

Bournemouth, Dorset and Poole Minerals Sites

Inspectors Matters, Issues and Questions Additional Statements

Submitted on behalf of Aggregate Industries UK Ltd

SAND AND GRAVEL MS-2 SAND AND GRAVEL AREA OF SEARCH

Issue 173 – Should have other considerations have been taken into account ?

Response

The Policy is overly restrictive and consideration should be given to sites coming forward in the Dorset AONB which meet the exceptional circumstances tests and are in the public interest. The Plan is therefore not consistent with national policy.

Aggregate Industries UK Ltd (hereafter referred to as the Company) operate the Chard Junction Quarry which is currently in production with around two years sand and gravel reserves remaining. The Quarry is included within Policy MS-1 (Production of sand and gravel).

The Company are currently promoting an extension to Chard Junction Quarry at Westford Park Farm. Assessment work for this proposal is at an advanced stage, a Scoping Opinion has been issued by Dorset County Council, Public Consultation events have taken place and a Planning Application is to be submitted shortly.

The sand and gravel Area of Search (AOS) of the Minerals Sites Plan are identified in Figure 2 and designated through Policy MS-2 which would facilitate the development of unallocated sites from within the AOS provided criteria set out in the policy are met. The AOS has been identified from within the Resource Blocks which the British Geological Survey (BGS) identified and considered to contain economically viable sand and gravel reserves. The resource blocks are identified in Figures 9 and 10 of the Bournemouth, Dorset and Poole Minerals Strategy (2014). The BGS assessment excluded all areas within the Dorset Area of Outstanding Natural Beauty (AONB). The proposed Westford Park Farm extension lies within the AONB.

Guidance contained within the recently issued NPPF in paragraph 172 states that great weight should be given to conserving and enhancing the landscape and scenic beauty of the AONB. Planning permission should be refused for major developments other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- The need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;
- The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- The detrimental effect on the environment, the landscape and recreational opportunities, and the extent that it could be moderated.

With regard to the need assessment, it has been confirmed that the vast majority of Dorset's existing (and future) permitted sand and gravel reserves are located in the south and east of the county between Dorchester and Bournemouth. Chard Junction Quarry stands out as the major exception in the far west on the Devon/Somerset border. Were Chard Junction to cease operations,

sand and gravel would need to be imported from further afield such as Dorchester or Exeter, increasing lorry miles and carbon footprint. Retaining this quarry is considered essential to the local rural economy and the supply of local materials. A significant proportion of the products made at Chard Junction Quarry are nationally sought after for their texture, physical properties and golden colour. 20mm single sized gravels command a premium in the market place and travel as far as Belgium, being used for driveway and decorative purposes.

The extension to Chard Junction Quarry at Carters Close was granted Planning Permission in 2012 by Dorset County Council. This site, like Westford Park Farm, was in the AONB and was not in a Preferred Area for sand and gravel in the Dorset Minerals and Waste Local Plan 1999. In the officer's committee report on 4th May 2012, the Carters Close site was assessed against the AONB exceptional circumstances test set out in paragraph 116 of the (2012) NPPF. The following extract from the Committee report (Paragraphs 7.7 to 7.9) is set out below.

“Chard Junction Quarry serves a local market to the west of the county, Devon and Somerset, with over 70% of the Quarry's final destination of delivered material being within a 30 mile radius. There is no other alternative source of supply within an 18 mile radius, the majority of the permitted reserves being located in the east of Dorset, between Dorchester and Wareham, and in the Avon Valley close to Hampshire, at some distance from the market served by Chard Junction Quarry. Having regard to the absence of an alternative supply of sand and gravel within the area, the proposed development is considered to provide significant gains in terms of sustainability because it would minimise transportation distances to the market that would otherwise have to be served by road from more distant sources. In view of national policy and emerging local policy to reduce carbon emissions and minimise transportation distances, this is an important consideration.

Further to the above, it is noted that the deposits from Chard Junction Quarry are of an exceptional quality in terms of the geological characteristics, individual colour and appearance of the mineral. The quality of the mineral is expressed in the desirability and demand for decorative as well as construction uses, serving a regional and national as well as local market.

Having regard to the adverse impact on the local economy if the proposal is refused, there could be some job losses. The quarry employs 6 full time staff with 2 full time haulers also based at the site. In addition, should the mineral have to be delivered over a greater distance, it is likely that the costs to the consumer would be increased to cover transportation costs.”

The above assessment undertaken in 2012 remains completely relevant today in the consideration of Westford Park Farm. The exceptional circumstances assessments which have to be met to permit major development in the AONB have not changed when compared to the assessments required of the new NPPF which has recently been issued in July 2018. Whilst it is acknowledged that there are different environmental considerations between Westford Park Farm and Carter's Close, the recognition of the importance of Chard Junction Quarry and maintaining production in the consideration of extending the site in the AONB has been accepted by the MPA.

Therefore, if an environmentally acceptable site comes forward within the AONB which is unallocated and meets the exceptional circumstances tests outlined above then the development can't be considered under Policy MS-2 because all land within the AONB has been excluded from both the Resource Blocks and the subsequent AOS. In the light of this the company request that the

Council incorporate **a further criteria in this policy which allows sites within the AONB to come forward which meet the exceptional circumstances tests in the public interest as set out in paragraph 172 of the NPPF.**

In the adopted Bournemouth, Dorset and Poole Minerals Strategy adopted in 2014, paragraphs 7.49 and 7.50 discuss extraction of sand and gravel in the AONB.

Paragraph 7.49 states that sand and gravel is widely found within the Dorset AONB and is currently extracted at Chard Junction Quarry on the Dorset/Devon border serving the western markets. Major extraction of sand and gravel in AONB's is generally discouraged because of its potential harm to the landscape. The NPPF acknowledge this, stating that planning permission should be refused for major developments in designated areas, except in exceptional circumstances where it is in the public interest.

Paragraph 7.50 of the above Minerals Strategy states that where there is no harm to the AONB or where the harm is minimal and can be satisfactorily mitigated against, then extraction of sand and gravel may be appropriate in exceptional circumstances.

It is the view of the Company that Policy MS-2 is inconsistent with the wording of Paragraphs 7.49 and 7.50 of the Minerals Strategy which again, when considering mineral proposals in the AONB which meet the exceptional circumstances tests in the public interest subject should be permitted. Including an additional criteria on these lines within Policy MS-2 would avoid this inconsistency.

With regard to the public interest, the Chard Junction Quarry is renowned for its gravel deposits, which are highly sought after in the local, regional, and in some cases, national and international market. The strong demand for Chard gravel is mostly manifested in the sought after 20 mm single sized golden gravels decorative stone of which represented 50% (92,626 tonnes) of 2017 sales. The nearest source of alternative material in Dorset is 34 miles away at Woodsford Quarry, Dorchester.

Chard Junction Quarry is in a unique logistical position in the market place, ideally suited to serve the rural markets in North Devon, South Somerset and West Dorset. The remaining part of delivered sales volume is made up of customers predominantly located in the wider south west region but due to the specific aesthetic properties of Chard materials and the limited alternative supply with similar characteristics available, the material is supplied UK wide and ends up geographically as far away as West Wales, London, Derbyshire, Ireland and Belgium. The extension at Westford Park Farm would provide a further 5 years provision of these important minerals.

Having regard to the absence of an alternative supply of sand and gravel in the area, the Westford Park site is considered to provide significant gains in terms of sustainability because it would minimise transportation distances to the market that would otherwise be served by road from more distant sources. The reduction of carbon emissions and minimising transportation distances is an important consideration supporting the proposal.

Notwithstanding the doubt on future allocations, they are all located in the south and east of the County between Dorchester and Bournemouth. Unfortunately, the landbank does not take into account the geographic location of permitted reserves, especially in relation to Chard Junction. This is reinforced by the absence of sites coming forward in North Devon and South Somerset area. Overall, this represents a strong need case for the continuation of Chard Junction Quarry to continue to meet these markets and a duty for the authorities of Dorset, Devon and Somerset to co-operate fully in securing this provision.

In terms of the AONB, there is clearly a presumption against mineral working but guidance in the NPPF does not preclude it. Exceptional circumstances are set out and assessments on need, alternatives and environmental impact are required, which are capable of supplying the existing markets at Chard Junction Quarry without significant increases in transportation costs which would increase carbon emissions.