## Hampshire Minerals and Waste Plan: Partial Update - Regulation 18 Draft Plan

# **Consultation Response from Dorset Council**

### Draft Plan Section 6. Supporting Hampshire's Economy

#### Aggregate Supply – Policy 17 and supporting text.

**Response**: Dorset Council notes the proposed approach to maintaining aggregate supply.

#### Local land-won extraction (sand & gravel) – Policy 20 and supporting text.

**Response**: Dorset Council notes that the Draft Plan identifies a need for approximately 9.7 million tonnes of sand and gravel reserves in new allocations in order to meet expected demand during the life of the Plan, while currently proposing some 17.7 million tonnes in new site allocations.

Dorset Council recognises that the Draft Plan figure, particularly at this early stage, will be higher than actually needed in order to allow for expected losses and has no objection in principle at this stage on the proposed approach of building in a contingency figure for consideration through the plan's preparation.

#### **Draft Plan Appendix A: Site Allocations**

#### Purple Haze

This is an existing allocation in the current 2013 Minerals and Waste Plan, and subject to a current application for mineral working.

The site is proposed for re-allocation.

**Previous responses from Dorset Council:** In response to the 2021 consultation on an application to develop Purple Haze Dorset Council objected to the detail of the proposed working and restoration, making the following points.

- i. Dorset Council was not satisfied that the Environmental Impact Assessment provided robust evidence that all impacts have been identified and will be avoided or appropriately mitigated;
- ii. Insufficient information had been provided to be able to rule out significant adverse impacts on nearby European and Nationally designated sites and species. The 2013 Hampshire Minerals and Waste Plan stated that development cannot be permitted if it may adversely affect the integrity of European protected sites. In the absence of sufficient evidence or assurances to the contrary, the precautionary principle should be applied;
- iii. Although the site was already allocated, Dorset Council did not accept that there were imperative reasons of overriding public interest to justify adverse impacts upon the integrity of Natura 2000 habitats. Furthermore, since the Plan was adopted, Natura 2000 habitats have faced other cumulative pressures arising from development in the area which would not have been present at the time the local plan was examined. If significant adverse effects could not be ruled out Hampshire County Council was asked to give serious consideration as to whether or not the principle of mineral extraction at Purple Haze can be justified; and
- iv. Notwithstanding the above, Hampshire County Council was asked to ensure that it is satisfied that all other impacts, such as those relating to health, amenity, recreation and highways are fully evidenced and suitably mitigated.

**Current Response:** This planning application response still stands, and is attached at **Appendix 1** of this Draft Plan response.

Dorset Council also notes Natural England's comments on the 2021 application (also attached at **Appendix 1** of this Draft Plan response). In the light of the multiple potential biodiversity impacts raised in objection to the proposal, Dorset Council questions whether this site can realistically be successfully delivered, and whether it is in fact a viable proposal to seek to re-allocate the site.

**Cumulative traffic impacts:** The B<sub>3</sub>o81 south of the Bakers Hanging Junction is already used by lorry traffic travelling between the A<sub>3</sub>1 and the Bleak Hill/Hamer Warren quarry site further north. Should Purple Haze be developed while Bleak Hill/Hamer Warren remains operational, there is potential for cumulative traffic impacts and Dorset Council will want to see evidence that the roads are suitable for the level of traffic likely to use them.

Cumulative traffic impacts take on an increased relevance in light of the other proposed site allocations further north, such as Midgham Farm and Cobley Wood, and the proposed hazardous waste landfill at Hamer Warren. All these sites will potentially rely on Alderholt Road/Harbridge Drove to access the B3081 in Dorset, and on to the A31.

Should more than one of these sites be working simultaneously, there is again potential for cumulative traffic impacts, both on the B3081 and the roads to the north of Baker's Hanging. Dorset Council would require clear evidence that any such cumulative impacts can be fully and appropriately mitigated, and the roads are suitable for carrying the likely traffic loading. Sufficient safeguards in the plan would also be needed.

It is noted that, should Hampshire County Council permit the development of Purple Haze, developers, construction sites and other users of sand/gravel in the Dorset Council and BCP Council administrative areas may benefit from the close proximity of the site as a source of aggregate.

However, as specific proposals for developing the Purple Haze site have emerged the difficulties faced in developing this site in a sustainable manner have become clearer, leading Dorset Council to question its suitability for re-allocation, given the significant risks posed to protected habitats (together with traffic and amenity impacts). If adverse effects cannot be ruled out, the site is not suitable for reallocation.

### **Draft Plan Appendix A: Site Allocations**

### Cobley Wood

The Cobley Wood proposed allocation is immediately to the east of the existing Hamer Warren quarry, approximately 700m from the Dorset border.

Dorset Council's concern over this proposed allocation is the potential for cumulative traffic impacts, should other sites in the vicinity such as Midgham Farm, Bleak Hill/Hamer Warren (as quarry or landfill) or Purple Haze be operational.

It is noted that the Bleak Hill/Hamer Warren lorries are currently using the Harbridge Drove/Alderholt Road for access to the B<sub>3</sub>o81 and A<sub>3</sub>1. Should the Bleak Hill/Hamer Warren site cease quarrying and not be used for landfill, it is possible that the Cobley Wood site could be developed safely. However, if quarrying/landfill activities were ongoing at Bleak Hill/Hamer Warren, given the width of the Harbridge Drove/Alderholt Road Dorset Council questions whether it could safely accommodate the traffic load of an additional quarry site together with traffic accessing Alderholt.

Dorset Council at this stage expresses concern over cumulative traffic impacts that could result from the development of Cobley Wood, while reserving its position until further and more detailed evidence assessing potential traffic and transport impacts is made available. If such evidence is not available, or if Dorset Council is not satisfied that it clearly demonstrates that the roads can accommodate the additional traffic loading, then Dorset Council would object to this site as an allocation.

## **Draft Plan Appendix A: Site Allocations**

## Midgham Farm

This proposed allocation lies immediately to the east and south-east of Alderholt. with potential for impacts (e.g. visual, noise, dust) on amenity of residents. Access to the site is likely to be from the Hillbury Road.

It is noted that the access to Midgham Farm is proposed to be off the Hillbury Road, across a strip of land that lies within Dorset Council's administrative area. Therefore, our response to this consultation is given without prejudice to any subsequent consideration we may be required to give to the development of an access onto the Hillbury Road, should this site be forthcoming.

**Amenity**: As noted, there is potential for adverse impacts on the amenity of residents of Alderholt, and other residents in the area. This could include noise, dust, vibration, loss of access to open space and impacts of traffic and transport. Dorset Council as Mineral Planning Authority is aware that minerals have to be worked where they are found, and mineral development often has potential to impact on neighbours. Such impacts should be minimised through appropriate mitigation to acceptable levels – the reference in the Draft Plan to "A buffer is required in the north-west corner of the site to protect the amenity of Alderholt Village" is a step towards this and is noted and welcomed.

However, Dorset Council considers further information on impacts and mitigation is needed to demonstrate that development can occur without unacceptable impacts, and will make further comment when this is available. Until then, Dorset Council expresses concern regarding potential impacts on amenity of Alderholt residents.

**Traffic impacts and cumulative traffic impacts**: This is again a key issue with this proposal. The points already made for the Cobley Wood and Purple Haze proposals apply for Midgham Farm. Dorset Council would want to see clear evidence that, should Midgham Farm be allocated, there would be no unacceptable cumulative traffic impacts along the Hillbury Road/Alderholt Road/Harbridge Drove, and that suitable mitigation measures will be secured in the plan. In the absence of this, Dorset Council would object to this site allocation.

**Cumulative Impacts**: The Bleak Hill Quarry Extension at Hamer Warren, with a current permission for extraction of sand and gravel, lies immediately south of the proposed Midgham Farm allocation. Dorset Council would want to be reassured that should Midgham Farm be allocated, the existing allocated extension at Hamer Warren will be completed before Midgham Farm is developed and there would be no simultaneous working of the Bleak Hill extension and the proposed Midgham Farm or Cobley Wood sites to avoid cumulative impacts.

**Traffic/Access impacts**: It has been noted that CEMEX lorries are currently using the Harbridge Drove/ Alderholt Road for access between Bleak Hill/Hamer Warren and the B3081 and A31. Very few lorries would be travelling north of Bleak Hill/Hamer Warren, and Dorset Council is concerned that the width of the road north of Bleak Hill/Hamer Warren and leading up to and beyond Alderholt is not currently adequate to take the increased traffic loading of a quarry along with non-quarry traffic in and round Alderholt.

Dorset Council would want assurances that the width of the road was adequate to safely accommodate the HGV traffic that would be using it, along with the residential traffic accessing Alderholt. If this cannot be demonstrated, Dorset Council would object to this site allocation.

Furthermore, Dorset Council would ask if consideration has been given to taking the mineral from Midgham Farm by conveyor over the Hillbury Road to the existing Bleak Hill/Hamer Warren site, to process and export it from there.

### **Draft Plan Appendix A: Site Allocations**

### Hamer Warren hazardous waste landfill

A part of the existing Bleak Hill (Hamer Warren) Quarry is proposed as a new strategic waste management site, a hazardous waste landfill taking soils contaminated by asbestos.

The proposed allocation is in close proximity to Dorset, but screened by the existing tree cover of Whitefield Bottom. Pollution risks will be addressed by Environment Agency and separate legislation requirements and potential developers of the site would need to acquire the necessary permissions and permits in advance of development commencing.

Development as a hazardous waste landfill would be part of the restoration of the site and is therefore not a new development. Lorries bringing waste material to be landfilled would contribute to cumulative traffic travelling to and from the A<sub>31</sub>, as previously mentioned.

The points already made for the Cobley Wood and Purple Haze proposals apply for this proposed landfill development. Dorset Council would want to see clear evidence that should Bleak Hill/Hamer Warren landfill be developed along with any of Purple Haze, Cobley Wood or Midgham Farm being also operational, there would be no unacceptable cumulative traffic impacts along the Hillbury Road/Alderholt Road/Harbridge Drove and the roads would be able to safely accommodate the additional traffic loading.

In the absence of conclusive evidence and suitable safeguards in the plan, Dorset Council would object to this site allocation.

Dorset Council 30 January 2023

# Dorset Council Response – Appendix 1

The following documents form part of Dorset Council's response to the Reg 18 Draft Plan, and are attached separately.

- 1. Dorset Council objection dated 28<sup>th</sup> May 2021 to Hampshire County Council application reference 21/10459 at Purple Haze, near Verwood.
- 2. Natural England objection dated 8<sup>th</sup> June 2021 to proposed development of Purple Haze near Verwood.