

Inspector's Matters, Issues and Questions (MIQs)

**iii) Sand and Gravel MS-1 :
Production off sand and gravel**

Question 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?

1. No.
2. Whilst this is idea could be pursued in the next iteration of the MSP its adoption in the current MSP would require considerable work to change relevant site assessments to reflect Poole Formation and River Terrace estimates and amend the MSP.
3. The current MSP Pre-Submission reflects the Mineral Strategys *AS1 – Provision of Sand and Gravel* (page 59) which does not mention Poole Formation and River Terrace but merely refers to *sand and gravel*.
4. The discussion on page 56 of the Minerals Strategy titled *Addressing the key issues and delivering the strategy – sand and gravel* shows a calculation in paragraph 7.37 which only considers *The amount of sand and gravel that will need to be provided for through the Minerals Strategy and the Mineral Sites Plan...*
5. Paragraph 7.38 states in the first sentence: *There will be a need to identify new sand and gravel sites containing around at least 9.36 mt in the Mineral Sites Plan.*
6. Thus the strategy requires DCC to identify sites to satisfy a simple sand and gravel total tonnage and does not require an identification of sites to provide separate tonnages of Poole Formation and River Terrace.
7. Policy AS2 on page 63 of the Minerals Strategy requires the Minerals Planning Authorities to maintain a separate landbank for both Poole Formation and River Terrace aggregates.
8. The MSP Pre-Submission Draft reflects the requirements in the Minerals Strategy as repeated above to select sites to provide a total amount of sand and gravel and not sub-totals reflecting the requirements of the individual land banks.
9. Question 70 in effect asks the Minerals Planning Authority to do something which is not in the Minerals Strategy, even though the concepts in Question 70 could have been required when the strategy was approved.
10. Moreton Parish Council has shown in its submission on MS-1 that the allocated quarries in MS-1 will not provide enough sand and gravel and will not provide a 7 year land bank of sand and gravel (as a global figure and not sub-divided).
11. Moreton Parish Council has also shown in its submission on the Area of Search that there are simply not enough mineral sites available, irrespective of a division into Poole Formation and River Plateau.

12. Thus whilst it is theoretically possible to implement the concepts in Question 70, it will not result in any increase in either Poole Formation or River Plateau sand and gravel.
13. There are simply not enough sites available to achieve the required aggregate total, let alone separate Poole Formation and River Terrace totals.
14. The considerable amount of work involved in implementing the requirements of Question 70 will not yield any more Poole Formation or River Terrace sand and gravel.
15. In other words, Question 70 represent a very theoretical approach.
16. The approach in the Minerals Strategy, repeated above, is a practical approach.
17. Moreton Parish Council recommend that subsequent to the examination of the MSP Pre-Submission Draft, consideration be given as to whether there would be merit in amending the Minerals Strategy to possibly adopt the suggestions in Question 70.

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Question 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?

1. No.
2. Question 71 is really repeating the concept in Question 70 and hence the answer to Question 70 also applies to Question 71.
3. Moreton Parish Council has shown in its submission on MS-1 that the allocated quarries in MS-1 will not provide enough sand and gravel and will not provide a 7 year land bank of sand and gravel (as a global figure and not sub-divided).
4. Moreton Parish Council has also shown in its submission on the Area of Search that there are simply not enough mineral sites available, irrespective of a division into Poole Formation and River Plateau.
5. Thus whilst it is theoretically possible to implement the concept in Question 71, it will not result in any increase in either Poole Formation or River Plateau sand and gravel.
6. There are simply not enough sites available to achieve the required aggregate total, let alone separate Poole Formation and River Terrace totals.
7. The considerable amount of work involved in implementing the requirements of Question 71 will not yield any more Poole Formation or River Terrace sand and gravel.
8. The concept in Question 71 of sub-dividing the MS-1 allocated sites' sand and gravel totals into River Terrace and River Plateau is not in the Minerals Strategy and hence there would also need to be consultation on an amendment to the Minerals Strategy.
9. The approach in the Minerals Strategy, repeated above, is a practical approach.
10. Moreton Parish Council recommend that subsequent to the examination of the MSP Pre-Submission Draft, consideration be given as to whether there would be merit in amending the Minerals Strategy to possibly adopt the suggestions in Question 70.

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Question 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?

1. Yes, but this will require considerable work to achieve and should be considered as part of the next MSP review.

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Question 73

Have the site assessments accounted for the demand for the different main types of sand and gravel?

1. No.
2. The MSP currently does not require site assessments to account for the different demand for different types of sand and gravel.

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Question 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?

1. The site assessments do not require operators to sub-divide the type of sand and gravel they could produce.
2. This question could only be answered if the operators were asked to provide the appropriate information about the type of sand and gravel their sites could produce and in what quantity.

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Question 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?

1. Yes.
2. Not really necessary.

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Question 76

For effectiveness, should the resource blocks be superimposed on Fig 1(Sand and Gravel site allocations)?

1. No.
2. It would complicate the figure.
3. It would also disguise the fact that despite a wide area of search the allocated quarries are within very small areas which have been used repeatedly.
4. This emphasises the fact that the availability of land for aggregate extraction is very small and the amount left to be extracted in these areas is very small.
5. All of this highlights the fragility and paucity of aggregate supply in Dorset.
6. Serious consideration should be given to conserving a proportion of aggregate stocks. This was raised in Moreton Parish Council's Area of Search submission.
7. It was also raised at the Minerals Strategy examination.

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Question 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?

1. The mitigation measures should not be put in MS-1 but put in the relevant Appendix A: Site Allocations.
2. A line could be included in the last paragraph of MS-1 highlighting that HRA mitigation measures are contained in the relevant Appendix A: Site Allocation.
3. The mitigation measures have far more impact when the appropriate site map is available together with a description of the relevant site. This is achieved in Appendix A.
4. The mitigation measures described in the last paragraph of MS-1 have very little impact because they are remote from the maps and descriptions in Appendix A.

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Question 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?

1. Moreton Parish Council's recommendations in the answer to Question 77 provide the best solution.

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Question 79

As suggested by Natural England, should Policy MS-1 make reference to “work[ing] towards achieving public benefits within the restoration vision”

1. No.
2. It is not obvious what this proposed sentence means.
3. It is not obvious what Natural England mean by *...achieving public benefits..*
4. The vast majority of people think that restoration means just that: restoring a site to its original state.
5. Anything else is not restoring but change of use.
6. Almost all the quarry sites in the Crossways area have not been restored but turned into housing or a solar park.
7. One of the reasons most people are against quarrying is because the quarrying ends up being a stepping stone to some other unwanted long-term use.