

Swanworth Quarry, Eastington Road,
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**Bournemouth, Dorset and Poole Mineral Sites Plan
Independent Examination.**

**Response to the Inspector's Matters, Issues and
Questions relating to Policy MS-3, PK-16
Swanworth Quarry Extension.**

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Response made on behalf of Suttle Stone Quarries by Quarryplan (GB) Limited

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1.0 INTRODUCTION

This document relates to the Independent Examination Inspector's Matters, Issues and Questions dated 12 July 2018 regarding the Bournemouth, Dorset and Poole Pre-Submission Draft Mineral Sites Plan 2017.

A response is provided to those Questions regarding the potential quarry extension to Swanworth Quarry allocated as a suitable site for the supply of crushed rock (**Crushed Rock: Policy MS-3 PK-16 Swanworth Quarry Extension** and specifically Questions 178 – 194).

The submission is made by Quarryplan (GB) Limited on behalf of Suttle Stone Quarries (Suttle) the operators of Swanworth Quarry.

2.0 INSPECTOR'S QUESTIONS

A total of 17 questions have been posed relating to the Swanworth Quarry Extension. Each of the questions is set out below and responses provided as appropriate. Additional or revised information is included as necessary in the accompanying Appendices.

Question 178

The MS Spatial Strategy (p35 paragraph ii – supply of aggregates) indicates that, due to the adequacy of the existing landbank (stated to be about 48 years in 2011), no new sites for crushed rock will be identified unless exceptional circumstances can be demonstrated. MS Policy AS3 (Crushed Rock) reflects this and gives a short non-exhaustive list of exceptional circumstances. Are there exceptional circumstances for allocating Swanworth Quarry Extension so as to comply with the Spatial Strategy and Policy AS3?

Response

The exceptional circumstances were set out in detail in the submission made by Quarryplan in January 2018 to the Pre-Submission Draft Mineral Sites Plan.

Question 179

Could the “Very significant adverse impact” (Category A) identified in the Site Assessment on criteria C9 – historic landscape, and the SA identified Strong Negative impact on landscape (ob.7) be adequately mitigated?

Response – Historic Landscape

The most recent SA for Swanworth does not indicate a “very significant adverse impact” on historic landscape, rather it indicates a “minor negative impact” during preparation/working and an “uncertain impact” during restoration and afteruse.

This change is due to the design of the quarry extension area being amended following discussions with Historic England and also the alteration to the restoration proposals to ensure the area is restored back to original ground levels.

Response – Landscape

It is considered that landscape mitigation has been provided as a consequence of the design changes to the quarry extension, provision of boundary screening, phased working and progressive restoration.

Further attention has been given to the proposed bridge crossing over the combe valley feature between the existing quarry and the extension area. A photomontage has been provided in **Appendix 1** showing the view of the bridge from the Purbeck Way public right of way running along the base of the combe. The photomontage demonstrates that the existing heavily

vegetated valley sides serve to effectively conceal the bridge abutments and only the span of the bridge would be visible.

Question 180

Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?

Response

The phased development of the extension area is an important mitigation factor in terms of landscape and visual impacts and also cumulative impacts with the existing quarry. **Appendix 2** contains information on the phased development and restoration of the extension area and the existing quarry in terms of the amount of land “disturbed” by quarrying at any one time. It can be seen that the extent of disturbance remains relatively constant while the extension area is developed and there is no substantial increase in the operational footprint.

Question 181

Historic England have concerns over the potential for substantial harm to Barrows in particular and the Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Should more direction on mitigating potential harm to heritage assets be given in the DGs?

Response

Historic England have confirmed in a letter dated 31 January 2018 from Rohan Torkildsen that they regard the Swanworth extension allocation as being soundly based if the mitigation measures discussed with Suttles were to be reflected in the Plan. The latest extension design incorporates all the agreed mitigation. The letter from Historic England is included in **Appendix 3**.

Question 182

What impact, if any, would there be on the significance of Corfe Castle and its setting?

Response

It is considered that there would be no impact on the significance of Corfe Castle and its setting as a consequence of any impacts arising from landscape, visual, amenity or highway aspects of the development as demonstrated in the Landscape and Visual Impact Assessment (LVIA) and Transport Statement submitted in January 2018.

Question 183

What impact, if any, would there be on the Jurassic Coast UNESCO World Heritage Site?

Response

It is considered that there would be no impact on the Jurassic Coast UNESCO World Heritage Site as a consequence of any impacts arising from landscape, visual, amenity or highway aspects of the development as referred to in the previous response.

Question 184

Is there any likelihood of the water supply to Kingston being impacted and, if so, should this be assessed? I understand that it is sourced from the area of Coombe Bottom and Hill Bottom, in close proximity to the site.

Response

The hydrological and hydrogeological risk assessment submitted in January 2018 and accepted by the Environment Agency demonstrates the extent of the study that would be undertaken as part of a planning application/Environmental Impact Assessment. The collection of surface water and groundwater data has already commenced. If there were to be any unacceptable impact on the Kingston water supply the Environment Agency and Dorset County Council would not grant permission for the development.

Question 185

The SA indicates strong negative impacts on the Dorset AONB and the Heritage Coast. Natural England and the Dorset AONB Team are concerned that the impacts on the AONB are likely to be highly significant and they question the ability of the site to meet the AONB protections within the MS and the NPPF. With this in mind, please consider the following:

Whilst the Site Assessment indicates that full assessments will be carried out at application stage, is there sufficient evidence to justify the principle of development at this plan-making stage or should further assessment be undertaken?

Response

There is clear evidence of the exceptional circumstances relating to the extension area development as provided in the submission of January 2018.

Assessments have already been carried out on landscape and visual matters, the hydrological and hydrogeological regime, highways and also on ecology. None of the assessments indicate that the extension area would result in unacceptable impact and the assessments would provide an important starting point for the further work required for the planning application/Environmental Impact Assessment for the extension development.

The original Phase 1 ecological survey was carried out in 2014 and did not cover the entire extension area, consequently a comprehensive Phase 1 ecological survey has been carried out in 2018 and the report on the survey is included in **Appendix 4**. The report identifies that a

number of further surveys would be required as part of a planning application/Environmental Impact Assessment to determine the presence of protected species and if present mitigation would be necessary.

Specifically, has sufficient landscape and visual impact assessment been carried out?

Response

The LVIA submitted in January 2018 deals with Mitigation Measures in Section 4. It is made quite clear that *“The proposed development has gone through a comprehensive series of design iterations led by the desire to minimise environmental impacts.”*

The statement made by Natural England on Page 4 of their letter of 31 January 2018 from Dr Andrew Nicholson to Dorset that, *“the lack of any appraisal of possible mitigation as a critical deficiency”* is untrue. Mitigation measures have been considered and assessed as part of the whole design iteration. The LVIA describes how the Mitigation Measures have been considered so that they, in themselves, address the position within an AONB.

c) In broad terms, how is it envisaged mitigation measures will lower identified impacts to an acceptable level to justify the allocation?

Response

At Section 4.11 of the LVIA the Mitigation Measures are summarised as follows:

Only the lower parts of the three fields would be extracted.

Extraction will be in a sequence moving northwards to minimise visual impacts.

Progressive restoration would be undertaken of the western higher slopes (particularly the in-situ overburden slopes) at the earliest opportunity.

The creation of low small linear bunds along the northern and eastern boundaries to reinforce the existing wall, fence and hedgerow structure. These bunds are to be rough grassed and scrub and are designed not to be visually intrusive but rather reflect the character of the existing coombe slopes

A bridge using gabion basket abutments would be built to cross the Purbeck Way linking the consented quarry with the proposed extension and providing the means of access for transportation of excavated material.

An access cut would be created which will contain vehicle movements and reflect the character of nearby coombes with its native herb/shrub/tree planting on its upper levels/slopes.

The proposed extraction area would be progressively filled to existing contours to remove completely any long term/permanent landscape or visual impact. Potential post-restoration

land use is expected to be a combination of agricultural and habitat creation for nature conservation.

Question 186

Would the Councils briefly explain the balancing exercise they have undertaken in allocating this site?

Response

No comment.

Question 187

Should the DGs give more direction on mitigation measures to reduce identified Category A effects and Strong Negative Impacts?

Response

Suttle would support the inclusion of additional detail in the DGs to reflect the changes and alterations made to the extension area design that reduce impacts.

Question 188

Should the DGs give direction on managing the cumulative effects of Swanworth Quarry Extension and the existing Swanworth Quarry?

Response

Information relating to the extent of land disturbed by quarrying within the extension area and the existing quarry is provided in **Appendix 2**.

The level of extraction, processing and output from the quarry would not increase as a consequence of developing the extension area.

Question 189

Should the Restoration Vision require early phased restoration to minimise visual impact on the AONB?

Response

Ongoing restoration of the existing quarry and the early phased restoration of the extension area as detailed in **Appendix 2** are fundamental to the development proposals.

Question 190

With reference to Natural England's comments, should the Restoration Vision include the creation of limestone pasture of conservation interest and natural re-vegetation to encourage successional limestone habitats, and is the inclusion of new copses in open landscape appropriate?

Response

The restoration of the extension area has the potential to provide limestone pasture of conservation interest and natural re-vegetation. The restoration of the existing quarry is already producing important biodiversity benefits in terms of the successful creation of calcareous grassland. A brief report on the restoration work in the existing quarry is included in **Appendix 5**.

We are open to any reasonable restoration suggestion however, the matter was addressed in the LVIA at paragraph 4.10 which states:

"The extension site is currently in agricultural use. Restoration to original ground level affords the opportunity to either revert the site to agriculture or a combination of uses including those which benefit biodiversity, geodiversity and public access (as envisaged in the restoration concept for the existing quarry – which has succeeded in creating an area of valuable species-rich limestone grassland)."

Question 191

Where landscape impacts cannot be avoided or adequately mitigated, MS Policy DM4 requires compensatory environmental enhancements to offset residual landscape and environmental impacts. Is it likely that Swanworth Quarry Extension will need to provide such compensatory enhancements? If so, should this be set out in Policy MS-3 and should the DGs also address this point?

Response

Please see the response to Question 190.

Question 192

Although no other crushed rock sites have come forward, have all other reasonable alternative options been considered in the SA?

Response

In geological terms the only outcrops of limestone in Dorset lie within the AONB or on Portland. **Appendix 6** contains a plan showing the limestone outcrop in the County and the most important environmental/landscape designations. There are no alternative options available.

Question 193

Is MSP paragraph 3.26 misleading? Representations state that Portland stone firms are capable of doubling production.

Response

It is not accepted that the output of crushed limestone from Portland could be doubled on a continuing basis. Even if this were to be the case the potential impacts would be considerable in terms of highway use, energy consumption and engine emissions and local amenity. A commentary on the benefits of continued supply from Swanworth to the main Poole/Bournemouth market and the local Purbeck market is provided in **Appendix 7**.

Question 194

Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

Response

Suttles have made it clear that they are open to discussion on compensatory enhancements but the clear advantage of the current proposals is that the land will be restored to the existing landform. As it says in Section 8 Conclusion to the LVIA:

8.12 All and any visual or landscape impacts are, in any event, temporary. The restoration of the whole proposed area to the original landform, land cover and land uses ensures this.

8.13 No landscape elements or features of any consequence are permanently lost.

8.14 There are no cumulative effects.

8.15 While there would be limited landscape impacts on the AONB and visual impacts limited to very restricted viewpoints in the AONB these would be temporary.

3.0 CONCLUSIONS

Suttle Stone Quarries operate the existing Swanworth Quarry which provides an important supply of limestone aggregate for the eastern half of Dorset and particularly to Purbeck District and the major market in Bournemouth and Poole. It is the closest source of limestone aggregates to these markets.

The Bournemouth, Dorset and Poole Pre-Submission Draft Mineral Sites Plan 2017 identifies an extension to Swanworth Quarry for the future supply of crushed rock.

The Independent Examination Inspector has raised a number of questions in relation to the Swanworth Quarry Extension and this document provides a response and additional information to those questions.

Appendices

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2 Phased development details

3 Historic England letter of 31 January 2018

4 Preliminary ecological appraisal August 2018

5 Existing quarry restoration report

6 Map of limestone outcrop and designations

7 Portland crushed limestone contribution