Official use only: ID No.	Comment No.

Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan

Modifications to the Pre-Submission Draft

Representation Form

This form should be returned by **5:00 pm** on **20th June 2019** to the address at the end of the form, or via email to mwdf@dorsetcouncil.gov.uk Additional copies of the form can be obtained from the Dorset Council website: www.dorsetcouncil.gov.uk/mineral-sites

Late representations cannot and will not be accepted.

- The Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan was previously known as the Bournemouth, Dorset and Poole Mineral Sites Plan**.**
- **All documents and copies of this form are available at** www.dorsetcouncil.gov.uk/mineral-sites
- **During this consultation you can comment on the modifications proposed to the Pre-Submission Draft Mineral Sites Plan.** The modifications are set out in the Schedule of Modifications and in the 'Modified Mineral Sites Plan'. They include main modifications necessary for the Mineral Sites Plan to be capable of being found 'sound' and additional modifications, which do not impact on whether the Plan is 'sound' or not. Main modifications are written in underlined red text and have the prefix 'MM' Additional modifications are written in underlined red italics and have the prefix 'AM'.
- If your representation does not relate to a modification it will not be valid.
- Please make it clear which modification your representation relates to – reference numbers can be found in the Schedule of Modifications and are written in brackets in the Modified Plan.
- A separate representation form should be provided for each modification commented on.
- You can also choose to comment on the sustainability appraisal and habitats regulations assessment
- The Planning & Compulsory Purchase Act 2004 (as amended) states that the purpose of the Examination is to consider whether the plan complies with legal requirements, the duty to co-operate and is 'sound'. Your comments on the modifications must therefore relate to these matters.

To be 'legally compliant':
Any comments which you wish to make on the way in which the Council has prepared the published plan must relate to matters of legal compliance, which include, in particular, whether the plan:

► has been prepared in accordance with the Local Development Scheme; the Statement of Community Involvement and the Town & Country Planning (Local Planning) Regulations 2012;
► has been subject to sustainability appraisal; and
► has had regard to national policy.

To be 'sound' a local plan should be:

► Positively prepared – Does the plan seek to meet objectively assessed needs for minerals; take account of unmet requirements from neighbouring/other authorities where it is reasonable to do so, and achieve sustainable development?
► Justified– Does the plan provide the most appropriate strategy when considered against reasonable alternative options?
► Effective – Do you think that the policies in the plan are capable of being delivered during the plan period?
► Consistent with National Policy – Does the plan enable the delivery of sustainable development in accordance with the National Planning Policy Framework?

Official use only: ID No.	Comment No.

This form has two parts:

Part A - Personal details (please only fill in Part A once);

Part B - Your representation(s) – Please fill in a separate sheet (Part B) for each representation you wish to make.

Please send in Part A and all representations together.

Part A – Respondent Details

	1. Personal Details	2. Agent's Details (for use only when using an agent)
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Telephone		
Email Address		

Data Protection:

The information you provide will be used by Dorset Council for the purpose of preparing the minerals and waste local plans. It will only be retained for as long as required for that purpose.

Note that representations, including respondent details, will be forwarded to the Planning Inspector who has been appointed by the Secretary of State to examine the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan. Please be aware that all representations will be made available for public inspection, including on the council's website.

By submitting this form, you are consenting to its use as detailed and you are agreeing for your details to be added to our database. Further information about the use of personal information is available on our web site at www.dorsetforyou.com or by contacting the Council's Data Protection Officer by email at data.protection@dorsetcouncil.gov.uk or by post at RMU, County Hall, Dorchester, DT1 1XJ

Official use only: ID No.	Comment No.

Part B – PLEASE USE A SEPARATE FORM FOR EACH REPRESENTATION

1. Please state the modification you are commenting on
(Please complete one sheet per main modification or additional modification)

Main modification number:	**MM** 2	**Additional modification number:**	**AM**

2. Do you support or object to the modification

Support ☐ **Object** ☑

3. If you object to a Main Modification, do you think it fails any of these statutory tests: (Please leave this blank if you are commenting on an Additional Modification)

Legal compliance	☑
Soundness	☑
Compliance with the duty to co-operate	☐
No comment	☐

3(a) If you are commenting on soundness, please indicate which test of soundness?

Positively prepared	☑
Justified	☑
Effective	☑
Consistent with National Policy	☑

4. **Please use the space below to provide more detailed comments on the modification**

1. ..1.89 *million tonnes (assuming sales in 2018 and* 2019 *remain generally in line with those for* 2017), The latest Local Aggregate Assessment 2016 is also given on the minerals Main Modifications web-site and is dated 2018. There is no evidence given to substantiate the 1.89 million tonnes and no evidence to support the statement that sales in 2019 will be in line with 2017. The past cannot automatically be taken as a predictor of the future. The sales in 2017 dropped significantly from those in 2016. On the same basis they could rise back up to 1.5 as in 2015, 1.73 as in 2014 or 1.6 as in 2013, or they could drop below those in 2017.

2.…taking into account *new permissions* issued in 2018. The Pre-Submission (dated December 2017 states: (*without any new permissions*). There is no indication what these new permission are. There should be.

3. As a result of these new permissions reserves rose from ~~10.78~~ to 11.5 million tonnes. A rise of 0.72 million tonnes, a rise of 6.7%. But there is no evidence to substantiate such a large rise.

4.…*the most recent ten year average of sand and gravel supply (….)* of ~~1.51~~ 1.48 million tonnes per annum,… Where is the evidence to support this figure of 1.48 mtpa? Where are the sales figures for 2008-2017 which underpin the figure of 1.48. There is no reference to where the relevant sales figure may be seen. I have discussed the 10 year rolling average figure of 1.48 in a second Representation Form on MM2.

5. …approximately 17 million tonnes. This figure is higher than the 10.69 million tonnes required to be provided for through this Plan, providing necessary flexibility should sales rise or allocations not come forward as expected. Attached to this section of this Representation Form is a copy of my *MSP Main Modifications – existing and allocated quarries profile 2019 – 2034* chart. This clearly shows that 5 of the 7 allocated quarries will continue operating after 2034 and one site, Hurst Farm does not start extraction until about 2043 or thereafter, about 10 years after the end of the Mineral Sites Plan period of 2019 to 2034. Thus of the 17 million tonnes, approximately 7.35 million tonnes will be extracted after the end of the plan period. Only approximately 10.63 million tonnes of the allocated sites output will occur during the plan period. The allocated sites will not provide any flexibility.

6. A reconciliation between the figures on page 17 of the Modified Version of the Pre-Submission Draft Mineral Sites Plan and my figures for the output of existing sites is given at the end of this section. To reconcile my figures with the MPA figures on page 17 I have raised the output profile of my existing quarries by 2.47%. In reality the differences between my figures for the existing quarries and the MPA's are very small and probably relate to different interpretations of the figures on the mineral site assessment sheets.

7. What the quarries profile chart clearly shows is that there are not enough allocated quarries for the land bank and for the plan period. The combined output of the existing and allocated sites will only rise above 1.48 million tonnes per annum on 4 of the 16 years of the Plan Period.

8. The quote from the MM 2 above highlights a profound misunderstanding of what the aggregate section of the Mineral Sites Plan is all about.

9. f. The last paragraph of the the green block states:

This amount, along with the Area of Search designated in Unallocated Sites Policy MS-2, *is considered to adequately meet the need for sand and gravel over the life of the Plan and will meet the requirement for a steady and adequate supply of sand and gravel in accordance with Policy AS1 of the Minerals Strategy*. **(MM2)**

10. The statements in the *Sites Proposed for Allocation – Screening for Cumulative Impacts* document which accompanied the Main Modifications document on the web site, clearly shows that a number of sites that have been allocated for aggregate quarries have significant restrictions, and may not produce as much aggregate as expected. The withdrawal of Phillols Farm, which was in the Pre-Submission MS-1 as a site for an aggregate quarry, illustrates that there are extremely few quarry sites available.

11. The failure of the Mineral Sites Plan to provide sufficient aggregate quarries and the great paucity of other sites clearly indicates that Dorset should start to conserve its fast depleting stock of aggregate.

12. Even the British Geological Society's Dorset survey showed that there is only a very limited supply of worthwhile aggregate sites and the owners of most of the land have no desire to lose their land for quarrying.

13. The Mineral Sites Plan is not legally compliant because it does not ,in accordance with the NPPF, dated February 2019):

a. Provide *sufficient supply of minerals*…. (page 58, paragraph 203)
b. …*plan for a steady and adequate supply of aggregates…*(page 59 paragraph 207

14. The Mineral Sites Plan – aggregate section, is not sound because:

a. It is not *effective.*
b. Not *consistent with National Policy.*

Chart MS-1 B.

Allocated quarries submit PAs and make preparations 2019-2021, and start extraction from 2022 or later

MSP Main Modifications

Plan period 2019 - 2034

= Extension
= adjacent
= close to exist quarry

	MSP Number		Sand + gravel	Poole	Area(ha)	Annual O/P(mtpa)	Reserves mt	Life yrs	Years of output =	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	Total new sites	Total 2019-34	Total remain	
			(p21+App A)							MSP approved 2019									Plan Period 2019 - 2034							End of period			
										2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034				
	Gt Plantation and Roeshot are linked to other sites and hence start date may be later.									Hurn Ct Ext PA approved 2018 hence starts earlier than MSP quarries. Included with existing quarries below									Gt Plantation st after Masters South? finished										
1	AS06+A	Gt Plantation	√	√ under	14.6	0.2	2	7	Gt Plantation										0.20	0.20	0.20	0.20	0.20	0.20	0.20	1.40	0.60	Gt Plantation	
	AS09	Hurn Court Ext (*granted*)	√		14.2	0.15	0.6	4	Hurn Ct Ext				0.15	0.15	0.15	0.15										0.60		Hurn Ct Extension	
	AS12	*Phillols Farm deleted*	*deleted*						*Phillols deleted*																	*0.00*		*Phillols deleted*	
2	AS13	Roeshot (1*)	not near	√ Riv Ter		74	0.2	3.5	18	Roeshot			BCP?	BCP?	BCP?	BCP?	BCP?	BCP?	0.20	0.20	0.20	0.20	0.20	0.20	0.20	1.60	1.90	Roeshot (phase with BCP)	
3	AS15	Tatchells ext	△	√ gravel	√	2.5	0.1	0.38	4	Tatchells Ext			0.10	0.10	0.10	0.08										0.38		Tatchells Extension	
4	AS19*	Woodsford (2*)	□	√Riv Terr		90	0.2	2.1	11	Woods Ext+Ph2			0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.10	*0.20*		2.10	0.00	Woodford Extension	
5	AS25	Station Rd, Moreton	⟷	√Riv Terr	√	58.5	0.15	3.1	20	Station Rd			0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	1.95	1.15	Station Rd	
6	AS26*	Hurst Farm, Moreton	⟷	√Riv Terr	√	77.6	0.15	3.3	21	Hurst Fm																0.00	3.30	Hurst Fm	
7	AS27	Horton Heath	not near	√Bag S, some grav		16.2	0.2	3	12~17	Horton Heath			0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	2.60	0.40	Horton Heath	
					Total Reserves =		**17.98**	①																					
										1	2	3	4	5	6	7	8	9	10	11	12	13				Total	Total		
										2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2019-34	remain		
	New sites - yearly totals				**Total 1.** Total yr O/P New Sites			(AS22 Sch 1)		0.00	0.00	0.00	0.65	0.65	0.65	0.63	0.55	0.75	0.95	0.95	0.95	0.95	0.85	0.75	0.75	10.63	7.35		
									Number of quarries per year =				4	5	5	4	3	4	5	5	5	5	5	4	4				
									Average quarry output per year =				0.16	0.13	0.13	0.16	0.18	0.19	0.19	0.19	0.19	0.19	0.17	0.19	0.19				
									Average of all quarry ouputs =				0.17																

Average of 2.4~3.5 million tonnes (p147)
3mt=average of 2.4~3.5 mt
Assume 15 yrs
Ann O/P = 3mt/15yrs =0.2mt/yr
(page 147)

Not including Woodsford Phase 2 which is included with Existing Sites below.

Sum of new sites 2019 to end 2034 output = **10.63** mt ②
Sum of new sites aggregate remaining after 2034 = 7.35 mt
Total = 17.98 mt ①

Profile of existing sites

Woodsford Phase 2

	Main MODs	Annual O/P(mtpa)	Reserves - mt Jun-19	Life yrs	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Total Existing Sites
Existing sand and gravel sites	page 17 →	1.48	11.51	7.7	1.25	1.19	1.27	1.11	1.08	0.81	0.75	0.59	0.59	0.59	0.59	0.59	0.56	0.30	0.07			0.20	9.07 mt
	New Permissions in 2018 Hurn Court Extension (?)					0.70			0.18	0.18	0.18	0.18											0.70
	Redman's Hill					0.10			0.03	0.03	0.03	0.03											0.10
							1.27	1.11	1.28	1.01	0.95	0.79	0.59	0.59	0.59	0.59	0.56	0.30	0.07	0.00	0.00	0.20	**9.87** mt

Main Mods P17 - increase in reserves end June 2019 from 10.78mt to 11.51mt (=0.73mt) due to new permissions issued in 2018

		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	Total existing and new sites
New sites plus existing sites - yearly totals		2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	
	Total new + existing sites =	1.27	1.11	1.28	1.66	1.60	1.44	1.22	1.14	1.34	1.54	1.51	1.25	1.02	0.85	0.75	0.95	**19.90** mt

Pink indicates when total output < 1.48mta
12 of 16 years = 75% of the Plan Period

Total shortfall

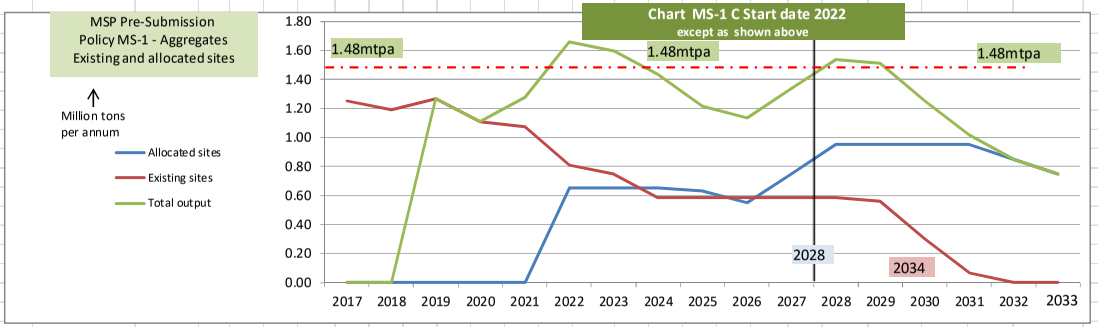
Shortfall below 1.48 =	-0.21	-0.37	-0.20	0.18	0.12	-0.04	-0.26	-0.34	-0.14	0.06	0.03	-0.23	-0.46	-0.63	-0.73	-0.53	-3.78	mt ③

Numbers of quarries required to make up shortfall

Number of quarries to make up shortfall at average quarry output of 0.17 =	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	
	-1.2	-2.1	-1.2			-0.3	-1.5	-2.0	-0.8			-1.3	-2.7	-3.6	-4.2	-3.1	④

The Problem - why more quarries are required

1. The total output of the quarries allocated in the Main MODs adds up to 17.98mt, as shown above at Total Reserves. ①
2. But the new sites output from 2022 to end 2034 is only 10.63mt. ②
3. The MSP assumes that all the 17.98mt is available during the plan period (page 17 Main MODs).
4. But in fact only 10.63 mt is available during the plan period. For example Hurst Farm is not used until approximately 2043~2045.
5. The total shortfall over the Plan Period = 4.56mt at 1.48mtpa. ③
6. The number of additional quarries required, at an averate quarry output of 0.18mtpa is shown at ④.



Reconciliation
between the figures I have used for the existing quarry outputs and the figures used by the MPA

1. My Existing sites total for 2019 to 2034 is 9.07mt

2. Adding the new permissions Hurn Court (0.6mt) and Redmans Hill (0.1mt) brings this up to 9.87mt

3. I have assumed that Woodsford Phase 1 operates to the end of 2020, a year is taken to transfer and set up on the extension which, therefore, starts in 2022. I have Woodsford Extension finishing with 0.1 mt in 2032, a year transferring to the Phase 2 site and extraction starting on Woodsford Phase 2 in 2034. The manager of the Woodsford site advised on the time taken to transfer between phases and the extension.

4. It is understood that the MPA figures assume Woodsford Phase 1 continues up to 2021 and Phase 2 starts in 2032

5. The MPA total for the existing sites at the end of 2034 will thus be approximately 0.6mt higher than my total.

6. Adding the 0.6mt to my 2034 total gives 10.47.

7. The 10.47 is effectively the figure at the end of 2018 since my figure for 2019 is at the end of 2019.

8. The Demand and Supply 'green block' on page 17 says that:

9. **at the end of June 2019 ~~2018~~** of approximately ~~10.78~~

10. Thus my figure of 10.47 mt is my approximation to the 10.78 mt quoted above.

11. My estimate is 2.47% lower than the figure in the Modified Version of the Pre-Submission Draft Mineral Sites Plan.

12. I have, therefore, multiplied my existing quarry outputs by **2.47%** to reconcile my existing quarry site's output in 2034 with that of the MPA's.

13. In reality I think the differences are merely due to very small differences in assumption between myself and the MPA on yearly site outputs for some sites based upon different interpretations of reserves and estimated yearly site outputs given in the Site Assessments.

5. **Please use the space below to give details of what change(s) you consider necessary to the modification (please restrict your response to the modification named above only)**

Changes required:

1. Provide details of the amounts of aggregate that have been extracted in 2016,2017, and 2018.

2. Provide details of the new permissions granted in 2018.

3. Provide evidence of the output of the new permissions.

4. Provide the quantity of aggregate extracted for each the past 10 year so that the ten year average of sand and gravel may be calculated.

5. Allocate another 2 aggregate quarries.to make up for the shortfall shown in my *existing and allocated quarry profile* chart.

6. The assumption on page 17 in the *Demand and Supply* section that:

> It is estimated that sales of sand and gravel during the period from the end of December ~~2016~~ 2017 to the end of ~~December 2018~~ June 2019 ~~(when it is expected that the Plan will be adopted)~~ will be approximately ~~2.77~~ 1.89 million tonnes (assuming sales in ~~2017 and~~ 2018 and 2019 remain generally in line with those for ~~2016~~ *2017*),

Official use only: ID No.	Comment No.

Please note: *Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.*

Please indicate if you wish to be notified of any of the following:

The publication of the Inspector's report following the Examination in Public	√
The adoption of the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan	√

Signature:	Nigel Hill	**Date:**	20 June 2019

Please send completed forms to the address below.

If you would like more information on the Bournemouth, Christchurch, Poole and Dorset Mineral Sites Plan or this process, please contact the Planning Policy Team at:

Minerals & Waste Planning Policy Team, Planning and Community Services, County Hall, Colliton Park, Dorchester, Dorset DT1 1XJ	Email: mwdf@dorsetcouncil.gov.uk Telephone: 01305 228585 / 224675