

Statement for Minerals Planning Enquiry in Response to the MIQs

From Rage in the Piddle

Introduction to Rage in the Piddle

“Rage in the Piddle” was formed in 2005, 13 years ago when the Dorset Council first informed us they were starting work on a new Minerals Plan for Dorset. The group consists of local residents and farmers who live in the beautiful Piddle Valley in Hyde, who oppose the Philliols Farm AS12 site being destroyed for sand and gravel. You will see from the number of letters of objections that there is a large group of residents who would be badly affected by gravel extraction and strongly oppose to this development.

Questions and issue further to the Inspector’s MIQs

1. **Re Page 9, i) General para 26.** The MIQs asks if the Landscape and visual impact has been adequately assessed. This is a very relevant and important question for the AS12 Philliols Farm site. When this site was last submitted by DCC over 20 years ago for the previous Minerals Plan it was rejected by the Inspector in 1996. Two of the main reasons the site was rejected were:
 - a. Gravel workings would have an obvious visual and audible intrusion into this peaceful rustic location being of intimate landscape character and would have a significant detrimental impact on the area as whole and on sensitive properties close to the site as well as parts of Hyde Heath. See Ref 10.3.3 of the Inspectors report.
 - b. Gravel extraction would have a serious adverse impact on the visual and residential amenity on the tranquil qualities of this pleasant and quiet corner of Dorset Countryside. Ref 10.3.4

We would argue that DCC should have given serious consideration to these issues in their Site Assessment and demonstrated they either do not exist or demonstrated what measures will mitigate these serious impacts. Considering the Minerals Planning Process for this Plan started in 2005 the DCC have plenty of time to ensure the site has been properly assessed including carrying out any studies and assessing what mitigation methods are needed and how effective they would be. They have done neither!

We understand that the DCC team that created the Site Assessment did not carry out a site visit as part of their process. Although it is understood one of the team had visited the site in the past, none of them have visited the properties that are in close proximity of the site and which would be badly affected by noise, dust and the visual impact of the gravel extraction.

Despite the reasons for previously rejecting the site in 1996 the Site Assessment for the AS12 site, the DCC graded the impact on designated landscapes C7 as grade D and graded the landscape capacity to accommodate the proposed development C8 as grade B, Low without mitigation and grade C medium/low with mitigation without any indication of the mitigation methods.

There is also no mention of the detrimental impact of the noise or air quality that would be caused by the gravel extraction, even though one property will be surrounded by gravel

extraction and other properties will be just 50 meters from the site. Although bunds may reduce the noise levels, they would have to be very high to reduce the noise from the upper floors of properties. The bunds and the gravel workings would have detrimental visual impact on properties that currently enjoy wonderful views across fields, woodlands and forest. Views from properties on higher ground that overlook the Piddle Valley would have their views destroyed throughout the life time of the site.

In conclusion we would argue that the Landscape and visual impact has not been adequately assessed for the AS12 site and the Plan for this site is therefore unsound.

2. **Re Page 9, i) General para 30** The MIQs asks whether there are any allocations where the impacts could not be adequately mitigated. The Plan for AS12 includes few mitigation methods and there is no justification or proof that the adverse impacts could be adequately mitigated. The details of the mitigation methods and effectiveness should have been included in the Plan so that people could consult on this important matter. We do not see how the DCC can answer this question. For this reason the Plan is not sound.
3. **Re Page 13 iii) Sand and Gravel MS-1 para 77.** The MIQs ask whether the range of mitigation methods for these sites should be identified to provide more certainty they would be met. We would strongly argue that the mitigation methods and their effectiveness need to be identified for the Plan to be sound. For the AS12 site the Plan suggests that every impact can be mitigated but provides little or no detail of the mitigation methods to be used. Part of the Consultation process should include not just the possible impacts but the methods of mitigation and the expected result from those methods. Otherwise the Plan is unsound.
4. **Re Page 13 iii) Sand and Gravel MS-1 para 80** The MIQs ask whether there are any sites that should have a detailed ecological and hydrological assessments carried out, before being put forward. We believe AS12 is one of those sites, please refer to the site assessment for this site. We would strongly argue that a detailed assessment should be carried out before the site being put forward otherwise the Plan is not sound. There has been plenty of time for the DCC or the landowner to provide this information.
5. **Re page 15 AS12 Philliols Farm Hyde para 102.** The MIQs ask if the very significant adverse impacts on various criteria can be adequately mitigated. The Plan provides little or no indication of the mitigation methods that could be used or how effective they would be.
6. **Re page 15 AS12 Philliols Farm Hyde para 103.** The MIQs ask if all significant matters have been properly taken into account in the Site Assessment. We would argue that the impact on the landscape and the visual and audible impacts has not been properly taken into account for the AS12 site as indicated in section 1 above.
7. **Re page 15 AS12 Philliols Farm Hyde para 104.** The MIQs ask how the residential properties in close proximity (within 50m) will be protected. The site assessment suggests screening, bunding and standoffs. However screening and bunding would need to be as high as 20-25 feet to protect the properties from the noise, dust and the visual impact of gravel extraction within 50 meters of the property. However the impact of replacing the current views from the properties or surrounding countryside of fields, woodland and forest with 20-25 feet high screening or bunding has not been taken into account in the Site Assessment. The noise of the diggers and lorries will only be reduced by the screening or bunding rather than eliminated, spoiling the peaceful nature of this beautiful and rustic Landscape site.

- 8. Re page 15 AS12 Philliols Farm Hyde para 105.** The MIQs ask what the mitigation methods are for the Ferry Shrimp and other protected species. As indicated before we do not believe the Plan for AS12 is sound without the mitigation methods being identified and being part of the Consultation process.
- 9. Re page 15 AS12 Philliols Farm Hyde para 106.** The MIQs asks whether the potential harm to the Frome and Bere Regis stream be mitigated. We do not believe the AS12 will have any impact on the river Frome:- we believe this should say the river Piddle as referred to by the Environment Agency in the site assessment under their heading Water quality and abstraction. As indicated before we do not believe the Plan for AS12 is sound without the mitigation methods being identified and being part of the Consultation process.
- 10. Re page 15 AS12 Philliols Farm Hyde para 107 – As for 9 above**
- 11. Re page 15 AS12 Philliols Farm Hyde para 109.** As for 9 above
- 12. Re page 15 AS12 Philliols Farm Hyde para 110.** As for 9 above
- 13. Re page 16 AS12 Philliols Farm Hyde para 112.** The MIQs ask how the balancing exercises between harms against benefits to reach the conclusion to allocate.

There appears to be no defined method for deciding what sites should be included and what sites excluded or how the DCC has assessed the total harm against the benefits of the sand and gravel available from a site. We would argue this should be part of the Consultation process but was not included.

The AS12 site was not only rejected by the Inspector in the last Minerals Plan but it was deleted from the Plan by the DCC in 2015 due to *"Impacts of working the site include nature conservation, hydrology/hydrogeology and amenity"*. The DCC obviously are fully aware of the harm gravel extraction would cause for this site and it would appear in 2015 did not believe the harm justified the benefit of the limited sand and gravel available. The extraction of the small amount of sand and gravel available is unlikely to be cost effective which is why Aggregate Industries are no longer interested in the site and there is no other sponsors for the site.

However we understand from a Councillor who is on the DCC Minerals Advisory Committee that the land owners contested the removal of the site and it was subsequently reinstated into the Plan in 2016. This demonstrates they either do not have a method to balance harm against benefits or will override it under pressure.

We would challenge this decision to reinstate the AS12 Philliols Farm site back into the Minerals Plan as the landowner has done nothing to provide any evidence that the site can be used without harm and they have been unable to find an aggregate company to promote the site.

- 14. Re page 16 AS12 Philliols Farm Hyde para 113.** The MIQs ask if more direction on mitigation should be provided for category A and strong negative impacts. As indicated before we do not believe the Plan for AS12 is unsound without the mitigation methods being identified and being part of the Consultation process.
- 15. Re page 16 AS12 Philliols Farm Hyde para 114.** The MIQs ask whether the DGs should provide more direction on the mitigation methods for the proposed access road. We would completely agree as the proposed access road will go through Wareham Forest which is used by many walkers, riders and cyclists and the impact of 200 lorry trips back and forth will have a great impact on the many users of the forest.

16. Re page 16 AS12 Philliols Farm Hyde para 115. The MIQs asks whether the DGs Restoration Vision to a heathland is correct or whether wetland is more appropriate as suggested by Natural England. This appears to be at odds with the assessment which states, *some 75% of the site is identified as 'Best and Most Versatile' (BMV) agricultural land.* To destroy this farmland and turn it into heathland or wetland where it currently provides a valuable income to the tenant farmer is totally wrong. It would deprive the tenant farmer of a living.

Sand and gravel extraction on farm land would have a long term detrimental impact on the quality of the soil which would take years to recover if at all.

David King

On behalf of Rage in the Piddle

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