

Appendix Hampshire M&W Plan final response 080411

Planning for Hampshire's Minerals and Waste Consultation February 2011

Response by Dorset County Council

- 1 This is the final response of Dorset County Council to the consultation document "Have Your Say! Planning for Hampshire's Minerals and Waste". It replaces the officer response submitted on 23 March 2011.
- 2 Preparation of the Hampshire Minerals and Waste Plan
 - 2.1 The plan preparation process is set out in the Introduction to the document. It would appear that there will be no formal consultation on the draft plan (under Regulation 25) prior to the pre-submission publication, when only matters of "soundness" can be raised. It is stated clearly that the present document is not a draft plan.
 - 2.2 It is felt that HCC (and partners) may be risking legal challenge if third parties have been given no opportunity to comment fully on a draft plan before it reaches pre-submission stage. We would certainly wish to have such an opportunity to comment.
- 3 Balanced supply of aggregates
 - 3.1 It is suggested in the document that Hampshire will endeavour to maintain a supply of aggregates until 2030 at a level of 4.3 million tonnes per annum. This total will be from recycled aggregates (0.5mt), marine dredged sand and gravel (1.6mt), imports of crushed rock, largely by rail (0.5mt) and local sand and gravel (1.7mt).
 - 3.2 The figure of 1.7mt for locally extracted sand and gravel is below the apportionment figure of 2.63mt contained in the South East Plan, and the later reduced figure of 2.05mt. However, it is higher than recent sales and reflects the average level of production over the last ten years. It is considered there should therefore be no pressure on Dorset to increase production or raise its own apportionment figure. No objection is made to the proposed balanced aggregate supply levels.
- 4 Paragraph 3.8
 - 4.1 This paragraph states "Consideration should be given to how emissions generated from traffic will be minimised". It is suggested this be strengthened into a firmer commitment to reduce emissions as far as possible, for example by moving freight from road to rail, and use of conveyor belts and low emission vehicles.
- 5 Suggested sand and gravel sites close to Dorset
 - 5.1 The document suggests three sites as extensions to existing mineral sites. One of these, Bleak Hill Quarry Extension, lies close to the Dorset border. A further five new sand and gravel sites are suggested, two being close to Dorset (Roeshot Hill and Purple Haze). Additional landfill void is proposed at the

existing Blue Haze site, using the access off the B3081. The sites are described in Appendix D to the document.

- 5.2 It needs to be demonstrated that consideration has been given to potential impacts across the county boundary from proposals within the document.

6 Bleak Hill Quarry Extension

- 6.1 This suggested site contains 500,000 tonnes of sharp sand and gravel and lies off Harbridge Drive. It would form an extension to the current permitted quarry. The site has been identified for many years as a preferred area and was shown in the 1998 Hampshire Minerals and Waste Local Plan. It is acknowledged that appropriate measures will need to be taken to protect areas of ecological importance. Restoration to biodiversity and public access uses is proposed, using inert fill. It will be necessary to ensure that sufficient quantities of this fill are available to enable this restoration, as inert material is increasingly required for producing recycled aggregates and for raising worked land above water table levels to avoid creating birdstrike hazards close to airfields. It will be important to ensure that the benefits of biodiversity creation and public access are achieved in practice.

7 Purple Haze

- 7.1 This large site containing 8 million tonnes of predominantly soft sand lies to the south west of the existing Blue Haze site. Importantly, it lies within the Moors Valley Country Park, understood to be the third most visited country park in England. The document acknowledges that appropriate measures will need to be taken to protect the many ecologically important features of this area. It will need to be demonstrated that any such measures would be effective.
- 7.2 Reference is made under development management issues to the very large tumulus in the centre of the site and this will also need to be taken into account. Consideration will need to be given to potential noise pollution and other impacts on businesses and residents who live in and around the Ebblake area. The impact of development on flooding will need to be addressed, including along the section of road immediately east of the informal forest access at Ebblake House.
- 7.3 The impact of activity (both sand extraction and landfilling) at this site on the Country Park needs to be carefully assessed before the site is identified, rather than waiting for a planning application to be submitted and an EIA undertaken. Unless it can be demonstrated that there would be no unacceptable adverse impact on the park, this authority would object to the site being identified as a preferred site.
- 7.4 It would also need to be shown that activities at this site would not result in increased visitor numbers to heathland sites. The Natural England officers for both Hampshire and Dorset areas would need to be consulted on this aspect in particular.
- 7.5 Given the extensive timescale for this site (at up to 250,000 tonnes per year, over 30 years) it will be difficult to ensure that sufficient quantities of non-hazardous waste will actually be available. Both Hampshire and Dorset

authorities are successfully diverting a large proportion of their waste away from landfill and commercial companies may follow. A shortage of suitable fill material could delay or frustrate restoration of the site to an acceptable landform and afteruses.

- 7.6 However, if it proves possible to address all of these not insignificant problems, the large quantity of sand released would help to supply SE Dorset, western Hampshire and SE Wiltshire. This would be welcomed.
- 7.7 The requirement for a Freight Management Plan is supported. The affected stretch of the B3081 in Dorset is relatively short and this authority would require all HGV traffic leaving the site to travel directly to the A31 and A338, which are more suitable routes than the alternatives.
- 7.8 There are ongoing concerns about the accident rate and the suitability of the Baker's Hanging junction of the B3081 and Harbridge Drove for increased HGV movements. We would seek to secure developer contributions to improve the junction to manage any increase or to implement other necessary mitigation measures. We would also advise widening the B3081 to allow a right-turn lane, which is, as the TA acknowledges, achievable within available land. HGVs exiting the site should use the most direct route to the primary road network, avoiding Verwood. It is understood there are also aspirations by East Dorset DC and Moors Valley Country Park to provide a roundabout at the junction, with a fourth arm giving an alternative access into the park.
- 7.9 Developer contributions would need to be secured to pay for any improvements necessitated by additional HGV movements. Hampshire County Council would be requested to impose restrictions preventing HGVs associated with the site from travelling through Verwood.

8 Roeshot Hill

- 8.1 This site adjoins the boundary of Dorset north of the railway line in Christchurch Borough. It has been the subject of previous representations and land on the Dorset side of the boundary has been suggested by the landowner as being suitable for gravel extraction (as shown in Dorset's Minerals Site Allocations Document Discussion Paper, October 2008).
- 8.2 Restoration proposals are for a return to agriculture with access and biodiversity elements. These last two are important in relation to the provision of a publicly accessible recreation area created within the restored area in the longer term. This could replace a more temporary Suitable Alternative Natural Greenspace (SANG) on the Dorset side to serve any new housing development south of the railway.
- 8.3 Provision of an attractive restored recreation area could also contribute to meeting the objectives of the National Park.
- 8.4 It is important that Hampshire continues to be closely involved with Christchurch Borough Council in the consideration of this site in relation to housing needs.
- 8.5 The need for a Freight Management Plan is welcomed, as the A35 is particularly congested in this area. It is thought that much of the sand and gravel from this site will supply Christchurch, Bournemouth and Poole.

Exploitation of reserves to the east of Christchurch at Roeshot Hill would impose a significant burden on the A35 westbound. This route already operates at capacity in peak periods. It would therefore be necessary to ensure that vehicles do not exit the site at peak hours as far as possible.

- 8.6 Given that this mineral extraction will generate an substantial increase in HGV movements westbound through Christchurch, Dorset County Council would seek contributions from quarry operators for the implementation of measures to mitigate the effects of heavy goods vehicles on the network.
- 8.7 Restrictions on HGV movements from the quarry will need to be imposed during the morning and afternoon peaks.
- 8.8 The need for acceptable measures to be taken to protect surface water drainage is welcomed, as this land has a very high water table. No significant areas of surface water should be created, to avoid birdstrike risks.
- 8.9 Continued liaison between officers of the two mineral planning authorities is essential in relation to this site.
- 8.10 A point of detail - the document contains conflicting figures for the sand and gravel yield from this site. Appendix D gives 4mt, whereas paragraph 5.52 gives 3mt.

9 Provision of additional landfill void at Blue Haze

- 9.1 Appendix D includes a suggestion for additional landfill void at Blue Haze to contribute to meeting landfill requirements up to 2030. The various development management issues to address environmental impacts are supported and the need for a Freight Management Plan is welcomed.
- 9.2 It is not made clear whether the existing waste management facilities, including the transfer station, are to remain. Quantities of waste from East Dorset DC, Christchurch BC and Dorset CC are taken to this transfer station. A relatively small quantity of household waste is also tipped at Blue Haze.
- 9.3 Subject to the environmental impacts being satisfactorily addressed, no objection is raised to the provision of additional landfill capacity at this site.