

## Inspector's Matters, Issues and Questions (MIQs)

## Legal Issues

## Question 8

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

1. The Minerals Strategy is contained in MSDCC-54 dated May 2014.
2. Vision. (page 30)
3. Under the title *A Vision for Mineral Extraction in Dorset* the strategy states: *An adequate and steady supply of Dorset's minerals will have been secured efficiently and in environmentally acceptable ways.*
4. The *Sand and Gravel Area of Search – Background Paper* Feb 2018 (MSDCC – 52) page 1, 2nd paragraph states that:

*The current assessment shows that, for sand and gravel the number of sites being actively promoted and appearing to be relatively unconstrained may not be adequate to meet demand and deliver the annual requirement for sand and gravel over the period of the plan.*
5. Thus the MSP fails the Mineral Strategy vision.
6. Objective 1 (page 31)  
*To support the economy of Dorset through the steady supply of aggregates.*
7. The quote above from the *Sand and Gravel Area of Search – Background Paper* show that the MSP will fail this objective.
8. Objective 5 (page 32)  
*To ensure that adverse impacts of mineral working on the environment, local communities, businesses and tourism are minimised*
9. Moreton Parish Council has shown in its answer to Question 58 that the proposed Station Road quarry will severely blight Moreton and Crossways for at least 41 years or more and contribute to the encirclement of Moreton Station and Crossways.
10. The MSP most definitely fails this Objective.
11. Spatial Strategy (page 35)
12. ii. Providing a continued supply of aggregates

13. The Hurst Farm proposed quarry will supply of River Terrace and Poole Formation over a period of about 22 years. No other parish in Dorset will make this scale of contribution to aggregates over such a long period and including both types of aggregate.
14. Moreton has already provided a supply over about 50 to 60 years of aggregate and has also hosted an aggregates recycling plant for about 15 years. No other community has spent so many years supplying aggregates and hosting a recycling plant.
15. Policy AS1 - Provision of Sand and Gravel (page 59)  
*An adequate and steady supply of locally extracted sand and gravel will be provided by maintaining a landbank of permitted sand and gravel reserves equivalent to at least 7years' worth of supply over the period to 2028,*
16. As the above quote indicates and Moreton Parish Council's Policy MS-1 shows conclusively, the MSP Policy MS-1 allocated sites will not provide a steady supply of aggregates and will not achieve a 7 year land bank and will only briefly ( 2/3 years) provide sufficient output to meet demand.
17. Moreton Parish Council has also shown that the so-called Area of Search will also not be able to provide sufficient sites to make up the shortfall in supply.
18. The MSP, therefore, conclusively fails the requirements of the Minerals Strategy.

## Inspector's Matters, Issues and Questions (MIQs)

## Legal Issues

## Question 9

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

1. The MSP aggregate section states on page 19 in the third paragraph of the green box that the most recent 10 year average of sand and gravel supply (2007-2018) is 1.51 million tonnes per annum (mta).
2. I have shown in the graphs I have presented in my submission on MS-1 – page 21 that the MSP will probably (because it is a projection) almost never achieve this target.
3. The MSP is therefore not consistent with the MS.
4. No justification has been given for this because DCC have not projected the outputs of their chosen proposed quarries over the plan period. They have simply added up the outputs, divided by the plan period and accepted the answer.
5. This is a grave and fundamental error on DCC's part.
6. The MSP simply does not contain either enough aggregate sites or sites of large enough output over the period of the plan to produce 1.51mta.
7. I have over several years in response to each of the drafts of the MSP submitted graphs of the total output of the chosen quarries and shown that the output will fail to meet the 1.51mta target.
8. At no time and in no document have DCC ever presented a similar graphical presentation.
9. As a result they have not recognised that the output of their chosen proposed quarries will not produce an output of 1.51mta.
10. The Pre-Submission MSP thus departs from the MS.
11. No justification has been given.

## Inspector's Matters, Issues and Questions (MIQs)

## Legal Issues

## Question 13

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

1. The Sustainability Appraisal (MSPSD-03) dated November 2017 appears comprehensive but is not.
2. The assessment for the Station Road proposed site states on page 164 that under the heading *Cumulative Impacts* that: *This site is a new proposal in an area where there is already mineral working. Depending on when it might start and what other sites are operating in the area, there could be an increased level of traffic on local roads, including the B3390.*
3. Of the two quarries proposed for Moreton, Station Road AS 25 and Hurst Farm AS26 only one will operate at a time and the Traffic Impact Assessment (AM Peak) – Moreton-Crossways-Woodsford dated December 2016, actually indicates there could be a decrease in quarry traffic on the B3390 and a dramatic increase in car traffic at 81% of B3390 capacity due to proposed Purbeck and West Dorset Local Plan Review (quotes in the answers to transport questions)
4. So the Sustainability Appraisal was completely wrong.
5. The Sustainability Appraisal also states under the heading *Cumulative Impacts* on page 164 that: *There are no sites allocated for major development in the Purbeck Local Plan Part 1 (adopted Nov 2012) within 5 km of the proposal. The emerging Purbeck District Council Plan has considered housing development in the vicinity, as has the emerging West Dorset District Council plan.*
6. Moreton Parish Council has submitted its Encirclement of Moreton Station and Crossways map to the Minerals authority at earlier consultations. This map contained a table indicating the likely scale of housing proposed for Crossways, Moreton and Crossways-Silverlake. The total was and is above 2,500 houses. The extant West Dorset Local Plan proposed 500 houses for Crossways in 2015, the Silverlake 1000 house development gained planning approval in about 2014, and the Purbeck Local Plan review proposed 350 houses for Moreton in June 2016 (since increased to 440 houses).
7. Thus, there has been plenty of advanced notice to the Mineral Authority about the scale of housing development being proposed for Moreton-Crossways some time before completion of the Sustainability Appraisal was published, but none of it is in the Sustainability Appraisal.
8. The Sustainability Appraisal state on page 65 in paragraph 8.35 that: *AS25 Station Road is spatially removed and largely screened by trees. Apart from the cumulative traffic impacts already mentioned, it will contribute relatively little cumulative impact.*
9. AS 25 Station Road is not spatially removed. The proposed quarry is right in the middle of Moreton and less than 300m from Moreton Station Settlement, some of which houses overlook the Station Road site, and separated from a relocated tourist caravan park (relocated by the Station Road site owner, Mr Frampton) merely by the width of the B3390 road.

10. The site is definitely not largely screened by trees as the many photographs submitted by Moreton Parish Council in their MSP response can testify. Almost the complete length of the site along the B3390 has no trees. The road from Redbridge to Moreton village at the eastern end of the site has a few trees but is otherwise is largely unscreened. Whilst there are trees along Station Road they only provide limited screening, as shown in Moreton Parish Council's photos.
11. The cumulative impact of the site is its contribution to the encirclement of Moreton Station Settlement and Crossways by housing and quarries and the consequent increase in traffic to at least 81% of the capacity of the B3390 with congestion at the Moreton Station level crossing highly likely and backing up to the Station Road quarry site.
12. The Station Road quarry will blight Moreton and contribute to the overall industrial blighting of Moreton Station and Crossways due to massive over-development, traffic congestion and quarrying.
13. None of this is in the Sustainability Appraisal.
14. So the Sustainability Appraisal failed to accurately assess the Station Road proposed site cumulative impacts.
15. The Sustainability Appraisal has not assessed whether the proposed allocated sites in the Policy MS-1 would provide sufficient aggregate. The *Proposed Area of Search* (MSDCC 52 dated February 2018) document states on page 1, 2<sup>nd</sup> paragraph that:  
*The current assessment shows that, for sand and gravel the number of sites being actively promoted and appearing to be relatively unconstrained may not be adequate to meet demand and deliver the annual requirement for sand and gravel over the period of the plan.*
16. Moreton Parish Council have been highlighting this fact using plots and graph of individual and total allocated quarry output for about 6 years in previous MSP consultations and in this (consultation).
17. The Sustainability Appraisal provides no indication as to whether the potential output from the allocated quarries would produce a sustainable output.
18. The Sustainability assessments for individual quarries do not always directly relate to the statements in the MSP Site Assessment Criteria.
19. A large number of the mitigation statements in the assessments of individual quarries are very anodyne.
20. The net effect of these observations is to raise serious doubt about the value of the Sustainability Appraisal.

## Inspector's Matters, Issues and Questions (MIQs)

**i) General**

## Question 22

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

1. This question highlights the confusing nature of the consultation of the MSP aggregates section.
2. The Minerals Strategy is recognised as having primacy and over the MSP and, therefore, that the MSP should be in conformity with the Minerals Strategy.
3. The MSP however appears to be in some ways subordinate to other Minerals Authority documents though this is not stated in the MSP.
4. For example, the SA and the MSP Site Assessment Criteria cover the same subject matter as indicated in SA table 8 (MSPSD-03 dated November 2017) pages 30 to 33. In theory the Site Assessment criteria take account of the SA Objectives. But the relationship appears to be complicated and in Table 8 the question “Does the proposal have any impact on...” is posed at the top of the right hand column containing site assessment criteria but no indication is given where an answer may be found.
5. The MSP provides less sites than are required to meet the annual aggregate production total. This is stated in the Sand and Gravel Area of Search – Background Paper Feb 2018 (MSDCC – 52) page 1, 2<sup>nd</sup> paragraph:

*The current assessment shows that, for sand and gravel the number of sites being actively promoted and appearing to be relatively unconstrained may not be adequate to meet demand and deliver the annual requirement for sand and gravel over the period of the plan.*

6. Table 9 discusses the relative merits of over providing or under providing aggregates as a result of mineral site allocations.
7. The Table 9 conclusion on page 45 appears to favour over production. But the MSP Policy MS-1 allocated sites will not produce enough aggregate to meet the annual target.
8. The discussion in the Table 9 Conclusion is not reflected in Policy MS-1, nor is the fact that the allocated sites will not produce enough minerals to meet demand.
9. MSP Policy MS-2 refers to an Area of Search but the document which explains this term was not published until 2 months after the MSP Pre-Submission Draft was published for consultation. The reader is, therefore unaware that the *Proposed Area of Search* (MSDCC 52 dated February 2018) is in fact all that's left of the British Geological Survey's Dorset Aggregate assessment after statutory constraints and scenic views have been taken into consideration. And the BGS document is not even mentioned in the *Proposed Area of Search* document. The BGS document is referred to on page 22 of the MSP but only as a document used in the 2014 Mineral Strategy.

10. The overall impact of the above examples and others is that the MSP Pre-Submission Draft is a very incomplete amalgam of other documents. In attempting to comment on the MSP one has to recognise that there may well be divergences between the MSP and that there may be very important statements in other documents that are not included in the MSP. The fact that the sites allocated in Policy MS-1 will not provide sufficient aggregate to meet demand is one example. This in turn leaves the reader confused as to which is the superior document and the extent to which the MSP aggregates section is a worthwhile part of the MSP document.

## Inspector's Matters, Issues and Questions (MIQs)

### **i) General**

#### Question 23

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

1. This question highlights the confusing nature of the consultation of the MSP aggregates section.
2. It is an example of the points made in Moreton Parish Council's answer to question 22. Because of the other differences between documents highlighted in the answer to question 22 the reader is left wondering which document is the authoritative superior document in the consultation.



## Inspector's Matters, Issues and Questions (MIQs)

## i) General Issues - alternatives

## Question 24

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

1. Most definitely not.
2. There are 5 mentions of the word alternatives in the SA.
3. Page 21, paragraph 5.2: refers to *...initial policy alternatives...*
4. Page 34, paragraph 6.1: refers states *Assessment of alternatives, and their effects, is central to the SA/SEA process and is a particularly important element of policy development.*
5. Page 42, table 9, section 11 states: *Greater numbers of sand and gravel sites could have a negative impact on production of alternatives to land-won sand and gravel.*
6. Page 217, section 11: To promote the use of alternative materials states *This proposal does not promote the use of alternative materials – there are no alternatives to Purbeck Stone as such.*
7. Page 320 top section, mitigation refers to *alternatives to Haycraft Lane for access and options for mitigation for any potential impacts.*
8. The *SA Objective: To promote the use of alternative materials* does occur frequently but this objective is not about alternative sites but alternative materials.
9. Alternative routes are mentioned in the above reference to Haycraft Lane.
10. The word alternative also occurs in the discussion of SANGS.
11. Neither the SA or the MSP discuss the possibility of alternative sites to certain propose sites.
12. I have explained at each consultation in great detail, considering all the MSP site criteria, why certain sites represent very suitable and acceptable alternatives to the Station Road site (AS25).
13. At no stage in the past consultations, nor in the Pre-Submission MSP or the SA have my alternatives, or any other alternatives been discussed.
14. I have shown on a number of occasions, using MSP documentation, that omitted sites in fact have many convincing advantages over selected sites.

15. But at no stage including in the MSP Pre-Submission Draft and in the SA has DCC considered or discussed alternative sites.
16. I have shown above that *..all reasonable alternatives* have definitely not *been assessed in the SA and* hence there are no *reasons for rejection set out*.
17. For example, I have shown that Gallows Hill B, the larger of the two proposed Gallows Hill sites is a very suitable alternative to Station Road. This site has not even been given full analysis in the SA, let alone consideration of its suitability as an alternative site to the proposed Station road site.
18. This is and has been a major failing of the iterations of the MSP and of the SA.
19. There are suitable alternatives to the Station Road site but DCC have not considered them, let alone analysed their suitability as alternatives to Station Road.

## Inspector's Matters, Issues and Questions (MIQs)

## i) General – landscape and visual impact

## Question 26

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

1. In general no and in particular for Station Road (AS25) the landscape and visual impact has definitely not been adequately assessed.
2. As an example, the SA states on page 65 in paragraph 8.35 that: *AS25 Station Road is spatially removed and largely screened by trees. Apart from the cumulative traffic impacts already mentioned, it will contribute relatively little cumulative impact.*
3. As I have shown in my submission, uninterrupted views of the Station Road site are available from the B3390 road, from part of Moreton Station settlement and from the road from Redbridge to Station Road. Extensive view of the site are also available from Station Road, as the photographs in my submission clearly show.
4. As the nearby Redbridge Quarry, Warmwell Quarry and Woodsford Quarrys all conclusively show, the proposed Station Road quarry will have a very deleterious impact on the local landscape.
5. The landscape and visual impact statements have been drafted to make sites appear acceptable and, in the case of the Station Road site, bear no resemblance to the current visual appearance of the site, and in no way reflect the appearance of the nearby Redbridge Road, Warmwell or Woodsford quarry sites.
6. The Redbridge Road quarry is also owned by the sponsor of the proposed quarry Station Road. It provides a very good illustration of the what the proposer of the Station Road quarry considers as acceptable visual and landscape impacts.
7. The SA states on pagw 160 at the ● at the top that the *Site is relatively isolated and unlikely to impact any of these sites visually or through increased traffic.* I have shown in my submission that the proposed site is, in fact very close to a tourist caravan site at Moreton Station, the houses at Moreton Station, some of which will easily see the workings on the site, and from the large 444 housing development proposed for part of the Redbridge Quarry site. I have also shown in photographs that a large tourist caravan park is to be relocated from the northern edge of Redbridge Quarry to a site just across the B3390 road from the proposed Station Road quarry.
8. Quite how a large tourist caravan park, separated from the proposed Station Road quarry by the width of the B3390 road, can be described as being *relatively isolated* from the proposed Station Road Quarry is very difficult to comprehend.
9. Tourism is Dorset's number one industry. It appears to be being sacrificed for the sake of a relatively minor industry which only employs one person in Moreton, according to the 2011 Census.

10. The landscape and visual impacts have been assessed to make sites appear acceptable and for the most part do not reflect reality, as the assessments for the proposed Station Road quarry have clearly shown.

## Inspector's Matters, Issues and Questions (MIQs)

## i) General – transport evidence

## Question 27

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

1. The Examination Library only contains two documents with titles covering Traffic Impact Assessments.
2. These documents are MSDCC - 35 Traffic Impact Assessment (AM Peak) – Moreton-Crossways-Woodsford and MSDCC – 36 Traffic Impact Assessment – Moreton-Crossways-Woodsford.
3. The total number of houses planned and approved for Crossways in the West Dorset, Weymouth and Portland (WD, W&P) Local Plan is 500 and the current Draft Local Plan Preferred Options includes a further 614 houses. West Dorset have also approved the building of 1000 houses on the Silverlake development, 10 houses on the Crossways garage site and 5 houses on the Rectory Site. Purbeck District Council have proposed 440 houses on Moreton Pit which is basically in Crossways. Thus 2569 houses have been approved and are planned for Crossways.
4. Crossways currently has about 1100 houses.
5. Total number of existing, approved and proposed for Crossways is there 2569 plus 1100 which equals 3669 houses.
6. The Traffic Impact Assessment considered 5 housing growths for Crossways of which the worst case scenario, SC5 which contained 2,880 dwellings is the closest to the 2569 approved and proposed growth for Crossways.
7. *The worst case SC5 scenario contains 81.3% more trips than the base.*
8. The report does state on page 26 in paragraph 5.21 that *The volume over capacity ratio is a common measure to show possible congestion. Any movement with a volume over capacity ratio greater than 85% is likely to experience congestion.*
9. Thus, the SC5 81.3% increase in trips is very close to the value over capacity ratio of 85% and hence congestion is likely.
10. The study makes no allowance for the congestion which currently occurs on the B3390 Warmwell Road in proximity to the Co-op shop. It is not unusual for the traffic to be reduced to almost a standstill one lane due to cars and heavy goods vehicles parking on the road due to the very limited car parking, as drivers access the shop. Neither the West Dorset Local Plan, Preferred Options or Purbeck Local Plan, or the Joint Working Group for Crossways and Moreton of which the MSP DCC author is a member, have proposed any additional parking.

11. The Traffic Impact Study has not taken any account of the very serious congestion at the Co-op.
12. The Traffic Impact Study has also not taken account of the fact that Summer Farm and the new Crossways surgery and village hall will require access to and from the B3390 Warmwell Road, further adding to congestion on the road. Pedestrian access the Summer Farm estate, surgery and village hall will all have to take place across the very busy B3390.
13. The Traffic Impact Study does not state that it has allowed for the fact that the Moreton Station level crossing one lane gates are due to be replaced by gates which span the road, in the same manner as the level crossing gates at Wool. Whereas by design the one lane gates remain down for a couple of minutes at most, because there is always an exit route available should a car inadvertently be in the middle as the gates are lowered, the full gates will remain closed for extended period as is currently the case at Wool to allow a car stuck in the middle time to arrange an exit before a train arrives.
14. This will produce very significant congestion on the B3390.
15. The study was conducted in the spring of 2016 which the report states on page 10 represents a *neutral time of year*. The report therefore does not project the likely traffic increase in the summer months which might well exceed the 85% congestion threshold (page 26, paragraph 5.21)
16. None of this appears to have been taken into account in the Traffic Impact Study.
17. The fact that no attempt has been made to indicate the likely increase in traffic during the summer months represents a significant omission.
18. Thus, for the only traffic impact study in the Examination Library, the answer to question 27: *In general, has adequate transport evidence been obtained for the allocated sites, both individually and in combination with other developments?* is most definitely no.
19. It is notable that the Recipients for the Moreton/Crossways/Woodsford – Traffic Impact Statement does not include Purbeck District Council, in which both the Hurst Farm and Station Road proposed sites are located.
20. The list of recipients also does not include Moreton Parish Council and Crossways Parish Council which represent the communities which will have to suffer the very significant cumulative impacts if the two proposed quarries are adopted.

## Inspector's Matters, Issues and Questions (MIQs)

**i) General – impacts not adequately mitigated**

## Question 30

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

1. The Station Road proposed site will result in very significant adverse impacts which cannot be adequately mitigated.
2. As a result of their January housing options consultation, Purbeck District Council have stated that they will propose the building of 440 houses on the Redbridge quarry site in their Pre-Submission Draft due to be published for consultation in October 2018.
3. As part of this proposed 440 housing development the Station Road site owner, Mr Frampton-Hobbs, has also proposed moving the existing tourist caravan park from the northern edge of Redbridge quarry to a site literally just across the B3390 road from the proposed Station Road site. Apart from putting the caravan park on the proposed Station Road quarry site it is not possible to locate the caravan park any closer to the proposed quarry.
4. West Dorset District Council plan and propose in their Joint Local Plan Review Preferred Options Consultation, published in August 2018, to locate 1114 houses (page LPR 81, Table 3.3) within a short distance of the Station Road quarry.
5. I have quoted the distances together with a Moreton Station – Crossways Encirclement Map in the Moreton Parish Council C21 submission.
6. The West Dorset and Purbeck District Councils proposed housing numbers on the Encirclement Map were extant at the time of the MSP Pre-Submission Draft, but have since been reduced slightly and are now as stated above.
7. The map also shows the 1000 house Silverlake holiday centre which will also be greatly affected by the proposed Station Road quarry.
8. The Traffic Impact Assessment (AM Peak)-Moreton-Crossways-Woodsford (MSDCC-35) states on page 27 in paragraph 5.23 that: *The graphs below show the predicted NB and SB AM peak traffic in SC5 forecast is likely to be much higher than the current highest peaks. This could cause additional queuing, particularly southbound towards Moreton Level Crossing.*
9. Moreton level crossing is only a short distance from the proposed Station Road quarry.
10. The SA states on page 160 at the top • that the *Site is relatively isolated and unlikely to impact any of these sites visually or through increased traffic.* As the Encirclement Map submitted as part of the Moreton Parish Council's MSP Pre-Submission Draft comments on MSP Criteria C21 clearly shows, the proposed Station Road site is far from being

*relatively isolated*. It is sandwiched closely between Moreton village and Moreton Station settlement and is directly adjacent to Crossways. It is virtually in the relocated large caravan park, only being separated by the width of the B3390 road.

11. No other quarry in proposed in the MSP Pre-Submission Draft will have as great an impact as the proposed Station Road quarry because no other proposed quarry is adjacent to such a large community as Moreton Station and Crossways, and no other communities in Purbeck and West Dorset are proposed to receive as great a proportional housing and population increases as Moreton and Crossways. No other site, except the Station Road site has a traffic survey in the Examination library which indicates that traffic congestion is likely in the vicinity of the proposed site (at the Moreton Station level crossing).
12. It is extremely naïve to assume that some bunds will provide adequate mitigation to overcome the cumulative impacts of quarrying, large scale housing developments and adjacent traffic flows which, as explained in my statement for question 27, traffic, are very likely to result in congestion on the B3350 adjacent to the Station Road site and in Crossways.
13. The overall impact will be to create an area of depressing overdevelopment and noise and thereby severely blight Moreton and Crossways.
14. The overdevelopment and blighting of Moreton and Crossways will in turn negatively impact on Dorset's number one industry of tourism by impacting on the relocated caravan park directly across the B3390 road from the Station Road site, the caravan park a few yards to the north of the site, the Silverlake 1000 holiday house development and the nearby caravan park in Crossways.
15. This combination of very large scale housing development, traffic congestion and within it all major quarrying on the Station Road site will severely degrade the Moreton Conservation Area and adversely impact on the overall setting of the Moreton cemetery containing Lawrence of Arabia's burial place.
16. In short there is simply too much housing development, traffic build up and congestion, and quarrying in the small area of the Station Road site, Moreton Station and Crossways.
17. Part of this overdevelopment can be relieved by not approving the inclusion of the Station Road quarry in the MSP. Bunding around the site will in no way mitigate the impact of the Station Road site.



## Inspector's Matters, Issues and Questions (MIQs)

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

## Question 32

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

1. No.
2. A fundamental part of the Site Assessments is that whilst heritage issues, wild life (eg: Ramsar sites) and certain parts of the countryside (eg: AONB, Green Belt etc) are accorded statutory protection, people have no such protection.
3. Impacts which would affect a feature which has statutory protection tend to be overcome by not nominating the affected site. Hence the MSP contains 10 allocated sites and 8 nominated but not allocated sites. Of the 10 allocated sites the overwhelming majority are not new sites but have been in operation before or are extensions to existing sites.
4. This approach means that the Site Assessment for cumulative impacts C21 is in the section dealing with people.
5. The Moreton Parish Council submission on Area of Search MS-2 contains a chart showing the assessment criteria and associated colour for all Criteria for all sites considered in the MSP.
6. Many sites have red A assessments for wild life (criteria C1 to C6)
7. Almost all sites have a red A assessment for a landscape or history or archaeology criteria.
8. All sites have a red A assessment for surface waters.
9. None of the criteria C17 to C25 which affect people, have a red A assessment for the allocated sites. This is in large part because people do not have statutory protection and, therefore, are only accorded very subjective and superficial attention.
10. For example, the SA Station Road assessment on page 159 in the section on Impact on Existing Settlements does not even mention that the Purbeck and Crossways Local Plan Reviews are likely to propose the building of in excess of 1554 houses within a 1 to 2 km of the proposed Station Road quarry or that the traffic will reach a level at which congestion is likely to occur.
11. The MSP Pre-Submission Draft section on AS 25 Station Road (pages 129-132) similarly does not mention the building of in excess 1500 houses within 1-2 km of the site or the likely traffic build up to congestion levels. The map on page 132 does not even show that 500 houses have been approved for the Summer Farm site and that housing has been proposed for both the Moreton Pit site and Woodsford Field site
12. Thus with only a superficial and subjective approach both the SA and Site Assessments do not apply an analytical approach to cumulative assessments and, therefore, do not *adequately deal with cumulative impacts*.

## Inspector's Matters, Issues and Questions (MIQs)

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

## Question 33

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

1. No.
2. The land designations should be shown on a separate map, with a reference to it given on the Policies map.
3. The Plan maps in the Proposed Aggregates Area of Search (MSDCC52 dated February 2018) illustrate how complicated maps become once they are overlain with designation and constraints.
4. The existing Policies Map (MSPSD – 02 dated December 2017) clearly indicates the locations of the MSP quarry locations.
5. These quarries would be lost if the designations and constraints were added to the map.
6. The Policies Map illustrates the point raised by Moreton Parish Council in its submission that the allocated and nominated quarries are all virtually bunched into quite small areas which have already been extensively quarried.
7. The Map highlights the points raised by Moreton Parish Council that Dorset's areas of aggregate excavation are very small and almost all past and present aggregate extraction has and is conducted in the same small area, and the MSP allocated quarries will all be located in the same very small areas.