

Independent Examination of Bournemouth, Dorset & Poole Draft Mineral Sites Plan

Inspector's Matters, Issues and Questions (MIQs)

This document lists matters (topics), issues (points for consideration), and questions that will form the basis for discussions during the hearing sessions and supply the context for any further written statements. Matters and Issues may change as the examination progresses, although participants will be given an opportunity to comment on any new Matters and Issues that arise. If sufficient information is provided on any particular questions I may decide not to pursue them further in any depth.

Answers to questions should be supported with reasons, unless exceptionally it is clear from the question that a simple yes or no answer is required. There may be some overlap between questions, in which case answers may be cross referenced as appropriate. Text that may be found in submitted evidence documents or within the Plan itself need not be repeated at length, but references (with page and paragraph numbers) to those documents should be provided where relevant.

All questions should be answered by the Authorities. Other participants may respond to issues relevant to points they have made in their earlier representations. At the hearing sessions, opportunity will be given to participants to raise any other soundness issues set out in their previous representations and not covered in these Matters Issues and Questions.

Abbreviations Used:

AONB	Area of Outstanding Natural Beauty
DGs	Development Guidelines
HRA	Habitats Regulation Assessment
MS	Minerals Strategy
MSP	Mineral Sites Plan
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SANG	Suitable Alternative Natural Greenspace
SSSI	Site of Special Scientific Interest
SPA	Special Protection Area
SFRA	Strategic Flood Risk Assessment

A) Duty to Co-operate

1. Has the duty to co-operate been met with respect to all relevant prescribed bodies in Regulation 4 of the 2012 Local Plans Regulations?
2. In a few paragraphs give a brief summary of how the duty to co-operate has been met. Amongst other relevant matters, include how the South West Aggregates Working Party, the South East Aggregates Working Party and any other relevant Aggregates Working Party have been involved.
3. How have the Councils determined what a strategic minerals matter is?
4. Are there any outstanding objections relating to the duty to co-operate and its fulfilment by the Councils? If so, please give details?

B) Legal issues

5. Has the Mineral Sites Plan (MSP) been prepared in accordance with the Councils' Local Development Schemes?

6. Was consultation on the MSP carried out in compliance with the Councils' Statements of Community Involvement?
7. Were all relevant community groups provided with an adequate opportunity to comment on all aspects of the MSP?
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?
9. Are there any parts of the MSP which depart from the MS and, if so, what is the justification for this?
10. Does the MSP replace any development plan policies?
11. Is the Development Plan as a whole in compliance with Section 19(1A) of the *Planning and Compulsory Purchase Act 2004* (as amended), which requires development plan documents to include policies designed to secure that the development and use of land in a local planning authority's area contribute to the mitigation of, and adaptation to, climate change? Does the MSP contribute to meeting this requirement?
12. Does the MSP have regard to the purpose of conserving biodiversity in accordance with section 40 of the *Natural Environment and Rural Communities Act 2006*?
13. In broad terms, is the Sustainability Appraisal (SA) adequate overall?
14. Does the MSP comply with all relevant legal requirements, including those in the 2004 Act (as amended) and the 2012 Regulations?

Habitats Regulations

15. I understand that the Councils are preparing a refreshed Habitats Regulations Assessment (HRA) as a result of [*People over Wind, Peter Sweetman v Coillte Teoranta*](#) so that avoidance and reduction measures are not taken into account at the screening stage but rather at the Appropriate Assessment stage. Would the Councils confirm that Natural England and any other relevant nature conservation bodies are being consulted with respect to this refreshed document?
16. The November 2017 HRA Screening Report identified sites (AS-06, AS-12, AS-13, BC-04) and policies (MS-1, MS-2, MS-3, MS-4, MS-5, MS-6, MS-8) as requiring mitigation to enable a conclusion of no likely significant effects to be made. Do the Councils want to put forward any main modifications to these sites/policies as a result of the refreshed report?
17. The November 2017 HRA indicates that for some of the allocated sites there is no certainty of securing mitigation, but indicates that this can be left to the application stage. Does this comply with the *Conservation of Habitats and Species Regulations 2017*?
18. Are there any other allocations that, but for mitigation measures, are likely to have significant effects on European or internationally designated nature conservation sites?
19. Does the HRA process take account of the *Wealden* judgement (*Wealden V SSCLG* [2017] EWHC 351 Admin) and potential "in combination" air quality impacts of traffic flows on relevant designated areas?
20. Overall, have the requirements of the *Conservation of Habitats and Species Regulations 2017* been met?

C) Soundness

Matter 1: Proposed Mineral Sites

Issue: *Whether the allocations provide a sufficient supply of economically viable minerals, and whether an appropriate balance between the economic, social and environmental roles of plan making has been achieved.*

i) General

21. In broad terms, how have mineral sites been assessed for allocation in the MSP? In a few paragraphs, please provide a brief overview including the methodology, how constraints and opportunities have been considered, and how allocations have been chosen over omission sites.
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.
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.
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?
25. Some allocated sites have scored "A" - "Very significant adverse impacts" against one or more MS criteria in the Site Assessments, and/or "Strong Negative Impact" in the SA objectives (obs). Generally, in broad terms what steps/assessments have the Councils undertaken to ensure that, in principle, these substantial negative impacts can be mitigated to an acceptable level in the balancing exercise, thereby ensuring the sites are deliverable?
26. In general, has landscape and visual impact been adequately assessed for the allocated sites?
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?
28. With respect to ecology/biodiversity, for those sites indicating "Strong Negative Impacts" in the SA or "Very significant adverse impacts" in the Site Assessments, have any ecological assessments been undertaken? If not, should they be undertaken at the plan-making stage to ensure that the relevant sites are deliverable?
29. With respect to hydrology, for those sites indicating "Strong Negative Impacts" in the SA or "Very significant adverse impacts" in the Site Assessments, have any hydrological assessments been undertaken? If not, should they be undertaken at the plan-making stage to ensure that the relevant sites are deliverable?
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?

31. Have the Development Guidelines in MSP Appendix 1 (DGs) for all sites in the vicinity of Bournemouth Airport or under its flight path dealt with the potential for an Aviation Impact Assessment covering impacts of bird strike (need for wildlife strike risk assessment), lighting on sightlines from Air Traffic Control, site radios on airport communication equipment, and tall structures? What sites are in this category?

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

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

Cluster 1 – Other Building Stone Sites: BS-02 Marnhull Quarry, BS-04 Frogden Quarry, BS-05 Whithill Quarry

34. Given that these sites form a loose cluster in the north of Dorset, are they likely to create any significant cumulative effects?
35. Should the DGs for each site make reference to this cluster?

Cluster 2 – C7 Wareham to A35: AS-12 Philliol's Farm, AS-15 Tatchells Quarry, BC-04 Trigon Hill Quarry Extension

36. What evidence is there to demonstrate that cumulative traffic impacts of these sites in the Wareham area could be made acceptable?
37. The SA refers to housing and employment allocations at Wareham. Have these been taken into account?
38. Should a cumulative traffic assessment, as suggested by Highways England, be obtained at the plan-making stage so that it can be established whether there is likely to be a significant impact on the Strategic Road Network?
39. Should the DGs for Tatchells Quarry and Philliol's Farm specify that the two sites should not be worked simultaneously unless it could be clearly demonstrated that the highway network could safely accommodate the increase in traffic? If so, how would this work in practice?
40. Should the DGs for each site make reference to this cluster?

Cluster 3: AS-09 Hurn Court Farm Quarry, AS-13 Roeshot

41. How has the MSP taken account of the eastern part of the Roeshot site, located in Hampshire, when considering the cumulative effects of these allocations located in the Christchurch area of Dorset?
42. I understand that traffic levels are high in this area and that additional traffic will result from the Christchurch Urban Extension south of Roeshot. Has this been adequately assessed?
43. Has the potential traffic impact on the New Forest National Park been considered and potential air quality impacts on Lyndhurst, which I understand is an Air Quality Management Area?
44. Is there potential for local rail sidings to be used to facilitate transport by rail? Could the following be used: rail sidings at Hamworthy (Fursebrook),

Wareham and Wool or facilities at Totton, the Fawley branch line or Brockenhurst?

45. Should the DGs make clear that transport assessments submitted with applications should take account of any traffic impacts on the New Forest National Park?
46. Highways England suggests that the cumulative traffic impacts on the Strategic Road Network of these sites and other development in the area be assessed at the plan making stage in conjunction with Highways England. Has any cumulative impact assessment been done?
47. I note that there is reference in the supporting evidence to a traffic assessment for the eastern, Hampshire Roeshot site being relied upon. Is this the case and what does that evidence say about cumulative traffic impacts? Can the Hampshire site traffic assessment be properly relied on for the Dorset sites?
48. The HRA indicates potential "in combination effects" of the western and eastern Roeshot sites situated on opposite banks of the River Mude with respect to the Southern Damselfly. It states that cross border timing of mineral extraction should ensure that working does not occur at the two sites at the same time. How would this be achieved in practice? Has this been adequately addressed in the DGs?
49. Should the DGs for each site make reference to this cluster?

Cluster 4 - Moreton Area of Dorset: AS-19 Woodsford Extension, AS-25 Station Road and AS-26 Hurst Farm

50. Given their close proximity to each other, have these sites' potential cumulative effects been adequately assessed including traffic impacts, harm to landscape, residents' visual and other amenity, and the historic environment?
51. Should more direction be given in the DGs on mitigating cumulative effects to an acceptable level?
52. The SA indicates that the main areas of cumulative traffic impact are likely to be along the B3390 and particularly the two narrow Hurst Bridges and the Waddock Cross junction, where there has previously been an accident problem. Does the transport assessment adequately consider and resolve these potential impacts taking account of all minerals and other built development in the area?
53. Do any of the Highways Authorities have any outstanding issues?
54. I note that the traffic modelling in the Moreton/Crossways/Woodsford Traffic Impact Assessments 2016 appear to be based on a SATURN model of the Crossways area created in 1999, although the network was audited and the model altered to reflect current conditions. How have changes in development between then and the 2016 base year been taken into account within the assessment?
55. In its Site Assessment comments on AS-25 and AS-26, Highways England refers to traffic modelling only being inter-peak period. Has this now been resolved to include all peak periods?
56. Also Highways England refers to the conclusion that there will be less traffic on the network as only two sites will be operating in the future and it asks for clarification. Would the Councils please clarify?

57. I understand from representations that there is a proposal to designate a Dorset National Park within the lifetime of the MSP and that it would include the area covered by these three sites. What is the position with this proposal and does it need to be referenced in the MSP?
58. The DGs indicate that AS-25 and AS-26 will not be worked simultaneously. How is this likely to work in practice and does it have implications for working the two sites within the Plan period?
59. According to the Halletec site investigation of June 2018 the sand and gravel resource for AS-25 and AS26 appears to be present throughout the whole site and includes both Poole Formation and River Terrace sand and gravel of commercial quality. I understand that the figures represent an increase of about 30% over previous estimates, which did not show the Poole Formation resource.
 - a) Should MSP Policy MS 1 be modified to reflect the increase and subdivision of resource?
 - b) Do the DGs require any modification as a result of this investigation?
60. Should the DGs for each site make reference to this cluster of three?

Cluster 5: As for Cluster 4 plus AS-06 Great Plantation

61. The SA considers these sites together due to potential traffic impacts on the road network and on a school situated on one of the HGV traffic routes. Does the traffic impact assessment for Cluster 4 include Great Plantation and does it resolve cumulative impacts? What is the position with the school?
62. Should these potential impacts be referenced in the DGs?
63. Should the DGs for each site make reference to this cluster?

Cluster 6 - Purbeck Stone Sites: Allocations listed in Policy MS-6 (PK-02, PK-10, PK-15, PK-17, PK-18, PK-19 and PK-21) and MS-3 Swanworth Quarry Extension (PK-16)

64. Have the potential main cumulative impacts of sites in the Dorset AONB been adequately assessed?
65. How is it envisaged the cumulative effects of these sites on the Dorset AONB will be mitigated to an acceptable level?
66. Is there sufficient direction given in the DGs on the mitigation of adverse effects on the AONB?
67. Should the DGs make reference to potential cumulative impacts?
68. Should the DGs for each site make reference to this cluster?

iii) Sand and Gravel MS-1: *Production of Sand and Gravel*

General Questions

69. Has the most appropriate methodology been used to assess aggregate demand? Are there any outstanding issues with the assessments?
70. MS Policy AS2-*Landbank Provision* requires the maintenance of separate landbanks for Poole Formation and River Terrace sand and gravel. Should the updated shortfall calculations in the MSP be broken down into Poole Formation and River Terrace estimates so as to reflect and deliver the MS provisions?

71. The MS states that past trends show that about two thirds of provision consists of soft sand from the Poole Formation (Bedrock) and about one third comes from River Terrace or Plateau sharp sand and gravel deposits (Superficial). It goes on to indicate that every effort will be made to ensure an appropriate split in provision. With this in mind, should the MSP indicate the type of sand and gravel supplied from the identified sites in MS-1?
72. Should figures be set out for both Poole Formation and River Terrace/Plateau sand and gravel to demonstrate how the sites overall provide an appropriate split between each of the identified types?
73. Have the site assessments accounted for the demand for the different main types of sand and gravel?
74. Do the allocated sites appropriately match the demand for each type of sand and gravel, and are they as far as reasonably practicable, appropriately located geographically?
75. Do the proposed allocations sit within the sand and gravel resource areas/blocks from which the MS indicates that new sites should be identified? Should this be made clear in the MSP?
76. For effectiveness, should the resource blocks be superimposed on Fig 1 (*Sand and Gravel site allocations*)?
77. Natural England suggests that reference be made in Policy MS-1 to the range of mitigation measures required for sand and gravel sites as listed in Appendix 2 of the HRA Screening Report so as to give this mitigation the weight of policy. Should these mitigation measures be set out in MS-1 to provide more certainty that they would be met?
78. Alternatively, would it be as effective to reference these mitigation measures in the DGs as opposed to committing them to the body of Policy MS-1?
79. As suggested by Natural England, should Policy MS-1 make reference to "*work[ing] towards achieving public benefits within the restoration vision*"
80. The MS at paragraph 7.44 states that no sites will be brought forward for sand and gravel that are likely to affect European or internationally designated nature conservation sites and that detailed ecological and hydrological assessments are required for potential allocations close to such sites before they are taken forward into the MSP. Have these assessments been done for any allocations that come within the scope of paragraph 7.44? Please identify any such sites.

Silica Sand

81. The MS states (paragraph 13.19) that: *Continued production of industrial sand will be investigated through the site allocations process, and Policy IS1-Industrial Sand* commits to an appropriate contribution to the national requirement for silica sand. Do any of the Poole Formation (Bedrock) sites in MS-1 provide industrial Silica Sand and, if so, should this be made clear?
82. If Silica Sand is to be produced for industrial purposes at any of these sites, should the MSP indicate how this contributes to providing a stock of reserves to support relevant industry? (NPPF paragraph 146 3rd bullet)

Site Specific Questions for allocations within Policy MS-1: Production of Sand and Gravel

83. For each of the allocations, the Councils should indicate whether any statutory regulatory bodies have any outstanding concerns about the sites, other than what has already been identified in the questions. If so, these concerns should be set out along with how they have been addressed in the MSP.

AS-06: Great Plantation, Puddletown Road, Bere Regis

84. Can the Strong Negative Impacts identified in the SA (ob. 2 – biodiversity) and the “Very significant adverse impact” (Category A) identified in the Site Assessment on biodiversity (Criteria C1-C5) be adequately mitigated, particularly for i) European/International Designations, ii) National Designations (eg SSSI) and iii) Protected species?
85. Have all significant matters been properly taken into account in these assessments and, if not, what matters require further consideration?
86. Natural England’s comments within the Site Assessment say “...it will be extremely difficult to find an area within Great Plantation where aggregate extraction would not be in conflict with NPPF policy and Habitats Regulation tests, both for habitats and species...” What are the Councils’ views on this?
87. Dorset Wildlife Trust is concerned about the impact on European Sites and protected species including Smooth Snake, Sand lizard and Nightjar. Can the nearby SPA, SAC and SSSI be adequately protected?
88. As the site is entirely on Open Access Land, could there be negative impacts due to the displacement of recreational users of this land?
89. Is this a case for consideration of Imperative Reasons of Overriding Public Interest?
90. Is this allocation in conformity with the MS, which states at paragraph 7.44 “No sites will be brought forward for sand and gravel which fall within and/or are likely to affect European or internationally designated nature conservation sites”?
91. The Site Assessment also identifies category “A” “Very significant adverse impact” for C8 – landscape capacity, C11 – archaeology, C12 – hydrogeology/groundwater, C13 – surface waters; the SA identifies Strong Negative Impacts for historic environment (ob. 6), landscape (ob.7), and access to countryside (ob.18). Are there reasonable prospects of these harms being adequately mitigated?
92. Historic England indicates that there are numerous designated assets and their settings that would be directly impacted. In particular concern is raised about permanent major adverse changes to the landform and landscape, which would impact on three Scheduled Monuments: a Bronze Age round barrow and two sections of the Battery Bank linear earthwork. The Heritage Assessment (Context One) refers to numerous heritage assets. Can the harm to the significance of these assets be adequately mitigated?
93. Would the Councils explain how the balancing exercise has been carried out in weighing harms against benefits and reaching a conclusion to allocate?
94. Should the DGs provide more direction on the mitigation measures required for nature conservation and other identified category “A” effects or Strong Negative Impacts?
95. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-09: Hurn Court Farm Quarry, Hurn, Christchurch

96. The Site Assessment identifies category "A" "Very significant adverse impact" for C10 – historic buildings, C11 – archaeology, C13 – surface waters. The SA shows Strong Negative Impacts for historic environment (ob.6), and quality of life (ob.17). The Heritage Assessment (Context One) refers to extensive heritage assets being impacted. Are there reasonable prospects of these harms being adequately mitigated?
97. Have all significant matters been properly taken into account in these assessments and, if not, what matters require further consideration?
98. There are residential and business properties in close proximity to the site. How is it envisaged residential amenity will be protected?
99. Should the DGs provide more direction on the mitigation measures required for identified Category "A" effects and Strong Negative Impacts?
100. Given that the site is located adjacent to Bournemouth Airport and within the airport's consultation zone, can birdstrike and other impacts on the airport be adequately mitigated?
101. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-12: Philliol's Farm, Hyde

102. Can the "Very significant adverse impact" (Category A) identified in the Site Assessment on criteria C1-C3 & C5 - biodiversity, C11 – archaeology, C12 hydrogeology/groundwater, C13 –surface waters, and Strong Negative Impacts identified in the SA on biodiversity (ob.2), historic environment (ob.6), landscape (ob.7), quality of life (ob.17) and access to countryside (ob.18), be adequately mitigated?
103. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?
104. There are residential properties in close proximity to the site (within 50m). How is it envisaged residential amenity will be protected?
105. How is it envisaged the potential harm identified in the HRA to the Fairy Shrimp and other protected species will be mitigated?
106. The Environment Agency commented on possible impacts to the River Piddle and Bere Stream SSSI and Natural England says that hydrological impacts on Bere Stream SSSI should be avoided. How is it envisaged the potential harm to the River Piddle and Bere Stream SSSI would be mitigated?
107. How is it envisaged impacts on Philliol's Coppice Site of Nature Conservation Interest would be mitigated?
108. The Heritage Assessment (Context One) refers to a number of heritage assets in the area. Does the Heritage Assessment adequately cover the potential impacts on the significance of all heritage assets?
109. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?
110. Can the potential harm to these assets and particularly the Listed Buildings in the centre of the site be adequately mitigated?

111. Historic England indicates that this allocation does not reflect the MS or national policy or legislation. What is the Councils' response to these matters?
112. Would the Councils explain how the balancing exercise has been carried out and how harms have been weighed against benefits to reach a conclusion to allocate?
113. Should the DGs provide more direction on the mitigation measures required for identified Category "A" effects and Strong Negative Impacts?
114. Natural England indicates that the main issue involving internationally designated sites concerns the proposed access road. Therefore, should the DGs provide more direction on the mitigation measures required for this?
115. Natural England suggests that the DGs Restoration Vision to a heathland is not appropriate and a wetland restoration would be better. Should the DGs be modified to reflect this?
116. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-13: Roeshot Quarry Extension, Christchurch

117. Could the "Very significant adverse impact" (Category A) identified in the Site Assessment on criteria C5 – biodiversity designations, C11 – archaeology, and C13 – surface waters, and the Strong Negative impacts identified in the SA on water (ob.4), and the historic environment (ob.6) be adequately mitigated?
118. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?
119. The Heritage Assessment (Context One) refers to a number of heritage assets in the area. Should the DGs provide more direction on the mitigation measures required for these and other identified Category "A" effects and Strong Negative Impacts?
120. Does the Plan adequately address potential impacts on designated sites in the New Forest National Park? Has sufficient assessment been undertaken of the Burton Common SSSI, the New Forest SPA, the New Forest SAC and Ramsar Sites?
121. The Environment Agency indicates that, due to its location partly in Flood Zone 3, a Sequential Test is advised to determine whether there are any other sites with lower flood risk. The Strategic Flood Risk Assessment of December 2017 (SFRA) indicates that the Sequential Test should be carried out before allocation (paragraph 9.10). Has this been done and with what outcome? (I note the comments in SFRA Appendix A Parts 1 and 2 on site AS13 but this does not make clear whether the Sequential Test has been applied).
122. Has the Exception Test been carried out and, if so, with what result?
123. How much of the site would be required for use as a Western Suitable Alternative Natural Greenspace (SANG) for the North Christchurch Urban Extension and would this impact on the quantity of sand and gravel that could be excavated?
124. I understand that part of the site is on land allocated for the SANG in Christchurch's local plan which is needed to satisfy Habitats Regulation requirements. Is there any conflict with this local plan?

125. I understand that an Eastern SANG is to be provided for Christchurch Urban Extension and that there is potential conflict with this SANG and the proposed haul road for AS-13. Can this conflict be avoided and should it be addressed in the DGs?
126. Is there a need for the Western and Eastern SANGS to be co-ordinated and how would this be done in practice?
127. Given that the site is located in the vicinity of Bournemouth Airport and within the airport's consultation zone, can birdstrike and other impacts on the airport be adequately mitigated?
128. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-15: Tatchells Quarry Extension, Wareham

129. Can the "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C13 –surface waters be adequately mitigated?
130. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
131. Should the DGs provide more direction on the mitigation measures required for this category "A" impact?
132. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-19: Woodsford Quarry Extension, Woodsford

133. Can the "Very significant adverse impacts" (Category A) identified in the Site Assessment on criteria C9–historic landscape, C11 – archaeology, and C13– surface waters be adequately mitigated?
134. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
135. Has the potential impact on "Sculpture by the Lakes", been taken into account? I understand that this is a cultural heritage site, which is also a Nature Improvement Area, adjacent to the allocation, and is an important arts venue for the county that relies on tranquil surroundings.
136. The Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Does the Heritage Assessment adequately cover the potential impacts on the significance of all heritage assets?
137. Should the DGs provide more direction on the mitigation measures required for the potential harm to these heritage assets and other category "A" impacts?
138. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?
139. Has the potential impact on the River Frome SSSI been adequately assessed?
140. As suggested by Natural England, should more direction be given in the DGs on the range of potential public benefits, such as nitrogen reduction inputs to Poole Harbour, flood alleviation, biodiversity gain and recreational opportunities?

141. From the Site Assessment it appears that the Environment Agency originally objected on the basis that water voles and other protected species (otter) may be present in the watercourses within the site. Were any such species found and should more detailed mitigation measures be set out in the DGs for their protection?
142. Highways England indicates that the surrounding highway network is tortuous and narrow and there would probably be a strong highway objection if these local roads were to be used. Whilst the DGs say that access will be via the existing access, for effectiveness, should they make clear which roads must not be used? Should the need for a conveyor system back to the existing site facility be set out in the DGs?
143. The SFRA Appendix A Part 1 states that the site is partly within Flood Zones 2 and 3 but Part 2 states that it is entirely within Flood Zone 1. Could this be clarified? The Environment Agency's comments in the Site Assessment say it is partly in flood zones 2 and 3. Does the Sequential Test need to be carried out before allocation (paragraph 9.10)? If so, has this been done and with what outcome?
144. Is there a need for an exception test and, if so, has this been done and with what outcome?
145. It appears from the National Grid comments that the site is located in the vicinity of National Grid infrastructure and, in particular, high voltage overhead lines. Should the DGs make reference to this and the need for safety clearances and consultation with National Grid?
146. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-25: Station Road, Moreton

147. Can the "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C13 –surface waters, and the SA identified Strong Negative Impact on the historic environment (ob.6) be adequately mitigated?
148. Should the DGs provide more direction on the mitigation measures required for these identified Category "A" effects and Strong Negative Impacts?
149. Have all significant matters been properly taken into account in these assessments and, if not, what matters require further consideration?
150. Has the impact on the nearby community been adequately assessed and, in particular, on "Employ My Ability", the college catering for people with learning disabilities?
151. The Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Does this Heritage Assessment adequately cover the potential impacts on the significance of all heritage assets, including features and buildings associated with TE Lawrence?
152. Can the potential harm to the significance of the Moreton Conservation Area and Listed Buildings adjacent to the site be adequately mitigated?
153. Should more direction on mitigation of potential harm to heritage assets be given in the DGs?
154. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?

155. Has the potential impact on nature conservation/biodiversity been adequately addressed and in particular any potential effects on the River Frome SSSI?
156. Are any issues relating to bats, the River Frome SSSI and/or Poole harbour Ramsar site capable of mitigation to an acceptable level?
157. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

AS-26: Hurst Farm, Moreton

158. Can the "Very significant adverse impact" (Category A) identified in the Site Assessment on criteria C9 – historic landscape, C11 – archaeology, C13 – surface waters be adequately mitigated?
159. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?
160. The Historic Assessment (Context One) refers to numerous heritage assets within the vicinity. Does this Heritage Assessment adequately cover the potential impacts to the significance of all heritage assets, including features and buildings associated with Thomas Hardy and TE Lawrence?
161. Should the DGs provide more direction on the mitigation measures required for these heritage assets and other Category "A" impacts?
162. Should more direction on the mitigation measures required to conserve historic features such as ancient trees and hedgerows be set out in the DGs as suggested by Historic England?
163. Has the potential impact on nature conservation/biodiversity been adequately addressed and in particular any potential effects on the River Frome SSSI?
164. As suggested by Natural England, should more direction be given in the DGs on the range of potential public benefits, such as nitrogen reduction inputs to Poole Harbour, flood alleviation, biodiversity gain and recreational opportunities?
165. The SFRA Appendix A Parts 1 and 2 indicates that the site lies partly within Flood Zones 2 and 3 and, therefore, the Sequential Test should be carried out before allocation (paragraph 9.10). Has this been done and with what outcome? (I note the comments in SFRA Appendix A on site AS-26 but this does not make clear whether the Sequential Test has been applied).
166. Has the Exception Test been carried out and, if so, with what result?
167. It appears from the National Grid comments that the site is located in the vicinity of National Grid infrastructure and, in particular, high voltage overhead lines. Should the DGs make reference to this and the need for safety clearances and consultation with National Grid?
168. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

iv) Policy MS-2: Sand and Gravel Area of Search

169. In Policy MS-2 should criterion i distinguish between Poole Formation and River Terrace sand and gravel?

170. Should MSP paragraph 3.13 (relating to the potential grant of permission to unallocated sites) make clear that it is permitted sand and gravel reserves of the *same specific type of aggregate* in the vicinity that are to be considered?
171. Does paragraph 3.13 set out another criterion that should go in Policy MS-2 itself rather than the supporting text? *ie The Mineral Planning Authority (MPA) will need to be satisfied that there are no permitted sand and gravel reserves capable of being worked but not currently being worked in the vicinity of a proposal through Policy MS-2, that could be used to meet the identified shortfall.* (It seems to say something different to MS-2, criterion iv.a).
172. Identifying the main points within the *Sand and Gravel Area of Search Background Paper* briefly explain how the Area of Search was determined and what the primary considerations were.
173. Should other considerations have been taken into account?
174. In general and in broad terms, is there potential to adequately overcome the main constraints within the Area of Search?
175. MSP paragraph 3.11 refers to a landscape and ecological assessment of the Resource Blocks, which appears to be the *Landscape & Ecological Assessment* Feb 2015, revised Feb 2018 within the Background Paper. Please confirm.
176. How have reasonable alternatives been assessed?
177. Is the Area of Search the most appropriate area?

v) Crushed Rock: Policy MS-3 PK-16 Swanworth Quarry Extension

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?
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?
180. Have all significant matters been properly taken into account in the Site Assessment and SA, and if not, what matters require further consideration?
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?
182. What impact, if any, would there be on the significance of Corfe Castle and its setting?
183. What impact, if any, would there be on the Jurassic Coast UNESCO World Heritage Site?
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.

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:
 - a) 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?
 - b) Specifically, has sufficient landscape and visual impact assessment been carried out?
 - c) In broad terms, how is it envisaged mitigation measures will lower identified impacts to an acceptable level to justify the allocation?
186. Would the Councils briefly explain the balancing exercise they have undertaken in allocating this site?
187. Should the DGs give more direction on mitigation measures to reduce identified Category A effects and Strong Negative Impacts?
188. Should the DGs give direction on managing the cumulative effects of Swanworth Quarry Extension and the existing Swanworth Quarry?
189. Should the Restoration Vision require early phased restoration to minimise visual impact on the AONB?
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?
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?
192. Although no other crushed rock sites have come forward, have all other reasonable alternative options been considered in the SA?
193. Is MSP paragraph 3.26 misleading? Representations state that Portland stone firms are capable of doubling production.
194. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

vi) Recycled Aggregate MS-4: *Site for the provision of recycled aggregate*

RA-01: White's Pit, Poole

195. For effectiveness, should Policy MS-4 state that Site RA-01 is actually allocated? MS-4 just says it is suitable for aggregates recycling.
196. The DGs for this site indicate that it is operating under a temporary permission. In order to provide direction on mitigation measures to consider in any future planning application, should the DGs provide more detail, particularly with respect to Site Assessment on criterion C13 – surface waters, which indicates a potential "Very significant adverse impact" (Category A) on a drain within the site boundary.

197. To what extent are there likely to be adverse impacts on nearby residents, including those along Arrowsmith Road, and can these impacts be adequately mitigated?
198. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
199. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

vii) Ball Clay MS-5: Site for the provision of ball clay

BC-04: Trigon Hill Extension, Wareham

200. The MS Spatial Strategy and the Ball Clay section of the MS indicate that extraction will be directed towards the "Areas of Less Environmental Sensitivity", although to ensure an adequate and steady supply of the range of clays, sites will also be required within the wider Ball Clay Consultation Area. To ensure consistency with the MS, should the Ball Clay section of the MSP say whether the Trigon Hill Extension is within an identified Area of Less Sensitivity and if not, how it is justified in terms of contributing to a range of clay supply?
201. For clarity and effectiveness should Figure 5 (*Ball Clay Allocation*) show the Areas of Less Sensitivity and the wider consultation area relative to site BC-04?
202. Will there be any extraction of sand and gravel as a secondary product to the Ball Clay at the proposed Trigon Hill Extension and, if so, should this be set out in Policy MS-5 and/or Policy MS-1 (*Production of Sand and Gravel*)?
203. Could the "Very significant adverse impacts" (Category A) identified in the Site Assessment on criteria C1 to C4 biodiversity, C11-archaeology, C12 - groundwater, and C13 - surface water and the SA identified Strong Negative Impact on landscape (ob.7) be adequately mitigated?
204. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
205. Historic England indicates that the allocation would have a substantial impact on the setting and significance of the scheduled Bronze Age round barrow monument on Trigon Hill. How is this to be addressed?
206. Have the identified Category A effects and Strong Negative Impacts been adequately assessed?
207. Should the DGs provide more direction on the mitigation measures required for these Category "A" effects and Strong Negative Impacts?
208. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

viii) Purbeck Stone MS-6: Sites for the provision of Purbeck Stone

General Questions

209. Should this section of the MSP state whether Policy MS-6 is aimed at meeting the committed provision in the MS (Policy PK1- Provision of Purbeck Stone) of at least 20,000 tonnes per annum on average of saleable Purbeck Stone (excluding Burr and Purbeck Marble)?

210. As there is a demand for a range of Purbeck stones from the different Purbeck Stone beds, should Policy MS-6 state the type of Purbeck Stone available at each site?
211. As suggested by Natural England, should the DGs' Restoration Vision for the Purbeck Stone sites include limestone pasture of conservation interest and provide for some areas to naturally re-vegetate to encourage successional limestone habitats?
212. As bat roosts are an important feature of old abandoned quarries in this area, should the Restoration Vision for the sites include the provision for the establishment of bat roosts?

Site Specific Questions

PK-02: Blacklands Quarry Extension, Langton Matravers

213. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?
214. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
215. Should the DGs provide more direction on the mitigation measures required for this category "A" impact?
216. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

PK-10: Southard Quarry, Swanage

217. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?
218. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
219. Should the DGs provide more direction on the mitigation measures required for this category "A" impact?
220. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

PK-15: Downs Quarry Extension, Langton Matravers

221. I understand that this site has planning permission and, therefore, the Councils wish to remove it from the MSP by way of main modification. Please confirm.

PK-17: Home Field, Acton

222. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology, and the Strong Negative Impact identified in the SA on water (ob.4) be adequately mitigated?
223. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
224. Should the DGs provide more direction on the mitigation measures required for these category "A" effects and Strong Negative Impacts?

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

PK-18: Quarry 4 Extension Acton

226. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?
227. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
228. Has sufficient account been taken of the potential impact on residential properties in the hamlet of Blacklands and the surrounding area?
229. Should the DGs provide more direction on the mitigation measures required for this category "A" impact?
230. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

PK-19: Broadmead Field, Langton Matravers

231. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11–archaeology be adequately mitigated?
232. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
233. Should the DGs provide more direction on the mitigation measures required for this Category "A" impact?
234. Should the DGs include reference to existing water mains and abandoned water tanks on site as suggested by Wessex Water?
235. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

PK-21: Gallows Gore, Harman's Cross

236. Could the potential "Very significant adverse impacts" (Category A) identified in the Site Assessment on criteria C11–archaeology, and C18-sensitive human receptors, and the Strong Negative Impact identified in the SA on quality of life (ob.17) be adequately mitigated?
237. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
238. Has the potential impact on residential receptors been adequately assessed and can this impact be mitigated to acceptable levels?
239. Have the potential traffic impacts been assessed and is the access route to the site acceptable?
240. The Dorset AONB Team considers that PK-21 is likely to produce adverse effects on the natural beauty of the AONB. Has this been adequately assessed? Is there scope to mitigate this impact to acceptable levels?
241. Should the DGs provide more direction on the mitigation measures required for these Category "A" effects and Strong Negative Impacts, and the effect on the AONB?

242. Given Wessex Water's concerns over the potential impact on their adjacent reservoirs and water main, should the DGs provide more direction on mitigation?
243. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

ix) MS-7: Sites for the provision of other building stone (excluding Portland and Purbeck stone)

General Questions

244. Do the sites set out in MS-7 meet the criteria in MS Policy BS1-Building Stone Quarries?
245. Should MS-7 state the type of building stone to be excavated at the three identified site extensions (presumably the same type of stone as the existing associated quarry set out under MSP paragraph 3.65)?
246. Does the wording of MS-7 reflect the intention to allocate the identified extensions in that it says "The following extensions to existing sites are allocated, provided that the applicant can in each case demonstrate....." (My emphasis). Does this need re-wording so that the allocation is not conditional, but rather any planning application is conditional?

Site Specific Questions

BS-02: Marnhull Quarry, Marnhull

247. Please confirm whether Marnhull Quarry, Marnhull, is the same as Whiteways Lane Quarry, Marnhull?
248. Could the potential "Very significant adverse impact" (Category A) identified in the Site Assessment on criterion C11-archaeology be adequately mitigated?
249. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
250. Should the DGs provide more direction on the mitigation measures required for this Category "A" impact?
251. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

BS-04: Frogden Quarry, Osborne

252. Are there any significant outstanding issues with this allocation?
253. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?
254. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

BS-05: Whithill Quarry, Lillington

255. Could the potential "Very significant adverse impacts" (Category A) identified in the Site Assessment on criteria C11-archaeology, and C13-surface waters be adequately mitigated?
256. Have all significant matters been properly taken into account in the SA and Site Assessment and, if not, what matters require further consideration?

257. Should the DGs provide more direction on the mitigation measures required for these Category "A" impacts?
258. Are there any other details that should be added to the DGs, including issues raised by statutory consultees and other representors?

Matter 2: Whether the remaining Plan policies promote sustainable development and make adequate provision for monitoring

i) Policy MS-8: Puddletown Road Area

259. Historic England question why this policy only addresses issues relating to the natural environment. Is there any merit in extending the scope of the Area Policy to include Heritage issues, or would this detract from its purpose?

ii) Safeguarding

Policy MS-9: Preventing Land-Use Conflict

260. Should the safeguarding of mineral sites (including sites allocated through the MSP) and infrastructure as listed in Appendix B and illustrated in Figure 9 be set out in policy rather than supporting text (MSP paragraph 5.6)? (Although such a policy would reference Appendix B and Figure 9, which would only be accurate at the time of adoption, the policy could explain how changes would be dealt with over time.)
261. In MS-9:Preventing Land-Use Conflict is the 250 metre consultation area around safeguarded mineral sites and infrastructure the most appropriate distance? Explain very briefly how this distance has been chosen?
262. How should applications for prior approval be treated in relation to safeguarding?
263. Are all exemptions set out in MSP paragraph 5.9 justified and is the list comprehensive in that it includes all development that should be exempt?
264. Should these exemptions have the force of policy and be included in the body of MS-9?
265. Are all relevant railheads listed for safeguarding? (Railfuture's representation indicates that they might not be)

iii) Implementation and Monitoring

266. Are the provisions for implementation and monitoring effective and do they identify appropriate triggers for review?
267. In MSP Tables 2 to 9, to be effective should there be a column for the action required if the monitoring trigger is met?
268. Should there be an additional indicator to assess any impact of the Area of Search on non-minerals development including its potential delay?
269. MSP paragraph 6.12 says "it is expected that it will be reviewed...". The Town and Country Planning (Local Planning)(England)(Amendment) Regulations 2017, regulation 4 "Review of local development documents" states that reviews of local plans must be completed every five years, starting with the date of adoption of the local plan. This regulation came into force on 6 April 2018. Should paragraph 6.12 be modified to reflect this?