

Mr M N Hill (ID934588)
For Moreton Parish Council

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31 October 2018

Mrs C Self
Programme Officer

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Dear Mrs Self,

Bournemouth, Dorset, & Poole Mineral Sites Plan

Comments on Documents

1. Attached to this letter are comments on the following documents:
 - a. The Schedule of Modifications.
 - b. Bournemouth, Dorset and Poole Local Aggregates Assessment 2016
 - c. Station Road, Moreton, Dorset – A Heritage Impact Assessment.

Yours sincerely,

M N Hill (ID 934588)
For Moreton Parish Council

SCHEDULE OF MODIFICATIONS

Comments

M N Hill (ID934588) representing Moreton Parish Council

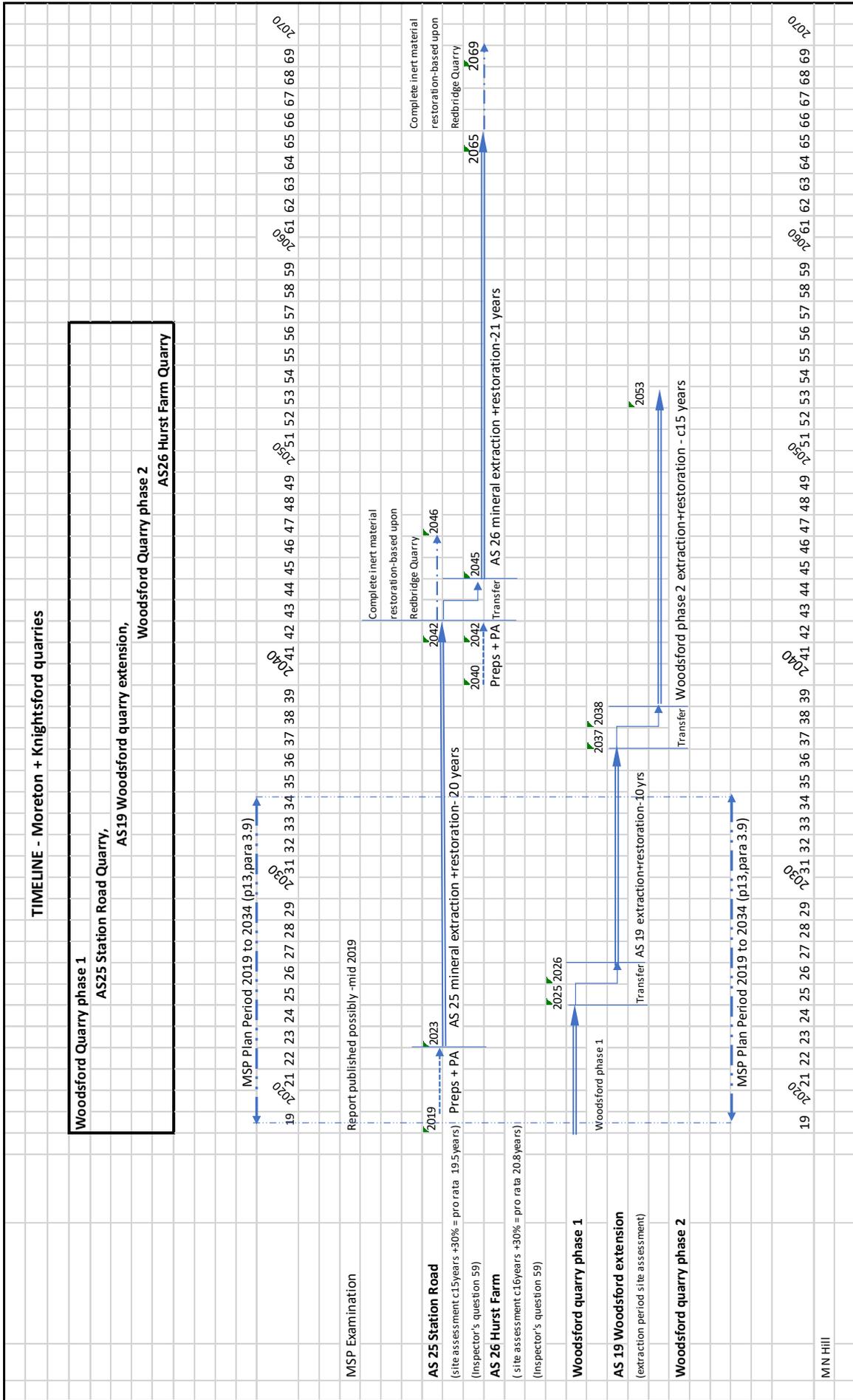
Introduction

1. This document is in 2 parts. The first part is a discussion based upon the review of the Schedule of Modifications. The discussion covers Cluster 4, cumulative Impacts and distinguishing between River Terrace and Poole Formation sand.
2. The second part of this document provides comment on the MMs and AMs in the Schedule of Modifications.
3. I have produced a timeline graph showing approximately when Woodsford quarry, AS19, AS25 and AS26 will be in operation
4. The individual quarry operating dates have been derived from the site assessments, the Haltec AS25 and AS26 report and information available on Woodsford quarry in documentation and from discussions with the site manager.

Discussion arising from reviewing the Schedule of Modifications

Cluster 4 – AS25 Station Road, AS19 Woodsford Extension, AS26 Hurst Farm

5. Referring to these quarries as a cluster is a misnomer. It implies that there is an association between the quarries which does not exist.
6. The AS19 Woodsford Extension is predicated on the current Woodsford Quarry. All activity associated with the site will be conducted through the existing site. Vehicles will access the site about a mile to the west of Crossways.
7. AS19 Woodsford quarry extension will operate in series between Woodsford Phase 1 and Phase 2. All access will be via the existing Woodsford quarry site.
8. AS25 Station Road quarry will operate whilst Hurst Farm will continue as a farm.
9. AS26 Hurst Farm quarry will operate when AS25 has completed extraction and has either been fully restored or is in the final process of restoration.
10. AS19 Woodsford Extension will operate whilst AS25 is in operation but should be complete by the time AS26 starts extraction activity.
11. Thus, each of the allocated quarries will operate independently of the other quarries. The only association between AS25 and AS26 is that they will use the same processing plant.
12. But there is no association between AS25 and AS26 Woodsford Quarry and AS19 Woodsford Extension.



13. Woodsford quarry and AS19 will extract to a shallower depth than AS25 and AS26, only produce River Terrace sand and will simply restore by replacing the original top soil.
14. AS 25 and AS26 will extract to a greater depth than the Woodsford quarries, will produce River Terrace and Poole Formation sand and use inert waste as part of the restoration process.
15. AS19 traffic will enter and leave the Woodsford site via the existing entrance to the west of the level crossing on the Crossways to Dorchester road.
16. AS 25 and AS 26 will access the B3390 road to the north of Crossways. But only one quarry will operate at a time
17. AS25 and AS 26 are physically separated by about a mile with the B3390 and woodland between the two sites.
18. AS26 and AS19 cannot be seen from AS25.
19. Thus, there is no association between the Woodsford, Station Road and Hurst Farm quarries.

Cumulative Impacts

20. There are a number of MMs which refer to cumulative impacts between AS25 Station Road quarry and AS26 Hurst Farm quarry.
21. As the timeline shows there cannot be any cumulative impacts between these quarries because they will not be in operation at the same time.
22. When AS25 Station Road is in operation Hurst Farm will be a farm.
23. When AS26 is in operation AS25 will be a restored site.
24. The Woodsford Extension AS19 will not impact upon AS25 as it is too far away
25. The Woodsford Extension AS19 should have completed operations some years before AS26 Hurst Farm starts operation and, therefore, will not impact upon AS26
26. The real cumulative impact will be upon the people who live and holiday in Moreton Station settlement and Crossways.
27. In addition to the impact of AS25, the people of Moreton Station and Crossways will also have to live with the 490 houses and 65 bed care home to be built on Moreton Pit just to the south of AS25, the 1114 houses to be built in Crossways, and the 1000 houses being built and occupied on the Silverlake site.
28. There is also now the possibility of a very large development comprising over 4000 houses called Higher Woodsford to be built just north of the railway line in Crossways (I raised at the hearings).

29. All this development is projected by the DCC Traffic Impact Assessment AM Peak to cause traffic on the B3390 to be just 3.3% below congestion level (page 18 paragraph 5.5 and page 26, paragraph 5.21), based upon a *neutral time of year (spring)* (page 10, paragraph 2.8) with queuing, *particularly southbound towards Moreton Level Crossing* (page 27 paragraph 5.23).
30. Moreton Station settlement will be closer to AS25 than Moreton village, TE Lawrence's grave, parts of the Moreton Conservation area and closer than the Sculptures by the Lakes will be to either AS26 or AS19.
31. I have included the Moreton Parish Council Encirclement Map on the next page to illustrate the proposed A25 Station Road site quarry and all the housing developments approved and planned for Moreton Station and Crossways to show that the overall proposed development is exceptionally excessive. According to the DCC Traffic Impact Assessment this development is likely to raise traffic to close to congestion levels and is likely to cause queuing by AS25 in Moreton Station settlement. AS25 represents a major industrialisation of the area and will last for decades into the 2040s and based upon the landowner's existing Redbridge Quarry which is using the same inert material restoration process, could easily still be being restored into the 2050s.
32. By far the greatest cumulative impact will be on the people of Moreton Station settlement and Crossways, but they are not mentioned in the MMs, whilst the cumulative impact between AS25 and a farm (Hurst Farm) and AS26 and a field (restored AS25) are given lengthy coverage.

Poole Formation and River Terrace Sand

33. A number of the MMs are concerned with distinguishing between Poole Formation and River Terrace sand

34. MM7 proposes a new paragraph 3.6 that states that (underlining left off for ease of reading):

In most cases the non-aggregate use is relatively small-scale, and Poole Formation sand is primarily used for aggregate uses. None of the sites producing Poole Formation sand are proposed primarily for silica sand/ non-aggregate use, but if there is demand a proportion of the output may be used for these purposes.

35. I have consistently shown over the 10 years the MSP consultation has been running that the allocated sites in the MSP will not provide sufficient sand and gravel irrespective of any distinction between Poole formation and River Terrace sand. The DCC Area of Search document on page 1 agrees with my assessment.

36. The proposed paragraph 3.6 states that:

Poole Formation non-aggregate use is relatively small scale and that Poole Formation is primarily used for aggregate uses.

37. Furthermore:

None of the sites producing Poole Formation sand are proposed primarily for silica sand/ non-aggregate use, but if there is demand a proportion of the output may be used for these purposes.

38. Thus, after distinguishing between Poole Formation Sand and River Terrace Sand in the MSP, and possibly giving priority to a Poole Formation quarry over a River Terrace quarry to contribute to the Poole Formation landbank, the actual sand produced is very likely to be ..used for aggregate uses.. because the non-aggregate use is relatively small scale....

39. Since the MPA does not have sufficient allocated quarries to meet the Mineral Strategy requirement, and the proposed paragraph 3.6 indicates that there is extremely little demand for Poole Formation sand for silica sand/non-aggregate use, there appears to be almost no point in distinguishing between the two types of sand as proposed in the MMs.

40. It is as I stated at the hearings an academic excise.

Conclusions

41. The timeline diagram shows that there is no association between the AS19 Woodsford Extension and AS25 Station Road and AS26 Hurst Farm quarries and, therefore, it is inappropriate to treat the group as a cluster.

42. The timeline diagram shows that the only association between AS25 and AS26 is that they use the same processing plant but that there is likely to be an interval of up to 2 years between the use of the plant by the AS25 quarry and the start of use of the plant by the AS26 quarry, based upon discussions with the Woodsford quarry site manager about conducting a similar exercise between the existing Woodsford quarry and the AS19 extension
43. As the timeline shows it will be almost impossible for there to be any cumulative impact of AS25 on Hurst Farm, AS26 on the restored Station Road field, and between AS25 and AS19.
44. But there will be a very significant cumulative impact of AS25 Station Road quarry on Moreton Station settlement and Crossways, to the extent that AS25 should be deleted from the list of allocated quarries.
45. The proposed MMs, however, virtually ignore this very significant cumulative impact on Moreton Station settlement and Crossways and concentrate instead on the fictitious impacts between AS25 and a farm and AS26 and a field.
46. A significant number of amendments are concerned with distinguishing between Poole Formation and River Terrace sand, whilst the proposed new paragraph 3.6 clearly shows that virtually all sand is used for aggregate uses, irrespective of whether it is Poole Formation or River Terrace.
47. And all the while there are insufficient allocated quarries to meet the Mineral Strategy aggregate target and the area of search and resource blocks will not enable the shortfall to be overcome.
48. As I remarked on several occasions during the hearings, the examination of the MSP is being dealt with in a very theoretical manner, devoid of reality.

Comment on the Schedule of Modifications

49. The schedule refers to different chapter and paragraph numbers than in the Pre-Submission Draft Mineral Sites Plan printed edition. This made it difficult to identify what is to be modified.
50. **AM1.** The deleted wording provides very good provenance for the document. Guidance and rules change and so the deleted text provides valuable information on the baseline for the document's construction.
51. The references to stakeholders and communities commenting on the document could be removed.
52. The Key Stages block could be updated and retained.
53. The references to the Inspector could be replaced by a brief statement to the effect that the *MSP Draft Pre-Submission was examined, including in public hearings, and approved by an Inspector once modifications had been incorporated.*
54. The chapter could then be titled *Background to this Document.*
55. **MM1.** Agreed.
56. **MM2.** The proposal is too narrow and is certainly not *comprehensive* (*Reason* column). Criterion C21 Effects of cumulative impacts, C18 Impact on Sensitive Human Receptors and C19 – Impact on existing settlements for AS25 all make reference to impacts on people and communities. The proposed amendment should include impact on people and communities. Policy DM5 only deals with biodiversity and geological interest. MM2 should recognise that quarries also have cumulative impacts on people.
57. The Station Road and Hurst Farm quarries are proposed to work in series and therefore do not have a cumulative impact between themselves but will have a significant cumulative impact on the people of Moreton Station Settlement and Crossways who will also be impacted by the building of 1604 houses (Purbeck 490 + a 65 bed care home and West Dorset 1114 houses) and traffic on the B3390 within 3.3% of congestion (DCC report).
58. **MM3.** The reason given in the *Reason* column is *For clarification...* This is precisely what the term *achieving public benefits* does not achieve. I asked the statutory organisation representative who used this expression at the public hearings what he meant by this term and he could not provide a satisfactory answer to myself and members of the public in attendance (they agreed with me during a break). Members of the public consider that restoration means restoring land to its original state. In Crossways and Moreton, restoration achieving public benefits has meant restoring land for the building of hundreds of houses and a solar farm. The term *public benefits* is widely recognised as a euphemism for development. The public then feel cheated twice: firstly for having a quarry in their midst and then for being cheated by being told that restoration means housing.
59. If quarry land is not to be restored to its former state, it would be much more honest to simply state that it is to be adapted for other uses and not use the term restored.

60. **MM3** continued. Recommend that after the word *adverse impacts*, the following wording is inserted: *including cumulative impacts and cumulative impacts on settlements....* as shown in the complete paragraph below:

Any proposal for the development of any of these allocations must address the development considerations set out for each site in Appendix *and work towards achieving public benefits within the restoration vision*, as well as *addressing* any other matters relevant to the development of each proposed allocation, and demonstrating that any adverse impacts *including cumulative and cumulative impacts on settlements* will be mitigated to the satisfaction of the Mineral Planning Authority.'

61. **MM4**. Agreed.

62. **MM5**. Not agreed. The wording I have suggested in MM3 : *including cumulative impacts and cumulative impacts on settlements* is more appropriate. The proposed MM5 wording indicates that it is only cumulative impacts which are of concern. In my wording singular as well as cumulative impacts must be mitigated. I have specifically added cumulative impacts on settlements because the second and third paragraphs refer to species and recreation, neither of which embrace settlements which are directly considered by Assessment Criteria C17 to C25. Recreation is only considered in Criteria C23.

63. **AM2**. This restricts the area of search.

64. **MM6**. Paragraph 3 refers to the *steady supply of sand and gravel*. The following page repeats the Policy MS-1 list of allocated sites which *primarily produce sand* with no mention of gravel. Is this intended?

65. Why has the word *approximately* been replaced by *up to*? *Up to* implies certainty about what is a guess until the start of restoration. It is possible that the estimate may be an underestimate as well as an overestimate. *Approximately* accommodates these variations, *up to* does not.

66. Station Road and Hurst Farm sites have been analysed using bore holes and samples to show that both types of sand are present. But both sites only refer to tonnages with no mention of sand, let alone the type of sand. Why?

67. Tatchell's Quarry *primarily* produces *sand* without any indication of the type. Why?

68. This table now emphasises the point I have been making that there are not enough sites.

69. The identification of the type of sand each quarry might produces emphasizes the point I made at the hearings that this is an entirely academic exercise. There aren't enough sites. If there aren't enough sites to satisfy the overall required total, then there will automatically not be enough Poole Formation and River Terrace sand.

70. MM7. The proposed new paragraph effectively says that Poole formation may to all intents and purposes be treated in the same way as River Terrace sand. A lengthy exercise of distinguishing between Poole formation and Terrace sand is to be conducted even though Poole Formation non-aggregate use is relatively small-scale.

Poole formation is primarily used for aggregate uses

71. Thus the previous practice of just considering sand without any sub-division into Poole formation or River Terrace was a very practical approach.

72. The new paragraph is agreed to show that the practice of distinguishing between Poole formation and River Terrace sand has very little practical significance.

73. It could be added that whilst Figure 8 of the Minerals Strategy, May 2014, shows that there are widespread deposits of Poole formation, much of it is either in an AONB or is in close proximity to built up areas around Poole and Bournemouth.

74. **AM3.** Agreed.

75. MM8. Same comments as above for MM7.

76. **AM4.** Not agreed. Figure 1 has great value because it shows how few sites are available and their geographical location relative to habitation. The map shows that AS25 is extremely close to Moreton Station settlement, very close to Crossways and is in the centre of Moreton parish. Once the resource blocks are added this very important geographical information will be hidden by the colouring of the resource blocks.

77. Figure 1 also shows that sand and gravel extraction has been and is projected to be in the areas around Crossways and along the Puddletown Road. Two relatively small areas in relation to the British Geological Survey's area of availability as indicated on Figure 8 of the Minerals Strategy.

78. The resource blocks should be shown on Figure 2.

79. **AM5.** Agreed.

80. **MM9.** Agreed

81. **MM10.** Agreed.

82. **MM11.** New paragraph 3.6 in MM7 indicates that for Poole formation In most cases the non-aggregate use is relatively small-scale and Poole Formation sand is primarily used for aggregate uses. Thus, essentially Poole Formation and River Terrace sands are for aggregate uses. Whether the shortfall is in Poole Formation or River Terrace is academic, there is a shortfall in sand for aggregate uses. Selecting a site because it has Poole Formation rather than a site which has River Terrace is an almost meaningless exercise, the sand will still be used for aggregate uses. This distinction is only relevant if there virtually no Poole formation land bank. A mere shortfall is not a good enough reason to choose a Poole formation site over a River Terrace site. It should be the relative merits of the site criteria for the Poole formation and River Terrace sites which should be the basis for site selection.

83. MM11 and MM12 need a sense of perspective. Since Poole formation non-aggregate use is relatively small-scale and Poole Formation sand is primarily used for aggregate uses, the shortfall is most likely to be because more sand has been taken from a Poole formation or River Terrace quarry for aggregate use than from the other sand type quarry, but it is still being used for the same aggregate purpose.
84. MM11 is not agreed. It is just an unnecessary academic exercise.
85. **MM12.** Agreed.
86. **MM13.** This a convoluted, academic, unrealistic rationale. If a site is permitted,..... capable of being worked but not currently being worked presumably this is an allocated site which is not being worked.
87. The fact that an existing allocated site is not being worked should not be enough reason to prevent another site owner from applying to work his site. The owner of the allocated site should be given a time limit after which the allocation will be revoked and the owner who wants to operate a site should be given allocated status, assuming that the proposed site satisfies the selection criteria and the MPA.
88. The issue of the shortfall in aggregate type has been shown above to be largely irrelevant and academic. It is the production of aggregate which is important. Providing there is some Poole formation land bank available for relatively small-scale use, the issue of which type of aggregate is not really an issue. Both Poole formation and River Terrace sand are used for aggregate purposes as stated in MM7 proposed paragraph 3.6.
89. The overall issue is unrealistic because Dorset does not have enough aggregate sites and hence is not in a position to differentiate between equal sites which are both capable of being worked but have different types of sand.
90. The MPS consultation process has shown over the course of almost 10 years that there are extremely few sites on offer to the MPA for allocation which the MPA considers acceptable. The result is that the MPS does not contain sufficient sites to meet the stated requirement.
91. The original wording in paragraph 3.13 and shown in red and lined through in MM12 should be used in MM13 and not the proposed wording.
92. **MM32.** Not agreed. The site allocation maps and Inset maps are complementary. The site maps show more detail because they are not overlaid with colouring. The colouring on the Inset maps show the extent of area of search, and buffer zones. Putting all this detail on one map would mean that detail would be hidden beneath colouring and the resulting maps would be too complicated.
93. Combining the maps would not achieve *clarification* as stated in the *Reason* column.

AS 25 - Station Road

94. **MM52.** The following requirements are set out in order to minimise cumulative impacts. The requirements will not prevent or take into consideration *the cumulative impacts ...on existing/proposed housing development, which must be taken into consideration*.
95. The Inset 3 map shows that part of Woodsford lane and all of the caravan park in Moreton Station settlement will be inside the 250m buffer. The map also shows that houses along Station Road and some of the houses along the Common will be within the buffer zone. There are two properties within yards of the southern boundary of the proposed Station Road quarry not shown on Inset 3 map but shown on the site map on page 132.
96. The Purbeck District Local Plan Pre-Submission proposes on page 53 that 490 houses and a 65 bed care home should be built on Moreton Pit on the southern boundary of the 250m buffer line
97. The West Dorset Local Review Preferred Options proposes on page LPR 81 that 275 houses should be built on Woodsford Fields (CRS5) in the area titled OSSWAYS on Inset 3 map.
98. Thus, there are many hundreds of existing and proposed housing developments to the south and south-west of the proposed Station Road site which have received no consideration in the examination hearings or the schedule of proposed modifications. Far more people will be affected by the proposed quarry to the south and south-west of the site than will be affected to the north and north-west of the site.
99. Added to this will be the 689 other houses to be built in Crossways as stated in the West Dorset Preferred Options on page LPR 81 as well as the people in the approximately 1143 house in Crossways (2011 census).
100. The caravan site just to the south of the railway line at Moreton Station will be affected as will the 1000 holiday house Silverlakes development on Crossways south-western boundary.
101. The DCC Moreton/Crossways/Woodsford Traffic Impact Assessment 2016 (AM Peak) states on page 4 that there will be *81.3% more trips than the base 2016 year* on the B3390 road through Moreton and Crossways. On page 26 in paragraph 5.21 the report states that: *Any movement with a volume over capacity ratio greater than 85% is likely to experience congestion*. Thus, the Impact Assessment predicts traffic reaching within 3.3% of congestion at a neutral time of the year.
102. There are nearly 100 households within the 250m to the south-west of the proposed Station Road site, far more than to the north and north-east of the site. There are many hundreds of existing and proposed houses to be built just to the south of the boundary and many hundreds in and around Crossways. All will experience major traffic flows on the B3390 with queuing at Moreton Station (page 27 paragraph 5.23) and traffic close to or exceeding congestion levels.
103. The cumulative impact of over development including Station Road quarry, on Moreton Station settlement and Crossways will be far greater than any impact on Moreton village or the conservation area. No where else in Dorset will experience this level of cumulative development
104. But MM52 ignores and indeed the hearings ignored this cumulative development.

105. MM52 is restricted to considering just AS25 and AS26 and states that there will be no simultaneous extraction and hence in effect no cumulative development. When AS25 is in operation Hurst quarry will not exist, it will still be Hurst Farm with AS25 processing equipment on the south-eastern corner.
106. Moving the boundary of the Station Road quarry inwards such that the buffer zone line will not include Moreton Station settlement and the caravan park is inconsequential. Moreton Station settlement, the caravan parks, Moreton Pit and Crossways will still be affected by the Station Road quarries' contribution to the overdevelopment of the area, of which the Station Road quarry would be a part.
107. It is only by the deletion of the proposed Station Road quarry that its contribution to the cumulative over development of the area can be stopped.
108. Simply to ignore the cumulative development and impact of quarrying, house building and traffic at near congestion levels is wrong and to only consider the cumulative impact between Station Road quarry and Hurst Farm is wrong.
109. **MM53.** The route of this pedestrian access is crucial for the safety of pedestrians. If the route is in the field to the west of the B3390 between Moreton Station settlement and Station Road it will mean that pedestrians will have to cross the B3390 where the traffic can be travelling at speed. Pedestrians will then have to walk along Station Road and share it with quarry lorries and greatly increased car traffic. If the route is inside the Station Road site along the B3390, pedestrians will have to walk along Station Road and share it with quarry lorries and greatly increased car traffic. The only safe route is along the southern border of the Station Road site and exit the site in the region of the village hall.
110. **MM54.** This modification is about the cumulative impact of two quarries which will not operate at the same time. The modification totally ignores the cumulative impact of the Station Road quarry on Moreton Station settlement, caravan parks, housing development, traffic at near or at congestion levels and all closer to the Station Road site than AS26 will be to the Station Road site.
111. In other words, the modification dwells on two quarries which by design will not operate at the same time and ignores the cumulative impact on a settlement and housing development which will take place concurrently with the operation of both quarries and which will be closer to AS25 than the non-existent AS26.
112. AS26 will only exist on completion of AS25. How can there be a cumulative impact between AS25 and the non-existent AS26? During the life of AS25, the AS26 site will be in agricultural use as it is today with a processing plant for AS25 at the south-eastern corner. It is most unlikely that there will be a cumulative impact between AS25 and its own processing equipment.
113. Thus, MM54 is about the cumulative impact of the Station Road quarry upon agricultural production on Hurst Farm, not the non-existent Hurst quarry.
114. What MM54 should be about is the cumulative impact of Station Road quarry upon the hundreds of people at Moreton Stations settlement and houses on Moreton Pit and upon Crossways and the hundreds of houses to be built, the greatly increased traffic on the B3390 and the impact on tourism.
115. **MM55.** Agreed.

AS26 Hurst Farm

116. **MM56.** This modification needs to state that during the life of AS26, AS25 will have ceased functioning as a quarry and will be a restored field.
117. The timeline at the start of this document shows that the scope for cumulative impacts on AS25 and AS19 are almost non-existent since both quarries will have ceased to exist.
118. The cumulative impact between AS26 and the Woodsford quarry phase 2 working will be extremely small since AS26 will be accessed from the B3390 about half a mile north of the turning for Station Road, and the Woodsford quarry phase 2 will be accessed from the Crossways to Dorchester road west of the level crossing. Most vehicles from AS26 will turn north and travel via Bere Regis and vehicles from the Woodsford quarry site will travel west to the Dorchester bypass.
119. The timeline shows that descriptions of the working of AS19 and AS26 are not necessary. AS25 will be in operation for almost twice as long as AS19, and the Woodsford quarry operator Hills will have vacated the AS19 site and have been operating the Woodsford phase 2 quarry for about 6 years before AS26 is started.
120. The overlap between AS26 and Woodsford phase 2 will last about 9 years and AS26 will continue operating for about a further 11 years, as the only quarry in the area.
121. The major cumulative impact created by AS26 will be upon the people of Moreton Station settlement and Crossways through the excessive over development described above in the AS25 modifications section.
122. There is a distinct possibility that during the next 5-year review of the housing plan covering the Moreton and Crossways area, the already multiple impacts from individual sites will be joined by the start of the building of a new 4000 plus houses settlement called Higher Woodsford, proposed by the same landowner who owns the land upon which the Woodsford quarry is being operated. This development could start building in 2027 or thereafter. T
123. This same landowner has already built hundreds of houses in Crossways and 275 houses are proposed to be built on Woodsford Estate land in Crossways (CRS5 on page LPR 81) as part of the West Dorset and Weymouth & Portland Preferred Options, which has recently completed consultation (15 October).
124. During the period of operation of AS25 and AS26, from 2027 to approximately 2070, 43 years, a total of 6450 houses could be built at 150 houses per year. The outline of the Higher Woodsford is shown on the Encirclement map earlier in this document.
125. Thus Moreton Station and Crossways face an exceptionally large number of multiple impacts from individual sites and/or a number of sites in a locality.
126. This is not mentioned in the proposed MM56

127. The proposed MM56 concentrates on the almost non-existent cumulative impacts with AS25, AS19 and Woodsford quarry phase 2 as shown by the timeline and ignores the likelihood of cumulative impacts on Moreton Station and Crossways and the possible building of Higher Woodsford.
128. MM56 is not agreed
129. **MM57.** Not agreed. As explained at the start of this document AS26, AS19 and AS26 do not form a cluster. There is no association between AS25 and AS26 and AS19. The only association between AS25 and AS26 is that the processing plant for AS25 is located on Hurst Farm.
130. As the timeline at the start of this document shows AS25 will operate for about half its time at the same time as AS19. But as explained above AS19 is almost a mile from AS25 which will be out of sight due to large trees. AS19 will be totally orientated to the west and the existing Woodsford quarry plant. AS25 will be to the east of the B3390 road and use the processing plant located on the south-eastern section of Hurst Farm.
131. The proposed wording makes no mention of the cumulative impact of AS26 upon Moreton Station and Crossways, which it should do.
132. **MM58.** This comment is not concerned with the proposed wording change. The first paragraph states: *a multi-functional landscape where recreation and amenity are just as important as agriculture, enhanced nature conservation value and flood water management.*
133. I wondered where the *recreation and amenity* are conducted within this multi-functional landscape?
134. **MM59.** Not agreed. The timeline and the discussion above clearly shows that *The potential for cumulative impacts with other mineral working in this area (particularly the Woodsford Extension site, AS19)* is almost zero.
135. The **Other** section also states that: *The potential for cumulative impacts with ...existing/proposed housing development, must be taken into consideration.* But this is almost totally ignored.
136. The cumulative impact of the building of 1604 houses starting on the other side of the railway line at Moreton Station settlement, traffic at 3.3% below congestion levels, queuing in Moreton Station settlement and a possible 4000 plus housing development at Higher Woodsford coming to Moreton Station settlement from the west will all occur about half a mile south of the AS26 site.
137. It appears that possible cumulative impacts between AS26 and a restored empty field on the southern side of Station Road (ex AS25) have a higher priority than the large number of developments outlined in the above paragraphs.
138. This is wrong. The AS26 section should disclose the full range of developments proposed to take place close to Moreton Station settlement and in Crossways.

Bournemouth, Dorset and Poole

**Local Aggregates Assessment 2016
March 2018**

M N Hill (ID934588) representing Moreton Parish Council

Overall comment

1. I have reviewed the Local Aggregates Assessment 2016 (LAA 2016) and find that it totally vindicates the Chart MS-1 B which Moreton Parish Council entered as part of its response to the Mineral Sites Plan (MSP) Pre-Submission Consultation in January 2018.
2. I have included a copy of Chart MS-1 B on the next page for reference.
3. The chart clearly shows that apart from an initial peak in 2022 the MSP does not contain sufficient allocated aggregate quarries to supply the 1.51 million tonnes per annum (mtpa) referred to in the calculation on page 16 of the Local Aggregates Assessment 2016.
4. I have tried various permutations of quarry start dates (and submitted them to the MPA) but the result is almost all cases worse than the result shown on Chart MS-1 B

Minor adjustments to Moreton Parish Council's Chart MS-1 B

5. The LAA 2016 page 16, paragraph 1.35 states that

...giving a permitted reserve of sand and gravel at the end of 2018 of approximately 10.78 million tonnes (without any new permissions).
6. I did not have the benefit of LAA2016 when I submitted Chart MS-1 B and had to conduct complicated and complex investigatory work to try to find the yearly output of the existing quarries (not openly available to the public). As a result, I assumed the reserves over the period 2018 to 2027 were 9.45mtpa.
7. Thus, my reserves were 1.33mtpa (10.78-9.45) too little.
8. But the difference does not alter my workings very much and the overall result would still show that there are too few allocated quarries in the MSP to consistently meet the required annual output of 1.51mtpa from about 2023 onwards.
9. The drop in output from approximately 2028 will be very severe, falling to approximately 0.78mtpa.
10. I have assumed a plan period of 2018 to 2033. But the actual plan period will now be 2019 to 2034 and hence the shortfall in output over the plan period will be worse than I have shown as the output will also be approximately 0.78mtpa in 2034.

Quarries needed to make up the shortfall

11. The average output for all the sites in say 2025 when the overall output will be 1.05mtpa is 0.17mtpa.
12. To make up the shortfall in 2025 of 0.21mtpa (1.51-1.3) would require 1.2 quarries (0.21/0.17) or about one more quarry.
13. But the graph shows that the output may drop to 1.02mtpa in 2023 and 2024 and to 0.78 mtpa by the end of the period. The drop to 1.02 mtpa would mean a shortfall of 0.49mtpa (1.51-1.02) which would require 2.8 quarries (0.49/0.17) or about 3 more quarries.
14. The drop to 0.78mtpa in the last 3 years of the plan period (2032 to 2034) would mean a 0.73 mtpa shortfall and would require an additional 4.3 quarries (0.73/0.17).
15. The MPS does not nominate any standby quarries from the area of search to make up these projected shortfalls.

The way ahead – conservation of aggregate stocks

16. The Moreton Parish Council Pre-Submission response also highlighted that the MSP allocated quarries were almost all from two small areas: Crossways – Moreton and the Puddletown Road and that a number are extensions to existing quarries, and that, therefore, these two areas are almost exhausted.
17. The response stated that if after almost 10 years of consultations on the MSP the result is an insufficient number of suitable quarries to allocate, and an almost complete dearth of standby new quarries in the area of search, then the time has arrived to think seriously about conserving aggregate stocks, otherwise the available aggregates may soon be exhausted.
18. This conclusion was also stated in great detail in submissions to the Minerals Strategy Pre-Submission and at the Minerals Strategy examination hearings.
19. Moreton Parish Council's Chart MS-1 B chart, confirmed by the LAA 2016, graphically illustrates the severity of the aggregate situation in Dorset.

Recommendation

20. As stated in Moreton Parish Council's Pre-Submission response and at the Hearings, deletion of AS25 Station Road would serve a positive objective for UK aggregates by starting the urgent need to conserve aggregate stocks.
21. Moreton Parish Council strongly recommends that AS25 Station Road quarry be deleted from the list of allocated quarries in MSP Policy MS-1.

Bournemouth, Dorset and Poole

**Station Road Moreton, Dorset
A Heritage Impact Assessment**

(34 pages)

Context One

(no date)

M N Hill (ID934588) representing Moreton Parish Council

The assessment conclusion

1. The report states on page 32 in the conclusion in third column and at the top of the column on page 33 that in relation to East Cottage and Lilac Cottage/Santa Maria that:

Mitigation might be provided by way of removing the north-east part of the scheme, that is the remainder of the north-easternmost field. This would create a greater separation from the northernmost edge of the proposed area, have the advantage of retaining the line of mature hedge and deciduous trees which form part of the middle distance view, and reduce the potential impact of noise, dust and odours by providing an additional screen between the Site and Station Road. Retention of this field boundary would also preserve more of the historic 18th and 19th century land form, and landscape organisation.

It is noted that the exact impact on heritage assets will depend on the eventual sequence and methods of extraction. However, on balance it is considered that impacts can be minimised during the extraction phase by employing of parcel by parcel extraction. The avoidance of tall spoil dumps during the extraction process would reduce these particularly visually intrusive additions to views or appearance of a scarred landscape. It is suggested that in order to mitigate impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, it would be beneficial to move the north-eastern boundary back to the next field boundary to the south, which incorporates a line of mature trees. Further detailed consideration should be undertaken with respect to these aspects as part of a planning application process.

Moreton Station Settlement and Crossways.

2. The above extracts are focussed on: *East Cottage and Lilac Cottage/Santa Maria.*
3. Moreton Station settlement, which contains 2 listed buildings, and is home to almost 200 people will be closer to the proposed AS25 quarry than parts of Moreton Conservation Area, Moreton village, Moreton House and TE Lawrence's grave. Large parts of Moreton Station Settlement will be closer to the quarry than Sculptures by the Lakes will be to AS19 and AS26.

4. Two properties in Moreton Station Settlement will be about as close to the proposed Station Road Quarry as East Cottage and Lilac Cottage/Santa Maria.
5. But no consideration whatsoever is given to Moreton Station Settlement, to the houses to be built in Moreton Station settlement and to the wider area of Crossways, containing over 2000 people.
6. I stated this information about Moreton Station Settlement and Crossways at the hearings.
7. The Heritage Impact Assessment states in relation to East Cottage and Lilac Cottage/Santa Maria the need to:
*reduce the potential impact of noise, dust and odours by
providing an additional screen between the Site and Station Road*

and it is considered that:

*impacts can be minimised during the extraction phase by
employing of parcel by parcel extraction. The avoidance of tall spoil dumps
during the extraction process would reduce these particularly visually intrusive
additions to views or appearance of a scarred landscape. It is suggested that in
order to mitigate impacts from noise, vibration and dust on the Moreton
Conservation Area in general and East Cottage and Lilac Cottage/Santa
Maria in particular, it would be beneficial to move the north-eastern boundary
back to the next field boundary to the south, which incorporates a line of
mature trees. Further detailed consideration should be undertaken with
respect to these aspects as part of a planning application process.*

Summary

8. Moreton Station Settlement and Crossways will suffer all the above impacts from Station Road Quarry but will also have to suffer the building of 1604 houses and traffic 3.3% below congestion levels, queuing along the B3390 in the vicinity of Moreton Station settlement and back to Station Road quarry, and the possible creation of an entirely new town at Higher Woodsford starting in about 5 years.
9. None of this will impact directly on East Cottage and Lilac Cottage/Santa Maria, but will most definitely impact upon the over 2000 people in Moreton Station settlement and Crossways.

Recommendation

10. Moreton Parish Council most strongly recommends that AS25 Station Road quarry be deleted from the list of allocated quarries in MSP Policy MS-1. The quarry will impact directly on the lives of the almost 200 people who live in Moreton Station Settlement including those who live within yards of the proposed quarry's southern boundary and those who stay in the caravan park a short distance from the quarry. The proposed quarry will be directly in the centre of the parish and impact negatively upon all who live in Moreton.