



Purpose: The following statement is made on behalf of Verwood Town Council (VTC) to the 10-week public consultation on Main Modifications (MMs) to the Minerals and Waste Local Plan. This follows the Additional Hearing held in September 2025 which focused on hydrological evidence and the resulting implications for the proposed sand and gravel allocation at Purple Haze.

Summary of Response: VTC are of the firm view that the Purple Haze allocation is **unsound** and remains unjustified, ineffective, inconsistent with the NPPF (2024) or the Habitats Directive despite the proposed main modifications.

1. VTC would like to reiterate reg.63 of the Conservation of Habitats and Species Regulations 2017 and the requirement that a plan can only be approved where, via an appropriate assessment, there will be no adverse impact on the integrity of protected European sites. There must be scientific certainty to ensure no adverse impact on Ebblake Bog (SSSI, SAC, SPA and Ramsar site) and other nationally and internally protected sites.

2. MM23: Paragraph 6.78 - Not legally compliant. Not sound

The proposed modification to incorporate '*further investigations*' where it states, '*These investigations **may** identify that extraction **may** need to be limited or possibly excluded in some areas*', fails the soundness test proving that the inclusion of large areas of the proposed Purple Haze allocation makes the plan unjustified¹. The repeat inclusion of the word 'may' creates uncertainty. The evidence submitted throughout the examination process has failed to demonstrate the scientific certainty needed to ensure no adverse impact on Ebblake Bog and so runs contrary to the Habitats Directive making this allocation legally unsound.

3. This ambiguousness and therefore lack of certainty as to the amount of potential mineral extraction at Purple Haze, undermines the deliverability of the overall plan. Plans should be prepared in a way that are aspirational but deliverable². The proposed modification in paragraph 6.78 and replicated in pages 199 and 200 lacks the certainty to ensure deliverability of the overall plans objectives, thus rendering the plan unsound.

4. From the outset of the plan making process, the total mineral resource has dropped from 7.25 million tonnes to now '*up to 4.4 million tonnes*'. The reality is that the amount of potential mineral extraction could be even less when the robust evidence (that

¹ Contrary to Paragraphs 36b) and 16d) of the NPPF (2024)

² As set out in paragraph 16b) of the NPPF (2024)



should have been provided at the start of this process) is produced. This undermines the deliverability of the overall mineral resource objective in the plan, failing the soundness test of effectiveness³.

5. The lack of certainty regarding the size and area of the site that can be won for minerals also fails to guide decision-makers. Through the examination process, we know that the size of the area of the site identified in Inset Map: 5 will not be the size of the site that is likely to be able to be worked for mineral extraction. As such, Inset Map:5 should be amended to reflect the size of the site that can worked. This is the only way to properly guide decision-makers.

6. The lack of certainty regarding the size of the site also undermines confidence in the commercial delivery of the proposed allocation. For a plan to be sound, it must be effective, which is defined as being '*deliverable over the plan period.*'⁴ The continued inclusion of Purple Haze therefore continues to make the plan unsound.

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7. Page 199, Development Considerations 1. - To be effective, this DC must be expanded to include the words at the end of the sentence '*such as no vehicles relating to the operation of the site to pass through the town of Verwood.*'

8. Page 199, Development Considerations 2 and 3. - The word '*significant*' should be removed from both development conditions 2 and 3. The LPA are reminded of the earlier submissions by VTC and previous case law where the application of Article 6(3) of the Habitats Directive has been helpful summarised as follows;

*Following assessment, the project in question may only be approved if the authority is convinced that it will not adversely affect the integrity of the site concerned. Where doubt remains, authorisation will have to be refused: Waddenzee at [56-57].*⁵

9. The assessment should be done at plan making stage to demonstrate that the proposed allocation will not adversely affect the integrity of Ebblake Bog and therefore establish the size of the proposed allocation. Failure to do so, makes the plan unjustified and therefore unsound. Any impact on such sensitive and fragile internationally protected sites must be avoided at all costs and policy protection must be in place to ensure this.

³ Paragraph 36 c) of the NPPF (2024)

⁴ Paragraph 36 c) of the NPPF (2024)

⁵ Paragraph 3, VTC submissions to Matters 9 and 1 September 2025.



10. Page 199, Development Considerations 4. - the last sentence needs to be amended to state, '*potentially through the limiting of extraction in the north **and other areas of the site.***' Failure to make this amendment could be interpreted by decision-makers that only the (as yet undefined) '*north of the site*' is to be removed following the outcomes of the assessments, when other areas of the site that have impacts to other nearby protected sites may be affected.

11. VTC maintains its continued objections to the allocation of Purple Haze for mineral extraction on grounds that the allocation is fundamentally inappropriate for the extraction minerals in such a sensitive location. The lack of scientific certainty on the effects of the internationally protected sites makes the allocation not legally compliant and the harmful impact on the amenities of the residents of Verwood that cannot be mitigated for. For the reasons set out VTC maintains that the Purple Haze allocation makes the entire Plan unsound.

End.