averages over the period 2002 to 2015 were at or above 1.55 million tonnes per year, significantly higher than the 1.48 million tonnes used in the Modified Version of the Pre-Submission Draft Mineral Sites Plan.

19. The analysis in this Representation Form clearly shows, contrary to the MM2 statement below, that **the Plan does not provide**

....necessary flexibility should sales rise or allocations not come forward as expected.

20. The NPPF (February 2019) states on page 59 (Adobe page 60) in paragraph 207 a) that Minerals Planning Authorities should prepare an:

....annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data

21. MM9 states on page 11 of the Schedule of modifications, under the title Introduction that:

Aggregate demand over the Plan period will be met through existing permitted reserves together with allocated sand and gravel sites as set out in Policy MS-1.

21. This response clearly shows that existing and allocated quarries will not satisfy the forecast aggregate demand over the Plan Period.

20. The intention of the MPA to rely on ad hoc unallocated sites being offered for extraction by landowners is a very poor and risky way to satisfy aggregate demand.

21. The extended Draft Mineral Sites Plan consultation process has unequivocally shown that extremely few eligible landowners are willing to put their land forward for extraction. The BGS Survey also showed that the vast majority of the aggregate in Dorset are contained in very small areas.

22. Land along the Puddletown road has just about been exhausted, to the extent that even the very impractical Philliols Farm site was included in the Draft MSP. There is very little suitable land remaining in the Moreton-Crossways-Woodsford area for aggregate extraction.

23. The possibility of another Warmwell or Woodsford quarry being proposed are remote.

24. This points to the need for the Draft Mineral Sites Plan to properly and adequately plan to meet the future need by conducting the sort of analysis contained in this Representation Form and proposing sufficient suitable sites to provide the amount of aggregate that has been identified.

25. The approach of the MPA in not producing a comprehensive supply of sites to match the requirement but hoping that a site(s) will come along in due course is not planning but wishful thinking.

5. Please use the space below to give details of what change(s) you consider necessary to the modification (please restrict your response to the modification named above only)

1. The Plan requires more quarries in order to meet the requirement in MM2 to provide the:
necessary flexibility should sales rise or allocations not come forward as expected.

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Please indicate if you wish to be notified of any of the following:

The publication of the Inspector's report following the Examination in Public



The adoption of the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan



Signature:

Nigel Hill

Date:

20 June 2019

Please send completed forms to the address below.

If you would like more information on the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan or this process, please contact the Planning Policy Team at:

Minerals & Waste Planning Policy Team,
 Planning and Community Services,
 County Hall,
 Colliton Park,
 Dorchester,
 Dorset DT1 1XJ

Email: mwdf@dorsetcouncil.gov.uk

Telephone: 01305 228585 / 224675