

**Second Stage
Consultation
Minerals Local Plan**

**Consultation Response
Document**

2013 - 2014

Table of Contents

Table of Contents.....	2
Index of responses by organisation.....	4
Introduction.....	6
Summary of responses	8
Open days.....	11
Consultation methodology.....	12
Notes on how the responses section is organised	13
Section 6: Portrait of Worcestershire	16
Question 1: Do you think there are any other issues we should be aware of when preparing the Minerals Local Plan?	16
Section 7: Vision and Objectives	33
Question 2: Do you think that the vision successfully addresses...?	33
Question 3: Does the vision address the principles of the NPPF?... ..	46
Question 4: Any other comments on the vision or spatial strategy?.....	56
Question 5 and 6: Do you support the objectives? And will the objectives deliver the vision?	64
Questions 7 and 8: Please give details of any other strategic issues that you think should be considered. Do you have any other comments on the objectives, or do you think there are any additional objectives which would help deliver the vision?.....	66
Section 8: How much mineral will we make provision for?.....	84
Questions 9 and 10: Do you agree with Option A?	85
Questions 11 and 12: Do you agree with the proposed approach to each of the industrial and energy minerals considered?.....	98
Section 9: When will minerals be worked and when will our reserves meet national targets?	103
Questions 13 and 14: Do you agree with Option B?	104
Question 15: Annual provision of aggregates up to and beyond 2016.	112
Question 16: Approach to industrial and energy minerals.....	128
Section 10: How will minerals be worked?	131
Question 17 and 18: Do you support the following policy issues (Table 5)? .	131
Section 11: Where will minerals be worked?	154
Question 19: Refining the opportunity area for clay.	154
Questions 20 and 21: Areas of search for industrial or energy minerals.	156
Question 22: Assessing aggregate resources.	169
Sites Submitted by Industry	181
Question 23: Do you agree with the approach to areas of search?	193

Questions 24 and 25: Enabling new mineral development through policy criteria.....	218
Section 12: How will minerals be worked?	243
Questions 26 and 27: Approach to restoration of mineral workings.	243
Questions 28 and 29: Policy development for restoration priorities.	274
Questions 30 and 31: Restoration plans.....	283
Section 13: How will we safeguard minerals for future use?	297
Questions 32 and 33: Approaches to mineral safeguarding.	297
Questions 34 and 35: Do you support the circumstances identified where the County Council will not object to development proposals in Mineral Safeguard Areas?.....	309
Questions 36 and 37: Exemptions.....	315
Question 38: Do you have any other comments to make on the application of Mineral Consultation Areas and the requirement for prior extraction?	320
Questions 39, 40 and 41: Approach to safeguarding infrastructure assets. ...	321
Questions 42 and 43: Policy development for safeguarding infrastructure ...	326
Section 14: Next Steps	329
Question 44: Are there any other matters you think we need to address in the next consultation?.....	329
Other comments and no comment responses	340

Index of responses by organisation

<i>Broadway Parish Council</i>	223
<i>Canal and River Trust</i>	15, 252, 286
<i>Carter Jonas LLP (on behalf of Croome Estate)</i>	189, 207
<i>Cemex</i>	21, 29, 83, 84, 124, 174, 175, 176, 184, 189, 198, 199, 215, 267, 330, 331, 332, 333, 345
<i>Centre for Radiation, Chemical and Environmental Hazards</i>	338
<i>Charlton Parish Council</i>	180
<i>Civil Aviation Authority</i>	350
<i>Cotswolds Conservation Board</i>	55, 66, 108, 193, 353
<i>Crothorne Parish Council</i>	169, 170, 182, 296
<i>Droitwich Spa Town Council</i>	162
<i>East of England Aggregates Working Party</i>	355
<i>English Heritage</i>	14, 15, 48, 54, 67, 100, 159, 196, 224, 305, 357
<i>Environment Agency</i>	28, 57, 61, 65, 74, 75, 78, 79, 150, 164, 167, 225, 231, 237, 244, 253, 260, 269, 271, 276, 279, 285, 297, 298, 305, 329, 330, 331, 333, 335, 348
<i>Fladbury Parish Council</i>	198
<i>Gloucestershire County Council</i>	11, 194, 196
<i>Harborough District Council</i>	355
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	28, 40, 51, 60, 78, 91, 108, 120, 149, 178, 188, 214, 237, 267, 285, 332
<i>Hereford and Worcester Fire and Rescue</i>	355
<i>Herefordshire and Worcestershire Earth Heritage Trust</i>	27, 40, 60, 100, 107, 110, 147, 157, 161, 284, 310, 325
<i>Highways Agency</i>	180, 181, 182, 202, 222, 230, 348
<i>Longdon Queenhill and Holdfast Parish Council</i>	37, 49, 50, 52, 56, 61, 76, 86, 94, 97, 101, 105, 116, 130, 143, 176, 206, 230, 306, 317, 320, 323, 332, 346
<i>Malvern Hills AONB Partnership</i>	28, 60, 69, 96, 107, 119, 148, 168, 178, 214, 236, 243, 265, 285, 296, 311, 347
<i>Marine Management Organisation</i>	338
<i>Mineral Products Association</i>	15, 112, 156, 161, 164, 165, 172, 202, 271, 308, 314, 330
<i>Moreton C Cullimore</i>	190
<i>Mr Adrian Buckmaster</i>	30, 32, 45, 71, 82, 93, 137, 197, 238, 252, 282, 293, 316, 342
<i>Mr and Mrs Peter and Nicola Inchbald</i>	21, 34, 47, 56, 83, 93, 104, 115, 139, 167, 174, 204, 226, 231, 255, 305, 317, 320, 323, 330, 344
<i>Mr Andrew Morris – Strong Farms</i>	185
<i>Mr James Whitaker</i>	15, 82, 97
<i>Mr John Corbet-Milward</i>	181
<i>Mr Roger Quiney</i>	16
<i>Mr Tom Meikle</i>	159, 165, 292
<i>Mrs Anne Pearson</i>	20, 45, 55, 65, 68, 70, 72, 74, 83, 138, 153, 199, 225, 253, 293, 305
<i>Mrs Christine Daniell</i>	21, 35, 49, 56, 74, 84, 105, 140, 175, 227, 239, 255, 276, 287, 293, 306, 331, 345, 359
<i>Mrs Pat Harries</i>	28, 42, 52, 61, 79, 92, 107, 150, 238, 245, 270, 312, 333, 348

<i>National Farmers' Union, West Midlands Region</i>	55, 74, 129, 163, 248, 255
<i>Natural England</i>	24, 56, 69, 96, 102, 110, 128, 131, 143, 148, 157, 171, 183, 206, 240, 245, 262, 283, 288, 294, 298, 302, 315, 321, 326, 328, 333, 337, 349, 359, 360, 361
<i>Network Rail</i>	356
<i>North Worcestershire Water Management</i>	19, 55, 74, 137, 224, 252
<i>Pershore Town Council</i>	173, 200
<i>Pleydell Smithyman</i>	186, 187
<i>Profin Protective Finishing Ltd</i>	136, 281, 282
<i>RSPB</i>	21, 22, 24, 35, 36, 49, 61, 75, 85, 105, 142, 205, 228, 229, 230, 256, 260, 261, 262, 282, 294
<i>Sandwell Metropolitan Borough Council</i>	356
<i>Severn Trent Water</i>	163, 335
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	24, 38, 41, 59, 64, 65, 73, 77, 89, 94, 99, 101, 106, 117, 121, 144, 168, 208, 212, 232, 240, 262, 278, 284, 294, 298, 301, 308, 319, 324, 326, 328, 334, 335, 347
<i>Springfield Lane Association</i>	222
<i>Staffordshire County Council</i>	87, 106, 116
<i>Swindon Borough Council</i>	82, 104
<i>Tewkesbury Borough Council</i>	20, 33, 93, 104, 139, 202, 225, 239, 275, 297, 343, 355, 356
<i>Tewkesbury Environmental Health</i>	356
<i>The Coal Authority</i>	65, 98, 130, 167, 232, 294, 307, 315
<i>Warwickshire County Council</i>	355
<i>WCC Environmental Policy</i>	30, 61, 80, 96, 102, 154, 171, 245, 270, 280, 286, 287, 302, 321, 325, 336, 349, 354
<i>Wildmoor Residents Association</i>	24, 40, 51, 59, 66, 69, 77, 91, 95, 100, 107, 109, 118, 130, 146, 154, 156, 161, 212, 235, 242, 264, 276, 284, 287, 295, 300, 309, 319, 324, 332, 347
<i>Worcestershire Archive and Archaeology Service</i>	30, 32, 45, 61, 67, 224, 282, 292, 340
<i>Worcestershire County Council Chief Executive</i>	356
<i>Worcestershire Regulatory Services</i>	14, 133, 135, 136, 151, 291, 353
<i>Worcestershire Wildlife Trust</i> ...	24, 58, 69, 88, 102, 110, 128, 131, 144, 155, 157, 171, 183, 220, 245, 262, 276, 284, 287, 297, 302, 307, 315, 318, 321, 324, 327, 328, 333, 337, 349
<i>Wyre Forest District Council</i>	54, 55, 82, 104, 192, 224, 305, 323, 352

Introduction

The Council ran a consultation from 11th November 2013 to 31st January 2014 on the second stage of the development of the new Minerals Local Plan with a variety of ways to get involved:

- **Consultation document:** We developed a detailed consultation document which set out our approach so far, and included questions to highlight the issues we think we will need to address in the draft plan.
- **Consultation Summary document:** This was a shorter version of the consultation document which included an introduction to each section of the main document. Not all of the questions contained in the questionnaire were part of the summary document, and in many cases the summary document directed readers to the main consultation document for further detail.
- **Questionnaire:** A 44-question questionnaire based on the full consultation document was made available in paper copies and online. The questionnaire allowed respondents to choose and respond to the sections which were of most interest to them, and they were not obliged to reply to every question.

We also received a number of representations on the consultation that were not questionnaire responses.

- **Background documents:** A suite of background documents is being prepared to set out the evidence which the Minerals Local Plan will be based on and to flag up some key issues. Some of these documents are quite detailed and some are inevitably more technical, but we asked everyone who felt they had the expertise to help us out by looking at the background documents we had prepared so far. Further background documents will continue to be prepared throughout the development of the Minerals Local Plan, and both new and updated background documents will be added to the website on a rolling basis as they are prepared.
- **Open days:** three open days were held at various locations around the county.
- **Interactive quiz:** The interactive quiz we developed for the first stage consultation remained active on our website during the second stage consultation.
- Consultation on the Sustainability Appraisal and the Habitats Regulations Assessment for the draft Minerals Local Plan ran alongside the items described above, with a separate questionnaire. These were made generally available, as well as to the statutory consultees. The responses received to this questionnaire have been passed to the officers preparing the Sustainability Appraisal and Habitats Regulations Assessment but have not been included in this document.

This document sets out the Council's initial response to the comments received to the consultation, via paper and online questionnaires, and general responses that were not tied to specific questions. All responses received up to the close of the consultation on 31st January 2014 have been included as a matter of priority. We are willing to accept comments on the emerging Minerals Local Plan at any time, and have included comments received after that date wherever possible. However, as comments received outside of the formal consultation period are not as easily recorded we cannot guarantee that these will receive an individual response though they will be taken into account. This document also provides an overview of feedback received during the open days.

The document is organised in three parts: the summary of responses, open days and workshops, and the full consultation responses. Comments received on background documents are addressed on a rolling basis through updates to the background documents as appropriate, and are not covered in this document.

Summary of responses

The comments received to the second stage consultation were broadly constructive and positive. The restoration-led approach was especially lauded by conservation organisations, though the minerals industry expressed some reservations and we anticipate that some refinement of the areas of search and the methodology employed to determine them will be necessary. We received very useful feedback from industry respondents regarding ways in which we may strengthen our approach as we begin to draft policies. Local Authorities within and neighbouring Worcestershire also brought a number of important cross-boundary issues to our attention that will require further work. These include projected housing development and demand for aggregates, crushed rock provision, and sustainable transport. Individuals and parish councils expressed concern about particular sites, and ensuring that Worcestershire's local character is captured and expressed in the draft plan.

There was general agreement with the "issues that need to be addressed through policy criteria" which were identified in tables 5, 10 and 24. Some respondents identified issues that they would like to see strengthened or added, and these will be addressed as we develop the draft policies. Monitoring was identified as a cross-cutting issue in the responses we received, and we will be looking at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation.

Below is a brief summary of some of the key issues that arose in each section of the consultation:

Portrait of Worcestershire

Respondents broadly agreed with the Portrait of Worcestershire, but in this section and in others, respondents indicated that we could do a better job identifying the things that make Worcestershire unique. Some people recommended that specific sites or locations be included, and we realise that we will need to do a better job conveying Worcestershire's local character in the draft plan.

Vision and objectives

Most responses were in general agreement with the vision and objectives. We received a number of suggestions for amended wording to help clarify our intentions, especially around the historic environment, and some respondents would like to see the objectives become more locally specific.

How much mineral will we make provision for?

Respondents expressed a number of views regarding our proposed approach to meeting our landbank. Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We are considering the comments we have received to establish the most appropriate way forward. Cross-boundary issues, crushed rock provision, and protection of AONBs all also figured heavily in responses to this section.

There were also concerns expressed about the conversion factor we used to calculate the amount of mineral in resource areas, and about the reliability of information used for one particular resource area. We will undertake further work to refine these estimates and will produce a revised version of the *Analysis of Mineral Resources in Worcestershire* in due course.

When will minerals be worked and when will our reserves meet national targets?

Consultees clarified that national policy regarding landbanks does not set targets. We acknowledge that this is correct and we mis-used the term "targets", but as we have used this terminology throughout the second stage consultation, we have continued to use it in this document in order to remain consistent with the consultation documents and the questionnaire. We will refine our terminology for the draft plan.

How will minerals be worked?

Proximity of mineral workings to "sensitive receptors" caused some concern, along with the removal of the now-outdated "sieve test" approach. The rationale for the removal of the sieve test is outlined in Appendix 1 of the main consultation document, along with a detailed explanation of changes to the regulatory and national policy context since the adoption of the 1997 Hereford and Worcester Minerals Local Plan. These changes mean that we have had to re-think our approach to identifying constraints and establishing "buffer zones" as the policy context is substantially different than it was in 1997.

Where will minerals be worked?

Respondents expressed concerns about the protection of Worcestershire's AONBs and other landscapes, and concern that visual impact has not been addressed satisfactorily in the second stage consultation. There was also concern expressed from industry and the public about how any proposed sites outside of the areas of search will be handled. We will be refining the areas of search based on the comments received during this consultation, and we believe that some of our earlier assumptions will need to be revisited.

Respondents have also specifically asked that we consider Nitrate Protection Zones, agricultural land quality and source protection zones in preparing our draft policies.

How will mineral workings be restored?

Responses to the restoration-led approach were generally positive, and were met with special acclaim from conservation organisations. Industry respondents expressed more reservations, however, and a number of suggestions were received for ways to refine the approach as we develop the draft plan.

We are considering several ways to further refine the areas of search and ensure delivery of the restoration priorities which may include spatial masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach. This approach will be informed by the responses received in questions 28 and 29, and we plan to explore these options further with the members of the Green Infrastructure Partnership working group which has helped inform the

development of the Green Infrastructure aspect of the Minerals Local Plan to date.

Several respondents suggested that further clarity is needed about how restoration priorities should be balanced or prioritised if more than one issue is identified for a particular area.

How will we safeguard minerals for the future?

There was general agreement with our proposed approach to safeguarding minerals and mineral infrastructure, but we expect that our approach will be further refined as we develop draft policies.

Next steps

We are planning a series of meetings to address respondents' requests and concerns before beginning to draft policies. Cross-boundary issues, including crushed rock provision, sustainable transport, demand forecasting linked to local development plans and potential AONB impacts all require further cooperation with surrounding authorities. A number of respondents have also offered their expertise and access to their data to help us to fill gaps in our knowledge, particularly around the Mercia Mudstone (clay) and building stone resources in the county. We are embarking on a phase of further information gathering to ensure our evidence base is as robust as possible, and to ensure we have fulfilled our duty to cooperate as we begin to prepare the draft wording for the next consultation.

Open days

Three open days were held near the beginning of the consultation period to give the public a chance to find out more about the second stage consultation, look at the background documents, and ask officers questions. A number of key pages from the consultation document were produced at poster scale, and all of the Areas of Search were also printed at a large scale. Background documents, the Sustainability Appraisal and Habitats Regulations Assessment, and large-scale geological maps of the county were also available for the public to peruse during the events. Though we attempted to direct the public to the digital copies of the documents, a number of printed consultation documents, summary documents and paper questionnaires were available for the public to take away.

Worcester Open Day

Saturday 30 November, 2013. 10:00 – 15:30, Worcestershire Countryside Centre

- **7 attendees**
- This event deliberately coincided with a well-attended fun run in the park, the Worcestershire Christmas Market (the County Council car park serves as a park and ride for Christmas shopping weekends) and a rugby match, all of which were expected to attract passing interest in the consultation.
- The main interest on this day came from Longdon/Queenhill, with parish councillors and residents from the Longdon, Queenhill and Holdfast Parish expressing concern about an existing application on a site near Holdfast.

Bromsgrove Open Day

Wednesday 4 December 2013. 14:00 – 20:00 in the Spadesbourne Suite at Bromsgrove District Council Office

- **21 attendees**
- This event was added to the schedule on the request of the Cabinet Member for Economy, Skills and Infrastructure and deputy leader of the council as there was local interest in the plan.
- Attendees at this event included Bromsgrove District Council, Gloucestershire County Council, local residents, and representatives from a number of parish councils (Bentley Pouncefoot, Belbroughton, Hagley).
- The main areas of interest were concerns about landfills in former quarries and potential links with housing proposals.

Kidderminster Open Day

Saturday 7 December 2013. 10:00 – 16:00 at Kidderminster Library

- **3 attendees**
- All attendees at this event were members of the public.

The number of attendees in itself does not indicate the success of these open days as many in-depth conversations were held about detailed aspects of the plan. People were primarily interested in learning about resources and sites in their areas, and some looked at Areas of Search maps in detail. Following specific questions, electronic links and detailed maps were emailed to answer individual queries. A number of attendees took full consultation or summary documents and questionnaires away with them. There were also a lot of general questions asked about the consultation and the minerals local plan.

Consultation methodology

A letter setting out details of the consultation and the variety of ways to view the consultation and background documents was sent on 11th November to 113 postal addresses, and 394 email addresses for organisations and individuals registered in our consultation database to receive information on minerals planning.

Following further consideration of the consultation database, it was felt that there may be additional contacts who it would be desirable to inform about the consultation. All contacts on the SCI and Waste Core Strategy consultation database had previously been sent a "Get involved in Planning" Questionnaire but a number of contacts either did not respond, or responded but did not request to receive information on minerals policy. These contacts were considered and three groups were identified:

- "white group" – this group were not considered essential to the development of the Minerals Local Plan and were not contacted again.
- "blue group" – this group were considered important to be involved in the development of the plan. This group were added to the Minerals consultation database but given the option to be removed on request.
- "pink group" – this group were considered to have a potential interest in the development of the Minerals Local Plan. This group were also sent the "Get Involved with Planning" questionnaire again but not automatically added to the Minerals consultation database.

The "blue" and "pink" groups were sent letters or emails on 12th December 2013¹ which contained the same information as the 11th November letters and emails with additional details of why they were receiving the communication. 122 letters and 49 emails were sent to blue group, and 165 letters and 52 emails were sent to the pink group.

10 copies of the main document and 6 copies of the summary document were posted out on request. Documents were made available in the county's libraries and at County Hall reception, and on the Council's website.

Public notices were placed in all the newspapers in the county. Media releases were sent in two rounds of proactive media activity tailored by news patch, and 11 articles appeared in the local media with an equivalent advertising value of £2,891. 7 social media messages were posted through the County Council Twitter channel (around 9,000 followers) over the consultation linking through to dedicated website section. The consultation was publicised in two articles posted on Worcestershire County Council's front-page news section during the consultation period and was listed on the Consultation Portal used by the Council and Partners. Articles were also carried in the National Farmers Union's weekly email newsletter to their members in the West Midlands and on the regional pages of NFUonline.com, as well as in the Worcestershire County Association of Local Councils "CALC Update" and Wychavon's Strategic Partnership and LSPs newsletter "Communicate".

¹ In error, the letters sent on 12 December were dated 11 November.

We received **30 questionnaire responses** and **36 general responses by letter or email** that did not use the questionnaire format for a **total of 66 responses**. This gives an overall response rate of 8.9%.

We proposed to hold two types of workshop during the consultation period:

- An industry workshop aimed specifically at operators to get an industry perspective and to focus on technical issues and deliverability.
- A green infrastructure workshop aimed at organisations involved in delivering and managing green infrastructure in and around the county to focus on the implementation and deliverability of our restoration aspirations.

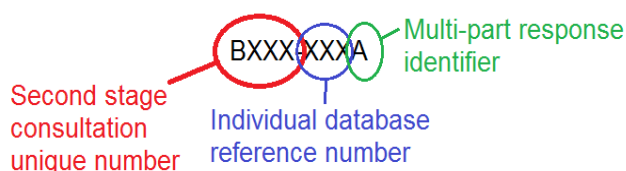
These workshops did not take place as no expressions of interest were received for either event.

Notes on how the responses section is organised

The responses section is organised by question and includes all responses received. Original copies of the responses can be viewed on request.

Below is a list of additional points on the methodology of the response section of the document.

- Each response was allocated an individual response reference number in the format BXXX-XXX. Those individuals and organisations who submitted both a questionnaire response and general comments have an additional multi-part response identifier: "BXXX-XXXA" for questionnaire responses and "BXXXX-XXXB" for general responses.



- Where respondents submitted only general comments, their responses have been split and recorded against the most appropriate "best fit" question from the questionnaire. These non-questionnaire responses are indicated by "nq" following the reference number.
- We have replied to comments under the question they were submitted under, but where respondents entered 'see above', we have not duplicated their comments as we consider the issue to have been previously addressed. The purpose of the response document is to reply to comments and identify issues for us to consider, and it is not intended to be a frequency count.
- Where the response to a previous question is pertinent (ie a 'yes/no' followed by an 'explain' question) the answer to the first portion is included in brackets for clarity.

- Where respondents have written "no comment" in a comment box, this has been recorded as we consider this to constitute a response. Where the box has been left blank it has not been recorded. No comment responses are collated at the end of each question.
- The graphs and quantitative figure tables presented in the document were generated using only questionnaire responses. As respondents were not required to respond to every question in the questionnaire, the totals shown may not equal the number of respondents, and may not total 100%. In some cases, we have only shown "yes" and "no" responses and not included "no reply" responses to improve the legibility of the table – because not everyone answered all of the questions, the 'no reply' responses tend to skew the results. The variability of response to the quantitative aspects means that these have been used for information purposes only and should not be considered reliable results for decision making.
- For the reasons set out above, not all questions were able to be presented graphically, and so we have only included graphs where we feel they help clarify the responses.

Our responses refer to policy and page references in the Second Stage Consultation document. These may change in future documents. Copies of all of the consultation documents and further copies of this document are available on our website www.worcestershire.gov.uk/minerals, or on request.

If you would like any further details please contact:

Nick Dean
Minerals and Waste Planning Policy Manager
Business, Environment and Community
County Hall
Spetchley Road
Worcester
WR5 2NP

(01905) 766374

minerals@worcestershire.gov.uk



Section 6²: Portrait of Worcestershire

Section 6 sets the context for minerals development in the county. It gives an overview of the mineral resources in the county, as well as Worcestershire's environment, economy and transport infrastructure.

Question 1: Do you think there are any other issues we should be aware of when preparing the Minerals Local Plan?

Summary of comments	Initial officer response
<p><i>Worcestershire Regulatory Services</i></p> <p>Page 17, Vision and Objectives: In addition to the Plans and policies listed, the Countywide Worcestershire Air Quality Action Plan should [be] included and considered as many of the measures listed within the Plan will be dependent on managing HGV movements affectively which will have an impact on proposed mineral sites.</p>	<p>B008-689 nq</p> <p>Noted. You refer to the list of plans and policies on page 17 of the consultation document; this is a list of the documents which were brought to our attention through the First Stage Consultation on the Minerals Local Plan, rather than a comprehensive list of the documents which have informed our approach so far. However, we agree that we will need to give careful consideration to how to avoid or mitigate impacts on air quality from minerals development.</p>
<p><i>English Heritage</i></p> <p>English Heritage welcomes reference to the following documents and encourages their continued use in the preparation of the emerging Minerals Plan for Worcestershire.</p> <p>Minerals Extraction and the Historic Environment (2008) - http://www.english-heritage.org.uk/publications/mineral-extraction-and-historic-environment/</p> <p>Minerals Extraction and Archaeology: A Practice Guide (2008) - http://www.english-heritage.org.uk/publications/mineral-extraction-and-archaeology/</p>	<p>B025-716 nq</p> <p>Noted.</p>

² Sections 1 through 5 of the Second Consultation document set out the background to the Minerals Local Plan, but do not contain any consultation questions.

Summary of comments	Initial officer response
<p>We also note the reference to the English Heritage Strategic Stone Study Database (SSSD) and agree that it would be appropriate to further collate this information to inform future small scale minerals development and mineral safeguarded areas for building stone, as mentioned in the emerging Minerals Plan. The availability of traditional building and roofing stone is fundamental to the upkeep of our local built heritage.</p>	<p>We published a background document <i>Building Stone in Worcestershire</i> alongside this consultation³. Due to the timescales involved in preparing the main consultation document, we were not able to incorporate its findings in the main consultation, but this document sets out further analysis of the Strategic Stone Study and we will consider this further as we develop the Minerals Local Plan. If you have any comments on the <i>Building Stone in Worcestershire</i> background document, please let us know.</p>
<p><i>Mineral Products Association</i></p>	<p>B20-1899 nq</p>
<p>Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website. http://www.mineralproducts.org/documents/MPA_MTL_Document.pdf</p>	<p>Noted. We will attempt to make these benefits clearer in the next consultation. Thank you for drawing our attention to the 'Making the Link' document, we have considered it in the preparation of background documents.</p>
<p><i>Mr James Whitaker</i></p>	<p>B004-2383</p>
<p>I don't understand how you can dismiss any discussion of the potential for shale gas extraction (using 'fracking') in such a minimal fashion. You may be right but there is little evidence for that in the document.</p>	<p>The evidence we are aware of to date is referenced in the document "Mineral Resource Information for Development Plans: Herefordshire and Worcestershire: Resources and Constraints." (British Geological Survey 1999). This suggests that there is little likelihood of 'fracking' or other methods of oil or gas extraction being viable or "prospective" in Worcestershire. However, we intend to produce a background document on oil and gas to explore these issues and provide a robust evidence base for the Minerals Local Plan, and we will publish this on our website⁴ as soon as it is available.</p>
<p><i>Canal and River Trust</i></p>	<p>B011-1280</p>
<p>Canal & River Trust are aware that minerals/materials are currently transported by barge along the River</p>	<p>We note your support for movement of mineral freight by waterway. We are currently developing a background document <i>Water Transport</i> to further</p>

³ Available on www.worcestershire.gov.uk/mineralsbackground.

⁴ www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p>The safety issues of housing a "quarry" and its equipment during excavation for children and youths living close by who are inevitably going to "play" there.</p> <p>The noise of working "plant" The dust of working "plant" in proximate home and schools both from a health point of view and of a cleaning point of view</p>	<p>need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>We have acknowledged safety as an issue that we should consider as we develop the Minerals Local Plan (Table 1, Table 4), but in the Second Stage Consultation Document this focuses on vehicular and pedestrian safety and access to, from and around the site or on transport routes, site safety during flooding events, and aviation safety from the risk of bird strike. The issue of unauthorised access and safety at working sites and former quarries is a real concern, but more difficult to address through planning policy as the legal responsibility for quarry safety lies with the operator and the landowner, and is set out in the Mines and Quarries Regulations. The minerals industry takes the issue very seriously and has a national "stay safe" campaign⁶ to raise awareness amongst younger children, teenagers, parents, teachers and youth workers about the dangers of entering quarries uninvited and unsupervised.</p> <p>Noise and dust are issues that we are aware we will need to address (see Table 1, Table 4, the draft Vision, Table 5, Table 24 in the main consultation document). As stated above, whilst we understand that proximity of a mineral working to schools or houses can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from</p>

⁶ http://www.mineralproducts.org/youth_playsafe01.htm

Summary of comments	Initial officer response
<p>The eventual loss of amenities specifically in Stourport ref Wyre Forest Golf Club and the nature supported by it.</p>	<p>Wyre Forest Golf Club lies between Stourport and Kidderminster and overlies part of a much larger solid sand resource. This has been assessed as a "key" resource (resource area 2/22 in the Analysis of Mineral Resources in Worcestershire, October 2013) and consequently forms part of the "Stour Corridor Standstone: South" area of search. However, the areas of search are large areas which indicate where there may be commercially attractive amounts of mineral resources over a large enough area that mineral workings in the area could collectively be restored as an integrated network of green infrastructure. They are not site specific allocations and we are not proposing that the Wyre Forest Golf Club area could or must be worked. Following the results of this consultation we think we may need to refine the areas of search, but if the Wyre Forest Golf Club location remains as part of an area of search it would then be a commercial decision for the landowner as to whether that site should be the subject of an application to extract minerals. However, we would anticipate that a relatively high-value land use such as a golf club would make it unlikely that mineral extraction would be an attractive option, and any such application would be considered against the policies in the plan. It should not be assumed that any application would necessarily be permitted.</p>
<p><i>North Worcestershire Water Management</i></p> <p>We feel that it would benefit the Plan to utilise any site specific information, particularly with regards to Flood Risk Management when dealing with planning applications for developments. This may be available through our team so would encourage contact wherever this seems needed.</p> <p>Additionally, we feel that it will be important to utilise SuDS and/or natural land drainage features wherever viable when restoring sites in order to help with Flood Risk Management issues at particular locations and to help in achieving the 'Utilise mineral restoration to</p>	<p>B030-1952</p> <p>We agree that it would be useful to discuss these issues with your team as we refine the proposals in the Minerals Local Plan. At this stage we do not think that the Plan will contain specific site allocations, but we would like to ensure we make use of any information you are able to provide at a strategic or "area of search" level. We intend to prepare a background document to look at water and flooding issues and will contact you to discuss this in due course.</p> <p>Water quality and flood alleviation are two of the high-level strategic restoration priorities that we put forward in the Second Stage Consultation. We note your support for these issues to achieve the proposed objectives.</p>

Summary of comments	Initial officer response
<p>enhance climate change resilience of the County' and the 'Protect and enhance natural and historic environments' objectives.</p>	
<p><i>Mrs Anne Pearson</i></p>	<p>B034-2395</p>
<p>I feel the Minerals Local Plan should ensure that areas designated for extraction should be better prioritised. Land identified for aggregate extraction should have the lowest current amenity value and would have the most to gain from restoration.</p>	<p>Following the results of this consultation we think we may need to refine the areas of search, and we will consider your suggestion of using current amenity value as one way to do this, although we will need to consider this alongside other factors. The approach proposed in the Second Stage Consultation aimed to establish "areas of search" by grouping resources into areas which could provide green infrastructure gains through restoration, and highlight which issues might be most relevant for each area of search.</p>
<p><i>Tewkesbury Borough Council</i></p>	<p>B036-703</p>
<p>The WMLP sets out areas of search, including some which are adjacent to other districts/counties, and the implications of working parts of these areas needs to be considered beyond Worcestershire's borders. For example in respect of the cumulative impact of flooding and surface water management, impact on landscape, biodiversity, transport etc.</p> <p>Additionally, appropriate provision for aggregate minerals needs to be made in Worcestershire based on National and Sub national Guidelines such that it does not place undue pressure on surrounding authorities to address any shortfall.</p>	<p>We intend to prepare a background document to look at water and flooding issues. We are also preparing a suite of background documents on transport issues. We recognise that the issues you raise are not confined to Worcestershire's borders, and we fully intend to co-operate with other local authorities to ensure we have fully considered cross-boundary issues.</p> <p>We agree that appropriate provision needs to be made for aggregate minerals. The level of provision proposed in the Second Stage Consultation is based on the Local Aggregates Assessment for Worcestershire - June 2013⁷. It is now a national requirement for the Local Aggregates Assessment to be updated annually, and we will take any future revisions into account to ensure that the provision made in the MLP is based on the most up to date evidence. We do not intend to place undue pressure on surrounding authorities, although we must all recognise that minerals can only be worked where they are found and some areas have a greater capacity to supply than others. We will continue to discuss these issues with other local authorities and with the West Midlands Aggregates Working Party.</p>

⁷ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>The WMLP notes the potential for new strategic scale development in adjacent authority areas - for example at Ashchurch MOD site and adjacent to Cheltenham (as set out in the draft Joint Core Strategy being prepared by Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils). Given the accessibility provided by the M5 corridor the potential for development around Gloucester City also needs to be factored into decision making (ref. paras 11.43-11.45).</p>	<p>As you note, we tried to take into account the level of likely development in and around the county and what this might mean for the demand for mineral resources in Worcestershire. We acknowledge that the method used (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of major transport routes. However, it showed that there was likely to be some demand for minerals in all areas of the county, and therefore none of the "areas of search" proposed should be ruled out due to lack of demand.</p>
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p>	<p>B038-2286</p>
<p>Nitrate Protection Zones. These are zones designated by Defra. As many of the areas of search include vast tracts of agricultural land and at the consultation workshop, it was agreed that mineral extraction lowers the agricultural land grade by at least one grade. Therefore, we have grave concerns that post-extraction, the amount of nitrates required to bring land back into economic production would severely compromise these areas and result in significant contamination and poor water quality. We consider that no areas of land within these NPZ's where the restoration to agriculture is proposed should be included in the areas of search.</p>	<p>Thank you for raising Nitrate Protection Zones. We acknowledge that this is an issue which the Minerals Local Plan should take into account and we will give consideration to how we might do this as we develop the plan. We may be able to incorporate Nitrate Protection Zones as an issue to be addressed through policy criteria, or it might be possible to use them as a consideration in defining the restoration profiles for each area of search. We will consult with Defra to establish if restoration necessarily lowers agricultural land value by at least one grade and develop policies accordingly.</p>
<p><i>Mrs Christine Daniell</i></p>	<p>B037-2396</p>
<p>Yes. Incorrect figures in regard to a proposed site identified as Holdfast/Queenhill. Application is for a maximum of 403000 tonnes but is probably less. This area should not then be described as a SIGNIFICANT deposit and excluded from future plans.</p>	<p>The area which is the subject of a current planning application at Holdfast (Cemex, 2011) falls within the wider deposit area mapped by the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013⁸. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p>

⁸ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p><i>RSPB</i></p> <p>Biodiversity</p> <p>Paragraphs 6.19 – 6.22 outline the environmental assets of the County, primarily in terms of designated sites. However, Chapter 6 (Portrait of Worcestershire) should refer to these environmental assets in the context of the massive – and ongoing – decline in biodiversity, both at a national and county level. For example:</p> <ul style="list-style-type: none"> the recent State of Nature report, produced by 25 conservation and wildlife organisations, has shown that 60% of the species assessed have declined over the last 50 years, with 31% declining strongly (ref: RSPB et al (2013) State of Nature 2013); the amount of lowland semi-natural grassland has declined by 97% between the 1930s and 1984, whilst lowland heathland has shrunk in area by 80% since 1800, with habitat loss continuing through the 1980s and 1990s (for example, in Derbyshire, an estimated 80-91% of the remaining semi-natural grassland was lost between 1984 and 1995) (ref: RSPB et al (2013) State of Nature 2013). <p>Chapter 6 should highlight the mission of the England Biodiversity Strategy:</p> <ul style="list-style-type: none"> <i>to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people</i> (Ref: Defra (2011) Biodiversity 2020: a strategy for England’s wildlife and ecosystem services.). 	<p>B039-1782</p> <p>Whilst we recognise the issue that you raise and agree that this should be incorporated, chapter 6 is a portrait of Worcestershire and needs to reflect the local context. We will look at the State of Nature report and investigate whether there is any local information available on biodiversity decline which could be incorporated.</p> <p>Noted and agreed.</p>

Summary of comments	Initial officer response
<p>Chapter 6 should go on to highlight that the minerals industry is uniquely placed to help deliver this mission, with mineral sites - on their own - having the potential to deliver 100% of the habitat creation targets for 9 priority habitats (Ref: RSPB (2006) Nature After Minerals: how mineral site restoration can benefit people and wildlife.).</p> <p>By highlighting and addressing these issues, the Plan will be demonstrating its commitment to delivering key requirements of the National Planning Policy Framework, in relation to biodiversity:</p> <ul style="list-style-type: none"> • para. 109: minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; • para 114: set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity; • Para. 117: <ul style="list-style-type: none"> ○ plan for biodiversity at a landscape-scale across local authority boundaries; ○ identify and map components of the ecological network, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified ... for habitat restoration or creation; ○ promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local 	<p>Noted and agreed that the status and role of the minerals industry in the county can be strengthened.</p> <p>Noted. We think that the approaches proposed in the Second Stage Consultation seek to achieve these requirements, but we recognise that there may be opportunities to strengthen the links in the Portrait of Worcestershire.</p>

Summary of comments	Initial officer response
<p>targets, and identify suitable indicators for monitoring biodiversity in the plan.</p> <p>Climate Change Paragraph 6.22 refers to climate change resilience (and flooding) being of particular concern in the county. The RSPB strongly supports the need to make the county more climate change resilient, for example through the creation of priority habitat to enable the movement of species to adapt to a changing climate. However, unlike the later sections of the Plan, Chapter 6 does not address the issue of climate change in its wider context, including the need to mitigate potential climate change impacts (e.g. emission of 'greenhouse gases'). Climate change should be addressed within this chapter under a separate heading, dealing with both mitigation and adaptation / climate change resilience.</p>	<p>Noted. We will consider how we can strengthen references to climate change issues and impacts in the Portrait of Worcestershire. We have published a Climate Change background paper on our website⁹ and we welcome comments on this document.</p>
<p><i>Natural England</i></p>	<p>B040-717</p>
<p>No. Natural England welcomes the inclusion of the section on the Environment. We particularly support the inclusion of green infrastructure.</p>	<p>Support noted.</p>
<p><i>Worcestershire Wildlife Trust</i></p>	<p>B044-1081</p>
<p>No, the plan as drafted appears to cover the salient issues in sufficient depth.</p>	<p>Support noted.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623,683 B</p>
<p>Section 6 provides a clear overview of the mineral resources in the County.</p>	<p>Support noted</p>

⁹ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>It would be helpful if the Chapter included a section on policy constraints, including reference to international, national and local planning designations and Local Plans.</p>	<p>We will consider how we can strengthen references to designations and local plans in the Portrait of Worcestershire.</p>
<p><i>Wildmoor Residents Association</i></p>	
<p>The issues relating to Minerals, Environment, Economy and transport are not clearly set out but inferred by statements. Looking at these statements some issues arise.</p> <p>1. E.g. The plan for taking a 'Green Infrastructure' approach may not be as protective of particular areas. In what circumstances would the new MLP consider quarrying within the Malvern Hills as it is not specifically prevented by the Malvern Hills Act.</p> <p>2. Re Solid Sand as considerable active workings are to be found in the Wildmoor areas already consideration should be given to restrict the multiplicity of further workings in the area.</p>	<p>B047-2295</p> <p>The "Green Infrastructure" approach proposed in the Second Stage Consultation is intended as a means to ensure that mineral working and site restoration realises benefits, and that these are thought about from the beginning of the process to drive both the direction of the Minerals Local Plan and the way in which individual sites are developed. It is not our intention that this approach will lessen environmental protection. The issues that we think will need to be considered and controlled through policy were set out in the main consultation document but this did not set out the specific circumstances where development will be allowed anywhere, including for the Malvern Hills. These issues will be fully worked up into draft policy wording for the next stage of consultation, taking into account the comments we have received during this consultation.</p> <p>This is quite a difficult issue for us. We have to balance:</p> <ul style="list-style-type: none"> • the need to make the best use of the resources we have and don't sterilise useful material by overly restricting working, • making sure that the plan we propose will be deliverable: knowing where mineral operators have thought a particular resource is commercially viable in the past is one indicator of where it is likely to be viable to work in future, • impacts on the local area, making sure that we take into account the potential for cumulative effects from a number of sites in a locality. <p>We may be able to develop the policy framework in a number of ways to</p>

Summary of comments	Initial officer response
<p>3. As the county is a net importer of aggregates an issue arises with clay. As it is widely found across the central area of the county why is it not worked to a far greater capacity to support the supply of bricks for building? these workings would not need to be in the same area as currently worked.</p> <p>4. The issue of secondary aggregates produced by industrial processes or waste management facilities should be an issue only considered by the Waste Core Strategy which restricts activity to the higher zones of the WCS close to densely populated areas.</p>	<p>control cumulative impacts in an area., We will give great consideration to these issues for the whole county, as well as the solid sand resources near Wildmoor.</p> <p>You are correct in stating that clay is widely found across the county, but we currently have little information to indicate where this might be of good enough quality to be used for brick making, and this is something we are hoping to refine as we develop the Minerals Local Plan. We currently have two brickworks in the county near to Hartlebury and Waresley. These are operated by Weinerberger and currently have planning permission to work enough clay to last until approximately 2034 at Hartlebury and 2059 at Waresley¹⁰. When operating at full capacity they can produce over 2 million bricks per week, and although there are some imports and exports across the county boundary due to bricks being a commercial commodity, this essentially makes Worcestershire a net exporter of bricks. We think this means it is unlikely that another brickworks would be commercially attractive to develop in the county, but we intend to develop the policy framework to ensure that any applications which come forward could be assessed. We are not able to substitute the amount of aggregate minerals the government expects us to produce with clay or bricks, they are used for different purposes and we have specific "landbank" requirements for aggregate minerals which the Minerals Local Plan needs to provide for.</p> <p>Secondary aggregates can be produced as a by-product of other mining or quarrying activities such as china clay waste, slate waste and colliery spoil, or as a by-product of other industrial processes, e.g. blast furnace slag, incinerator ash, or the ash from coal-fired power stations¹¹. We do not currently know of any processes in Worcestershire which produce such secondary aggregates although we are aware of the current application for an Incinerator Bottom Ash recycling facility at Sandy Lane, Wildmoor.</p>

¹⁰ "Ensuring adequate and steady supply of Industrial and Energy Minerals", October 2012, available on www.worcestershire.gov.uk/mineralsbackground

¹¹ http://www.bgs.ac.uk/planning4minerals/Resources_1.htm

Summary of comments	Initial officer response
<p>5. The 'Green Infrastructure' approach sited in 6.22 does not seem to be reflected in the body of the consultation appendices 1 and 2.</p>	<p>You are correct that any facilities which are proposed to manage or process either secondary aggregates or to recycle aggregates such as construction and demolition waste would be assessed against the policies of the Waste Core Strategy, and we do not intend to duplicate those provisions in the Minerals Local Plan.</p> <p>However, recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we need to give this due consideration to ensure that we make the most of the resources we have available.</p> <p>The Second Stage Consultation was developed with the Green Infrastructure approach in mind at all times, although it is most prominent in sections 11 and 12 which address where minerals will be worked and how mineral workings will be restored. Appendix 1 highlights the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We agree that it does not make significant reference to the Green Infrastructure approach, as this is in the main body of the consultation document. Appendix 2 sets out the draft restoration profiles for each area of search. These are directly derived from the green infrastructure approach, considering the issues of landscape, flood alleviation, habitat quality and fragmentation, water quality, geodiversity, horticulture and food production, the historic environment, and access and recreation using the methodology which is outlined in Section 12.</p>
<p><i>Herefordshire and Worcestershire Earth Heritage Trust</i></p> <p>No. This all reads well. Only a few suggestions – para 6.19 would be better split into three parts – an introduction to the landscape, biodiversity, and historic environment.</p> <p>Para 6.20 – very good as it is.</p>	<p>B048-800</p> <p>We will consider whether this approach would help clarity. However, we are keen not to consider these aspects in isolation. As part of the Green Infrastructure approach we are proposing, these need to be considered as interdependent parts of Worcestershire's environment.</p> <p>Support noted.</p>

Summary of comments	Initial officer response
<p>Para 6.24 – economy and employment – should there be some mention of the tourism industry? The county has some beautiful landscapes and does attract tourism, particularly to areas like Malvern and locations along the rivers. The Abberley and Malvern Hills Geopark exists to contribute to the local economy through encouraging geotourism. Tourism does get a mention later as an issue related to objective 3.</p>	<p>Noted and agreed.</p>
<p><i>Malvern Hills AONB Partnership</i></p> <p>We are satisfied that this section refers to the presence of Malvern Hills AONB, the Malvern Hills Acts and the strategic approach to green infrastructure in the county.</p> <p>In terms of mineral resources, it would be useful to outline the situation in the county with regard to fracking.</p>	<p>B049-802B</p> <p>Support noted.</p> <p>Hydrocarbons are discussed in paragraphs 6.14-6.15, although we referred to "shale gas" and unconventional hydrocarbons rather than using the term "fracking". We will strengthen this section if further evidence becomes available.</p> <p>We intend to produce a background paper on oil and gas, including shale gas, in the county and have been collecting information to that end. In light of recent developments and government announcements, these issues have become more urgent and we are aware of the need to address this with the best possible information ahead of the next consultation.</p>
<p><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p> <p>Not aware of any that have not already been identified.</p>	<p>B050-1504 A</p> <p>Noted.</p>
<p><i>Environment Agency</i></p> <p>Having consideration for those matters within our remit we find the 'Portrait' to be comprehensive and representative of Worcestershire.</p>	<p>B058-719</p> <p>Noted.</p>

Summary of comments	Initial officer response
<p>We would welcome greater reference to the objectives of the WFD and Flood Risk betterment in this section to highlight its relative importance in the wider plan.</p>	<p>Noted. We are developing a background paper to address water and flooding issues and we will develop policies to ensure that WFD and Flood Risk betterment are addressed within the plan.</p>
<p><i>Mrs Pat Harries</i></p>	<p>B060-2399</p>
<p>Agree that deposits of 600,000 tonnes should be considered 'not significant'. Would like to see the SIEVE test kept as it is a good approved policy.</p> <p>Ref 6.19 would like to see the continuation of a buffer zone around Historic features & listed buildings (I reserve the right to submit extra information on this)</p>	<p>Support for 600,000 tonne threshold noted. Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>As discussed above, appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, including scheduled and ancient monuments, land within or abutting a conservation area, and sites of archaeological importance, however this did not include a buffer around these features. The adopted Hereford and Worcester Minerals Local Plan did contain a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate</p>

Summary of comments	Initial officer response
<p>In Table 7 of the consultation document there is an error in appendix 19 as it relates to 19/7 ie land north of the parishes of Queenhill & Holdfast. It says that there is a resource of 780,000 tonnes. This is inaccurate as Cemex in its Planning application shows only 303,000 tonnes able to be sourced. I therefore would ask that it be excluded from search areas as shown on Table 9 of Page 59 of the second consultation document.</p>	<p>that there will be no unacceptable adverse impacts on properties, "sensitive receptors" or heritage assets. We welcome any additional information you can provide.</p> <p>The area which is the subject of a current planning application at Holdfast (Cemex, 2011) falls within the wider deposit area mapped by the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013¹². We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search. We are reassessing resource areas on the basis of new information we receive. Based on the results of this consultation we are aware that we will need to refine the areas of search.</p>

No Comment Responses

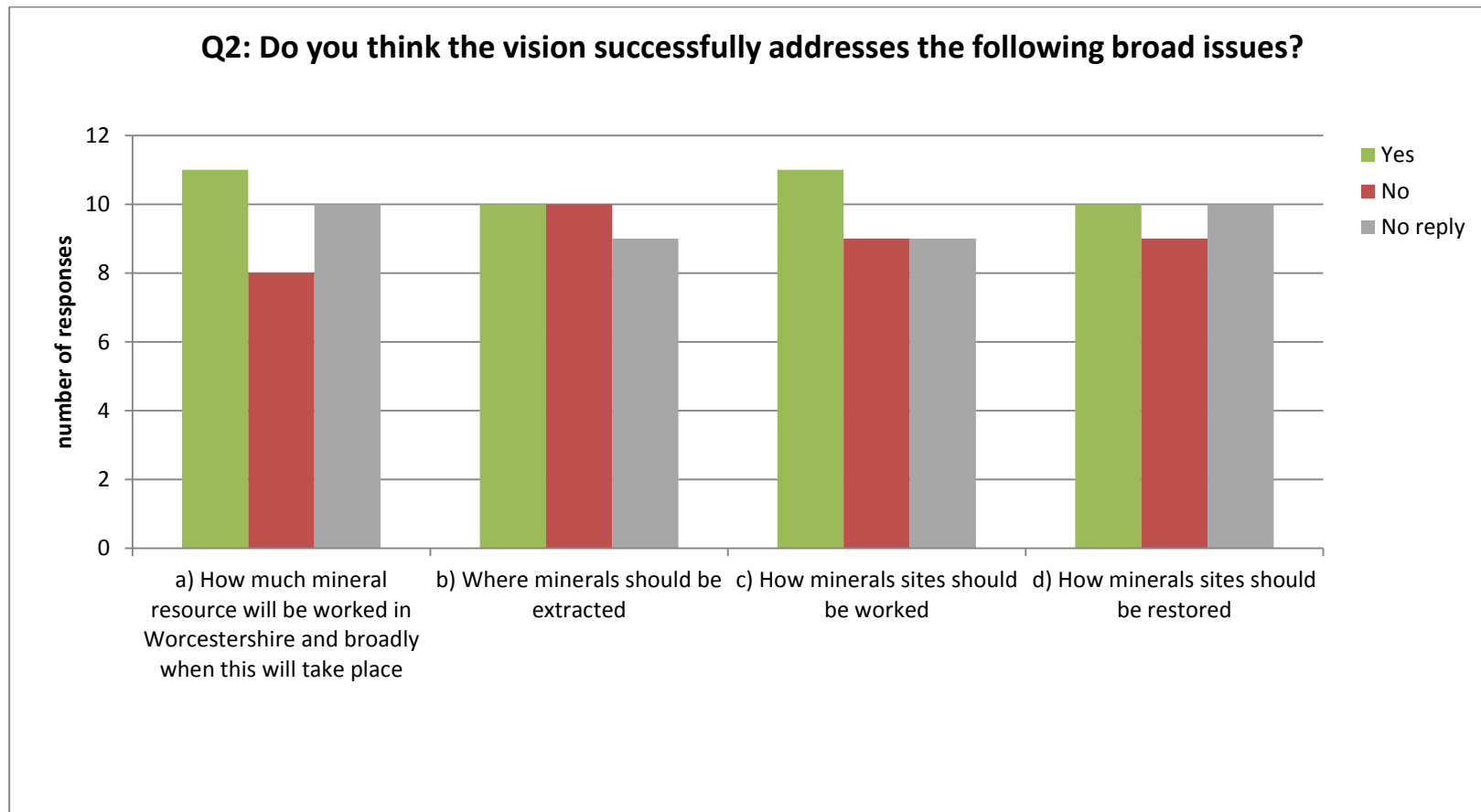
<i>Worcestershire Archive and Archaeology Service</i>	B031-509
No specific comments	Noted
<i>Mr Adrian Buckmaster</i>	B032-2394
No	Noted
<i>WCC Environmental Policy</i>	B059-2004
No comment	Noted

¹² Available on www.worcestershire.gov.uk/mineralsbackground.

Section 7: Vision and Objectives

In Section 7, we have set out a draft vision which outlines the Council's ambition for what mineral provision and restoration will 'look like' in the county in the next 15 years, and draft objectives which outline high-level priorities for realising the vision. We would like to know if you support the draft vision and if you think it will address the necessary issues and requirements of national policy.

Question 2: Do you think that the vision successfully addresses the following broad issues?



Please provide details of how you think the vision could be improved to address these points.

Summary of comments	Initial officer response
<p><i>Worcestershire Archive and Archaeology Service Service</i></p> <p>c) (How mineral sites should be worked): In Section 10.6 – "Wet working" may not be a viable option in some instances where there are archaeological issues, since this can significantly restrict delivery of appropriate mitigation (National policy states that there can be no unacceptable adverse impacts on the natural and historic environment and if no effective mitigation can be provided then that would be unacceptable).</p> <p>d) (How mineral sites should be restored): We support the restoration lead approach as detailed in this consultation document.</p>	<p>B031-509</p> <p>Noted. We will ensure the policies we develop take this into account.</p> <p>Support noted.</p>
<p><i>Mr Adrian Buckmaster</i></p> <p>It does not address the proximity to dwellings. There seems nothing about how close excavation might be to houses unless it becomes unsafe.</p>	<p>B032-2394</p> <p>Whilst we understand that proximity of a mineral working to houses or schools (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues</p>

Summary of comments	Initial officer response
<p>There is not enough emphasis on restoring to what it is like today and too much about changing the landscape to wetlands etc.</p>	<p>need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>In paragraph 12.24-12.25 we state that <i>"mineral extraction by its nature results in a change to the landscape. In order to ensure that the overall landscape quality of the county is not degraded by mineral workings, consideration must be given to the existing landscape character and the nature of the changes that could result from mineral extraction. Following extraction, the connectivity of the landscape needs to be re-established. Depending on the type of mineral operation and the impact on the landscape, it may be possible to restore workings to their former Landscape Type by recreating or enhancing the key characteristics. However, in some cases the scale or nature of the workings will prohibit this from being done effectively. In such circumstances it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type."</i> We are actively considering this issue, and we think that we will be able to develop the restoration profiles for the areas of search to give greater certainty about when sites might be able to be restored to the former landscape type and when working might result in whole-scale change. We will seek to manage any change to ensure that it is appropriate, but we have to recognise that working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable.</p>
<p><i>Tewkesbury Borough Council</i></p>	<p>B036-703</p>
<p>Impacts on adjacent counties/districts need to be considered (and if that is encompassed within the phrase 'local people' this should be made explicit).</p>	<p>We agree that impacts on adjacent counties/districts need to be considered and we are endeavouring to do so. We would be happy to meet you to discuss any issues of concern.</p>

Summary of comments	Initial officer response
<p>More emphasis needs to be placed on flood management both during working and as part of restoration.</p> <p>Full aggregate provision, including landbanks, should be planned for throughout the plan period - certainty can be increased by identifying specific deliverable sites in the early part of the plan.</p> <p>Please note that once 'ticked' the selection could not be undone so left as a 'no' rather than a 'yes' as it was felt that the vision was not clear in these respects.</p>	<p>We consider that the references in the vision to working and locating minerals in a socially and environmentally sustainable way, and restoring mineral workings to maximise social, environmental and economic gains through co-ordinated networks of green infrastructure captures a wide variety of issues, including flood management. Flood alleviation is one of the high-level strategic restoration priorities proposed, and we have suggested that flood risk is an issue which will need to be addressed through policy criteria relating to how and where minerals will be worked, and how sites will be restored.</p> <p>In the draft vision we stated that "<i>Annual requirements for minerals will be met and reserves replenished to ensure the delivery of minerals throughout the life of the plan and beyond. To enable sustainable supply in the long-term, reserves of aggregates will meet minimum landbank targets by halfway through the plan-period</i>". We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although this is not our intention. We think that it could be difficult to reach the landbank requirements early in the plan period as we are currently below required levels, therefore we wanted the vision to aspire to achieve the requirements but also be realistic about deliverability. We have no intention to prevent development coming forward, and we will consider revising the wording to make it clear that we now aim to meet and maintain the landbanks required in national policy asap and will consider reviewing the plan if we have not achieved them by halfway through the plan period. At this stage we do not intend to allocate specific sites for development, although following the results of this consultation we think we may need to refine the areas of search to give a greater level of certainty.</p> <p>Noted.</p>
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p>	<p>B038-2286</p>
<p>The documents are very difficult to follow and seem to</p>	<p>We are sorry to hear that you found the documents difficult to follow, but we</p>

Summary of comments	Initial officer response
<p>include vast areas of the County which could provide much more than the 18m tonnes required. The result of this will BLIGHT huge areas of land. We suggest that a second phase of sifting, based on environmental constraints, is undertaken to refine the areas of search. We understand that the County Council are trying to adopt an innovative approach to the provision of minerals in the County but at some stage the plan will need to allocate sites for development rather than these huge areas of search. We are particularly concerned about how the restoration-led approach is to be implemented. The plan is unclear as to whether a proposal MUST meet ALL of the Level 1 priorities, how this is to be measured and compared on a site by site basis.</p>	<p>hope that we were able to help you find the information you required following our telephone conversations. We are aware that the mapped information on mineral resources may not have been as easy to follow as we hoped, and we will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have.</p> <p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this. At this stage we do not intend to allocate specific sites for development and we think it is important to set a strategic vision for green infrastructure led restoration at a landscape scale, although we have no desire to "blight" large areas of land.</p> <p>As we develop the Plan we will define how proposals will be expected to meet the restoration priorities. The worked example which we set out in the main consultation document (pages 98-110) was intended to illustrate how we think this might work in practice. It is likely that we will expect developers to show how their restoration proposals have taken the priorities into account and made the links with the key features or focus points in and around the site in order to meet the restoration objectives for the area of search, rather than a tick-box exercise.</p>
<p><i>Mrs Christine Daniell</i></p>	<p>B037-2396</p>
<p>The vision is working with far too large an area. This needs rationalising to only include sites which have been narrowed down by sieve tests.</p>	<p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this. However, at this stage we do not intend to allocate specific sites for development and we think it is important to set a strategic vision for green infrastructure led restoration at a landscape scale.</p> <p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used</p>

Summary of comments	Initial officer response
	as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".
<i>RSPB</i>	B039-1782
<p>The RSPB supports the vision of maximising environmental gains through coordinated restoration that delivers networks of green infrastructure in an integrated way. The RSPB also supports the aim of the Spatial Strategy to drive development to the locations that will enable the delivery of the strategic restoration objectives.</p> <p>Although biodiversity is clearly a key element of the overall green infrastructure delivery, the RSPB recommends that the vision (and Spatial Strategy) should specifically promote a biodiversity-led approach to restoration, such that habitat creation will be the primary focus for mineral site restoration in the County. This is because, as outlined in response to Question 1, the minerals industry is uniquely placed to deliver a number of national habitat creation targets. Whilst the other high-level restoration priorities are important, they are not as uniquely dependent on minerals development and restoration for their delivery and should be incorporated into this biodiversity-led approach.</p> <p>The RSPB is particularly pleased that vision aims to maximise environmental gains, rather than just minimising adverse effects. However, the vision should also specifically require all mineral development to deliver a net-gain in biodiversity (in line with NPPF, paras. 9 and 109).</p>	<p>Support noted.</p> <p>This is an interesting concept and we would like to explore this with other members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date. However, even without placing biodiversity as the leading aspect, the habitat quality and fragmentation methodology used in this consultation resulted in this restoration priority being identified as either a determining factor or a significant component for all the areas of search. If the proposed methodology and areas of search were taken forward unchanged this would still ensure a high level of consideration would be given to biodiversity, although it is likely that we will need to refine the areas of search and possibly some of the approaches to establishing restoration priority levels as we develop the Minerals Local Plan.</p> <p>Support noted. We consider that the references in the vision to working and locating minerals in a socially and environmentally sustainable way, and restoring mineral workings to maximise social, environmental and economic gains through co-ordinated networks of green infrastructure captures a wide variety of issues, including biodiversity gain. However, we agree that this could be strengthened and we will look at how we can incorporate this in the vision.</p>

Summary of comments	Initial officer response
<p>Driving development to the locations that will enable the delivery of the strategic restoration objectives is particularly visionary. This is particularly important for delivering biodiversity gains as it will give preference to those sites where habitat creation will make the greatest contribution to the creation of a coherent and resilient ecological network (in line with NPPF, paras.109, 114 and 117).</p>	<p>Support noted.</p>
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p>	<p>B041-595</p>
<p>Whilst the draft vision considers the total amount of mineral to be worked in the County and, in the case of sand and gravel, comes up with a preference of 18.54 million tonnes, this is then not reflected in the areas of search. According to the analysis for sand and gravel in Table 9 there are 11 areas of search and hundreds of millions of tonnes of mineral containing that sand and gravel. It seems that the County Council have said ‘the sand and gravel is where it is so we will include vast areas of land in our area of search and see what the developers come up with’. The effect of this will blight vast areas of the County. The proposed policies relating to ‘safeguarding’ are a clumsy tool which will not overcome this blight. We strongly OBJECT to this approach and in particular, consider the County Council should exclude the Lower Severn Corridor from their area of search for the reasons outlined below.</p> <p>Furthermore, we urgently request the County Council consider the retention of the ‘sieve test’ in the currently approved Minerals Plan. This is based on extensive map work done in the 1980’s which plotted environmental constraints, much of which is still relevant today. By adapting these and updating the criteria therein with those contained in the NPPF and Table 10 of the Stage</p>	<p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this. We have no desire to "blight" large areas of land, but we think that to set a strategic vision for green infrastructure led restoration this needs to be at a landscape scale.</p> <p>The proposed policies relating to 'safeguarding' are not intended to indicate where minerals might be worked now or in the future, but rather to safeguard mineral resources from being 'sterilised' by other types of development to ensure that they remain available should they be required at any point in the future.</p> <p>We have responded to your reasons for objecting to the inclusion of the Lower Severn Corridor below.</p> <p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most</p>

Summary of comments	Initial officer response
<p>Two Consultation Document. This would enable the County to slim down the areas of search. We believe that only 'KEY' areas of over 200ha which can provide over 2 million tonnes of sand and gravel AND that are subject to the revised sieve test, should be included in the 'area of search'.</p> <p>Furthermore, whilst we support a restoration-led approach it is clear that all sites do not start from the same base point. For example, how do you make a comparative decision between an SSSI and an edge of town brownfield site both of which may be restored to a reasonable level.</p>	<p>benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>We aim to address these issues through identifying the strategic restoration priorities for each area of search in the restoration profiles (see Appendix 2 of the main consultation document). In Section 12 we have also set out some proposals for how we might take this further through a combination of policy criteria and potentially a "spatial masterplan" for each area of search which would help to highlight the key features and focus points, such as SSSIs or access and recreation requirements.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623,683 B</p>
<p>(a) The draft vision indicates how much mineral resource will be worked in Worcestershire but does not indicate when this will take place. The South Worcestershire authorities suggest that it would be helpful if the Minerals Local Plan included a phasing policy which indicated the likely level of minerals required to 2015, 2015 – 2020 etc.</p> <p>(b) The draft vision does not address where minerals should be extracted.</p>	<p>Noted. This is something we intend to consider further, and we plan to revise the vision in light of comments received during this consultation.</p> <p>We are considering revising the vision in light of comments we have received in this consultation, but at this stage we are not considering identifying preferred areas as part of the vision.</p> <p>The vision does incorporate the spatial strategy which "drives development to the locations where the working of viable mineral resources will meet market demand and enable the delivery of the strategic restoration priorities identified". The spatial strategy is intended to be read as part of the vision, and we recognise that this link could be made clearer.</p>

Summary of comments	Initial officer response
<p>The South Worcestershire authorities suggest that the draft vision include reference to: - Ensuring that appropriate levels of planned and future supplies of minerals are maintained -</p> <p>Identifying preferred areas where future mineral working may be appropriate having regard to economic viability</p> <p>the environmental capacity of the area, the impact on the local community and restoration opportunities.</p>	<p>We feel that appropriate levels of planned and future supplies of minerals are addressed in the draft vision which states: <i>"mineral provision in Worcestershire will be adequate to contribute to national and local needs, enabling the contribution of at least 18.54 million tonnes of sand and gravel and 3.61 million tonnes of crushed rock to national supply, and enabling the provision of industrial and energy minerals and local building stone where appropriate. Annual requirements for minerals will be met and reserves replenished to ensure the delivery of minerals throughout the life of the plan and beyond. To enable sustainable supply in the long-term, reserves of aggregates will meet minimum landbank targets by halfway through the plan-period; nationally and locally important mineral resources will be safeguarded for future use; and the use of secondary and recycled materials will be encouraged"</i>.</p> <p>We have tried to address viability through analysis of mineral resources¹³, and we have asked industry to help us identify viable deposits by giving us the evidence that we need. You may refer to responses in section 11 of this document, specifically question 22 where respondents from industry have proposed sites they would like us to consider. Although we are extremely conscious of the need to consider economic viability to ensure the plan we propose is deliverable, final decisions on economic viability are taken by the minerals industry as they ultimately decide whether a site contains deposits that merit submitting an application. Viability can also change over time with variation in market demands or availability of resources, so we need to make sure that the plan is both robust and flexible.</p> <p>We intend to address environmental capacity and community impact through policy criteria rather than using them as search criteria. The vision currently states that <i>"minerals will be worked and located in a socially and environmentally sustainable way that takes account of the health and amenity of local people, the vitality of the local economy, the integrity of the environment and the value of local features and characteristics"</i> which we</p>

¹³ Analysis of Mineral Resources in Worcestershire, October 2013, available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>Identifying and safeguarding opportunities for the transportation of minerals by rail or water.</p>	<p>think addresses the points you raised. However, we intend to revise the vision in light of comments received during this consultation and we will consider whether we can strengthen these aspects.</p> <p>Restoration opportunities are mentioned in the vision which states <i>"Mineral workings will be restored to maximise social, environmental and economic gains, through coordinated restoration that drives green infrastructure in an integrated way"</i>.</p> <p>We are preparing background documents on transportation which will include rail and water.</p> <p>These matters need to be addressed specifically through policies that will be developed for the next stage of consultation. However, we intend to revise the vision in light of comments received during this consultation and we will consider whether we can strengthen these aspects in the vision.</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>Draft vision difficult to improve as it seeks to address the broad issues. The policy that arises from the Draft Vision is what is significant.</p>	<p>Noted. Draft policies will be developed for the next stage of consultation.</p>
<p><i>Herefordshire and Worcestershire Earth Heritage Trust</i></p>	<p>B048-800</p>
<p>Likely location of extraction is clear enough if the map (Fig 7) is included as explanation of the Vision</p>	<p>Noted. Figure 7 is intended to be read as part of the vision and is referenced in the vision. We agree that this could be made clearer.</p>
<p><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p>	<p>B050-1504A</p>
<p>We feel that the vision fails to be clear on the delivery of minerals through the Plan period. We are particularly concerned about the intention to meet minimum targets to only halfway through the Plan period, this is contrary to policy contained within NPPF.</p>	<p>Noted.</p> <p>In the draft vision we stated that <i>"Annual requirements for minerals will be met and reserves replenished to ensure the delivery of minerals throughout the life of the plan and beyond. To enable sustainable supply in the long-term, reserves of aggregates will meet minimum landbank targets by halfway through the plan-period"</i>. We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although this is not our intention.</p>

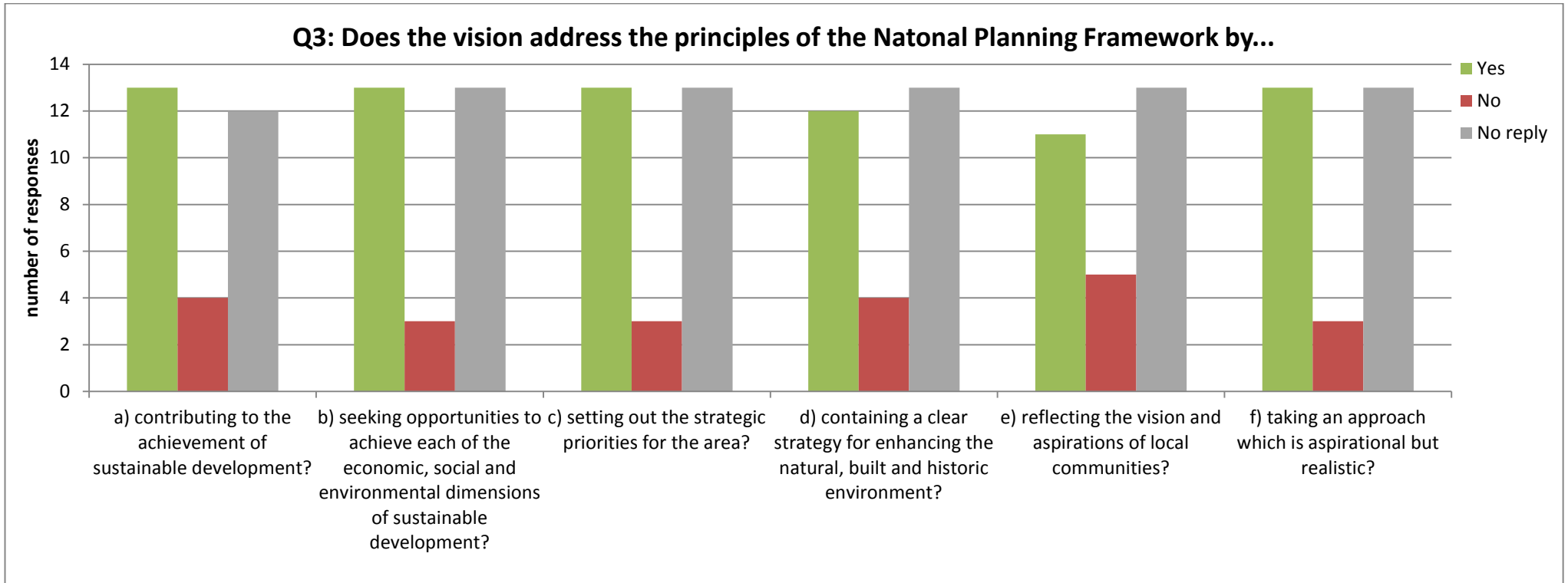
Summary of comments	Initial officer response
<p>The vision states when the Plan period runs to but fails to be specific on when it commences. It is only later in the document that the Plan period is scheduled to commence until the Plan is adopted (winter 2015). It is normal practice for the Plan period to commence at the start of the consultation process so that clarity over figures can be provided.</p>	<p>We think that it could be difficult to reach the landbank requirements early in the plan period as we are currently below required levels, therefore we wanted the vision to aspire to achieve the requirements but also be realistic about deliverability. We have no intention to prevent development coming forward, and we will consider revising the wording to make it clear we now aim to meet and maintain the landbanks required in national policy asap and will consider reviewing the plan if we have not achieved them by halfway through the plan period.</p> <p>This is an issue that has been raised by several respondents, and we are considering revising the vision in light of comments we have received in this consultation.</p> <p>Noted. This is something that will be addressed in the next consultation.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 A nq</p>
<p>The South Worcestershire Authorities consider that the Worcestershire Minerals Local Plan should aim to encourage the prudent use of available mineral resources whilst also ensuring that an appropriate level of planned and future supply can be maintained. In making this provision, account should be taken of the need to secure the best balance of community, social, environmental and economic interests, consistent with the principles of sustainable development.</p>	<p>Agreed. These are the aspects that we are trying to balance as we develop the Minerals Local Plan.</p>

Summary of comments	Initial officer response
<p>Also no consideration of the stability of the ground after extraction which would lead to an increase in the flooding in the area.</p> <p>also is there any consideration that this historic landscape is part of the Ham Court Estate: land that was designed by Capability Brown</p>	<p>Not all resource areas will be affected equally by all of these factors. We think that this will lead to an overestimate of the resource in some areas and an underestimate in others, averaging out across the county.</p> <p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this.</p> <p>Ground stability and subsidence is identified as a relevant issue in Objective 4 and flood risk and flood alleviation in Objectives 4 and 5. These are also identified as issues to be addressed through policy criteria relating to how and where minerals are worked and how sites are restored in Table 5, items p, r and t; Table 10, items f and g; Table 24, items h and j; and flood risk is one of the high level restoration priorities. These are issues that will be addressed through policy criteria and will be developed further in the draft plan.</p> <p>Historic landscape is considered as part of the spatial strategy and is mentioned in objective 6. Both landscape character and the historic environment are identified as relevant issues to be addressed through policy criteria which will be developed further in the draft plan. However, we agree that the methods used so far potentially undervalue some existing non-designated assets, and we will be working to find a way to address this across the county. It is useful to have these areas of local importance brought to our attention.</p>

Question 3: Does the vision address the principles of the National Planning Policy Framework by...

	Yes	No
a) Contributing to the achievement of sustainable development?	<input type="checkbox"/>	<input type="checkbox"/>
b) Seeking opportunities to achieve each of the economic, social and environmental dimensions of sustainable development?	<input type="checkbox"/>	<input type="checkbox"/>
c) Setting out the strategic priorities for the area?	<input type="checkbox"/>	<input type="checkbox"/>
d) Containing a clear strategy for enhancing the natural, built and historic environment?	<input type="checkbox"/>	<input type="checkbox"/>
e) Reflecting the vision and aspirations of local communities?	<input type="checkbox"/>	<input type="checkbox"/>
f) Taking an approach which is aspirational but realistic?	<input type="checkbox"/>	<input type="checkbox"/>

If not, please give details of how you think the vision could be improved to address these points



Please give details of how you think the vision could be improved to address these points:

Summary of comments	Initial officer response
<p><i>Worcestershire Archive and Archaeology Service</i></p> <p>a) YES, but would strongly recommend that "Archaeology and Aggregates in Worcestershire" be included as a key background document regarding local issues (ref P10 of consultation document) active link to document is http://archaeologydataservice.ac.uk/archives/view/worcs_agg_eh_2007/</p>	<p>B031-509</p> <p>You refer to the list of background documents on page 10 of the consultation document; this is a list of documents prepared by the policy team which provide additional (often technical) information on key issues rather than a comprehensive list of the documents which have informed our approach so far.</p> <p>We welcome any additional information you can provide, and will consider the document you have referred us to.</p>

Summary of comments	Initial officer response
<p><i>Mr Adrian Buckmaster</i></p> <p>There is not enough emphasis on restoring to what it is like today and too much about changing the landscape to wetlands etc.</p>	<p>B032-2394</p> <p>As explained above, in paragraph 12.24-12.25 we state that <i>"mineral extraction by its nature results in a change to the landscape. In order to ensure that the overall landscape quality of the county is not degraded by mineral workings, consideration must be given to the existing landscape character and the nature of the changes that could result from mineral extraction. Following extraction, the connectivity of the landscape needs to be re-established. Depending on the type of mineral operation and the impact on the landscape, it may be possible to restore workings to their former Landscape Type by recreating or enhancing the key characteristics. However, in some cases the scale or nature of the workings will prohibit this from being done effectively. In such circumstances it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type."</i></p> <p>We are actively considering this issue, and we think that we will be able to develop the restoration profiles for the areas of search to give greater certainty about when sites might be able to be restored to the former landscape type and when working might result in wholesale change. We will seek to manage any change to ensure that it is appropriate, but we have to recognise that working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable.</p>
<p><i>Mrs Anne Pearson</i></p> <p>The Vision is a blanket term that is meaningless.</p> <p>The majority of those whose lives will be affected by mineral extraction live in rural areas. Sustainable development should continue to be mainly restricted to</p>	<p>B034-2395</p> <p>We are sorry that you feel the vision is meaningless.</p> <p>The vision is supposed to be a very short summary of what the minerals local plan is aiming to achieve, and by its nature is aspirational and broad. We plan to revise the vision in a number of ways in light of comments received during this consultation and will endeavour to ensure it is locally distinctive.</p> <p>The presumption in favour of sustainable development, set out in pgph 14 of the National Planning Policy Framework, applies to all development regardless of its location. The purpose of the Minerals Local Plan is to ensure</p>

Summary of comments	Initial officer response
<p>existing towns and villages.</p> <p>By its very nature, mineral extraction destroys the existing natural, built and historic environment. The key areas for mineral extraction should be confined to areas with low grade aesthetic, natural, built and historic environments, thus enabling improvements to be made by restoration. See also my comments with regard to transportation in Q2.</p>	<p>that minerals development in the county is sustainable. However, minerals can only be worked where they naturally exist. Whilst some resources are associated with existing towns and villages, we would anticipate that relatively high-value land uses such as residential or employment areas would make it unlikely that mineral extraction would be an attractive option, and any such application would be considered against the policies in the plan. The policies that we will be developing will enable minerals to be worked adjacent to existing settlements or in rural areas if appropriate working practices are adopted to ensure that there will be no unacceptable adverse impacts.</p> <p>In paragraph 12.24-12.25 we state that <i>"mineral extraction by its nature results in a change to the landscape. In order to ensure that the overall landscape quality of the county is not degraded by mineral workings, consideration must be given to the existing landscape character and the nature of the changes that could result from mineral extraction. Following extraction, the connectivity of the landscape needs to be re-established. Depending on the type of mineral operation and the impact on the landscape, it may be possible to restore workings to their former Landscape Type by recreating or enhancing the key characteristics. However, in some cases the scale or nature of the workings will prohibit this from being done effectively. In such circumstances it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type."</i></p> <p>We recognise that mineral extraction can result in a change to the landscape and impact upon the natural, built and historic environment. However, we think that with the right policies in place to protect the county's important features, mineral working and restoration can also present an opportunity to enhance these features. We are actively considering this, and we think that we will be able to develop the restoration profiles for the areas of search to give greater certainty about when sites might be able to be restored to the former landscape type and when working might result in wholesale change. For example, sites can be restored to expand existing habitat networks,</p>

Summary of comments	Initial officer response
	improve water quality, or enhance degraded landscapes. We are aiming to develop a policy framework which will both protect and enhance Worcestershire's natural, built and historic environment through the Minerals Local Plan.
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
<p>We do not consider that the vision, and the discussion thereof contained within Appendix 1 of the Consultation Document (p.124 -132).</p> <p>In the case of agricultural land the NPPF says that local authorities should seek to use lower quality agricultural land. The currently adopted Minerals Local Plan mapped all of the agricultural land quality throughout the County. We suggest that this information should be used in the preparation of the emerging plan to ensure compliance with the NPPF.</p>	<p>This comment seems to be incomplete. We think you are saying that the vision does not address the principles of the NPPF. Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. It does not directly deal with how the vision for the draft plan addresses the principles of the NPPF.</p> <p>You are correct that paragraph 112 of the NPPF states that "<i>Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality</i>". However, paragraph 143 which specifically addresses facilitating the sustainable use of minerals, states that policies should be put in place "<i>to ensure worked land is reclaimed at the earliest opportunity... and that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources)...</i>". We have identified horticulture and food production as a relevant issue for Objective 3 and soil resources as relevant for Objective 4. These are also identified as issues to be addressed through policy criteria relating to how and where minerals are worked and how sites are restored in Table 5, item q; Table 10, item h; Table 24, item i; and as one of the high level restoration priorities which has informed the spatial strategy.</p> <p>We expect to develop a background document to explore the issues for agriculture and forestry and this will look at the interaction between agricultural land quality and mineral resources. We will consider whether we are able to refine the areas of search using agricultural land quality. It may</p>

Summary of comments	Initial officer response
<p>The NPPF says that plans be prepared "so as to ensure that permitted operations do not have an unacceptable adverse impact on the natural and historic environment' and 'heritage assets are irreplaceable, any loss or harm should require clear and convincing justification. Substantial harm to of a grade II listed building, park or garden should be exceptional." The areas of search should exclude all such assets.</p> <p>We consider that the extensive map based work undertaken in the preparation of the Approved Minerals Local Plan is still valid and should be updated to reflect the considerations of the NPPF this will result in a smaller, more appropriate, area of search.</p>	<p>not be possible for us to avoid high quality agricultural land completely but we are looking at prioritising agricultural restoration as one of the options under the restoration strategy.</p> <p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this. Please refer to our response to English Heritage in question 4 below.</p> <p>The areas of search are large areas which indicate where there may be commercially attractive amounts of mineral resources over a large enough area that mineral workings in the area could collectively be restored and contribute to integrated networks of green infrastructure. They are not site specific allocations and we are not proposing that any given area could or must be worked. Following the results of this consultation we think we may need to refine the areas of search. However, the policy framework will be developed to protect the natural and historic environment and heritage assets.</p> <p>We recognise that mineral extraction can result in a change to the landscape and impact upon the natural, built and historic environment. However, we think that with the right policies in place to protect the county's important features, mineral working and restoration can also present an opportunity to enhance these features. For example, sites can be restored to expand existing habitat networks, improve water quality, or enhance degraded landscapes or the setting or heritage assets. We are aiming to develop a policy framework which will both protect and enhance Worcestershire's natural, built and historic environment through the Minerals Local Plan.</p> <p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan (we believe this is the map based work you refer to), how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. The preparatory work for the adopted plan was undertaken between</p>

Summary of comments	Initial officer response
	<p>1990 and 1997 and we think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints.</p> <p>We would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out". We have therefore undertaken extensive map-based work to analyse the mineral resource areas and develop the areas of search and restoration priorities in the preparation of this consultation. We anticipate that the areas of search will be revised in light of comments and additional information received during this consultation.</p>
<i>Mrs Christine Daniell</i>	B037-2396
See parish council comments. Don't know where to start answering!	Noted. Comments from the Longdon Queenhill and Holdfast Parish Council appear below.
<i>RSPB</i>	B039-1782
<p>The RSPB agrees that, overall, the vision addresses the principles of the NPPF.</p> <p>However, the vision should specifically aspire for the County to move from a net loss of biodiversity to achieving net gains for nature, in line with NPPF, paragraph 9. This is particularly important, in the context of the NPPF, because it is referred to in the over-arching section on 'Achieving sustainable development', not just the section on 'Conserving and enhancing the natural environment'. As outlined in response to Q2, the vision should set out a requirement for every mineral development to deliver a net-gain in biodiversity.</p>	<p>Support noted.</p> <p>We agree that it is important for the Minerals Local Plan to aspire to achieve net gains for biodiversity, and this is reflected in Objective 6 "To protect and enhance the natural and historic environment" and the identification of habitat quality and fragmentation as one of the high level restoration priorities proposed.</p> <p>Placing biodiversity as an over-arching consideration is an interesting concept and we would like to explore this with other members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date. We appreciate that minerals sites are important for delivering biodiversity, but we also think that other aspects of Green Infrastructure are important in Worcestershire. Many of these priorities can be integrated in holistic restoration schemes and minerals sites will be one of the key opportunities for delivering the Worcestershire Green Infrastructure Strategy. Prioritising biodiversity as an over-arching priority</p>

Summary of comments	Initial officer response
	<p>might run the risk of unintentionally overlooking other GI aspects without necessarily resulting in any additional biodiversity gains.</p> <p>We are considering revising the vision to reflect the comments received in this consultation and will consider whether we can strengthen this aspect.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>We do not consider that the approach meets the requirements of the NPPF. In particular, it doesn't set out the strategic priorities for each of the area included in Table 10. Does not contain a clear strategy for enhancing the natural, built and historic environment as it make no allowances for the starting quality of the land only what it might be restored to. Aspirational yes, but not realistic.</p> <p>To include such vast areas of search can only result in a huge number of competing schemes being put forward and an unsustainable workload being placed on the County Council. It will be somewhat akin to the current 5 year supply of housing land appeals being undertaken and will result in a huge resources commitment and costs to the County Council.</p>	<p>We felt that the vision accurately captured the strategic priorities by stating "<i>minerals will be worked and located in a socially and environmentally sustainable way that takes account of the health and amenity of local people, the vitality of the local economy, the integrity of the environment and the value of local features and characteristics</i>" and that this was supported by the draft objectives and the relevant issues identified in table 1. However, in light of yours and other comments received we realise that more local detail would be helpful in refining the vision and highlighting the links with the policy framework (such as the issues addressed in Table 10).</p> <p>A variety of aspects of the natural, built and historic environment have been considered in developing the spatial strategy and identifying relevant issues to be addressed through policy criteria which will be developed further in the draft plan. However, we agree that the methods used so far potentially undervalue some existing non-designated assets, and we will be working to find a way to address this across the county.</p> <p>As highlighted in Sections 8 and 9, the landbank for sand and gravel and for crushed rock in Worcestershire is currently well below the levels required by national policy. We must therefore ensure that the Minerals Local Plan will enable and encourage sites to come forward to reach these minimum requirements. However, it can be a lengthy and expensive process to obtain planning permission for a minerals sites, permissions have to be implemented within a certain timescale and often have conditions which require them to be completed by a certain date and therefore the minerals industry does not tend to develop more sites than demand for material requires.</p>

Summary of comments	Initial officer response
	<p>The areas of search are large areas which indicate where there may be commercially attractive amounts of mineral resources over a large enough area that mineral workings in the area could collectively be restored as an integrated network of green infrastructure over the life of the plan and beyond. We recognise that if a lot of sites were to be developed in a particular area this could lead to cumulative impacts and this will be addressed as we develop the policy framework.</p> <p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>e) To reflect the vision and aspirations of local communities liaison with local groups will need to be far more pro-active, effective and involve direct discussions by knowledgeable people not as in the case of the broad brushstrokes of discussions re this MLP 2nd Stage Consultation.</p>	<p>We agree that pro-active, effective and direct involvement is important to achieving the aims of the plan. We have engaged in discussions with experts and stakeholders across the county to develop the restoration-led green infrastructure approach which underpins the plan. Under the duty to cooperate, we have also engaged with district, borough and parish councils within and around Worcestershire. We are sorry that the Residents Association does not feel that the consultation has been effective to date, and we welcome further involvement from the Association in future stages of consultation.</p> <p>Open days were held to allow residents and local groups the opportunity to engage with the consultation and ask questions of the officers developing the plan. The second stage consultation was intended to clarify the broad brushstrokes you refer to, and the next one will be clearer with refined approaches and areas of search and draft policy wording for detailed comment.</p> <p>Following this consultation we realise that we will need to refine the areas of search, and at that point it might be possible and appropriate to have more focused consultations at a local level.</p>

Summary of comments	Initial officer response
<p data-bbox="188 221 864 252"><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p> <p data-bbox="188 260 965 395">The vision does not contribute to the achievement of sustainable development because it has no intention to secure a landbank of aggregate minerals for the whole of the Plan period.</p> <p data-bbox="188 967 943 1102">For q. b) to e) – we cannot see how in the vision that these are met. The vision is a brief summary of aspirations and therefore it would be difficult to address the points raised in b) to e) in any meaningful way</p>	<p data-bbox="992 221 1151 252">B050-1504</p> <p data-bbox="992 260 2040 786">In the draft vision we stated that "<i>Annual requirements for minerals will be met and reserves replenished to ensure the delivery of minerals throughout the life of the plan and beyond. To enable sustainable supply in the long-term, reserves of aggregates will meet minimum landbank targets by halfway through the plan-period</i>". We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although this is not our intention. We think that it could be difficult to reach the landbank requirements early in the plan period as we are currently below required levels, therefore we wanted the vision to aspire to achieve the requirements but also be realistic about deliverability. We have no intention to prevent development coming forward, and we will consider revising the wording to make it clear that we now aim to meet and maintain the landbanks required in national policy asap and will consider reviewing the plan if we have not achieved them by halfway through the plan period..</p> <p data-bbox="992 826 2022 927">This is an issue that has been raised by several respondents, and we are considering revising the vision in light of comments we have received in this consultation.</p> <p data-bbox="992 967 2040 1278">Noted. We felt that the vision accurately captured the strategic priorities by stating "<i>minerals will be worked and located in a socially and environmentally sustainable way that takes account of the health and amenity of local people, the vitality of the local economy, the integrity of the environment and the value of local features and characteristics</i>" and that this was supported by the draft objectives and the relevant issues identified in table 1. However, in light of yours and other comments received we realise that more local detail would be helpful in refining the vision and highlighting the links with the policy framework.</p> <p data-bbox="992 1318 2022 1422">A variety of aspects of the natural, built and historic environment have been considered in developing the spatial strategy and identifying relevant issues to be addressed through policy criteria which will be developed further in the</p>

Summary of comments	Initial officer response
	draft plan. However, we agree that the methods used so far potentially undervalue some existing non-designated assets, and we will be working to find a way to address this across the county.
<i>Mrs Pat Harries</i>	B060-2399
Please see Longdon Parish Council response	Noted. The Longdon, Queenhill and Holdfast Parish Council response appears above.

Question 4: Do you have any other comments on the vision or spatial strategy?

We would like to know if you support the draft objectives and if you think they will deliver the vision. Please also give details of any other strategic issues that you think should be considered.

Summary of comments	Initial officer response
<i>Wyre Forest District Council</i>	B007-1968 nq
<p>The restoration led-approach to the Minerals Local Plan is welcomed.</p> <p>It is also pleasing to see that this is being closely linked to the work undertaken on Green Infrastructure Planning across the County. I would draw your attention to the District's own Green Infrastructure Study and Strategy which provide a significant volume of information in relation to the current green infrastructure resource within the District and the aspirations for its future development. This work has been compiled alongside the County Council's green infrastructure work.</p>	<p>Noted.</p> <p>Support for the Green Infrastructure approach noted. We appreciate any additional information that you are able to provide, and will consider the documents you refer to.</p>

Summary of comments	Initial officer response
<p><i>English Heritage</i></p> <p>It is unclear within the spatial strategy how the historic environment, specifically heritage assets and their settings have been taken into account in the identification of 'areas of search' / 'opportunity area' / 'minerals safeguarding areas'. Whilst we recognise that mineral resources are found where they exist, English Heritage has to be satisfied that the emerging Minerals Plan has appropriately assessed any impacts on heritage assets and their settings and established a positive strategy for their protection, conservation and enhancement. We would hope to see clarification in future versions of how appropriate areas/sites have been identified ensuring the protection, conservation and enhancement of the historic environment, in line with the NPPF.</p>	<p>B025-716 nq</p> <p>These issues have been raised by a number of respondents with respect to historic environment and the areas of search. Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this.</p> <p>However, we expect that the policy framework will provide the appropriate level of protection for heritage assets and their settings and the restoration priorities will identify opportunities for conservation and enhancement of these features.</p> <p>The next consultation will contain draft policy wording which will address these issues in more detail, and should provide the clarification sought.</p>
<p><i>Wyre Forest District Council</i></p> <p>The vision and objectives are supported and the District particularly welcomes the restoration led approach to ensuring an adequate supply of minerals. The strategic restoration priorities are considered to be appropriate and are therefore supported.</p>	<p>B007-1968 nq</p> <p>Support noted.</p>
<p><i>Cotswolds Conservation Board</i></p> <p>The Vision of the Plan is supported.</p>	<p>B006-740 nq</p> <p>Support noted.</p>
<p><i>National Farmers' Union, West Midlands Region</i></p> <p>We broadly agree with the draft vision on page 20.</p>	<p>B017-857 nq</p> <p>Support noted.</p>
<p><i>North Worcestershire Water Management</i></p> <p>We are pleased to see that the vision encompasses stakeholder engagements and hope that this would involve our team at times throughout the stages. We are also impressed to</p>	<p>B030-1952</p> <p>Support noted.</p>

Summary of comments	Initial officer response
see how much recognition has been made towards Flood Risk issues.	
<i>Mrs Anne Pearson</i>	B034-2395
<p>The broad brush nature of the Local Minerals Plan gives inaccurate figures for the hectareage available. For example, Appendix 19, Area 19/2 contains many more domestic dwellings and properties than are shown on the OS map extract. This is likely to reduce the hectareage from 223ha to below 200ha. This area is also compromised by roads. My contention being that the calculation of over 4m tonnes of extractable minerals is an exaggeration.</p>	<p>Available hectareage for all resource areas was calculated using the methodology and assumptions set out in the "Analysis of Mineral Resources in Worcestershire" document using the best information we had available¹⁵. As part of the calculation we decided to halve the resource potential when estimating the resource volume because we recognised the need to avoid spurious accuracy, minimise the risk of overestimating the resources and to allow for the following factors:</p> <ul style="list-style-type: none"> • Many resource areas are overlain by dispersed development and it is therefore unlikely that the whole resource area would be worked. • Information about depth is limited in detail and the quality and depth can vary across the resource area. • Constraints that will be set out in criteria-based policies have not been applied to the assessment of resource areas; it is possible therefore that some parts of the resource areas would be constrained from being fully worked. <p>Not all resource areas will be affected equally by all of these factors. We think that this will lead to an overestimate of the resource in some areas and an underestimate in others, averaging out across the county.</p> <p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this.</p>
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
We fully endorse the comments made by Longdon Parish Council.	Agreement with Longdon Parish Council comments noted. Please see our response below.
<i>Mrs Christine Daniell</i>	B037-2396
As above	Noted.
<i>Natural England</i>	B040-717
Natural England particularly welcomes that statement that "minerals will be worked and	Support noted.

¹⁵ See Chapter 3 in the Analysis of Mineral Resources in Worcestershire, October 2013, available on www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p>located in a socially and environmentally sustainable way that takes account of ... the integrity of the environment". And that "minerals workings will be restored to maximise social, environmental and economic gains, through coordinated restoration that delivers networks of green infrastructure in an integrated way".</p>	
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p>	<p>B041-595</p>
<p>See above. We are particularly concerned about river and surface water flooding in our Parish. Whilst we appreciate that Central Government advice does not preclude gravel extraction within a flood plain we are concerned that any extraction in our area may increase the risk of flooding.</p> <p>The vision and spatial strategy do not seem to reflect any difference between a quarry which destroys the river terraces thereby potentially increasing a flood plain or another area which would not.</p> <p>Furthermore, if the sand and gravel is extracted we consider that the risk of surface water flooding will be increased due to the impermeability of the back-filled land. We urgently request that the County Council prioritise their 'key' areas to those which would not potentially increase a flood plain area or exacerbate surface water run-off.</p>	<p>We recognise that fluvial and surface water flooding can be of concern in the Lower Severn Corridor, however the River Severn Catchment Flood Management Plan (RSCFMP) indicates that this area (the "Lower Severn Corridor and Leadon catchment") is a policy 2 area, defined as "areas of low to moderate flood risk where we (the Environment Agency) can generally reduce existing flood risk management actions. The RSCFMP considers that the current and future risks do not warrant as much intervention (for example on maintaining existing defences) and it is therefore not worth continuing. We (the Environment Agency) can allow the risk of flooding to increase in a managed way so that we do not create unacceptable risks." For these reasons flood alleviation has been identified as a level 3 restoration priority to be integrated wherever possible in restoration schemes.</p> <p>Whilst historically quarries and pits have been used as landfill sites, we do not expect this to be the case in the future. The Waste Core Strategy identifies that there is no need for additional landfill space up to 2027, although new sites could be developed if a shortfall in capacity is identified or the proposal is essential for operational or safety reasons or is the most appropriate option, meaning that some backfill could be allowed if it is shown to be necessary. Any materials that would be permitted would be tightly controlled by the Environment Agency. We realise that we haven't specifically addressed landfill in the consultation draft, but we do not feel that at this stage it is helpful to repeat the contents of the Waste Core Strategy as this already forms part of the development plan and must be complied with.</p> <p>We intend to prepare a background document to look at water and flooding issues and will be working closely with the Environment Agency to ensure that the</p>

Summary of comments	Initial officer response
<p>We are a largely agricultural area and as acknowledged at the workshops undertaken, sand and gravel extraction results in the restored land dropping at least on agricultural land grade.</p> <p>The area around Queenhill and Holdfast lies within a Nitrate Vulnerability Zone which has been designated to reduce nitrogen loss from agriculture to water. We are very concerned that in order to get the land back into agricultural production, high levels of nitrates may be applied to the land post restoration. We therefore suggest that the County Council exclude Nitrate Vulnerability Zones from their area of search.</p> <p>The vision makes no reference to the contribution that could be made to sand and gravel supplies from recycling and river dredging. We consider that there could be a valuable contribution to be made from these areas and urge the County Council to consider inclusion of a target from these sources.</p>	<p>approaches we propose are appropriate. We expect to develop policies to ensure that impacts on flood risk are fully considered and minimised at all stages.</p> <p>This issue was raised in workshops, but we will consult with Defra to establish if restoration necessarily lowers agricultural land value by at least one grade and develop policies accordingly. A number of examples exist both within and beyond Worcestershire of successful agricultural restoration schemes.</p> <p>Thank you for raising Nitrate Protection Zones. We acknowledge that this is an issue which the Minerals Local Plan should take into account and we will give consideration to how we might do this as we develop the plan. We may be able to incorporate Nitrate Protection Zones as an issue to be addressed through policy criteria, or it might be possible to use them as a consideration in defining the restoration profiles for each area of search.</p> <p>Secondary aggregates can be produced as a by-product of other mining or quarrying activities¹⁶. We do not currently know of any processes in Worcestershire which produce such secondary aggregates although we are aware of the current application for an Incinerator Bottom Ash recycling facility at Sandy Lane, Wildmoor. However, recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we agree that we need to give this due consideration to ensure that we make the most of the resources we have available.</p> <p>We don't have any information about the nature and amount of material that might be produced through river dredging. As river dredging touches many areas – including waste and river management – we don't think it is appropriate for the Minerals Local Plan to encourage or discourage river dredging as a source of</p>

¹⁶ http://www.bgs.ac.uk/planning4minerals/Resources_1.htm

Summary of comments	Initial officer response
	aggregate materials. However, we don't want to rule it out completely, and we will seek to develop the Minerals Local Plan policies to be able to address any applications which might come forward.
<i>Worcestershire Wildlife Trust</i>	B044-1081
We are pleased to support the clear weight given to GI provision through the vision's restoration proposals. In addition we welcome the spatial strategy shown in figure seven and in particular the restoration priority given to habitat quality and fragmentation across the county. Taking a strategic approach to delivering GI networks is critical to delivering sustainable growth in Worcestershire and the strategy neatly lays out where the minerals plan can play a part in this.	Support noted.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623,683 B
It is suggested that reference to "meet[ing] minimum landbank targets by halfway through the plan period" be deleted from the vision.	<p>Noted. We have received many comments on this issue. In the draft vision we stated that "<i>Annual requirements for minerals will be met and reserves replenished to ensure the delivery of minerals throughout the life of the plan and beyond. To enable sustainable supply in the long-term, reserves of aggregates will meet minimum landbank targets by halfway through the plan-period</i>". We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although this is not our intention. We think that it could be difficult to reach the landbank requirements early in the plan period as we are currently below required levels, therefore we wanted the vision to aspire to achieve the requirements but also be realistic about deliverability. We have no intention to prevent development coming forward, and we will consider revising the wording to make it clear that we expect landbank requirements to be met by no later than halfway through the plan period.</p> <p>This is an issue that has been raised by several respondents, and we are considering revising the vision in light of comments we have received in this</p>

Summary of comments	Initial officer response
	consultation. Please also refer to officers' responses regarding landbank targets and timing in Section 9.
<i>Wildmoor Residents Association</i>	B047-2295
<p>Difficult to argue with Vision or Spatial Strategy. However, it will only deliver if the policies adequately reflect the objectives.</p> <p>Spatial Strategy does not prioritise areas or give any real indication of where development would take place.</p> <p>Over-arching restoration priorities or principles are sound.</p>	<p>Noted and agreed.</p> <p>The spatial strategy indicates broad areas where minerals development may take place in the form of a diagram which represents the strategic aspects of the plan. In light of comments received during this consultation, we think we might need to refine the areas of search and we will be considering ways of doing this. After the areas of search are refined, the spatial strategy will also be refined to reflect this.</p> <p>Support noted.</p>
<i>Herefordshire and Worcestershire Earth Heritage Trust</i>	B048-800
No – they seem simple and clear.	Noted.
<i>Malvern Hills AONB Partnership</i>	B049-802B
Under the local considerations section on page 17 we would wish to see the Malvern Hills AONB Management Plan added to the list of documents.	The list of plans and policies on page 17 of the consultation document is a list of documents which were brought to our attention through the First Stage Consultation on the Minerals Local Plan rather than a comprehensive list of the documents which have informed our approach so far. However, we agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county and that the Management Plans are a tool that can assist with this.
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
Figure 7 would be better if it were produced at a larger scale	Noted. We will seek to ensure that the spatial strategy diagram is produced at a useful scale for future consultation stages. We are also aware that the mapped information on mineral resources may not have been as easy to follow as we hoped, and we will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have.

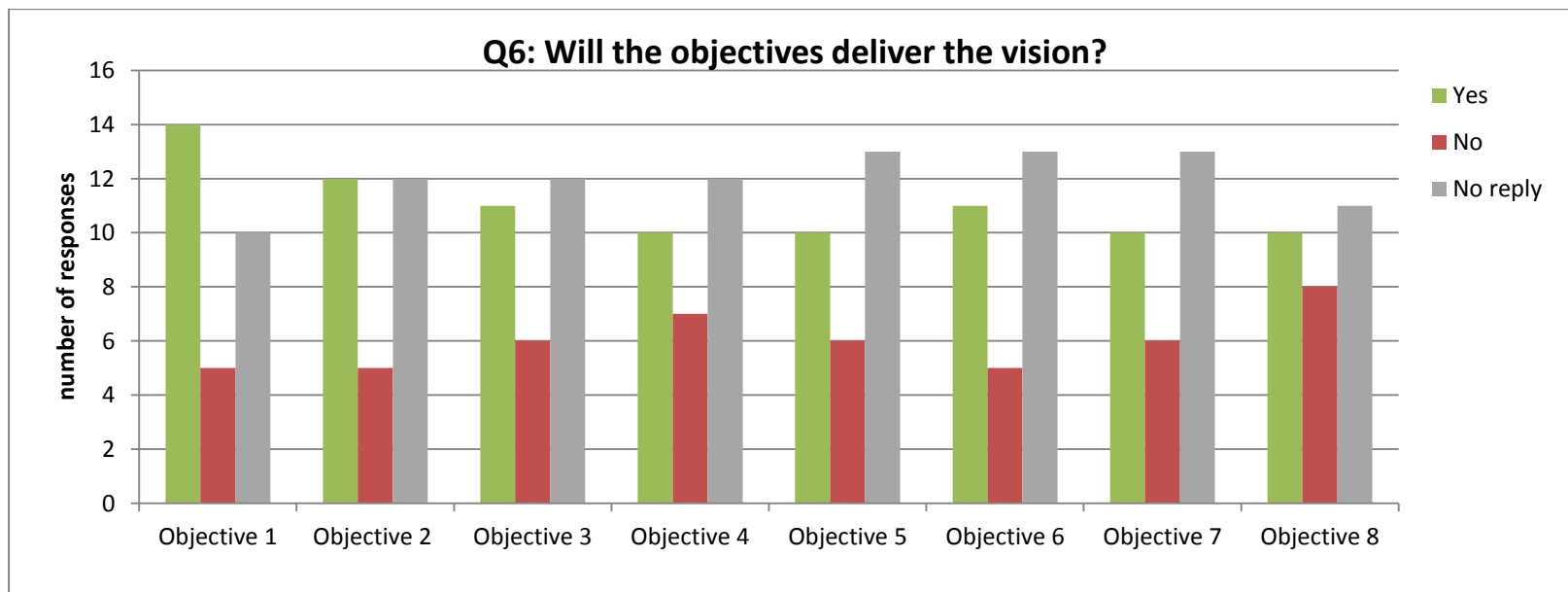
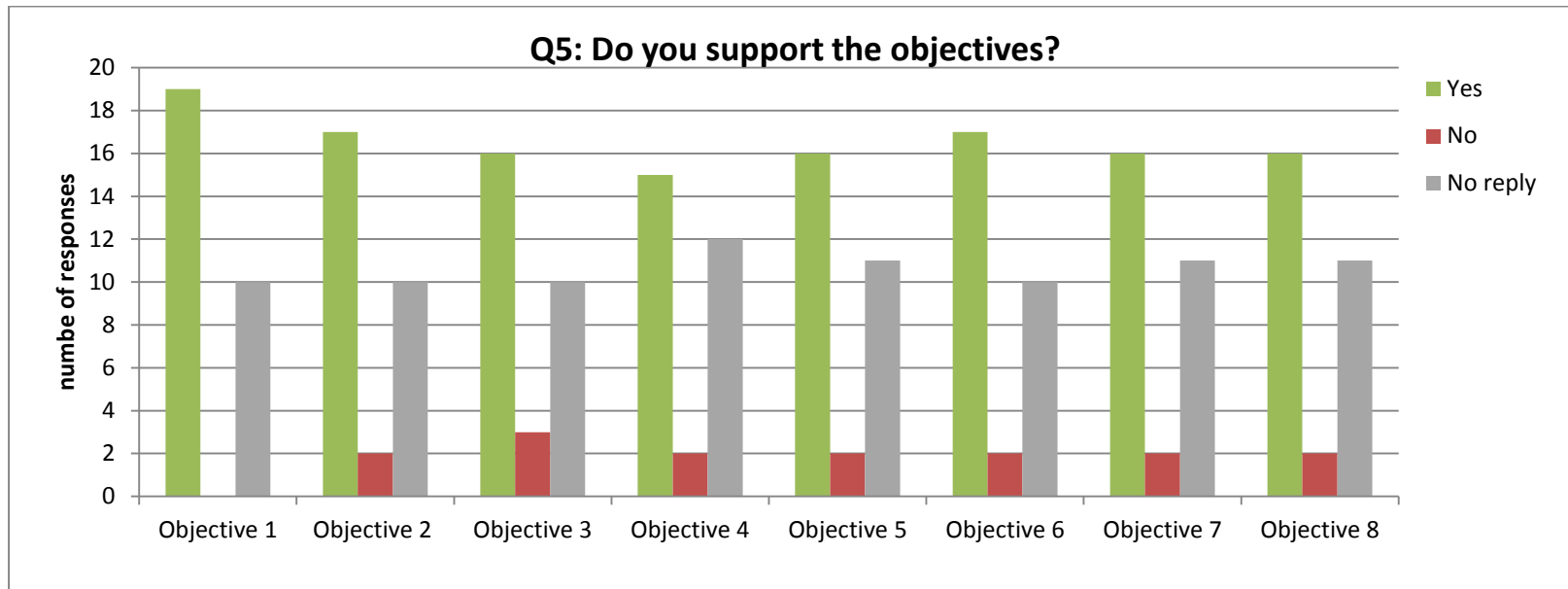
Summary of comments	Initial officer response
<i>Malvern Hills AONB Partnership</i>	B049-802A nq
On a positive note, the AONB Partnership is very pleased to see green infrastructure and landscape character put at the heart of the proposed approach. Overall the approach set out in the document seems to be a very good one. More emphasis could be put on assessing visual impacts to ensure that the scenic beauty of the AONB and its setting is conserved and enhanced	Support Noted. This issue has been raised by a number of respondents, and we are considering revising the vision in light of comments received in this consultation.
<i>Environment Agency</i>	B058-719
We welcome the clear commitment to work minerals in an environmentally sustainable way; ensuring betterment opportunities are at the heart of future decision making. The Vision is progressive and worded positively. We support the commitment to restore sites in a coordinated manner that seeks to ensure delivery of Green Infrastructure in an integrated way.	Support noted.
<i>Mrs Pat Harries</i>	B060-2399
See Longdon Parish Council response	Please refer to the officers' response to the comments from the Longdon Queenhill and Holdfast Parish Council above.

No comment responses:

<i>Worcestershire Archive and Archaeology Service</i>	B031-509
No specific comments	Noted.
<i>RSPB</i>	B039-1782
No comments.	Noted.
<i>WCC Environmental Policy</i>	B059-2004
No comments.	Noted.

Question 5 and 6: Do you support the objectives? And will the objectives deliver the vision?

	Yes	No
Objective 1 - Ensure adequate and steady supply of aggregate, industrial and energy minerals over the life of the plan.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 2 - Ensure the long term sustainability of supply of minerals resources.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 3 - Protect and enhance Worcestershire's key economic sectors.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 4 - Ensure mineral operations are resilient to and mitigate the impacts of climate change.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 5 - Utilise mineral restoration to enhance the climate change resilience of the county.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 6 - Protect and enhance the natural and historic environment.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 7 - Protect and enhance health and amenity.	<input type="checkbox"/>	<input type="checkbox"/>
Objective 8 - Involve all those affected as openly and effectively as possible.	<input type="checkbox"/>	<input type="checkbox"/>



Questions 7 and 8: Please give details of any other strategic issues that you think should be considered. Please refer to the relevant objective number in your answer. (8) Do you have any other comments on the objectives, or do you think there are any additional objectives which would help deliver the vision?

Responses to these two questions have been presented together and divided by objective number as this was how people responded to them. Comments made against question 8 were equally relevant to question 7 and vice versa. All comments received for both questions are recorded in the table below.

Summary of comments	Initial officer response
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623,683 (B)
<p>Objective 1 - "Meet[ing] minimum landbank targets by halfway through the plan period" will not necessarily ensure an adequate and steady supply of aggregate over the life of the plan.</p>	<p>Noted. This is an issue that has been raised by several respondents, and we are considering revising the vision in light of comments we have received in this consultation.</p> <p>In the draft vision we stated that "<i>Annual requirements for minerals will be met and reserves replenished to ensure the delivery of minerals throughout the life of the plan and beyond. To enable sustainable supply in the long-term, reserves of aggregates will meet minimum landbank targets by halfway through the plan-period</i>". We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although this is not our intention. We think that it could be difficult to reach the landbank requirements early in the plan period as we are currently below required levels, therefore we wanted the vision to aspire to achieve the requirements but also be realistic about deliverability. We have no intention to prevent development coming forward, and we will consider revising the wording to make it clear that we now aim to meet and maintain the landbanks required in national policy asap and will consider reviewing the plan if we have not achieved them by halfway through the plan period.</p>
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623,683 (B)

Summary of comments	Initial officer response
<p>Objective 3 - Protecting and enhancing Worcestershire's key economic sectors (such as manufacturing, cyber security and defence) is not an appropriate objective for a Minerals Local Plan.</p>	<p>Minerals extraction is important for the national economy. Aggregates extraction is especially important for local economies as most aggregates are used within 30 miles of their point of extraction and as aggregates are critical for the construction industry and infrastructure developments. While minerals extraction may not be a major sector for Worcestershire's economy, it has an important role to play in enabling development to take place, securing a healthy economy at a broader scale.</p> <p>Worcestershire's key economic sectors are outlined in the Worcestershire Local Enterprise Partnership's Business Plan 2012 "The Outlook is Bright in Worcestershire" and we think that this is an important document setting out Worcestershire's priorities for the future. We think that the Minerals Local Plan needs to consider these sectors, both in terms of protecting them from any potential impacts through the policy framework, but also through encouraging potential benefits to be realised through the Green Infrastructure approach to restoration. Whilst we recognise that opportunities may be more limited in terms of benefitting manufacturing, cyber security and defence than the tourism, food production and horticulture, and environmental technology sectors, we do not think it would be appropriate to remove them from being addressed under the objective.</p>
<p><i>The Coal Authority</i></p>	<p>B045-2184</p>
<p>Objective 4 - The Coal Authority is pleased to note the reference to subsidence and land stability issues identified under draft objective 4.</p>	<p>Noted.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623,683 B</p>
<p>Objective 4 – Sustainable transport is an important aspect of mitigating the impacts of climate change and could usefully be referenced in the Vision.</p>	<p>Noted. We are considering modifications to the vision based on the comments received during this consultation.</p>
<p><i>Mrs Anne Pearson</i></p>	<p>B034-2395</p>
<p>Draft objective 4) to Ensure mineral operations are resilient to and mitigate the impacts of climate change -</p>	<p><i>Please note that this portion of Mrs Pearson's comment was originally submitted in the response box for question 17. It has been included here for</i></p>

Summary of comments	Initial officer response
<p>the flood risk would be likely to be exacerbated by the extraction of sand and gravel from the flood plain. The area of land below Ham Court has been flooded since Christmas 2013. Upton lies only 10m above sea level and extraction is going to remove the land's ability to soak up water. There are many very old Park Oaks on the land and these would suffer from mineral extraction. This also applies to Draft objective 5).</p>	<p><i>continuity and clarity purposes as her comments relate to specific objectives.</i></p> <p>Flood risk and flood alleviation are addressed in objectives 4 and 5. These are also identified as issues to be addressed through policy criteria related to how and where minerals are worked and sites are restored in table 5 (items p, r and t), table 10 (items f and g) and table 24 (items h and j). Lakes and wetlands can contribute to flood alleviation by helping to slow water flow, providing additional natural storage for flood waters, and restoring natural flood plains. They also provide important habitats and contribute to biodiversity.</p> <p>We are also developing a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>Objective 5 - This needs to include economic and social impacts to improve the resilience of the county. WCC needs power to restore workings currently not complying with vision/objectives.</p>	<p>Objective 5 relates specifically to climate change resilience. We feel that Objective 3: Protect and enhance Worcestershire's key economic sectors addresses the first part of your comment about the economy, and that social impacts are addressed in Objective 7 and 8. We agree that there is some crossover between the issues that are relevant to the various objectives – this will be addressed through the draft policies developed during the next consultation.</p> <p>Once the Minerals Local Plan is adopted it will provide the County Council with a much stronger basis for monitoring and enforcement and we will look at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation. However, current sites must comply with the conditions imposed through their individual planning permissions and although we have some legislative powers to review whether those conditions are still appropriate, we will not be able to simply restore workings which don't comply with the vision and objectives of the new Minerals Local Plan. This is quite a complex area of mineral planning. We are preparing a background document to look at the implications of the "Review of mineral planning permissions" procedures and this will be made available on our</p>

Summary of comments	Initial officer response
	website (www.worcestershire.gov.uk/mineralsbackground) as soon as possible.
<i>Cotswolds Conservation Board</i>	B006-740 nq
Objective 6 - The Board would suggest that “scenic beauty” should be included with landscape character. It is not just the impact on landscape character which requires assessment, but also visual impacts.	Noted. We will seek to incorporate visual impacts and scenic beauty in addition to landscape character.
<i>English Heritage</i>	B025-716 nq
<p>Objective 6 - We particularly welcome the inclusion of a specific objective within the emerging Minerals Plan on the historic environment, including a wide range of sub-objectives including built and archaeological heritage.</p> <p>We recognise that you value the historic environment and would encourage a specific reference to this within your vision.</p> <p>We would hope to see in the next iteration evidence of how the emerging Minerals Plan sets out a positive strategy for the enhancement of the historic environment. The policy approaches/ policy criteria identified within the emerging Minerals Plan appear positive for the historic environment. Additionally, we would anticipate detailed policy wording to be available as the Plan develops.</p>	<p>Support noted.</p> <p>The historic environment has been raised by a number of respondents, and we are considering revising the vision in light of comments we have received in this consultation.</p> <p>We are pleased that you feel the draft plan appears positive for the historic environment. We have received a number of comments on this issue, and further detail on how this will be achieved will be provided in the draft policies which will form part of the next consultation. As highlighted in Section 12, we are aware that further work on this needs to be undertaken and we will work closely with colleagues in Worcestershire County Council's Archive and Archaeology Service as well as English Heritage to find the best way to take a positive approach to the historic environment in the Plan.</p>
<i>Worcestershire Archive and Archaeology Service</i>	B031-509
Objective 6 - No, but suggest simplifying International, National and Local Heritage Assets – Archaeological features – Vernacular or locally important features to simply Historic Environment.	Noted. As this was an early stage of consultation we felt that listing all the aspects would set out clearly for all consultees that we intend to give due consideration to all aspects of the Historic Environment, but we would not wish to omit any aspects in error. We acknowledge that Historic Environment is a simpler term which encapsulates the aspects which we had listed as being relevant under Objective 6 and we are considering revising the objectives in light of the comments we have received in this consultation.

Summary of comments	Initial officer response
<i>Natural England</i>	B040-717
Objective 6 - Natural England particularly welcomes objective 6.	Support noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
Objective 6 - We fully support objective 6 in particular. Successful implementation of this objective will be essential in delivering the vision of the minerals plan and must therefore take a central role in decision-making regarding mineral working in Worcestershire.	Support noted.
<i>Wildmoor Residents Association</i>	B047-2295
Objective 6 - Insufficient areas are included as having special consideration. Area of Search Junction 4(a) North includes the lower slopes of Clent. Previously these areas had significant landscape value.	<p>"Areas of Great Landscape Value" was a local designation which dated from the County Development Plan of 1959, which was used to inform the County Structure and other Plans. Those Plans have now been revoked or superseded. Areas of Great Landscape Value were identified to include land over the 800 feet contour. This approach no longer accords with modern concepts about the value of landscapes, national policy or the approach used in the Council's Landscape Character Assessment.</p> <p>We will seek to protect and enhance landscapes and landscape character through policies relating to working practices, the location of development and the restoration of mineral workings. Landscape character is one of the fundamental parts of the Green Infrastructure approach to restoration which we proposed in this consultation. The characteristics of the predominant landscape types have been considered and set out in the restoration profiles for each area of search. We set out in Section 12 that "we think that landscape character should form the framework within which the other priorities sit and when landscape character is respected this should facilitate the delivery of cohesive restoration schemes."</p>
<i>Malvern Hills AONB Partnership</i>	B049-802B
Objective 6 - Draft objective 6 could be expanded to include references to green infrastructure and landscape character as these are central to the strategic restoration priorities.	Noted. The relevant issues for Objective 6 include landscape character, and although green infrastructure is not specifically mentioned we think that the issues listed relating to the natural and historic environment are the factors which come together to form "green infrastructure". We are considering

Summary of comments	Initial officer response
	revising the objectives in light of the comments we have received in this consultation and will consider whether specific reference to green infrastructure in the objectives is appropriate.
<i>Mrs Anne Pearson</i>	B034-2395
Objective 7 is unachievable in ECA 19/2.	We will be developing the policy framework to ensure that health and amenity are protected and enhanced through measures such as controlling impacts on air quality, noise and dust emissions, vibration, visual intrusion, light pollution, ensuring safety during all phases, protecting and promoting public rights of way, and enhancing opportunities for access and informal recreation. We intend that these policies could and would be applied across the county.
<i>Mrs Anne Pearson</i>	B034-2395
Draft objective 7) to Protect and enhance health and amenity - The removal of the 200m buffer zone flies in the face of the working practice criteria policies, such a buffer should not only be retained for small settlements of 6 houses or more, but expanded to ALL residential property.	<p><i>Please note that this portion of Mrs Pearson's comment was originally submitted in the response box for question 17. It has been included here for continuity and clarity purposes as her comments relate to specific objectives.</i></p> <p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues</p>

Summary of comments	Initial officer response
	<p>need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p>
<p><i>Mr Adrian Buckmaster</i></p>	<p>B032-2394</p>
<p>Objective 8 - It does not address the proximity to dwellings. There seems nothing about how close excavation might be to houses unless it becomes unsafe.</p>	<p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See</p>

Summary of comments	Initial officer response
<p>There is not enough emphasis on restoring to what it is like today and too much about changing the landscape to wetlands etc.</p>	<p>Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>In the draft vision we state that "<i>...Minerals will be worked and located in a socially and environmentally sustainable way that takes account of... the integrity of the environment and the value of local features and characteristics. Mineral workings will be restored to maximise social, environmental and economic gains, through coordinated restoration that delivers networks of green infrastructure in an integrated way.</i>" We do not intend to give greater emphasis through either the vision or objectives to landscape change over restoring the present landscape types. However, mineral extraction can lead to a change to the landscape. This is something that we have stated will be addressed by policy criteria and is one of the reasons that we think landscape is an over-arching issue for our restoration strategy as part of a Green Infrastructure approach. We think that depending on the type of mineral operation and the impact on the landscape, it may be possible to restore mineral workings to their former Landscape Type by recreating or enhancing the key characteristics but in some cases the scale or nature of the workings will prohibit this from being done effectively. In these cases it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type. We will develop policies to address these issues in the Minerals Local Plan.</p> <p>We think that we will be able to develop the restoration profiles for the areas of search to give greater certainty about when sites might be able to be restored to the former landscape type and when working might result in whole-scale change. We will seek to manage any change to ensure that it is appropriate, but we have to recognise that working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable.</p>
<p>Mrs Anne Pearson</p>	<p>B034-2395</p>
<p>Objective 8 has been unsuccessful so far - information</p>	<p>The mineral resources in Worcestershire are widespread across the county.</p>

Summary of comments	Initial officer response
<p>should have been sent to all households likely to be affected.</p>	<p>Whilst we have tried to raise awareness of this consultation and bring it to people's attention, we are not able to send information directly to all households in Worcestershire. This consultation aimed to set the direction for the development of the Minerals Local Plan but does not identify specific sites which will be promoted for development, and we were therefore not able to target consultation materials to households which might be adjacent to specific sites.</p> <p>However, we did formally advertise the consultation in all the newspapers in the county and a number of papers also ran news articles. We also promoted the consultation on the council's facebook and twitter feeds and through the Council's web-based consultation portal. We held three open day sessions for members of the public to come and talk to us and specifically held these in accessible locations to try to gain as much coverage of the county as possible. We have a consultation database which any member of the public can sign up to and receive information on the Minerals Local Plan and other planning consultations, and information was sent to all the city, borough, district, town and parish councils in the county. All the consultation material was freely available on our website along with our contact details for people to request paper copies of any of the documents.</p> <p>Whilst we agree that it is important to bring the consultation to as wide an audience as possible and particularly those most likely to be directly affected, we have to do this in a proportionate and cost-effective manner. Following this consultation we realise that we will need to refine the areas of search, and at that point it might be possible and appropriate to have more focused consultations at a local level and we hope that local people will engage with future consultations on the Minerals Local Plan. If you have any ideas about how we can make our consultation procedures more effective or reach a wider audience, we would be pleased to hear your thoughts.</p> <p>Please also note that when any applications for specific mineral</p>

Summary of comments	Initial officer response
	developments come forward, these are advertised in accordance with our Statement of Community Involvement ¹⁷ , meaning that notices are placed in local newspapers, neighbouring properties are notified, public notices are posted in the vicinity of the proposed site and the local Parish Council is consulted. We think that Objective 8 is important as we want to encourage greater community involvement from the start of the process at pre-application stage and for this to continue throughout a site's working, restoration and aftercare stages.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
Objective 8 – Community engagement is an important objective which could usefully be referenced in the Vision.	Noted. We are considering revising the vision in light of the comments we have received in this consultation.
General comments	
<i>National Farmers' Union, West Midlands Region</i>	B017-857 nq
Under the objectives (page 23) we welcome the acknowledgement of the importance of the horticultural and food production in the county and the aim to protect and enhance this key economic sector.	Support noted.
<i>North Worcestershire Water Management</i>	B030-1952
Again, really encouraged to see such reference and acknowledgement to climate change and flood risk resilience.	Support noted.
<i>Mrs Anne Pearson</i>	B034-2395
A great deal more effort will be required to achieve Objectives 2-8. There is no clear vision to achieve Objective 4 and 5.	The information contained in this consultation was reasonably broad brush as we wanted to consult on the issues, concepts and alternatives that should be developed further. We think that as we develop the policy framework for the draft plan the links with the objectives will become clearer. We will also develop monitoring indicators and evaluation targets which will help to ensure that the objectives are being achieved once the plan is adopted and

¹⁷ <http://www.worcestershire.gov.uk/cms/strategic-planning/community-involvement.aspx>

Summary of comments	Initial officer response
	<p>development". It does not make any specific reference to mineral storage or stockpiling, although less vulnerable development should not be located in flood zone 3b (the functional flood plain), and water-compatible development should remain operational and safe for users in times of flood, result in no net loss of floodplain storage and not impede water flows and not increase flood risk elsewhere. We will consider all these factors as we develop the policy framework and agree that storage and stockpiling of materials are not likely to be compatible with the functional floodplain.</p> <p>We are also developing a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.</p>
<i>RSPB</i>	B039-1782
<p>As outlined in response to Questions 1 and 2, the minerals industry is uniquely placed to deliver national and local habitat creation targets, with the restoration of mineral sites providing the main mechanism for creating many of these priority habitats. As such, the Plan should promote a biodiversity-led approach to mineral site restoration. There should be a stand alone objective to reflect this issue: • Deliver a net-gain in biodiversity - primarily through the landscape-scale creation of priority habitats on restored mineral sites - such that it makes a significant contribution to establishing a coherent and resilient ecological network.</p>	<p>Biodiversity is identified as a relevant issue under Objective 6. As we replied above, setting biodiversity as the leading criteria is an interesting concept and we would like to explore this with other members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date. However, even without placing biodiversity as the leading aspect, the habitat quality and fragmentation methodology used in this consultation resulted in this restoration priority being identified as either a determining factor or a significant component for all the areas of search. If the proposed methodology and areas of search were taken forward unchanged this would still ensure a high level of consideration would be given to biodiversity, although it is likely that we will need to refine the areas of search and possibly some of the approaches to establishing restoration priority levels as we develop the Minerals Local Plan.</p> <p>We will be revising the vision and objectives in response to comments received during this consultation, and we will take your feedback into account.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>We consider that an updated 'sieve test' is a better means of achieving these objectives.</p>	<p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local</p>

Summary of comments	Initial officer response
<p>One of the greatest areas of concern raised at the workshops was on monitoring and enforcement particularly relating to ground water pollution. A new set of policies need to be added to the Minerals Plan outlining how the County Council intends to monitor and enforce best practice during any mineral extraction.</p>	<p>Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>We agree that monitoring and enforcement is a vitally important aspect of ensuring sustainable mineral development. Conditions will be imposed as part of any planning permissions reflecting the requirements of the policy framework. Operators/landowners will need to comply with these conditions and they are a legally binding aspect of the planning permission. Compliance with conditions is regularly monitored and enforcement action can be taken if the conditions of the planning permission are not complied with.</p> <p>We are aware that some of the older mineral sites in the county were permitted and worked with minimal, often without any, conditions. In some cases the results of this have been unacceptable to everyone. We expect the Plan to specify that future mineral workings should be worked and restored in accordance with contemporary best practice, so the failures of the past should not be repeated.</p> <p>Our monitoring officer visits each of the current minerals sites in the county on average three or four times per year and takes action as necessary to ensure that the conditions on planning permissions are complied with. The council has considerable powers in this regard and ultimately can suspend or discontinue workings and force operators to restore sites. Once the Minerals Local Plan is adopted it will provide the County Council with a much stronger basis for monitoring and enforcement and we will look at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District</i></p>	<p>B046-681,1623, 683 B</p>

Summary of comments	Initial officer response
<p><i>Council</i>)</p> <p>In addition to identifying and safeguarding mineral resources to ensure that appropriate levels of planned and future supplies can be maintained, it is suggested that further objectives of the Minerals Local Plan should be to: include criteria to indicate the circumstances under which mineral working might be permitted, and indicate preferred areas where future mineral working may be appropriate having regard to economic viability, the environmental capacity of the area, the impact on the local community and restoration opportunities.</p>	<p>We agree that the issues you raise here are important and need to be addressed within the plan. The areas of search indicate the areas where future mineral working may be appropriate and these are indicated in the spatial strategy which should be read as part of the draft vision. We will consider whether it is also possible and appropriate to include a "spatial" objective.</p> <p>We intend to include policies which refine where minerals should be worked and set the criteria indicating circumstances under which mineral working might be permitted and how development should have regard to economic, social and environmental factors. We think that these aspects sit comfortably with the draft objectives.</p>
<p><i>Wildmoor Residents Association</i></p> <p>Objectives 4, 5, 7, 8 are not deliverable.</p>	<p>B047-2295</p> <p>Achieving the objectives relating to climate change resilience and mitigation, health and amenity, and involving people will be challenging, but we think these are extremely important issues and we need to strive for the Minerals Local Plan to play its part with regard to these issues. The policies we develop will contribute towards achieving the objectives.</p> <p>Whilst the Minerals Local Plan will not on its own be able to solve climate change, or address the county's health and amenity issues, it will be able to make some contribution. For example, by promoting sustainable transport options, efficient use of water, minimising waste and considering flood risk and flood alleviation, the Minerals Local Plan can ensure that minerals development in the county minimises any potential negative impacts on climate change and contributes to climate change resilience. There are opportunities for mineral sites to be restored to enhance the green infrastructure of the county, including habitat creation and public access which can contribute to improving health and amenity in the county, as well making sure the plan minimises potential detrimental impacts such as from dust or air quality emissions from mineral working. The Minerals Local Plan can also encourage involving those affected by mineral development by</p>

Summary of comments	Initial officer response
	<p>promoting pre-application discussions and community liaison throughout a site's life.</p> <p>The next consultation will provide draft policies that should provide clarity on how the objectives will be delivered. We will also develop monitoring indicators and evaluation targets which will help to ensure that the objectives are being achieved once the plan is adopted and these will trigger a review if necessary.</p>
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
<p>Although we support the objectives we do not believe that there is sufficient clarity within the document to ascertain how the objectives will deliver the vision. At this point we cannot agree that the objectives will deliver the vision.</p>	<p>Support for objectives noted.</p> <p>The next stage consultation will provide draft policies that should provide the detail you seek.</p>
<i>Environment Agency</i>	B058-719
<p>We welcome the objectives. We consider them to be robust and comprehensive.</p> <p>Whilst inferred within the objectives, we would seek explicit reference to 'Flood Risk' and 'betterment opportunities' within the objective framework to highlight the importance of these ambitions</p>	<p>Support noted.</p> <p>As drafted, flood risk is identified as a relevant issue under objective 4 and flood alleviation under objective 5, relating to climate change resilience and mitigation. We understand that flooding is not always linked to climate change, and in developing the Second Stage Consultation we discussed with partners on the Worcestershire Green Infrastructure Partnership whether we should address flooding and flood risk as a separate issue or under the banner of climate change. The partners felt that although flooding has always happened to some extent, climate change is likely to be a significant factor in flood risk now and in the future, and that treating it separately was more likely to marginalise the issue rather than give it the prominence of consideration it requires.</p> <p>We envisage developing a policy framework which will explicitly refer to flood risk, and water quality and flood alleviation (betterment opportunities) are two of the high-level strategic restoration priorities that we put forward in the</p>

Summary of comments	Initial officer response
	<p>framework and agree that storage and stockpiling of materials are not likely to be compatible with the functional floodplain.</p> <p>We are also developing a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.</p>

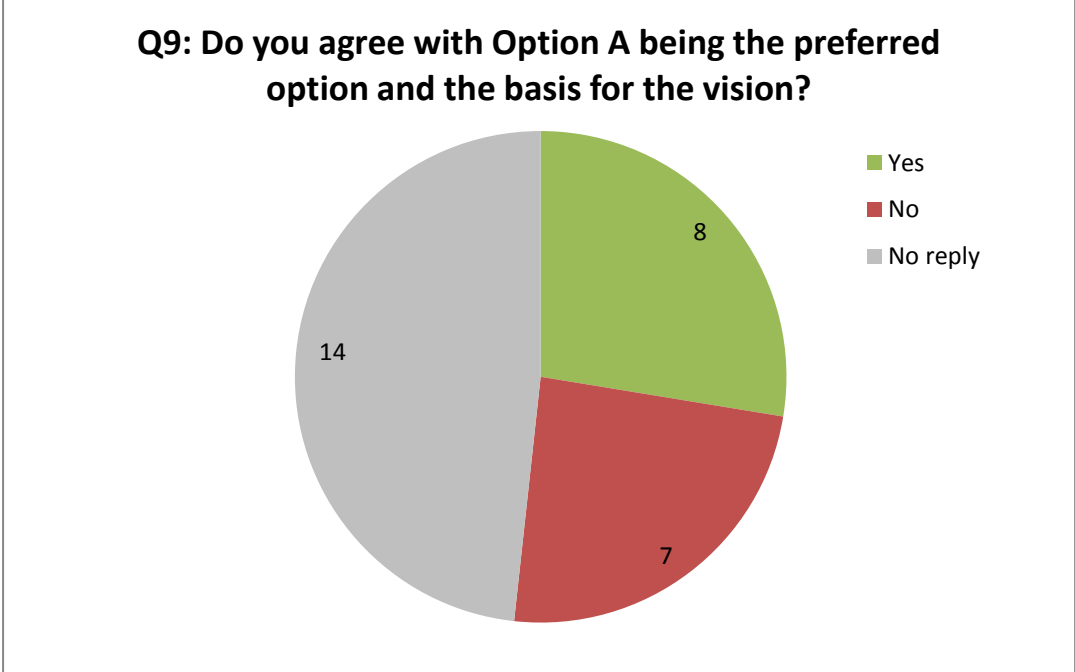
No comment responses:

<i>WCC Environmental Policy</i>	B059-2004
No comments.	Noted

Section 8: How much mineral will we make provision for?

In Section 8 we put forward three options for addressing the landbank for aggregates:

- Option A: Assume there is no permitted landbank at the start of the plan period
- Option B: Assume the shortfall in landbank continues at current (published) levels
- Option C: Assume there is no shortfall in landbank at the start of the plan period



Questions 9 and 10: Do you agree with Option A being the preferred option and the basis for the vision? If you think there are other options we should consider, please provide details.

Summary of comments	Initial officer response
(Q9) Do you agree with Option A being the preferred option for the basis of the vision? Please explain.	
<i>Wyre Forest District Council</i>	B007-1968 nq
The District Council support the approach to landbanks set out in option A. This option avoids under provision and the consequential risk to the delivery of development across the County.	Support for Option A noted.
<i>Swindon Borough Council</i>	B019-2232nq
In regards to calculating the level of provision to address the shortfall in landbank of sand and gravel and crushed rock, Option A (assume there is no permitted landbank at the start of the plan period) would appear to be the most realistic method of delivering the required landbank. The other two options would result in a high risk of under provision over the plan period, in particular in the long term.	Support for Option A noted.
<i>Mr James Whitaker</i>	B004-2383
(answered Yes) We need these materials and there are economically exploitable reserves.	Support for Option A noted.
<i>Mr Adrian Buckmaster</i>	B032-2394
(answered No) There will still be some landbank at the start of the plan period	Disagreement with Option A approach noted. You are correct in stating that there will still be some landbank for sand and gravel at the start of the plan period but as explained under Option B, it is likely that "without additional reserves receiving planning permission, the landbank will fall by approximately 2 years" by the time the plan is adopted (planned for 2015). It is national policy that we should make provision to meet and maintain the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock. As we are not meeting these at the moment it is essential that the plan enables the delivery of these landbanks during the plan period. We feel that despite the fact that there will still be some landbank of sand and gravel at the start of the plan period, the lack of

Summary of comments	Initial officer response
	<p>landbank for crushed rock and the uncertainty regarding the amount of sand and gravel could result in under-provision.</p> <p>Some consultees have suggested that we take different approaches to sand and gravel (which will have some landbank at the start of the plan period) and crushed rock (which we currently have no landbank for). We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p>
<i>Mrs Anne Pearson</i>	B034-2395
<p>(answered No) The application by Cemex to extract at Holdfast is full of errors and incorrect assumptions. It is likely that the quantities of sand and gravel on this site are considerably less than Cemex originally stated. There would be a significant loss of habitat for ground nesting bird species such as Curlew, other plovers as well as Oystercatchers. The acute bend in the River Severn at this point slows the flow sufficiently for Little Egrets, and Crested Grebe to use the margins of the banks and the river itself. There has been evidence of an otter holt in the eastern bank at this point too.</p>	<p>The area which is the subject of a current planning application at Holdfast (Cemex, 2011) falls within the wider deposit area mapped by the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013¹⁹. Whilst the BGS memoirs provided a small amount of information on this deposit, we felt that the further information provided by the Cemex application was useful in assessing the resource, although we acknowledge that there are some unanswered questions about this. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p> <p>We agree that the wildlife, habitat and biodiversity issues you raise are important and we will develop the policy framework to ensure these issues are addressed as part of any planning applications.</p>
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
<p>(answered No) There is an existing landbank of 4.49 years. There will still be a landbank in existence by the time the plan is approved.</p>	<p>Disagreement with Option A approach noted. You are correct in stating that there will still be some landbank for sand and gravel at the start of the plan period but as explained under Option B, it is likely that "without additional reserves receiving planning permission, the landbank will fall by approximately 2 years" by the time the plan is adopted (planned for 2015). It is national policy that we should make provision to meet and maintain the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock. As we are not meeting these at the moment it is</p>

¹⁹ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
	<p>essential that the plan enables the delivery of these landbanks during the plan period. We feel that despite the fact that there will still be some landbank of sand and gravel at the start of the plan period, the lack of landbank for crushed rock and the uncertainty regarding the amount of sand and gravel could result in under-provision.</p> <p>Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p>
<i>Mrs Christine Daniell</i>	B037-2396
<p>(answered No) The 4.49 year land bank at the moment for sand and gravel should be included in a future allocation. Strongly object to the application at Holdfast/Queenhill as it is based on incorrect calculations of tonnage. This has been pointed out to the County Council previously.</p>	<p>You are correct in stating that there will still be some landbank for sand and gravel at the start of the plan period but as explained under Option B, it is likely that "without additional reserves receiving planning permission, the landbank will fall by approximately 2 years" by the time the plan is adopted (planned for 2015). It is national policy that we should make provision to meet and maintain the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock. As we are not meeting these at the moment it is essential that the plan enables the delivery of these landbanks during the plan period. We feel that despite the fact that there will still be some landbank of sand and gravel at the start of the plan period, the lack of landbank for crushed rock and the uncertainty regarding the amount of sand and gravel could result in under-provision. Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p> <p>The area which is the subject of a current planning application at Holdfast (Cemex, 2011) falls within the wider deposit area mapped by the British</p>

Summary of comments	Initial officer response
	<p>Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013²⁰. Whilst the BGS memoirs provided a small amount of information on this deposit, we felt that the further information provided by the Cemex application was useful in assessing the resource, although we acknowledge that there are some unanswered questions about this. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p>
<p><i>RSPB</i></p> <p>(answered No) The supporting text (para. 8.32) indicates that there is likely to be no permitted landbank for crushed rock at the start of the plan period. However, the same text indicates that there is currently a landbank of 4.49 years for sand and gravel, with the possibility of an additional year's worth of landbank if the applications at Strensham and Holdfast are approved. This would suggest that it would not be appropriate to assume that there will be no permitted landbank for sand and gravel at the start of the plan period.</p> <p>Therefore, the assumptions in Option A might be appropriate for crushed rock, but would not appear to be appropriate for sand and gravel.</p> <p>The Areas of Search for crushed rock shown in Figure 7 both cover prominent landmarks / viewpoints in Areas of Outstanding Natural Beauty (AONB) - the Malvern Hills and the Cotswolds. Both of these areas are valued for</p>	<p>B039-1782</p> <p>Disagreement with Option A approach noted. You are correct in stating that there will still be some landbank for sand and gravel at the start of the plan period but as explained under Option B, it is likely that "without additional reserves receiving planning permission, the landbank will fall by approximately 2 years" by the time the plan is adopted (planned for 2015). It is national policy that we should make provision to meet and maintain the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock. As we are not meeting these at the moment it is essential that the plan enable the delivery of these landbanks during the plan period. We feel that despite the fact that there will still be some landbank of sand and gravel at the start of the plan period, the lack of landbank for crushed rock and the uncertainty regarding the amount of sand and gravel could result in under-provision.</p> <p>You seem to be suggesting an alternative that would involve using Option A for crushed rock and Option B for sand and gravel. This is an interesting idea, and we will consider this suggestion in developing the next consultation draft.</p> <p>The areas of search were derived using the method set out in Section 11. Following the results of this consultation we realise that the areas of search may need to be refined, and this will include taking into account the findings of the Habitats Regulations Assessment which accompanied the consultation</p>

²⁰ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>their biodiversity, with one of these areas (Bredon Hill in the Cotswolds AONB) containing a Special Area of Conservation (SAC). Mineral extraction within these areas could potentially conflict with relevant legislation, as well as conflicting with the Draft Vision and Objectives of this Plan (i.e. protect and enhance the natural and historic environment). This issue is particularly significant in the context of the Plan promoting areas of search with a minimum area of 200ha. The NPPF (para. 144) also states that local planning authorities should, as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside AONBs. The Plan should therefore set a realistic provision for crushed rock that reflects the likelihood of planning permission being granted for new mineral developments in these AONBs. Bearing these points in mind, It may be necessary for the Mineral Planning Authority (MPA) to demonstrate a duty to cooperate with other MPAs by negotiating a higher level of crushed rock provision elsewhere, in order to allow for a reduced level of crushed rock provision in Worcestershire.</p>	<p>to ensure our approach is legally compliant and will not promote development which would have significant effects on the Bredon Hill or any other Special Areas of Conservation (SAC) in or around the county.</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy. We note that the NPPF states that we should, as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside AONBs. Unfortunately the AONBs in Worcestershire are the main resources of rock suitable for use as crushed rock aggregate. There are some smaller deposits outside of the AONBs such as the Suckley Hills, Lickey Hills and Abberley Hills, but these are limited in size and were "screened out" from inclusion as areas of search following the methodology in Section 11.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, and we are actively discussing the issue of crushed rock provision with them to establish whether there are any other avenues available for provision of Worcestershire's crushed rock requirements from outside of the AONBs.</p> <p>We intend to develop the policy framework to ensure that the natural beauty and biodiversity of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p> <p>We recognise that this is a major issue for the Cotswolds AONB, the Malvern Hills AONB, and other stakeholders and that we have yet to satisfactorily address concerns that have been raised by these groups. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p>

Summary of comments	Initial officer response
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>(answered No) There is a currently permitted landbank of 4.49 years for sand and gravel and this should be used in the assessment of how much landbank to include in a future allocation.</p> <p>We strongly object to the inclusion of a reference to the application at Holdfast. This is an application which was submitted in August 2011 and on which the County Council sought further information in October 2011 due to the discrepancies and errors contained within the application as pointed out by this Parish Council. The application would now require an updated ES to progress any further. The developer has made no substantive response to the County Council in over 2 years and it would not, in our view, be prudent to include it in any calculations.</p>	<p>Disagreement with Option A approach noted. You are correct in stating that there will still be some landbank for sand and gravel at the start of the plan period but as explained under Option B, it is likely that "without additional reserves receiving planning permission, the landbank will fall by approximately 2 years" by the time the plan is adopted (planned for 2015). It is national policy that we should make provision to meet and maintain the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock. As we are not meeting these at the moment it is essential that the plan enables the delivery of these landbanks during the plan period. We feel that despite the fact that there will still be some landbank of sand and gravel at the start of the plan period, the lack of landbank for crushed rock and the uncertainty regarding the amount of sand and gravel could result in under-provision.</p> <p>Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p> <p>It is a national policy for us to make provision to meet and maintain a 7-year landbank for sand and gravel and a 10-year land bank for crushed rock. In the discussion of options for provision in Section 8, we have referred to the two undetermined applications at Holdfast and Strensham. This is not intended as an indication that we will rely on them, but instead to indicate what the impact might be on the landbank were they to be permitted in order to assist with projections. Even with those applications we would still have a shortfall in the required landbank.</p> <p>It is critical that we base our calculations on appropriate and robust data, and we agree that we should not rely on any undetermined applications in our calculations. However, we think that applications can provide an indication of</p>

Summary of comments	Initial officer response
	the conditions of the minerals industry in Worcestershire and must be acknowledged as we look at the deliverability and the risks of our proposals.
<i>Staffordshire County Council</i>	B042-701
Yes in relation to crushed rock provision. Given current circumstances relating to the production of crushed rock (refer to paragraph 6.10 of the consultation document); an approach based on Option A is considered appropriate as there does not appear to be any current viable reserves. No in relation to the provision of sand and gravel. Option B reflects current circumstances and in preparing the final draft of the Plan, the assessment of the current landbank should be updated using data from the 2012 Aggregates Working Party Survey.	<p>We think you are suggesting an alternative that would involve using Option A for crushed rock and Option B for sand and gravel. This is an interesting idea, and we will consider this suggestion in developing the next consultation draft.</p> <p>We have used the 2012 RAWP survey data to determine the landbank for sand and gravel, but because sales of crushed rock from Worcestershire have been agglomerated with those of other counties for most years there is no comparable data available.</p>
<i>Worcestershire Wildlife Trust</i>	B044-1081
(answered yes) No Further comments	Support for Option A noted.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
(answered Yes) Construction aggregates (sand and gravel and crushed rock) are essential for built development and the construction and maintenance of infrastructure (e.g. roads, flood defences). They are therefore essential to deliver growth, create and maintain sustainable communities and to deliver the South Worcestershire Development Plan (SWDP). The draft SWDP (which covers the period from 2006 to 2030) proposes major new housing development across South Worcestershire, additional employment sites and infrastructure improvements. The draft SWDP makes provision for a net increase of 23,200 new homes during the Plan period – an average of around 1,000 per annum (a similar level to the annual average number of completions in recent years). The number of proposed	Support for Option A noted. We have noted elsewhere your request to discuss the SWDP with you to ensure that we have taken into account areas for housing provision when considering the boundaries of the areas of search.

Summary of comments	Initial officer response
<p>new homes in South Worcestershire could be higher, pending the outcome of the SWDP Stage 1 Examination hearings. The South Worcestershire authorities agree that, of the options considered in the consultation document, Option A would should be the preferred option because over the plan period it would make provision for the largest supply of sand and gravel (18.54m tones - compared to 14.62m tonnes for Option B and only 12.44m tonnes for Option C). Option A would also make provision for the largest supply of crushed rock (3.6m tonnes - compared to 3.04m tonnes for Option B and only 1.98m tonnes for Option C).</p> <p>However, the south Worcestershire authorities recognise that Worcestershire is already a net importer of aggregates from other areas and note that the proposed provision of aggregates from within the County (based on a rolling average of annual sales levels in the County in the last 10 years) would fall quite sharply post-2016. This raises doubts about whether the Minerals Local Plan could deliver Draft Objectives 1 and 2 – to ensure adequate and steady supply of aggregate, industry and energy minerals over the life of the plan, and also to ensure the long term sustainability of supply of mineral resources.</p>	<p>Minerals can only be worked where they are naturally found, and mineral resources are not evenly distributed across the country. This, combined with differing levels of demand, means that some materials will be imported and some exported, and this often does not result in net equilibrium. We recognise the need to strive to make steady and adequate provision as far as possible, and we have followed government guidance in establishing the level of provision which is appropriate from Worcestershire.</p> <p>Up to 2016, the level of provision has been agreed by the West Midlands Aggregates Working Party by breaking down the West Midlands apportionment which was established by government and apportioning the appropriate requirement to each Mineral Planning Authority. Beyond 2016 there is no regional apportionment or agreement on the amount that each authority should seek to provide, and instead government guidance indicated that a rolling average of the last ten years sales should be used as the basis for provision, with some other aspects factored in. The Local Aggregates Assessment for Worcestershire 2013 was based on this guidance but will be updated annually, and the next iteration will take into account comments received to this consultation as well as the changes to the guidance recently published in the National Planning Practice Guidance.</p>

Summary of comments	Initial officer response
	We note your concern that provision would fall, based on this year's 10-year average. However, these levels should not be seen as a cap, but as the minimum provision that we will seek to achieve. As this is based on a rolling average, an upturn in the economy and demand for minerals could see an upturn in the provision figure, although averaging over a 10-year period is intended to smooth out any fluctuations.
<i>Wildmoor Residents Association</i>	B047-2295
(answered Yes) Agree that to work from a basis of nothing i.e. no initial landbank is a way forward and would provide more chance of success for the new MLP statistically as there will be some landbank to contribute to the required levels.	Support for Option A noted.
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
(answered Yes) Of the three options this is the most realistic approach and the one that could avoid any shortfalls in sand and gravel provision.	Support for Option A noted.
<i>Mrs Pat Harries</i>	B060-2399
(answered no) As there is 4.49 years already in the land bank Strongly object to inclusion of land at Holdfast & Queenhill as it cannot progress in its current form as the proposal is full of errors & the calculation of the amount of viable tonnage is inaccurate.	<p>Disagreement with Option A approach noted. You are correct in stating that there will still be some landbank for sand and gravel at the start of the plan period but as explained under Option B, it is likely that "without additional reserves receiving planning permission, the landbank will fall by approximately 2 years" by the time the plan is adopted (planned for 2015). It is national policy that we should make provision to meet and maintain the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock. As we are not meeting these at the moment it is essential that the plan enables the delivery of these landbanks during the plan period. We feel that despite the fact that there will still be some landbank of sand and gravel at the start of the plan period, the lack of landbank for crushed rock and the uncertainty regarding the amount of sand and gravel could result in under-provision.</p> <p>Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and</p>

Summary of comments	Initial officer response
	<p>crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p> <p>It is national policy that we should make provision to meet and maintain a 7-year landbank for sand and gravel and a 10-year land bank for crushed rock. In the discussion of options for provision in Section 8, we have referred to the two undetermined applications at Holdfast and Strensham. This is not intended as an indication that we will rely on them, but instead to indicate what the impact might be on the landbank were they to be permitted in order to assist with projections. Even with those applications we would still have a shortfall in the required landbank.</p> <p>It is critical that we base our calculations on appropriate and robust data, and we agree that we should not rely on any undetermined applications in our calculations. However, we think that applications can provide an indication of the conditions of the minerals industry in Worcestershire and must be acknowledged as we look at the deliverability and the risks of our proposals.</p>
(Q10) If you think there are other options which we should consider, please provide details.	
<i>Mr Adrian Buckmaster</i>	B032-2394
Option B	Support for Option B noted.
<i>Tewkesbury Borough Council</i>	B036-703
<p>The Joint Core Strategy being prepared for Gloucester City, Cheltenham Borough and Tewkesbury Borough proposes (in its draft version) strategic allocations for over 33,500 houses in those areas up to 2031 and their construction will create a significant demand for minerals. The proximity of these allocations to aggregate resources identified in the south of Worcestershire potentially makes those minerals attractive for developers to use due to haulage accessibility. See also response to question 23.</p>	<p>Noted. We agree that development in north Gloucestershire could create demand for mineral resources from Worcestershire. We have recognised this in Section 11 and particularly figure 21 which shows the potential "market-pull" between areas of search in Worcestershire and likely demand for minerals from development in and around Worcestershire. We have noted elsewhere your request to meet to discuss the impacts of adjacent workings and downstream effects, and we expect that the issues identified here could also inform those discussions.</p>

Summary of comments	Initial officer response
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p> <p>A revised Option B. We object most vehemently to the reference to the application at Holdfast for reasons we outline below.</p>	<p>B038-2286</p> <p>Support for a revised Option B noted.</p> <p>Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p> <p>It is national policy that we should make provision to meet and maintain a 7-year landbank for sand and gravel and a 10-year land bank for crushed rock. In the discussion of options for provision in Section 8, we have referred to the two undetermined applications at Holdfast and Strensham. This is not intended as an indication that we will rely on them, but instead to indicate what the impact might be on the landbank were they to be permitted in order to assist with projections. Even with those applications we would still have a shortfall in the required landbank.</p> <p>It is critical that we base our calculations on appropriate and robust data, and we agree that we should not rely on any undetermined applications in our calculations. However, we think that applications can provide an indication of the conditions of the minerals industry in Worcestershire and must be acknowledged as we look at the deliverability and the risks of our proposals.</p>
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p> <p>A revised option B to reflect current permissions</p>	<p>B041-595</p> <p>Support for a revised Option B noted.</p> <p>Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p> <p>It is national policy that we should make provision to meet and maintain a 7-</p>

Summary of comments	Initial officer response
	<p>year landbank for sand and gravel and a 10-year land bank for crushed rock. In the discussion of options for provision in Section 8, we have referred to the two undetermined applications at Holdfast and Strensham. This is not intended as an indication that we will rely on them, but instead to indicate what the impact might be on the landbank were they to be permitted in order to assist with projections. Even with those applications we would still have a shortfall in the required landbank.</p> <p>It is critical that we base our calculations on appropriate and robust data, and we agree that we should not rely on any undetermined applications in our calculations. However, we think that applications can provide an indication of the conditions of the minerals industry in Worcestershire and must be acknowledged as we look at the deliverability and the risks of our proposals.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 B</p>
<p>Levels of past aggregates sales, particularly in an area like Worcestershire which has depended on imports from other areas, is not a good indicator of future demand. Alternative approaches have been adopted elsewhere (including the West Midlands) which take account of past sales, future demand (based on proposed development in Local Plans) and the availability of minerals.</p>	<p>Minerals can only be worked where they are naturally found, and mineral resources are not evenly distributed across the country. This, combined with differing levels of demand, means that some materials will be imported and some exported, and this often does not result in net equilibrium. We recognise the need to strive to make steady and adequate provision as far as possible, and we have followed government guidance in establishing the level of provision which is appropriate from Worcestershire.</p> <p>Up to 2016, the level of provision has been agreed by the West Midlands Aggregates Working Party by breaking down the West Midlands apportionment which was established by government and apportioning the appropriate requirement to each Mineral Planning Authority. Beyond 2016 there is no regional apportionment or agreement on the amount that each authority should seek to provide, and instead government guidance indicated that a rolling average of the last ten years sales should be used as the main basis for provision. There is scope within the guidance for consideration of some other aspects as well. The Local Aggregates Assessment for Worcestershire 2013 was based on national guidance but will be updated</p>

Summary of comments	Initial officer response
	<p>annually, and the next iteration will take into account comments received during this consultation as well as the interpretation of the guidance recently published in the National Planning Practice Guidance.</p> <p>However, these levels should not be seen as a cap, but as the minimum provision that we will seek to achieve. As this is based on a rolling average, an upturn in the economy and demand for minerals could see an upturn in the provision figure, although averaging over a 10-year period is intended to smooth out any fluctuations.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>Concern that the higher levels of sand and gravel in option A as compared with B and C will not be sustainable or achievable. They would be unrealistically high because of the zero land bank to begin with. Perhaps some indication of how the land bank for sand, gravel and crushed rock is achievable through the life of the MLP would be useful.</p>	<p>Some consultees have suggested that we take different approaches to sand and gravel which will have some landbank at the start of the plan period and crushed rock which we currently have no landbank for. We will consider the comments we have received to establish the most appropriate way forward in addressing landbank issues.</p> <p>We intend to include a 'deliverability' section in the next consultation draft which will set this out in more detail. We will also develop monitoring indicators and evaluation targets which will help to ensure that the objectives are being achieved once the plan is adopted and these will trigger a review if necessary.</p>

No comment responses:

<i>Natural England</i>	B040-717
No Comments	Noted.
<i>Malvern Hills AONB Partnership</i>	B049-802B
No comments to make on this.	Noted.
<i>WCC Environmental Policy</i>	B059-2004
No comments.	Noted.

Questions 11 and 12: In Section 8, we set out why we do not intend to identify milestones for the provision of non-aggregate minerals. Do you agree with the proposed approach to each of the industrial and energy minerals considered? If you think there are other minerals which we should consider please provide details.

	Yes	No		Yes	No
a) Clay	<input type="checkbox"/>	<input type="checkbox"/>	e) Coal	<input type="checkbox"/>	<input type="checkbox"/>
b) Silica Sand	<input type="checkbox"/>	<input type="checkbox"/>	f) Conventional and unconventional hydrocarbons	<input type="checkbox"/>	<input type="checkbox"/>
c) Building Stone	<input type="checkbox"/>	<input type="checkbox"/>	g) Secondary and recycled aggregates	<input type="checkbox"/>	<input type="checkbox"/>
d) Salt	<input type="checkbox"/>	<input type="checkbox"/>			

Summary of Comments	Initial Officer Response
(Q11) Please give reasons for your responses to Q11. Please specify the material to which your comments refer.	
<i>Mr James Whitaker</i>	B004-2383
I don't understand how you can dismiss any discussion of the potential for shale gas extraction (using 'fracking') in such a minimal fashion. You may be right but there is little evidence for that in the document.	Hydrocarbons are discussed in paragraphs 6.14-6.15, although we referred to "shale gas" and unconventional hydrocarbons rather than using the term "fracking" as this term was not part of the policy guidance at the time that the second consultation document was produced. We intend to produce a background paper on oil and gas, including shale gas, in the county and have been collecting information to that end. In light of recent developments and government announcements, these issues have become more urgent and we are aware of the need to address this with the best possible information ahead of the next consultation. We will strengthen this section if and when further evidence becomes available.
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
It is important to set targets particularly for secondary	Secondary aggregates can be produced as a by-product of other mining or

Summary of Comments	Initial Officer Response
<p>and recycled aggregates.</p>	<p>quarrying activities such as china clay waste, slate waste and colliery spoil, or as a by-product of other industrial processes, e.g. blast furnace slag, incinerator ash, or the ash from coal-fired power stations²¹. We do not currently know of any processes in Worcestershire which produce such secondary aggregates although we are aware of the current application for an Incinerator Bottom Ash recycling facility at Sandy Lane, Wildmoor.</p> <p>Any facilities which are proposed to manage or process either secondary aggregates or to recycle aggregates such as construction and demolition waste would be assessed against the policies of the Waste Core Strategy, and we do not intend to duplicate those provisions in the Minerals Local Plan.</p> <p>However, recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we agree that we need to give this due consideration to ensure that we make the most of the resources we have available.</p>
<p><i>The Coal Authority</i></p>	<p>B045-2184</p>
<p>The Coal Authority acknowledges that coal resources are limited within Worcestershire, and has no additional evidence to demonstrate future demand.</p>	<p>Noted.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District)</i></p>	<p>B046-681,1623, 683 B</p>
<p>The South Worcestershire authorities agree with the suggested approach for the provision of the building stone, clay, coal, hydrocarbons, salt, and silica sand for the reasons outlined in the consultation document, including the proposal to develop policies to assess individual applications.</p> <p>The demand for primary aggregates could be reduced by maximising the use of secondary and recycled materials in construction projects wherever possible. Whilst the</p>	<p>Support noted.</p> <p>We agree that recycled and secondary materials have a role to play in meeting our landbank requirements, however in practice this is a complex issue that overlaps with areas addressed in the Worcestershire Waste Core</p>

²¹ http://www.bgs.ac.uk/planning4minerals/Resources_1.htm

Summary of Comments	Initial Officer Response
<p>First Stage Consultation document indicated that 5 – 7 million tonnes of secondary and recycled aggregates would be required between now and 2030, the Second Stage Consultation simply says that secondary and recycled aggregates is addressed through the Waste Core Strategy. The south Worcestershire authorities consider that milestones for the provision of secondary and recycled materials need to be included in the Minerals Local Plan in order to better demonstrate that adequate supplies of minerals can be met and to reduce the demand for primary aggregates. It is recognised that the delivery and use of alternative materials will require better collection of data (e.g. through regular Aggregate Working Party surveys of secondary aggregates, waste management capacity monitoring, and monitoring of on-site recycling through the development management process) and a greater emphasis being placed on the reuse and recycling of on-site materials, particularly in the urban areas. It should be noted that to safeguard the use of primary aggregates, the draft SWDP already encourages developers to recycle and reuse materials on site in construction projects, subject to environmental considerations of any proposed operations.</p>	<p>Strategy. We believe that while it may be necessary to address recycled materials to some extent in the Minerals Local Plan, it is not necessary to repeat what has already been covered in the Waste Core Strategy. The amount of mineral we think we need to plan for takes into account that there will be some use of recycled and secondary aggregates.</p> <p>Recycled and secondary materials can (and do) displace some of the requirement for primary materials, especially on individual sites, but the overall contribution of recycled materials to the flow of aggregates is particularly difficult to calculate. For example, recycled aggregates, often means construction and demolition waste, which is often re-used on the site where it arises. The data we have available on construction and demolition waste recycling comes from waste site returns, and these do not capture materials re-used on site making projections difficult.</p> <p>We have tried to address this in the Waste Core Strategy, but this can only capture part of the picture. We want to promote and encourage the use of recycled materials, and maximise its use as far as possible but as the figures are unreliable, we are unable to put a firm number against this. This is an issue that the Aggregate Working Party and Resource Technical Advisory Body (waste) are aware of.</p> <p>Secondary aggregates can be produced as a by-product of other mining or quarrying activities such as china clay waste, slate waste and colliery spoil, or as a by-product of other industrial processes, e.g. blast furnace slag, incinerator ash, or the ash from coal-fired power stations²². We do not currently know of any processes in Worcestershire which produce such secondary aggregates although we are aware of the current application for an Incinerator Bottom Ash recycling facility at Sandy Lane, Wildmoor.</p> <p>Any facilities which are proposed to manage or process either secondary aggregates or to recycle aggregates such as construction and demolition</p>

²² http://www.bgs.ac.uk/planning4minerals/Resources_1.htm

Summary of Comments	Initial Officer Response
	<p>waste would be assessed against the policies of the Waste Core Strategy, and we do not intend to duplicate those provisions in the Minerals Local Plan.</p> <p>However, recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we agree that we need to give this due consideration to ensure that we make the most of the resources we have available.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>Silica sand has not been used as an industrial material for a considerable time. As it is not used as such currently should not be classified separately as an industrial and energy material but together with sand and gravel, as a general aggregate, as it is currently being quarried and used. Policies should not be developed 'ad hoc' to assess individual applications.</p>	<p>We don't think that significant amounts of silica sand from Worcestershire have been used as moulding sand for some time. Historically, this was a very important use, but we are still pursuing data on modern uses. Nationally, silica sand is still very important for other uses like glass making but we don't know whether the type of silica sand in Worcestershire can be used for this purpose. We are preparing a background document on silica sand which will be published on our website²³ when it is complete. Three sites in Worcestershire still produce silica sand as an aggregate, and we need to discuss with the operators whether they consider there is likely to be a future market for silica sand from Worcestershire for non-aggregate uses. These discussions will inform the subsequent draft for consultation and any policies developed therein.</p>
<i>Herefordshire and Worcestershire Earth Heritage Trust</i>	B048-800
<p>Building Stone – In addition to the information contained in English Heritage's Strategic Stone Study, a major Heritage Lottery Funded project is being carried out (2013 – 2016) by Herefordshire & Worcestershire Earth Heritage Trust to research the types of stone used in areas across the whole county and to identify the quarries from which they came, as well as the industrial and social history related to stone extraction. The information collected during the project will be entered into a publicly available database. Local volunteers are</p>	<p>We have produced a background document²⁴ to inform the Minerals Local Plan looking at building stone resources in Worcestershire, which draws on the information in the Strategic Stone Study, and we welcome any comments you might be willing to provide on it. We will also be interested to see the results of the Earth Heritage Trust's further work. Although the timescales of the project mean that we may not be able to take the results into account in the final MLP, we anticipate that the policy framework we develop will be flexible enough to take account of new information as it becomes available.</p> <p>At present, we don't have any information about the viability of building stone</p>

²³ www.worcestershire.gov.uk/mineralsbackground

²⁴ Available from our website at <http://www.worcestershire.gov.uk/cms/pdf/Building%20Stone.pdf>

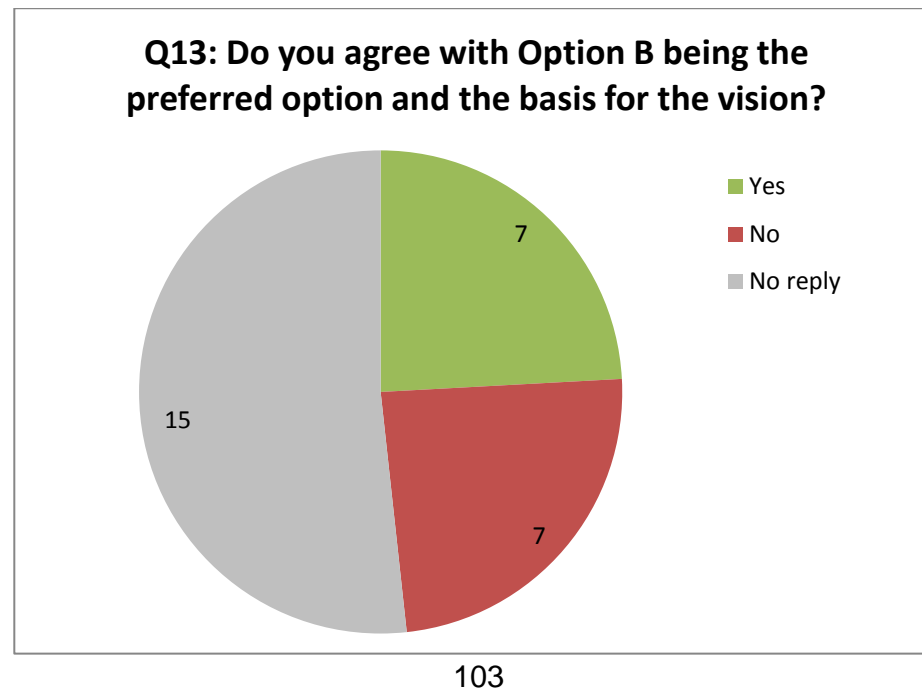
Summary of Comments	Initial Officer Response
<p>being used to carry out the bulk of the research, with the aim of increasing local interest and awareness of the use of local stone for building, and hopefully acceptance of the opening of any small pits for repairs or extensions to historic buildings, including homes. It was felt that there was a need for this project as the Strategic Stone Study only provided a description of the stones, examples of some of the buildings in which they were used and brief reference to the main quarries. This new project will build on that work by doing the research that links stones and buildings to sources quarries and pits of all sizes and by engaging the public to support the use of stone.</p>	<p>resources in the county. The work being undertaken by the EHT and the One Thousand Years Project should help provide background information about historical locations of reserves and the use of local stone within the county, and will be taken into account as far as possible in subsequent consultations.</p>
<p>(Q12) If you think there are other minerals which we should consider please provide details.</p>	
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p>	<p>B041-595</p>
<p>Not to our knowledge</p>	<p>Noted.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 B</p>
<p>The Minerals Local Plan needs to acknowledge that not all of the minerals consumed in Worcestershire are produced in the County, and not all of the material produced in Worcestershire is sold in the County. It is therefore important that the Minerals Local Plan includes assumptions on the level of sand and gravel and crushed rock that will come from imports outside the County and the likely levels to be exported.</p>	<p>Noted and agreed. This is mentioned in paragraph 6.18, and covered in detail in the Local Aggregates Assessment, but we agree that more detail could be provided.</p> <p>The issue of predicting future need has been raised by a number of respondents and is covered in detail in section 9 below. The most recent information we have regarding the flow of aggregate imports and exports from the county dates from 2009 making predictions difficult.</p>
<p>No comment responses:</p>	
<p><i>Natural England</i></p>	<p>B040-717</p>
<p>No comments</p>	<p>Noted.</p>
<p><i>Worcestershire Wildlife Trust (Q11 and Q12)</i></p>	<p>B044-1081</p>
<p>No Comment</p>	<p>Noted.</p>
<p><i>WCC Environmental Policy</i></p>	<p>B059-2004</p>
<p>No comment.</p>	<p>Noted.</p>

Section 9: When will minerals be worked and when will our reserves meet national targets?

In Section 9, we put forward three options for setting milestones to achieve landbank targets for aggregates:

- Option A: Aim for permitted reserves that will provide a minimum 7 year landbank for sand and gravel and 10 year landbank for crushed rock throughout the plan period
- Option B: Aim for permitted reserves that will provide a minimum 7 year landbank for sand and gravel and 10 year landbank for crushed rock by halfway through the plan period
- Option C: Aim for permitted reserves that will provide a minimum 7 year landbank for sand and gravel and 10 year landbank for crushed rock by the end of the plan period

Details of these options and their implications are set out in Section 9 of the consultation document.



Questions 13 and 14: Do you agree with Option B being the preferred option and the basis for the vision? If you think there are other options that we should consider please provide details.

Summary of comments	Initial officer response
(Q13) Do you agree with Option B being the preferred option and the basis for the vision? Please explain.	
<i>Wyre Forest District Council</i>	B007-1968 nq
With regard to question 13, it is agreed that option B is the most appropriate approach.	Support for Option B noted.
<i>Swindon Borough Council</i>	B019-2232nq
In regards to when the required landbank of reserves should be achieved, Option B does provide a sensible option in terms of trying to meet the requirements outlined in national policy whilst giving a realistic timeframe to achieve the delivery of the required landbank however this should not lessen the impetus of Worcestershire Council to try and achieve the landbank reserves sooner.	Noted and agreed. We agree that the plan needs to be flexible enough to address shortfalls as soon as possible, and we will consider the best way of doing this. We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although this is not our intention. We think that it could be difficult to reach the landbank requirements early in the plan period as we are currently below required levels, therefore we wanted the vision to aspire to achieve the requirements but also be realistic about deliverability. We have no intention to prevent development coming forward, and we will consider revising the wording to make it clear that we now aim to meet and maintain the landbanks required in national policy asap and will consider revising the plan if we have not achieved them by halfway through the plan period.
<i>Tewkesbury Borough Council</i>	B036-703
(answered no) Full provision should be the aim throughout the plan period, preferably with specific sites at the beginning and if necessary falling back on areas of search towards the end. The plan needs to be flexible and subject to monitoring to address landbank shortfalls.	Noted. Full provision throughout the plan period is presented as Option A. Although we agree that this is desirable, we do not think that this will be deliverable due to the fact that the landbank is currently well below the requirements and will likely remain so until after the adoption of the plan. However, we agree that the plan needs to be flexible enough to address these shortfalls as soon as possible. Your suggestion of specific sites/preferred areas at the start of the plan period and areas of search towards the end is an interesting one. We will consider the best way of delivering the landbank over the life of the plan in preparing the next consultation.

	Once adopted, the Minerals Local Plan will be monitored annually and reviewed as required. Details of these monitoring and review requirements will be drafted for the next stage of consultation alongside the draft policies.
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
(answered no) The target should only include permitted development schemes. The reference to Holdfast should be removed from the document. The application referred to cannot proceed in its' current form and we understand that the developer has not responded to the County Council inquiries in over 2 years.	<p>Noted. In Section 8 and Section 9 of the consultation document we have looked at options for how much mineral we need to provide and when we will be able to reach these required landbanks. Throughout the document, we have not relied on proposed schemes which have not yet been determined as we agree that this would be prejudicial. However, current applications do give some indication of what the minerals industry is trying to bring forward in Worcestershire, and it can be useful to use this as a reality check on our proposals. Where we have referred to the Holdfast and Strensham applications in Section 8 it is purely to indicate the level of impact the applications could have on the landbank if they were to be permitted, but this has not been relied upon in our calculations.</p> <p>At the moment we are not achieving the required landbank levels for sand and gravel or crushed rock, and this would still be the case even if these proposals were to be permitted, therefore it is critical that we demonstrate how and when the plan will achieve the landbank levels.</p>
<i>Mrs Christine Daniell</i>	B037-2396
(answered yes) All of the references to Holdfast and Queenhill should be deleted.	<p>Support for Option B noted. In Section 8 and Section 9 of the consultation document we have looked at options for how much mineral we need to provide and when we will be able to reach these required landbanks. Throughout the document, we have not relied on proposed schemes which have not yet been determined as we agree that this would be prejudicial. However, current applications do give some indication of what the minerals industry is trying to bring forward in Worcestershire, and it can be useful to use this as a reality check on our proposals. Where we have referred to the Holdfast and Strensham applications in Section 8 it is purely to indicate the level of impact the applications could have on the landbank if they were to be permitted, but this has not been relied upon in our calculations.</p> <p>At the moment we are not achieving the required landbank levels for sand and gravel or crushed rock, and this would still be the case even if these proposals were to be permitted, therefore it is critical that we demonstrate</p>

	how and when the plan will achieve the landbank levels.
<i>RSPB</i>	B039-1782
See comments in response to Q9	Noted. Please refer to our response to question 9 above.
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
(answered no) Option B does have the potential to be the most acceptable option but it should be updated to reflect only the currently permitted schemes. Any reference to proposed schemes which have not gone through the proper planning process would, in our view be prejudicial.	<p>Noted. It is national policy that we should make provision for the maintenance of landbanks of a least a 7-year landbank for sand and gravel and a 10-year land bank for crushed rock. In Section 8 and Section 9 of the consultation document we have looked at options for how much mineral we need to provide and when we will be able to reach these required landbanks. Throughout the document, we have not relied on proposed schemes which have not yet been determined as we agree that this would be prejudicial. However, current applications do give some indication of what the minerals industry is trying to bring forward in Worcestershire, and it can be useful to use this as a reality check on our proposals. Where we have referred to the Holdfast and Strensham applications in Section 8 it is purely to indicate the level of impact the applications could have on the landbank if they were to be permitted, but this has not been relied upon in our calculations.</p> <p>At the moment we are not achieving the required landbank levels for sand and gravel or crushed rock, and this would still be the case even if these proposals were to be permitted, therefore it is critical that we demonstrate how and when the plan will achieve the landbank levels.</p>
<i>Staffordshire County Council</i>	B042-701
(answered no) No, option A is preferred on the basis of maintaining a steady and adequate supply. Provision should be made for the shortfall in actual landbanks to be recovered as soon as possible. Accepting that towards the end of the Plan period there may be a need for review to ensure that the landbanks are maintained.	Support for Option A noted. Although we agree recovering the shortfall in landbank as soon as possible is desirable, we do not think that achieving this at the start of the plan period will be deliverable due to the fact that the landbank is currently well below the requirements and will likely remain so until after the adoption of the plan. However, we agree that the plan needs to be flexible enough to address these shortfalls as soon as possible. We recognise that stating that we will meet landbank requirements by halfway through the plan period we might appear to be avoiding making adequate provision, although we have no intention of preventing development coming forward. If we continue with option B, we will consider revising the wording to make it clear that we now aim to meet and maintain the landbanks required in national policy asap and will consider revising the plan if we have not achieved them by halfway through the plan period.

	Once adopted, the Minerals Local Plan will be monitored annually and reviewed as required. Details of these monitoring and review requirements will be drafted for the next stage of consultation alongside the draft policies.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
(answered yes) Given the very low landbank levels likely at the time of plan adoption and the need to meet national targets, Option B, which aims for minimum landbank reserves halfway through the plan period seems to be the most deliverable approach.	Support for Option B noted.
<i>Wildmoor Residents Association</i>	B047-2295
(answered yes) Option B is the only one possible therefore not really a choice. Starting with a zero land bank would be fictitious if throughout the plan 7 and 10 year land banks were available. To achieve even option B is going to require an aggressive approach to the granting of planning permissions. This is not always a fair and equitable approach for people living in the vicinity of developments / areas of search.	Support for Option B noted. We appreciate your concerns with regard to what you describe as an "aggressive approach", but we intend that the policy framework in the plan will be robust enough to prevent sites from causing unacceptable impacts for local residents. All proposals will be assessed in accordance with the policy framework, and although a shortfall in the landbank can mean there is increased pressure for sites to be granted planning permission, conditions would still be put in place to manage the potential impacts of the development.
<i>Herefordshire and Worcestershire Earth Heritage Trust</i>	B048-800
(answered yes) Yes, it seems the only sensible option, but let's hope that national policy eases in coming years as a result of us trying to live a more sustainable lifestyle in general!	Support for Option B noted.
<i>Malvern Hills AONB Partnership</i>	B049-802B
(answered yes) This allows time to fully assess potential sites and identify those that would cause the least harm whilst making the necessary provision.	Support for Option B noted.
<i>Mrs Pat Harries</i>	B060-2399
(answered no) All reference to Holdfast & Queenhill to be deleted as above.	Noted. In Section 8 and Section 9 of the consultation document we have looked at options for how much mineral we need to provide and when we will be able to reach these required landbanks. Throughout the document, we have not relied on proposed schemes which have not yet been determined as we agree that this would be prejudicial. However, current applications do give some indication of what the minerals industry is trying to bring forward in

	<p>Worcestershire, and it can be useful to use this as a reality check on our proposals. Where we have referred to the Holdfast and Strensham applications in Section 8 it is purely to indicate the level of impact the applications could have on the landbank if they were to be permitted, but this has not been relied upon in our calculations.</p> <p>At the moment we are not achieving the required landbank levels for sand and gravel and crushed rock, and this would still be the case even if these proposals were to be permitted, therefore it is critical that we demonstrate how and when the plan will achieve the landbank levels.</p>
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
<p>(answered no) We believe that the preferred option has to be in accordance with the NPPF. Therefore rather than the preferred option being permitted reserves it should focus on making provision through the Plan so that capacity can be maintained. We agree that it would be difficult for Worcestershire to meet the aims set out in Option A for the start of the Plan period. However, the Plan needs to be clear that new sites or extensions to existing sites will be supported, subject to environmental/amenity impacts, where there is a shortfall in the landbank. The Plan cannot enforce operators to come forward with planning applications so that the landbank is maintained as set out in the options. The Plan can only identify appropriate reserves/resource through the allocation of sites.</p>	<p>Noted. We agree that Option A would be particularly difficult to achieve. Your suggestion of using provision through the plan rather than permitted reserves to fulfil our obligations under the NPPF is interesting, and we are considering ways of refining our approach for the next draft.</p> <p>We hope that the plan will provide a positive policy framework for operators and landowners to operate in that will facilitate sites being brought forward and result in long-lasting benefits to their host communities. We agree that comprehensive working of reserves should be encouraged and that this might require extensions to permitted areas. This is an area that will be incorporated in preparation for the next draft. However, we think that both extensions to existing quarries and new sites need to be considered on their own merits against the policy framework, and whilst we recognise that extensions to existing sites can be beneficial in maximising the exploitation of resources and enabling re-use of existing plant and equipment, we also need to remain conscious of the potential for cumulative impacts on neighbouring communities and the risk of stifling competition if extensions are prioritised over new sites. We are working to find a way to balance these considerations in the draft plan.</p>
(Q14) If you think there are other options that we should consider please provide details.	
<i>Cotswolds Conservation Board</i>	B006-740 nq
<p>The major concern of the Board is that the Plan is proposing to meet the supply of crushed rock from Bredon Hill within the Cotswolds AONB. This is proposed to be 3.61 million tonnes of crushed rock in the plan</p>	<p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county. The NPPF requires us to "as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads,</p>

period, with 0.163 million tonnes in the period up to 2016, with beyond 2016 a rolling average of annual sales in the last 10 years.

In paragraph 6.10 it is stated:

“Crushed rock has been worked in the Abberley and Woodbury Hills, Malvern Hills and Fish Hill (near Broadway) over the last 50 years. However there are currently no workings or planning permissions for crushed rock in the county. Several private Acts of Parliament between 1884 and 1924 established the Malvern Hills Conservators and gave the body the responsibility to protect the beauty of the Malvern Hills from the ‘threat’ of quarrying. It is therefore unlikely that large scale mineral working will take place in the Malvern Hills in the future, although this is not specifically prevented by the Acts.”

In paragraph 10.12 it is stated:

10.12. We propose to enable new mineral development in the broad areas identified in the Spatial Strategy (see Section 7) where it is demonstrated that all of the issues outlined in Table 5 relating to working practices have been adequately addressed.

Table 5 includes:

*“**bb. Landscape – the consideration of landscape character [and scenic beauty]** will be an important factor in this issue. Designations such as Areas of Outstanding Natural Beauty will also have an influence on working practices and site design.”*

For Aggregates (Sand, gravel and crushed rock) in paragraph 11.9 it is stated:

11.9. We propose taking the approach that new aggregate development will be permitted in the areas of search identified in the Spatial Strategy where it is demonstrated

Areas of Outstanding Natural Beauty [...]” (pgph.144). Unfortunately the AONBs in Worcestershire are the main resources of rock suitable for use as crushed rock aggregate.

Although there are some smaller deposits outside of the AONBs such as the Suckley Hills, Lickey Hills and Abberley Hills, these are limited in size and were "screened out" from inclusion as areas of search following the methodology in Section 11, meaning that in practice the only potentially economically viable resources are located within designated areas (the Malvern Hills AONB and the Cotswold AONB which includes Bredon Hill). We agree this presents challenges.

Following the results of this consultation we realise that the areas of search may need to be refined, and this will include taking into account the findings of the Habitats Regulations Assessment which accompanied the consultation to ensure our approach is legally compliant and will not promote development which would have significant effects on the Bredon Hill or any other Special Areas of Conservation (SAC) in or around the county, and will also need to consider whether or not the Malvern Hills Acts mean that it is not appropriate for the Malvern Hills to be included as an area of search.

We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, including the apportionment of crushed rock and how we might be able to address the lack of landbank as a region. We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.

that all of the locational criteria have been complied with.
These are set out in Table 10

Table 10 includes:

p. Areas of Outstanding Natural Beauty – although national policy gives the highest status of protection to these areas, mineral working is not excluded from them. Policy criteria will need to be developed to ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.

Importantly footnote 51 related to this criteria states:

51. In Worcestershire crushed rock resources are predominantly found in the AONBs. It is not likely to be possible to provide for the maintenance of the required landbank for crushed rock in Worcestershire from outside of the AONBs.

Due to the protection afforded to the Malvern Hills by legislation referred to above, Bredon Hill in the Cotswolds AONB is the only area of search proposed for crushed rock in the draft Plan.

Whilst the cooperative approach to restoration would be welcomed, neighbouring Counties, particularly Gloucestershire, have considerable reserves of crushed rock, notably in the Forest of Dean. The Board would wish to be reassured that the “Duty to Cooperate” as required by the Localism Act has included discussions with neighbouring minerals authorities regarding the provision of crushed rock from less environmentally sensitive areas than Bredon Hill.

Wildmoor Residents Association

Admit that a 7 & 10 year landbank are not viable and plan more realistically.

B047-2295

It is national policy that we should make provision to provide and maintain a 7-year landbank for sand and gravel and a 10-year land bank for crushed rock. We do not have a choice about whether to plan for this, and therefore

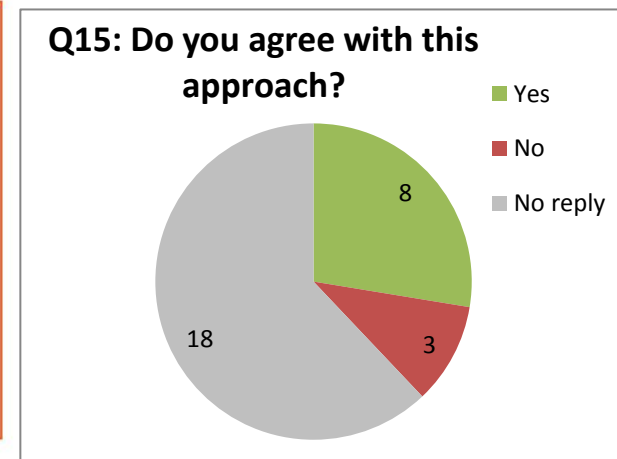
	<p>we are trying to find the best and most realistic way to meet the requirements. Options B and C present two ways that we think we will be able to meet these requirements while also achieving multiple green infrastructure benefits for the county. We are also still engaging in discussions with neighbouring mineral planning authorities under the duty to cooperate regarding several important issues, including the apportionment of crushed rock and how we might be able to positively and realistically address the lack of landbank across the wider area.</p>
<p><i>Herefordshire and Worcestershire Earth Heritage Trust</i></p>	<p>B048-800</p>
<p>Place more emphasis on recycling of materials.</p>	<p>We agree that recycled and secondary materials have a role to play in meeting our landbank requirements, however in practice this is a complex issue that overlaps with areas addressed in the Worcestershire Waste Core Strategy. We believe that while it may be necessary to address recycled materials to some extent in the Minerals Local Plan, it is not necessary to repeat what has already been covered in the Waste Core Strategy. The amount of mineral we think we need to plan for takes into account that there will be some use of recycled and secondary aggregates.</p> <p>Recycled and secondary materials can (and do) displace some of the requirement for primary materials, especially on individual sites, but the overall contribution of recycled materials to the flow of aggregates is particularly difficult to calculate. For example, recycled aggregates often means construction and demolition waste is re-used on the site where it arises. The data we have available on construction and demolition waste recycling comes from waste site returns, and these do not capture materials re-used on site making projections difficult.</p> <p>We have tried to address this in the Waste Core Strategy, but this can only capture part of the picture. We want to promote and encourage the use of recycled materials, and maximise its use as far as possible but as the figures are unreliable, we are unable to put a firm number against this.</p> <p>However, recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we need to give this due consideration to ensure that we make the most of the resources we have available.</p>

No comment responses:

Natural England	B040-717
No comment	Noted.
Worcestershire Wildlife Trust	B044-1081
No comment	Noted.

Question 15: Annual provision of aggregates up to and beyond 2016.

We estimated in Section 8 that to replenish reserves we would need to make the following annual provision:



In Section 9 we state that we will seek to deliver these annual levels consistently during the plan-period, whilst also ensuring that we build up enough reserves to meet the land-bank requirements. We think that this approach complies with national policy.

Summary of comments	Initial officer response
(Q15) Do you agree with this approach? Please explain.	
<i>Mineral Products Association</i>	B020-1899 nq
<p>Status of the LAA</p> <p>We were concerned to note the statement in the consultation document that the LAA is now adopted by the authority. This has not met the requirements of NPPF which state that mpas should plan for a steady and adequate supply of aggregates by</p> <ul style="list-style-type: none"> • <i>“participating in the operation of an Aggregate Working Party and taking the advice of that Party into account when preparing their Local Aggregate Assessment; and</i> • <i>making provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans taking account of the advice of the Aggregate Working Parties...”</i> (para 145) <p>As far as we can see this has not been done. We recognise that the AWP for the West Midlands Cluster has not met to consider LAAs, but in our view if you continue to rely on a document which hasn't met the NPPF requirements then we would judge it (and the plan based on it) is likely to be found unsound at Examination.</p> <p>We did make comments on the draft LAA and are pleased that some of these have been taken into account in the revised draft. However, we still believe it is deficient in many respects given the DCLG's MASS guidance and in the light of experience.</p>	<p>The LAA and the method for updating the LAA on an annual basis through the AMR have both been adopted by Worcestershire County Council's cabinet.</p> <p>As you note, the West Midlands AWP has not met regularly for some time and therefore we have not been able to take their advice into account. However, the Draft Local Aggregates Assessment was consulted on alongside the First Stage Consultation on the Minerals Local Plan in late 2012, which was sent to a number of bodies and stakeholders many of whom are members of the AWP. The comments we received were taken into account in developing the 2013 LAA.</p> <p>The LAA will be updated annually and therefore we have an opportunity to address your remaining concerns before the plan is adopted. We expect to consult the AWP (or neighbouring authorities and the MPA if the AWP is still not fully functioning), and that these subsequent refinements will make it more robust and address your concerns.</p> <p>Noted. The former MASS guidance has now been revoked, and we will complete the annual review of the LAA in light of the new Planning Policy Guidance website and any Appeal or Examination decisions.</p>

One such anomaly is the almost complete absence of any actual forecast of demand. Given that such a forecast is the first of the three basic requirements of an LAA according to the beta version of the National Planning Practice Guidance, the LAA appears not to have considered 'other relevant local information' as required by NPPF.

You say that it is impossible to give a 'static figure' for demand post 2016, but that is precisely what you will have to do when you come to finalise the plan. In that you do not have any economic component to this 'forecast', by relying only on the moving ten year average you will find that provision will be going down as more of the recessionary figures and fewer of the 'growth' figures pre-recession are included in the calculation, whilst the expectation is that the demand will be rising as we come out of the recession. This is counter intuitive and suggests that you need to include some economic forecasting of demand. If it can be done for waste arisings, it surely must be possible for minerals demand.

We are still of the view that the consumption figures for the county are likely to be grossly under-estimated and this should be subject of further work.

Furthermore, you say that recycled aggregates will contribute 383ktpa to 2016 and 315ktpa thereafter. You also observe that nationally recycled aggregates and secondary materials account for 28% of total demand. Since you don't have any secondary sources and are a largely rural county it is not expected that you will come near the national average for alternative materials. A calculation of aggregates consumption in Worcs in 2009

Our intention was not for the landbank figures to be read as caps or maximums, but rather as a baseline level that we would expect to deliver through the plan. We will consider revising our wording when we develop the draft policies for the next consultation.

We agree that it is necessary to ensure that that the plan is flexible enough to handle possible changes to the targets over the life of the plan. We have received feedback during this consultation that indicates that our assumptions about projected demand may need to be revised, and we are considering the best way of taking this forward. We have received a number of suggestions about potential sources of information about projected development in the county over the coming years which would help fulfil the 'other relevant local information' recommendation in the NPPG.

Noted. We intend to refine our assumptions about projected demand based on comments we have received during this consultation.

Thank you for bringing this to our attention. We will revisit these assumptions and attempt to clarify our thinking and methodology as part of the annual review of the LAA. We would appreciate any better information you may have about calculating recycled aggregate contributions.

from tables 3.3 – 3.5 of the LAA shows that total consumption was 114kt (sand and gravel) plus 250kt (total imports) = 364 kt. If recycled materials accounted for say, 25% of total demand in 2009 then the figure would be about 121kt. There is a large difference between your forecasted figures which needs to be explained. Either the consumption figures are wildly underestimated or the recycled component is very much higher than expected.

Resource issues

You also need to factor in the demand forecast the reasons for the lack of interest from the industry. In the last consultation we suggested it might not be wholly due to the recession, as you admit. We suggested it might be because of planning constraints but it has come to our attention that there might also be a resource issue here, which you do not mention. Our members tell us that it is difficult to find sites with sufficient good quality material needed by the market in them to justify the required investment. If this is true then relying on a historic method of forecasting demand will be inadequate. The issue was aired in a research report 'An evidence based approach to predicting the future supply of aggregate resources in England', published in 2011 (Case Study 12). This identified the reason for the apparent lack of industry interest as lack of quality of resources. We were surprised that you did not mention it.

This appears to be a problem that is likely to occur in Warwickshire as well, and would therefore benefit from a wider research perspective. We have not had an opportunity to go through your assessments of aggregates in each AoS block, so we have suggested that our members specifically consult their geologist

Thank you for bringing this to our attention. We will revisit these assumptions and attempt to clarify our thinking and methodology as part of the annual review of the LAA.

As you note, we have produced an Analysis of Mineral Resources in Worcestershire, looking in detail at the geological information we have available through BGS and planning history to estimate the quantity of resources we have available in the county. However, we recognise that this is an overview and reliant on a number of assumptions, and we have very little information on the quality of those resources. We would appreciate any information you or your members might be able to provide about resource quality in the county.

Although we have received some more detailed geological information from the minerals industry in response to this consultation, this relates to a small number of specific sites, and does not give a "geologist's view" of these issues for the county as a whole. We would be interested in meeting the MPA to discuss how we may be able to resolve these issues and will contact you in due course.

colleagues for a view and perhaps you could arrange a meeting with MPA to discuss the results. If a consensus emerges that the resource base will not support an apportionment based on a 10 year average, then consideration will have to be given to reducing the apportionment and examining wider scale supply options. If you see any merit in this approach the MPA would be willing to facilitate such a meeting.

The Apportionment

We were therefore surprised to learn that the mpa intends to have a plan period that does not commence until the plan is adopted. This is certainly a novel approach but we cannot see how it will work since you will not have the requisite data on which to plan 'future' provision until after the plan period starts. It would make far more sense to base the plan start date at some convenient point when information is available on output and reserves, such as 2012. Your preferred solution to assume reserves will be zero may well prove to be prophetic, but that still leaves you with not knowing the output when the plan period starts. And if you can use earlier data, then we don't see why you can't start the plan period earlier.

We intend for the plan to "start" when it is adopted, and we anticipate that this will be in 2015. However, we agree that there is merit in your suggestion of using available data in advance of that to inform the plan, and this is certainly something we will consider as we develop the draft plan.

Mr and Mrs Peter and Nicola Inchbald

B038-2286

(answered yes) However, these should be kept under review and the targets reviewed downward if take-up is not forthcoming.

Noted. We agree that the targets should be reviewed regularly, and monitoring indicators and evaluation targets will be drafted for the next stage of consultation.
 We believe that you are referring to take-up of sites (ie applications being submitted, approved and commenced). Our projections are primarily based on a rolling average of the past 10 year's sales, and this will be updated each year, meaning that the review of targets is built in to the plan. However, the targets also need to take into account market demand and so it is possible that if development increases in the county our targets could need to be revised upward. We also need to take into account any reasons for the minerals industry not bringing sites forward and try to address these through the plan.

	The Local Aggregates Assessment considers all these factors and will be updated annually. We have received feedback during this consultation that indicates our assumptions about projected demand may need to be revised.
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
(answered yes) However, we consider that the targets should be adjusted downwards if average sales decrease.	<p>Noted. We agree that the targets should be reviewed regularly, and monitoring indicators and evaluation targets will be drafted for the next stage of consultation.</p> <p>Our projections are primarily based on a rolling average of the past 10 year's sales, and this will be updated each year, meaning that the review of targets is built in to the plan. However, the targets also need to take into account market demand and so it is possible that if development increases in the county our targets could need to be revised upward. We also need to take into account any reasons for the minerals industry not bringing sites forward and try to address these through the plan. The Local Aggregates Assessment considers all these factors and will be updated annually. We have received feedback during this consultation that indicates that our assumptions about projected demand may need to be revised.</p>
<i>Staffordshire County Council</i>	B042-701
(answered yes) Yes subject to providing flexibility to take into account that there may be additional demand for aggregate resources over the Plan period from within the West Midlands conurbation area. The sub national guidelines for the West Midlands region "over provided" for the period 2005 – 2012 and therefore, an assessment based on a 10 years sales average is considered relevant at this stage. A concern, however, is that the 10 years sales average for sand and gravel sales in Worcestershire takes into account a period where the required minimum landbank has been not been maintained and there is a need to verify whether sales have been affected by a restricted capacity to produce.	Support noted. We agree that it is necessary to ensure that that the plan is flexible enough to handle possible changes to the targets over the life of the plan. We have received feedback during this consultation that indicates that our assumptions about projected demand may need to be revised, and we are considering the best way of taking this forward. Your suggestion of considering demand from development in the West Midlands Conurbation and incorporating further economic information echoes other respondents and we will take this into account as we develop the draft plan.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B

(answered no) The proposed approach, which involves a reduced annual provision of both sand and gravel and crushed rock in the period 2017 – 2030 compared to 2015 – 2016 levels does not seem to be justified given (a) the current low landbank levels, (b) the need to build-up and then replenish landbanks, and (c) the Government's push for housing growth. Rather than a blanket annual provision of aggregates for the period 2017 – 2030, it is suggested that the Minerals Local Plan include a phasing policy which indicates the likely level of minerals required to 2015, 2016 – 2020, 2021 - 2025 etc.

As a guide to the overall level of minerals that will be required during the Plan period, it is suggested that the level of development outlined in Local Plans (including the draft SWDP) for the next ten years (compared to levels of development in the previous ten years) could provide a useful guide.

The proposed approach would involve a slightly reduced provision after 2016 based on the current average of past 10 years sales. This level could increase (or decrease) based on future trends.

We agree that there is a need to build up and replenish the landbanks, but we consider that this will be achieved through the grant of permissions whose existence would ensure that there are enough permitted reserves to deliver the annual provision needed. We do not think that a slightly lower level of targeted annual provision would adversely affect our ability to achieve the landbank requirements, in practice, a lower annual requirement would have the effect of increasing the landbank because the volume permitted would last longer.

Whilst our projections are primarily based on a rolling average of the past 10 year's sales, this will be updated each year, meaning that the review of targets is built in to the plan. The targets also need to take into account market demand and so it is possible that if development increases in the county our targets could need to be revised upward. We also need to take into account any reasons for the minerals industry not bringing sites forward and try to address these through the plan. The Local Aggregates Assessment considers all these factors and will be updated annually. We have received feedback during this consultation that indicates that our assumptions about projected demand may need to be revised.

Your suggestion of a phasing policy is interesting and we will consider this as we develop the draft plan.

Noted. We have received feedback during this consultation that indicates that our assumptions about projected demand may need to be revised, and we are considering the best way of taking this forward, Your suggestion of considering levels of demand based on development proposed in the SWDP echoes other respondents.

<p>To ensure the delivery of a steady and planned supply primary aggregates (and secondary and recycled aggregates) the South Worcestershire Authorities endorse the proposed annual monitoring of progress and identification of trigger points should further impetus be required.</p>	<p>Support for annual monitoring noted.</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>(answered yes) Yes. If annual sales remain lower than provision then reserves will build up but in the event of the economy improving and increased housing levels then national policy will not be complied with. If not complying anyway with clay, building stone, coal, etc why is there a need to comply with sand, gravel and crushed rock?</p>	<p>Support for general approach noted.</p> <p>Aggregate minerals (sand, gravel and crushed rock) are critical to the functioning of the UK economy to provide raw materials for building the infrastructure we need, such as houses, schools and roads. It is important that there is a steady and adequate supply of aggregates, and therefore national policy requires us to provide landbanks of aggregate minerals reserves (7 years for sand and gravel, 10 years for crushed rock) to ensure the security of aggregate minerals supply. Historically we have also had to provide for a pre-determined annual "apportionment", which amounts to being a target for the amount of aggregate minerals which should be worked and sold in the county each year. We now have the responsibility to calculate what this level of provision should be in a Local Aggregates Assessment, taking into account the level of past sales, likely future demand and other local factors such as geology or the economy, and this will be reviewed annually.</p> <p>The situation is slightly different for industrial minerals, such as clay and coal. Whilst they are also important, national policy gives more emphasis to safeguarding and enabling stockpiling of reserves to ensure they remain available for use. It does not require landbanks to be provided in the same way and there is no annual "apportionment" that we must try to meet. However, to give a little further information about why we are not making specific annual provision for non-aggregate minerals:</p> <ul style="list-style-type: none"> • Worcestershire currently has a landbank of permitted clay reserves which extends ten years beyond the end of the plan period. As such, we do not think that it is necessary to set provision milestones for clay. • We have strong evidence from the Coal Authority that there is no likely potential for any new commercial coal extraction within the county.

	<ul style="list-style-type: none"> • We also don't have any evidence on the viability of building stone resources in the county, although we have received more information about these resources during this consultation. At this stage, we did not think it was appropriate to set specific targets for building stone. • We don't think that there are any viable hydrocarbon (oil, gas, shale gas) resources in the county. • We don't think that the salt and brine resources in the county are likely to be commercially viable. • We don't have any evidence to set a required provision level for silica sand separately from general building sand.
<i>Malvern Hills AONB Partnership</i>	B049-802B
<p>(answered no) Given that only 2 areas are identified as areas of search for crushed rock and that one of these is within the Malvern Hills AONB we have major concerns about the amount of crushed rock extraction being proposed. Under the requirements of sections 115 and 116 of the NPPF great weight will need to be given to the AONB and developments will need to demonstrate that exceptional circumstances exist and that any extraction is in the public interest. It will be particularly important to have robust procedures in place to ensure that applicants can demonstrate that the same provision cannot be delivered elsewhere outside the AONB. Therefore the AONB Unit strongly objects to the inclusion of an area of search for crushed rock in the Malvern Hills as extraction will harm the AONB, people's enjoyment of it and potentially its economic value in attracting visitors to the area. It is also likely to be contrary to the Malvern Hills Acts.</p>	<p>The areas of search for crushed rock are based on the geological profile of the county, and these minerals may only be worked where they are found. The 10 year landbank for crushed rock is prescribed in national planning policy, and the amount proposed is based on our regional apportionment which is determined by the managed aggregate supply system through the regional Aggregates Working Parties.</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county. The NPPF requires us to "as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty [...]" (pgph.144). Unfortunately the AONBs in Worcestershire are the main resources of rock suitable for use as crushed rock aggregate.</p> <p>Although there are some smaller deposits outside of the AONBs such as the Suckley Hills, Lickey Hills and Abberley Hills, these are limited in size and were "screened out" from inclusion as areas of search following the methodology in Section 11, meaning that in practice the only potentially economically viable resources are located within designated areas (the Malvern Hills AONB and the Cotswold AONB which includes Bredon Hill). We agree that presents challenges.</p> <p>Following the results of this consultation we realise that the areas of search may need to be refined, and this will include taking into account the findings of</p>

	<p>the Habitats Regulations Assessment which accompanied the consultation to ensure our approach is legally compliant and will not promote development which would have significant effects on the Bredon Hill or any other Special Areas of Conservation (SAC) in or around the county, and will also need to consider whether or not the Malvern Hills Acts mean that it is not appropriate for the Malvern Hills to be included as an area of search.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, including the apportionment of crushed rock and how we might be able to address the lack of landbank as a region. We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p>
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
<p>These figures are based upon the LAA, June 2013, which we believe is flawed. The LAA has not been agreed with the Aggregates Working Party for the West Midlands. The LAA does not provide any consideration of 'other relevant local information', therefore there is no economic considerations for supply/demand during the Plan period. Therefore the apportionment figure is based solely on the last 10 years production, this figure is heavily skewed by the economic recession over the last few years and will therefore be depressed. Whereas indications suggest that demand will rise as we come out of the recession. This approach is unsound as it will not provide the delivery of appropriate levels of aggregate over the Plan period.</p>	<p>The LAA and the method for updating the LAA on an annual basis through the AMR have both been adopted by Worcestershire County Council's cabinet.</p> <p>The West Midlands AWP has not met regularly for some time and therefore we have not been able to take their advice into account. However, the Draft Local Aggregates Assessment was consulted on alongside the First Stage Consultation on the Minerals Local Plan in late 2012, which was sent to a number of bodies and stakeholders many of whom are members of the AWP. The comments we received were taken into account in developing the 2013 LAA.</p> <p>Your concerns are noted, and have been echoed by other respondents. We have had a number of additional sources of information brought to our attention through this consultation, and we are considering the best way of incorporating this into the next draft as we believe our assumptions about projected demand may need to be revised.</p> <p>The LAA will be updated annually and therefore we have an opportunity to address your remaining concerns before the plan is adopted. We expect to consult the AWP (or neighbouring authorities and the MPA if the AWP is still not fully functioning), and that these subsequent refinements will make it more</p>

	<p>robust and address your concerns.</p> <p>Our intention is not for the figures to be read as caps or maximums, but rather as a baseline level that we would expect to deliver through the plan. We will consider revising our wording when we develop the draft policies for the next consultation. We agree it is necessary to ensure that that the plan is flexible enough to handle possible changes to the targets over the life of the plan.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 A nq</p>
<p>The South Worcestershire authorities consider that the Minerals Local Plan should include assumptions on the level of sand and gravel and crushed rock that will come from imports outside the County and the likely levels to be exported.</p> <p>The Plan should also include figures for the levels of secondary and recycled materials to be produced within the County which will reduce the demand for primary aggregates.</p>	<p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, including the apportionment of crushed rock and how we might be able to address the lack of landbank as a region. Although we briefly discussed imports and exports in paragraph 6.18, we recognise that further detail about the expected level of imports and exports would be useful. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p> <p>We agree that recycled and secondary materials have a role to play in meeting demand for aggregates, however in practice this is a complex issue that overlaps with areas addressed in the Worcestershire Waste Core Strategy. We believe that while it may be necessary to address recycled materials to some extent in the Minerals Local Plan, it is not necessary to repeat what has already been covered in the Waste Core Strategy. The amount of mineral we think we need to plan for takes into account that there will be some use of recycled and secondary aggregates.</p> <p>Recycled and secondary materials can (and do) displace some of the requirement for primary materials, especially on individual sites, but the overall contribution of recycled materials to the flow of aggregates is particularly difficult to calculate. For example, recycled aggregates often means construction and demolition waste which is re-used on the site where it arises. The data we have available on construction and demolition waste recycling comes from waste site returns, and these do not capture materials re-used on site making projections difficult.</p>

<p>To minimise the need for new sites it is considered that comprehensive working of permitted reserves in existing quarries should be encouraged. Also, subject to conformity with the constraints criteria, extensions to existing quarries should be examined prior to identifying new quarries.</p>	<p>We have tried to address this in the Waste Core Strategy, but this can only capture part of the picture. We want to promote and encourage the use of recycled materials, and maximise its use as far as possible but as the figures are unreliable, we are unable to put a firm number against this.</p> <p>However, recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we need to give this due consideration to ensure that we make the most of the resources we have available.</p> <p>We agree that comprehensive working of permitted reserves is desirable in order to make best use of the resource, but this must be balanced against requirements for the final land-form for a beneficial after-use if imported fill materials are not appropriate for a particular site.</p> <p>We also have a number of considerations to balance when it comes to considering extensions over new sites:</p> <ul style="list-style-type: none"> • the need to make the best use of the resources we have and not to sterilise useful material by overly restricting working, • making sure that the plan we propose will be deliverable: knowing where mineral operators have thought a particular resource is commercially viable in the past is one indicator of where it is likely to be viable to work in future, • impacts on the local area, making sure that we take into account the potential for cumulative effects from a number of sites in a locality. <p>We may be able to develop the policy framework in a number of ways to control cumulative impacts in an area and will be working to address these issues for the next consultation.</p>
<p><i>Cemex</i></p>	<p>B057-1793 nq</p>
<p>Local Aggregates Assessment</p> <p>The second and third paragraphs within paragraph 145 of the NPPF state the following:</p> <ul style="list-style-type: none"> ➤ “participating in the operation of an Aggregate Working Party and taking the advice of that Party into account when preparing their Local 	<p>The LAA and the method for updating the LAA on an annual basis through the AMR have both been adopted by Worcestershire County Council's cabinet.</p> <p>The West Midlands AWP has not met regularly for some time and therefore we have not been able to take their advice into account. However, the Draft Local Aggregates Assessment was consulted on alongside the First Stage Consultation on the Minerals Local Plan in late 2012, which was sent to a</p>

- Aggregate Assessment;
- making provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans taking
 - account of the advice of the Aggregate Working Parties and the National Aggregate Coordinating Group as appropriate. Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate;"

The Minerals Local Plan states that the LAA has been adopted by the Council but to the Company's knowledge Worcestershire have not sought the advice of the West Midlands Aggregate Working Party in drafting its LAA. Given this, it follows that the AWP's advice cannot have been taken into account in the drafting of the LAA, and therefore any Development Plan derived from such a LAA, as in the case of Worcestershire, is likely to be found unsound in the light of the above NPPF guidance.

number of bodies and stakeholders many of whom are members of the AWP. The comments we received were taken into account in developing the 2013 LAA.

We have had a number of additional sources of information brought to our attention through this consultation, and we are considering the best way of incorporating this into the next draft as we believe our assumptions about projected demand may need to be revised.

The LAA will be updated annually and therefore we have an opportunity to address your remaining concerns before the plan is adopted. We expect to consult the AWP (or neighbouring authorities and the MPA if the AWP is still not fully functioning), and that these subsequent refinements will make it more robust and address your concerns.

As is set out in paragraph 2.8 of the LAA (page 8), "*The Local Aggregate Assessment will be updated annually through the Minerals and Waste Local Development Scheme Annual Monitoring Report (AMR) published by the Council in December each year.*" We also intend to annually update our projections of aggregates required beyond 2016 as stated on page 28 of the Second Stage Consultation. The first revision of the LAA will take place in autumn 2014, and it is possible that the LAA will be updated again before the plan is adopted. Hopefully revisions to the LAA and the further refinements that the draft plan will undergo prior to the next consultation will address your concerns.

The reliance within the LAA on an average of the previous 10 years of sales data for projecting demand post 2016 is understandable but potentially simplistic. The industry is only now starting to slowly emerge from the longest and deepest economic recession for many years, a period which has seen sales dip significantly below long term trends. The sales statistics for the recession years will have the effect of unduly depressing estimates for the demand for aggregates in the County in the future, giving the appearance that demand for aggregate will decline when in fact it may well be increasing as the economy continues to strengthen.

Whilst there is no agreed methodology for correcting this statistical anomaly, the first paragraph of paragraph 145 of the NPPF does allow MPA's to account for other relevant local information as well the rolling 10 year average of sales data when producing an LAA. The Company would welcome the explicit identification of this potential phenomena by the MPA in the Local Plan, a commitment to maintain an annual review of the LAA and an undertaking to utilise agreed (with stakeholders) local correctional factors in calculating future aggregate demand within the County if future LAA reviews do uncover an under provision of aggregates due to the use of sales data alone.

We agree that the economic downturn has had an impact on demand projections, and we are considering ways that we might be able to strengthen our approach for the next draft. We might be able to incorporate more economic information into our projections based on development in the county that we are aware of and that is included in local development plans. However, our intention is not for the figures to be read as caps or maximums, but rather as a baseline level that we would expect to deliver through the plan. We will consider revising our wording when we develop the draft policies for the next consultation. We agree that it is necessary to ensure that the plan is flexible enough to handle possible changes to the targets over the life of the plan.

We agree that we should strengthen our explanation of our approach to these projections and their potential limitations.

As is set out in paragraph 2.8 of the LAA (page 8), we have committed to an annual review of the LAA: "*The Local Aggregate Assessment will be updated annually through the Minerals and Waste Local Development Scheme Annual Monitoring Report (AMR) published by the Council in December each year.*" We also intend to annually update our projections of aggregates required beyond 2016 as stated on page 28 of the Second Stage Consultation. The first revision of the LAA will take place in autumn 2014, and it is possible that the LAA will be updated again before the plan is adopted.

Any suggestions you are able to provide about ways of refining the projection methodology would be appreciated.

Future Provision

The MPA proposes in the draft the adoption of a zero aggregates reserves assumption at the time the Plan is adopted, on the basis of Figure 1 within the draft assumed to be early 2016. In the Company's experience this is an unprecedented approach. The more conventional approach when developing Development Plans for the winning and working of minerals is to adopt a baseline for the most recent year that reliable data is available for both reserves and sales and project forward from that point for the remaining Plan period. There seems to be little justification for the adopted approach beyond stating that the MPA has only received two planning applications for the winning and working of sand and gravel in the County (both submitted by the Company) and had no formal pre-applications with industry regards other potential sites. The MPA is urged to either provide more convincing justification for its choice in determining the start date for the Plan or revert to the more traditional approach as outlined above.

It has been noted that throughout the Plan the landbank figures for sand and gravel and hard rock are referred to as "targets". At no point does NPPF make reference to them as targets, paragraph 145 paragraph 6 simply advises that the maintenance of landbanks of at least 7 or 10 years needs to be provided for by MPAs. By describing landbanks as targets the implication is that an MPA only has to maintain a landbank of at least 7 or 10 years and that once/if achieved there would be no need to grant further planning permissions for the supply of aggregates until landbanks dropped, through sales, below the 7 and 10 year 'target'. The Company does not believe that this is an approach that would lead to the steady and adequate supply of aggregates

We intend for the plan to "start" when it is adopted, and we anticipate that this will be in 2015. However, we agree that there is merit in your suggestion of using available data in advance of that to inform the plan, and this is certainly something we will consider as we develop the draft plan.

The adoption of the 'zero aggregates reserves' assumption is one of the approaches we have proposed in this consultation. We agree that we have presented this option (Option A) as the preferred option, but the second stage consultation also sought suggestions for alternative approaches that we might be able to consider, and we will consider your suggestions in preparing the next consultation draft.

Thank you for your feedback on this issue. Our intention was not for the landbank figures to be read as caps or maximums, but rather as a baseline level that we would expect to deliver through the plan. We will consider revising our wording when we develop the draft policies for the next consultation.

and the multiple references to landbanks as targets should not be perpetuated into the next iteration of the Plan, least it be found unsound.

The transportation of aggregates by rail only warrants one paragraph within the draft, paragraph 6.26. It is not clear from this paragraph whether the comments contained within relate to the importation of aggregates into the County by rail, of the haulage of aggregates from a quarry within the County. The Company would agree with the conclusion that it would be unlikely that an in County of sufficient scale would be developed to justify rail haulage, but is disappointed to note that the consideration of facilities to accept the importation of aggregates into the County by rail also appears to have been dismissed. The MPA is urged, particularly in the light of its inability to identify sufficient land won specific sites or Preferred Areas to maintain landbanks of at least 7 or 10 years, to undertake as rigorous an exercise as it has regards land won aggregates to seek to identify potential railheads to accept imports into the County. It is also suggested that locational criteria be devised against which to assess possible future proposals should opportunities be identified by developers.

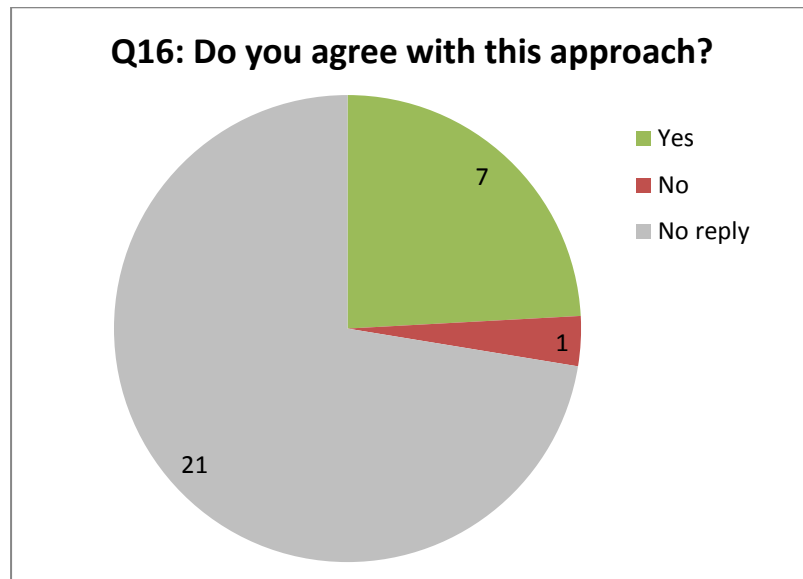
We agree that this is an issue that has not been given sufficient attention in the second stage consultation. We are preparing a background paper on rail transportation that will help inform the draft policies on sustainable transportation and we will ensure that considers opportunities for rail imports into the county as well as exports.

No comment responses:

<i>Natural England</i>	B040-717
(no answer) No comment	Noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
(answered yes) No further comments	Noted

Question 16: Approach to industrial and energy minerals.

There is no projected demand for industrial or energy minerals. In Section 9 we state that the issue of phasing provision across the life of the Minerals Local Plan is not considered relevant for industrial or energy minerals, but the policy framework will enable applications to be considered when they come forward.



Summary of comments	Initial officer response
(Q16) Do you agree with this approach? Please explain.	
<i>National Farmers' Union, West Midlands Region</i>	B017-857 nq
The plan states that the Worcestershire County Council does not think that the resources in the county are viable and that policy will develop to assess individual applications. We agree with this wait and see approach. Our members are	Support for approach noted. The evidence we are aware of to date suggests that there is little likelihood of 'fracking' or other methods of oil or gas extraction being viable or "prospective" in Worcestershire. However, we intend to produce a background document on oil and gas to explore these issues and provide a robust evidence base for the Minerals Local Plan, and we will publish this on our website ²⁵

²⁵ www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p>watching the development of these industries with interest, particularly shale gas extraction. If such projects were proposed for Worcestershire there would need to be a further phase of public consultation and an assessment of the potential threats to land based industries. e.g via subsidence and disruption to drainage systems.</p>	<p>as soon as it is available. In light of recent developments and government announcements, these issues have become more urgent and we are aware of the need to address this with the best possible information ahead of the next consultation.</p> <p>In accordance with the Council's normal practice and Statutory regulations all planning applications are publicised. We agree that the policy framework must ensure that subsidence and drainage are considered among other issues.</p>
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p>	<p>B041-595</p>
<p>(answered no) We consider that the policy should state that such applications would not normally be allowed</p>	<p>Noted. Though the data we have available indicates that there is little likelihood of industrial minerals being economically attractive in Worcestershire in the foreseeable future, we cannot rule this out completely. National policy requires us to take a positive approach to planning and economic development, but we must also ensure that the plan is robust and detailed enough to ensure that were any applications to come forward, they would not have any unacceptable impact on the environment or local communities.</p>
<p><i>The Coal Authority</i></p>	<p>B045-2184</p>
<p>(answered yes) The Coal Authority agrees that there is no policy requirement to phase provision in relation to energy minerals.</p>	<p>Noted.</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>(answered yes) [Agree] Overall but highly sceptical of a policy framework which will be able to consider applications as they come forward. At that point anything would be considered.</p>	<p>Support for the general approach noted. We agree that it is challenging to develop a policy framework which will be able to address any applications which might come forward, but we need to ensure that the plan is robust and detailed enough to ensure development would not have unacceptable impacts on the environment, economy or local communities. Although the details of applications can vary considerably, the potential impacts tend to be similar, such as noise, dust, traffic movements, or visual impacts. We think that the policies we develop will be able to be applied across the variety of applications which could potentially come forward, and the planning system also allows for other material considerations to be taken into account.</p>

No comment responses:

<i>Natural England</i>	B040-717
No Comment	Noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
(answered yes) No further comments	Noted.

Section 10: How will minerals be worked?

We propose to enable new mineral development where it is demonstrated that all of the issues to be addressed through policy criteria relating to working practices have been adequately addressed. Further detail of what these policies might contain is set out in section 10 of the consultation document.

We would like to know if you support the policy issues identified. Please also give details of any other issues that you think should be considered or additional considerations which should inform each topic.

Question 17 and 18: Do you support the following policy issues (Table 5)?

	Yes	No
Sustainable supply of mineral resources		
a) Recycled and secondary aggregates	<input type="checkbox"/>	<input type="checkbox"/>
b) Maximising resource potential	<input type="checkbox"/>	<input type="checkbox"/>
Impacts on health, amenity and Worcestershire's key economic sectors		
c) Noise and vibration	<input type="checkbox"/>	<input type="checkbox"/>
d) Air quality and dust	<input type="checkbox"/>	<input type="checkbox"/>
e) Visual intrusion	<input type="checkbox"/>	<input type="checkbox"/>
f) Light pollution	<input type="checkbox"/>	<input type="checkbox"/>
g) Odour	<input type="checkbox"/>	<input type="checkbox"/>
h) Public rights of way	<input type="checkbox"/>	<input type="checkbox"/>
i) Amenity along transport routes	<input type="checkbox"/>	<input type="checkbox"/>
Transport		
j) Sustainable transportation - road, rail, water or other alternative modes of transport	<input type="checkbox"/>	<input type="checkbox"/>
k) Safety of or congestion on transport routes	<input type="checkbox"/>	<input type="checkbox"/>
Sustainable design and operation		

- l) Water efficiency of working and processing
- m) Energy efficiency of working and processing
- n) Use of renewable and low carbon energy
- o) Generation of renewable and low carbon energy
- p) Flood risk
- q) Soil resources
- r) Land stability and subsidence
- s) Green belt

Natural and historic environment

- t) Ground and surface water resources
- u) Geodiversity
- v) European sites of nature conservation importance
- w) Internationally identified habitats and species
- x) Nationally identified habitats, species and nature conservation sites
- y) Locally identified habitats, species and nature conservation sites
- z) Heritage assets and their settings
- aa) Archaeology
- bb) Landscape

Open and effective engagement

- cc) Pre-application discussion
- dd) Community liaison groups

If you think that there are other issues we should consider relating to how minerals are worked, please provide details.

Summary of comments	Initial officer response
(Q17) Please give details of any additional considerations which should inform any of these topics. Please specify which topic your comment refers to by quoting the relevant letter code.	
<i>Worcestershire Regulatory Services</i>	B008-689 nq

Summary of comments	Initial officer response
<p>Consultation - Nuisance / Noise For further information on this matter ask for Michelle Lowe</p> <p>In Table 5 on page 40 and Table 24 on page 111; issues to be addressed through policy criteria, point C in table 5 and point A in table 24, public liaison is not mentioned. This is an important tool in preventing nuisance complaints.</p> <p>When referring to mitigation for lighting we would recommend that external artificial lighting should be compliant with current guidance produced by the Institute of Lighting Engineers; <i>Guidance for the reduction of obtrusive light 2012</i>.</p> <p>In Table 5, page 40 and Table 24 on page 111; issues to be addressed through policy criteria, point D in Table 5 and point B in Table 24, no mention is made of cleaning of local roads. Dirt/mud and therefore dust on the road can be of great annoyance to residents and can be a source of dust generation and therefore nuisance to residents in the vicinity.</p> <p>No mention in either tables about monitoring nuisance. For large, long term projects it would be a beneficial tool to measure the impact that is being had on the local community. Developers should be encouraged to be more proactive and self-managing, reacting to issues before complaints are received by the general public.</p>	<p>Thank you for providing specific contacts.</p> <p>Noted. Point C in table 5 suggests ways in which policy could prevent noise impacts from occurring or mitigate their impact. Points cc and dd promote pre-application discussions and community liaison groups, as we recognise their value in ensuring two-way communication and their role in preventing nuisance situations and complaints. These issues are also being proposed in the draft revision of the Statement of Community Involvement, and will carry that forward into the draft policies.</p> <p>Noted and agreed.</p> <p>Noted. This issue will be incorporated in the next consultation.</p> <p>Noted. Once the Minerals Local Plan is adopted it will provide the County Council with a strong basis for monitoring and enforcement and we will look at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation. Sites must also comply with the conditions imposed through their individual planning permissions.</p>

Summary of comments	Initial officer response
<p>I disagree with the statement on page 131; 'although national policy gives a high level of protection to health and amenity, we do not think it is appropriate for this to be an absolute constraint on mineral development.' This is going completely against national policy. Any policy should be aiming to protect residents of Worcestershire not allowing noise to give rise to significant adverse impacts on health.</p>	<p>Noted and agreed. This needs to be rephrased. It is not our intention to allow residents to be subjected to unacceptable levels of noise or nuisance or for their health to be compromised as a result of mineral workings. The statement related to the previous policy approach of imposing a buffer strip to prevent mineral working within a certain distance of settlements, and we think that this is no longer the most appropriate way to manage potential impacts on health and amenity.</p>
<p><i>Worcestershire Regulatory Services</i></p>	<p>B008-689 nq</p>
<p>Consultation - Contaminated Land, Air and Water Quality. For further information on this matter ask for Mark Cox.</p> <p>Page 10: Background documents: A suite of documents is proposed to support the Minerals Plan and set out the evidence that the Plan will be based on to tackle the key issues. It is important that the County Council ensure all appropriate issues are covered and do not conflict with County or District Council policies and objectives.</p> <p>To this end, it is important that any proposed background document relating to wider environmental impact such as the Environmental Impact Assessment document proposed considers air quality, potential contamination issues as well as nuisance.</p> <p>Page 15: Environment and Page 16: Transport: Neither of these two sections make note of air quality or quality of groundwater. Both are relevant to Mineral Planning. Unfortunately traditional Mineral Planning has not considered the impact on air quality from extraction and transport. Many extraction sites give rise to Particulate Matter deteriorating air quality and the transport</p>	<p>Noted and agreed.</p> <p>Noted. These issues will be addressed in consultation with Worcestershire Regulatory Services but may be included in the plan as draft policies rather than in background documents.</p> <p>We agree completely. These concepts are referred to elsewhere in the consultation and are listed as issues to be considered in the policy sections. Nonetheless, we recognise the need to strengthen references to these issues in the spatial portrait.</p>

Summary of comments	Initial officer response
<p>generated from the activity often has little choice but to use routes through Air Quality Management Areas (AQMAs) which are designated as such due to poor air quality (which is solely due to traffic in Worcestershire AQMAs). It is important that dust minimisation and transport routes are given serious consideration in the process.</p> <p>Additionally, Worcestershire has some significant groundwater resources used by many as private water supplies, abstraction sources or that are important for river water feeds. The importance of these needs to be recognised so that potential impact on such must be considered in the process.</p>	<p>We agree completely. These concepts are referred to elsewhere in the consultation and are listed as issues to be considered in the policy sections. Water quality, including groundwater, and flood alleviation are two of the high-level strategic restoration priorities that we put forward in the Second Stage Consultation. These issues will be considered in detail as draft policies are developed. Planning law tends to separate public interests (which the planning system exists to protect) from private interests where we do not have jurisdiction. We would particularly value your advice on how private supplies should be addressed in the plan.</p>
<p><i>Profin Protective Finishing Ltd</i></p>	<p>B010-1601</p>
<p>Flood Risk - The current water courses struggle to accommodate the volume of water generated by the natural weather conditions. In my view any additional water added to the existing system could well cause an overload situation. I feel due consideration should most certainly be given to the formation of additional water courses in order to accommodate any additional volumes.</p>	<p>We intend to prepare a background document to look at water and flooding issues.</p> <p>Water quality and flood alleviation are two of the high-level strategic restoration priorities that we put forward in the Second Stage Consultation. These issues will be considered in detail as draft policies are developed.</p>
<p><i>North Worcestershire Water Management</i></p>	<p>B030-1952</p>
<p>I (water efficiency of working and processing) - Emphasising the use of Sustainable Drainage Systems wherever viable.</p>	<p>Water quality and flood alleviation are two of the high-level strategic restoration priorities that we put forward in the Second Stage Consultation. While Sustainable Drainage Systems (SuDS) are not specifically mentioned in the consultation, their importance is increasing under the Flood and Water Management Act 2010. We intend to prepare a background document to look at water and flooding issues and will consider whether Sustainable Drainage Systems can be promoted for the working phases of a minerals site's life.</p>

Summary of comments	Initial officer response
p (flood risk) - Do not hesitate to get in touch with us regarding any site specific information we may have available which you can utilise.	Noted. Thank you.
<i>Mr Adrian Buckmaster</i>	B032-2394
It does not address the proximity to dwellings. The current plan commits that future excavations will not be within 200m of a group of 6 dwellings. This has been abandoned and there now seems nothing about how close excavation might be to houses unless it becomes unsafe.	Whilst we understand that proximity of a mineral working to houses or schools (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required " <i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i> ", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).
<i>Mrs Anne Pearson</i>	B034-2395
Item 10.6 gives reference to the moving and storing of minerals extracted. I would refer to my previous comments about mineral extraction to the west of the	Moving and storage is part of the mineral extraction process, and will occur on any mineral working site, but we intend that the draft policies will address any potential impacts from this and ensure they are handled appropriately

Summary of comments	Initial officer response
<p>River Severn at Upton and the very poor transport infrastructure being unable to cope with heavy vehicles.</p>	<p>and that there are no unacceptable adverse effects.</p> <p>We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport which will consider these issues in more depth and inform the development of draft policies for the next consultation.</p>
<p><i>Tewkesbury Borough Council</i></p>	<p>B036-703</p>
<p>With regards to 'draft objectives' (Table 4, pg.38) the impact of mineral working should also be considered in respect of effects across authority areas. Draft objectives should refer to 'and other areas' as impacts don't cease at the county boundary.</p> <p>In addition please see response to Qu.24 with regards flood and water management and cumulative impacts.</p>	<p>Suggestion of revised wording noted. We agree that there are a number of cross-boundary issues that have yet to be sufficiently addressed, but we are continuing to work with neighbouring authorities to resolve these. We welcome the opportunity to meet with you to discuss these further as we develop the draft policies.</p> <p>Please refer to our response to your comments in question 24.</p>
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p>	<p>B038-2286</p>
<p>We consider that these criteria should be plotted wherever possible to reduce the areas of search and could be updated to form an updated 'sieve test' for proposals.</p>	<p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>Whilst some of the criteria in Table 5 could be mapped to inform the identification of areas of search, such as potential transport routes and European sites of nature conservation importance, we think that it is appropriate for these issues to be considered on a site-by-site basis through the policy framework, as the location, design and working practices proposed</p>

Summary of comments	Initial officer response
<p>We consider that it is important to retain a 'buffer zone' around residential properties.</p>	<p>will all influence whether or not mineral development is appropriate. However, the areas of search will be refined based on feedback received during this consultation and we will take your comments into account as we develop the draft plan.</p> <p>Whilst we understand that proximity of a mineral working to houses or schools (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p>

Summary of comments	Initial officer response
<p>h) (public rights of way) should be expanded to include National Footpaths e.g. the Severn Way.</p>	<p>The Severn Way is a long distance footpath which follows the Severn from its origin to the sea. The footpath is a public right of way, and is afforded the same protection as all public rights of way. Public rights of way are identified as an issue that will be addressed through policy criteria in Table 5 (item h) – specifically the protection of current routes.</p> <p>We recognise the value of such features for tourism, as well as access and recreation opportunities, and we are intending to strengthen the references to the importance of tourism for Worcestershire's economy in the spatial portrait section of the consultation document.</p>
<p><i>Mrs Christine Daniell</i></p>	<p>B037-2396</p>
<p>All these items should be included in an updated sieve test which would help to more clearly define suitable areas.</p> <p>Buffer zones around ALL residential properties</p>	<p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>Whilst some of the criteria in Table 5 could be mapped to inform the identification of areas of search, such as potential transport routes and European sites of nature conservation importance, we think that it is appropriate for these issues to be considered on a site-by-site basis through the policy framework, as the location, design and working practices proposed will all influence whether or not mineral development is appropriate. However, the areas of search will be refined based on feedback received during this consultation and we will take your comments into account as we develop the draft plan.</p> <p>Whilst we understand that proximity of a mineral working to houses or schools (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to</p>

Summary of comments	Initial officer response
<p>and careful regard to historic water courses should be given.</p>	<p>address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>We are not sure what you mean by "historic water courses". Some data is available on historic properties and features, such as listed buildings and registered historic parks and gardens, but this does not specifically capture water courses. We would welcome any additional information that you might have on this. We think that our proposed approach of requiring historical assets to be considered at application stage and protected and enhanced through the policy framework is the most appropriate solution. However, the areas of search will be refined based on feedback received during this consultation and we will take your comments into account as we develop the draft plan.</p>

Summary of comments	Initial officer response
<p><i>RSPB</i></p> <p>The RSPB supports the policy issues identified in Table 5, particularly those relating to habitats, species and nature conservation sites.</p> <p>Paragraph 143 of the NPPF, which forms the basis of the criteria to be used in deciding how minerals will be extracted in Worcester, focuses on avoiding unacceptable adverse impacts. This is not as aspirational as the Draft Vision, which seeks to maximise environmental gains. An example of maximising environmental gains for an operation quarry would be to enhance the biodiversity of operational quarries by appropriate management of land that is not being extracted at any particular point in time. Therefore, the requirements of the NPPF should be seen as a bare minimum.</p> <p>As well as requiring mineral operators to avoid unacceptable adverse impacts, the Plan should require them to maximise environmental gains during the operational life of the site, not just during restoration.</p>	<p>B039-1782</p> <p>Support noted.</p> <p>Support for aspirational approach noted. We agree that the NPPF should form the basis of policy and that the draft vision goes some way beyond what is required in paragraph 143. We feel that this is appropriate and justified in the context of the Green Infrastructure Strategy which has been developed for the county by the Worcestershire Green Infrastructure Partnership and translated for the minerals local plan into an over-arching Green Infrastructure approach to restoration. Your suggestion of strengthening this for operational phases is interesting and we will consider how to incorporate this as we develop the policy framework.</p> <p>We agree that it is important for the Minerals Local Plan to aspire to maximise net environmental gains as stated in the Draft Vision, and we think that your suggestion of ensuring that these are achieved during the working phase of an operation is important. We will strive to ensure that this is captured in the draft policies that will be developed for the next consultation.</p>
<p><i>Natural England</i></p> <p>Natural England particularly supports the inclusion of the policy criteria on the natural and historic environment.</p> <p>Green infrastructure and soils could also be included.</p>	<p>B040-717</p> <p>Support noted.</p> <p>Soil resources are included as policy criteria under the 'Sustainable design and operation' section (item q).</p> <p>The Second Stage Consultation was developed with the Green Infrastructure approach in mind at all times, although it is most prominent in sections 11 and 12 which address where minerals will be worked and how mineral workings will be restored. Your suggestion of strengthening this for</p>

Summary of comments	Initial officer response
	operational phases is interesting and we will consider how to incorporate this as we develop the policy framework.
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>See above. We believe that these should be developed into an updated 'sieve test' which could then be mapped and help to further define the areas of search. In addition we consider that the current 200m buffer zone from settlements of 6 houses or more should be carried forward as an adopted policy and expanded to include ALL residential property thereby avoiding any confusion over the definition of settlements.</p>	<p>As stated previously, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>Whilst some of the criteria in Table 5 could be mapped to inform the identification of areas of search, such as potential transport routes and European sites of nature conservation importance, we think that it is appropriate for these issues to be considered on a site-by-site basis through the policy framework, as the location, design and working practices proposed will all influence whether or not mineral development is appropriate. However, the areas of search will be refined based on feedback received during this consultation and we will take your comments into account as we develop the draft plan.</p> <p>We understand that proximity of a mineral working to houses or schools (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by</p>

Summary of comments	Initial officer response
	<p>national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p>
<p><i>Worcestershire Wildlife Trust</i></p> <p>Locally identified habitats etc (section y). Drivers here should include engagement with the Sub-Regional GI Strategy as well as the BAP and Habitats Inventory so that genuinely local priorities can be taken forward.</p>	<p>B044-1081</p> <p>Noted and agreed. BAP habitats are mentioned specifically in item y in table 5.</p> <p>We agree that the methods used so far potentially undervalue some existing non-designated assets, and we will be working to find a way to address this across the county. It is useful to have these areas of local importance brought to our attention.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p> <p>The working of mineral sites should be carried out to the highest possible environmental and operational standards if sustainable development objectives are to be met. Proposals for minerals extraction must be required to show that high standards will be maintained during the period of working.</p>	<p>B046-681,1623, 683 B</p> <p>Agreed. The purpose of the Minerals Local Plan is to ensure that mineral workings meet high environmental standards and contribute to sustainable development goals. This is set out in the Draft Vision, along with how the plan will address the demand for minerals within the county over the plan period. We agree that applicants must be required to maintain high environmental standards during the working phase of extraction – this is addressed in section 10: How will minerals be worked?</p>

Summary of comments	Initial officer response
<p>Issues which should be addressed during the working of a site include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> impacts on those living nearby (noise, dust, vibrations, visual impacts, site operating times) <input type="checkbox"/> impacts on the environment (habitats, species, landscape, archaeology, historic environment, surface and ground water) and <input type="checkbox"/> transport (site access and methods for transporting materials). <p>Proposals in the Green Belt must contribute to Green Belt purposes by maintaining its openness and visual amenity.</p>	<p>Once the Minerals Local Plan is adopted it will provide the County Council with a strong basis for monitoring and enforcement and we will look at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation. Sites must comply with the conditions imposed through their individual planning permissions. Our monitoring officer visits each of the current minerals sites in the county on average three or four times per year.</p> <p>Agreed. The issues you raise are issues that we think need to be addressed through policy criteria and appear in table 5:</p> <ul style="list-style-type: none"> - Impacts on those living nearby are addressed under the 'impacts on health, amenity and Worcestershire's key economic sectors' section (item c, noise and vibration; item d, air quality and dust; item e, visual intrusion; and others). - Impacts on the environment are addressed in the 'sustainable design and operation' and 'natural and historic environment' sections (items w, x, and y, habitats and species; item bb, landscape; item aa and z, archaeology and historic environment; and items l, p and r, surface and groundwater). - Impacts on transport are addressed in the section on 'transport' (item j, sustainable transportation; item k, safety and congestion on transport routes). <p>The National Planning Policy Framework states that mineral extraction is not inappropriate in the Green Belt provided the development preserves the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt. We intend to develop policies to ensure that working a mineral site would not conflict with national policy on green belt, and ensure consideration is given to any impacts from aspects such as site layout, haul roads and stockpiles. This is addressed in Table 5, item s.</p>

Summary of comments	Initial officer response
<p>In relation to transport, any proposals for mineral working must include an assessment of the likely generation of traffic and its impact upon the local highway network. Wherever possible, the delivery of minerals and mineral related products should be by sustainable transport. It is also recognised, however, that proposals for rail or water borne transport must be realistic and capable of being delivered. Planning permission for minerals extraction should only be granted where the access along local highways would be adequate in both physical and environmental terms for the likely traffic generated by the working.</p>	<p>Sustainable transport is identified as a relevant issue under Objective 4 and is implicated in key issues under other objectives, notably air quality, dust, noise and minimisation of emissions. We are preparing a suite of background documents on transport issues which will examine alternatives including transport by water and rail in detail. These will be published on our website²⁶ in the near future.</p> <p>We are aware of the impact plant traffic could have on amenity and that access would need to be safe and adequate to support any proposed development. We have highlighted this as an issue which we will consider through policy criteria a number of times in the consultation document (Table 5, items j and k; Table 10, items a-e; Table 24, items l and m).</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>(a) Waste management facilities should not be considered where working life of mineral workings near to completion.</p> <p>(b) Phasing and restoration of sites asap important</p>	<p>This issue is addressed in Table 5, item a, when it states that provision for recycled and secondary aggregate "might include enabling waste management facilities associated with operational mineral workings, but would need to highlight the temporary nature of these types of facilities". This is addressed by the Waste Core Strategy's policy <i>WCS 7: Development associated with existing temporary facilities</i> which would only allow such facilities "for a temporary period commensurate with the permitted use on site; and where they do not have an adverse impact on the restoration of the site".</p> <p>Agreed. We have referred to phasing under a number of items, including maximising resource potential. We have set out our aspirations for how sites will be restored in section 12: How will mineral workings be restored? and in appendix 2: Restoration Profiles. We recognise that many of the policy areas identified in this table (table 5) overlap with issues identified elsewhere in the document, and we expect that the draft policies that will be prepared for the next consultation will clarify matters.</p>

²⁶ www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p>(c) to (i) All these issues are significant but policy criteria seems to indicate that all impacts are manageable regardless of manageability, health and amenity can be affected.</p> <p>(h) to (s) Only 'q' really brings about a solution, all the others find reasons to mitigate and ignore issues. Replaced soil should always be equal or of a higher quality.</p>	<p>The purpose of the policies that will be put forward in the draft plan is to "ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health" as required by paragraph 143 off the NPPF. We anticipate that the policy criteria will be strong enough to ensure that proposals would only be permitted where the development is designed to ensure that unacceptable adverse impacts will not occur. If adverse impacts would occur even with any proposed mitigation measures in place, the planning application is likely to be refused. Once the Minerals Local Plan is adopted it will provide the County Council with a strong basis for monitoring and enforcement and we will look at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation. Sites must comply with the conditions imposed through their individual planning permissions. Our monitoring officer visits each of the current minerals sites in the county on average three or four times per year.</p> <p>At this stage, table 5 is intended to present a list of issues that we think will need to be addressed through policy criteria. These are not intended to be read as policies as they stand – the draft policies will be developed having taken into account the comments and feedback received during this consultation. We agree that some items may be more positively worded than others at the moment, but our intention is that the draft policies will ensure that permitted operations will not have unacceptable adverse impacts on the natural and historic environment or human health, and that they will contribute to the county's strategic green infrastructure goals through their restoration plans.</p> <p>With regard to your comment about soils and soil quality, this might be dependent on the proposed after-use of the site. Whilst we need to safeguard high quality soils and their potential for the future, it might be that high quality soils could be used on part of a site to be returned to agricultural productivity, whilst lower quality soils might provide an appropriate substrate for some types of habitat creation. These issues will be considered further as we develop the policy framework.</p>

Summary of comments	Initial officer response
<p><i>Herefordshire and Worcestershire Earth Heritage Trust</i></p> <p>Is there an error in the wording of item S in table 5? Should the word 'providing' be 'unless'?</p> <p>Regarding landscape, item, BB and for the section on the natural and historic environment in general – it may be useful to include Natural England's new National Character Area documents, which will all be complete by April 2014. In fact, many also include a description of the infrastructure of an area and certainly include a description of the soils, item Q.</p>	<p>B048-800</p> <p>The sentence you refer to is a quote from paragraph 89 in the NPPF which states that "certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt".</p> <p>Thank you for bringing these to our attention. While the National Character Area documents do contain extensive information about the general characteristics of soil in the county, they do not contain the level of detail that would allow us to determine the quality of soil on a given site which is essential for restoration plans. Specifically, these documents do not provide a breakdown of grade 3a and grade 3b agricultural land. We will consider whether the soils information they contain can assist us to fill in the gaps in our knowledge about soil quality in some parts of the county.</p>
<p><i>Malvern Hills AONB Partnership</i></p> <p>We welcome the inclusion of landscape character as a consideration under bb above. However, this section underplays the importance of AONBs – they must be a major constraint on development and not simply a factor to take into account in working practices and site design. Major development in AONBs should only be in exceptional circumstances and subject to the tests in section 116 of the NPPF, which can override the presumption in favour of sustainable development. Our view is that the provision of crushed rock is not a sufficient reason for undertaking extraction in the most popular part of a nationally protected landscape which covers a relatively small area. The setting of AONBs should also be a consideration in planning decisions.</p>	<p>B049-802B</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county. The NPPF requires us to "as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty [...]" (pgph.144). Unfortunately the AONBs in Worcestershire are the main resources of rock suitable for use as crushed rock aggregate.</p> <p>Although there are some smaller deposits outside of the AONBs such as the Suckley Hills, Lickey Hills and Abberley Hills, these are limited in size and were "screened out" from inclusion as areas of search following the methodology in Section 11, meaning that in practice the only potentially economically viable resources are located within designated areas (the Malvern Hills AONB and the Cotswold AONB which includes Bredon Hill). We agree this presents challenges.</p> <p>Following the results of this consultation we realise that the areas of search may need to be refined, and this will include taking into account the findings of the Habitats Regulations Assessment which accompanied the consultation</p>

Summary of comments	Initial officer response
	<p>to ensure our approach is legally compliant and will not promote development which would have significant effects on the Bredon Hill or any other Special Areas of Conservation (SAC) in or around the county, and will also need to consider whether or not the Malvern Hills Acts mean that it is not appropriate for the Malvern Hills to be included as an area of search.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, including the apportionment of crushed rock and how we might be able to address the lack of landbank as a region. We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p> <p>We understand from your other comments that there is guidance available about protecting views to and from the AONB that we intend to consider in preparing the draft policies, and that we can strengthen the references to visual amenity within the document.</p>
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
<p>Matters of international or national environmental, heritage importance are covered by policies within the NPPF and do not need repeating within the MLP.</p> <p>Policy on Green Belt is not necessary as mineral development within the Green Belt is an accepted use subject to appropriate on site management and restoration.</p>	<p>We agree that national policy should not be unnecessarily repeated. However, we think it is important that the plan clearly sets out what the important issues for consideration are, and not including these matters could result in the interpretation that matters of environmental or heritage importance are not valued, rather than simply covered by national policy. We think that the Minerals Local Plan has a role to play in conveying local interpretation of national policies, and as such we intend that the Minerals Local Plan will provide locally relevant policy guidance on issues that are covered in national policy and will explain how we would like these policies to be applied in a way that is consistent with the county's strategic priorities.</p> <p>We agree that mineral development in Green Belt is not necessarily inappropriate. The National Planning Policy Framework states that mineral extraction is not inappropriate in the Green Belt provided the development preserves the openness of the Green Belt and does not conflict with the</p>

Summary of comments	Initial officer response
	<p>purposes of including land in Green Belt. However, we intend to develop policies to ensure that working a mineral site would not conflict with this national policy on green belt, and ensure that consideration is given to any impacts from aspects of mineral working such as site layout, haul roads and stockpiles, in order to comply with national policy and achieve our Green Infrastructure aspirations.</p>
<p><i>Environment Agency</i></p> <p>We support the criteria for policy in Table 4. We would welcome greater commitment in any future policy wording towards 'betterment opportunities' (flood alleviation, habitat creation, WFD objectives, water quality etc...). We consider this to be a cross-cutting theme that affects a number of the above letter codes.</p>	<p>B058-719</p> <p>Support noted. We believe we have given a commitment to betterment opportunities through our Green Infrastructure approach to restoration. However, your suggestion of strengthening this for operational phases is interesting and we will consider how to incorporate this as we develop the policy framework.</p>
<p><i>Mrs Pat Harries</i></p> <p>Update the current SIEVE test which could be in mapped form which would help members of the public support the Governments Localism Plan. Would therefore like to see a 200m buffer zone around vulnerable properties, moats & historic ditch systems to prevent damage.</p>	<p>B060-2399</p> <p>As stated previously, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out".</p> <p>We understand that proximity of a mineral working to houses or schools (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one</p>

Summary of comments	Initial officer response
	<p>method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>Whilst some of the criteria in Table 5 could be mapped to inform the identification of areas of search, such as potential transport routes and European sites of nature conservation importance, we think that it is appropriate for these issues to be considered on a site-by-site basis through the policy framework, as the location, design and working practices proposed will all influence whether or not mineral development is appropriate. Some mapped data is available on historic properties and features, such as listed buildings and registered historic parks and gardens, but this would not capture all of the types of features you mention. We think that our proposed approach of requiring such assets to be considered at application stage and protected and enhanced through the policy framework is the most appropriate solution. However, the areas of search will be refined based on feedback received during this consultation and we will take your comments into account as we develop the draft plan.</p>

Summary of comments	Initial officer response
(Q18) If you think that there are other issues that we should consider relating to how minerals are worked, please provide details.	
<p><i>Worcestershire Regulatory Services</i></p> <p>Section 10, details how the minerals should be worked. In addition to the guidance that is listed, the Worcestershire Air Quality Action Plan (http://www.worcsregservices.gov.uk/pollution/air-quality/air-quality-action-plan.aspx) should also be included. This would assist in locating where the AQMAs are in the county which need consideration in terms of particulate matter generation as well as traffic routes, and the Plan identifies the key factors that are contributing to the poor air quality which any proposal likely to have an impact on the locality will need to have consideration of. The inclusion of air quality, water quality, dust, noise, vibration and light is welcomed in Table 4.</p> <p>Section (d) of Table 5 suggests that consideration may be given for Air Quality Management Areas (AQMAs). It is imperative that the Planning Department ensures traffic management considers AQMAs for all applications. All of Worcestershire's AQMAs have been declared due to traffic emissions and HGVs emissions in particular are a significant contributory factor in all sites declared. The County Council should not permit the deterioration of air quality in the AQMAs or cause a borderline location to become an AQMA due to an application or the cumulative effect of applications increasing traffic. Air Quality impacts should be modelled, assessed and mitigated against where there is a potential adverse effect on an AQMA or where a locality is close to breaching the National Objective for a pollutant that would require declaration as an AQMA.</p>	<p>B008-689 nq</p> <p>We are aware of the Air Quality Management Areas you mention, and we intend to further consult the Worcestershire Air Quality Action Plan in developing draft policies for the next consultation. We also agree that air quality is related to traffic emissions, particularly HGVs, and as such these considerations should also be included in the section on sustainable transport policy.</p>

Summary of comments	Initial officer response
<p>Section (t) of Table 5 on Ground and Surface Water is welcomed and there should be a requirement to include these aspects in the Environmental Impact Assessment requirement of any application.</p> <p>The pre-application discussions (section cc page 43) would be supported and these should include consideration for air quality issues and potential contamination issues.</p> <p>The omission from Air Quality considerations under Sustainable Transport in Table 10 must be rectified. It is imperative that any application considers the impact on AQMAs or borderline AQMAs so that air quality is not adversely impacted and any appropriate alternative transport routes are considered at the earliest opportunity.</p>	<p>Noted.</p> <p>Support noted.</p> <p>Noted and agreed.</p>
<p><i>Mrs Anne Pearson</i></p>	<p>B034-2395</p>
<p>Draft objective 4) to Ensure mineral operations are resilient to and mitigate the impacts of climate change - the flood risk would be likely to be exacerbated by the extraction of sand and gravel from the flood plain. The area of land below Ham Court has been flooded since Christmas 2013. Upton lies only 10m above sea level and extraction is going to remove the land's ability to soak up water. There are many very old Park Oaks on the land and these would suffer from mineral extraction. This also applies to Draft objective 5). Draft objective 6) to Protect and enhance the natural and historic environment - The landscape of the old Ham Court Estate is believed to be of considerable importance and have been designed by a pupil or colleague of Capability Brown. Mineral extraction would destroy this. Draft objective 7) to Protect and enhance health and amenity -</p>	<p><i>Please note that the response to this comment appears under question 5 in section 7 for continuity and clarity purposes as that question specifically addresses the individual draft objectives. It appears here as Mrs Pearson submitted the comments as a response to question 17 in the questionnaire.</i></p>

Summary of comments	Initial officer response
<p>The removal of the 200m buffer zone flies in the face of the working practice criteria policies, such a buffer should not only be retained for small settlements of 6 houses or more, but expanded to ALL residential property.</p>	
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>(t) to (z) improved as no mitigation offered. With regard to 't' this SHOULD not COULD include consideration of source protection zones and potential impacts on the quality and quantity of water resources.</p> <p>National policy, cf 10.10, is not adhered to as although issues identified, adverse unacceptable impacts are circumvented.</p>	<p>Noted. The items listed in table 5 are issues that we intend to address through policy criteria, and are not in themselves draft policies. Draft policy wording will be developed for the next consultation draft, and we will take your suggestions of re-wording into account at that time.</p> <p>As referred to in Paragraph 10.10, the purpose of the policies that will be put forward in the draft plan is to "ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health" as required by paragraph 143 off the NPPF. We anticipate that the policy criteria will be strong enough to ensure that proposals would only be permitted where the development is designed to ensure that unacceptable adverse impacts will not occur. If adverse impacts would occur even with any proposed mitigation measures in place, the planning application is likely to be refused. Once the Minerals Local Plan is adopted it will provide the County Council with a strong basis for monitoring and enforcement and we will look at how monitoring requirements could be incorporated into the draft policies at the next stage of consultation. Sites must comply with the conditions imposed through their individual planning permissions. Our monitoring officer visits each of the current minerals sites in the county on average three or four times per year.</p>
<p><i>WCC Environmental Policy</i></p>	<p>B059-2004</p>
<p>Can birds be a problem if attracted in large numbers?</p>	<p>We are preparing a background paper on bird strike, this will be available from our website in due course.</p>

No comment responses:

<p><i>Worcestershire Wildlife Trust</i></p>	<p>B044-1081</p>
<p>No comment</p>	<p>Noted</p>

Section 11: Where will minerals be worked?

To drive development to the locations where the working of viable mineral resources will meet market demand and enable the delivery of strategic restoration priorities, we have developed areas of search for aggregates and an opportunity area for clay. Further detail of how these have been developed is set out in Section 11.

Question 19: We would like to refine the opportunity area for clay. If you have any information which could help us to do this, such as whether there are any particular sub-groups of the Mercia Mudstone strata which are more important than others, please let us know.

Mercia Mudstone (a type of clay) is currently worked in Worcestershire to make bricks and supplies a national market. The 'opportunity area' for clay will give an indication of areas where clay working is possible and will highlight its importance in the spatial strategy but we have no information to refine this to identify meaningful areas of search.

Summary of comments	Initial officer response
<p><i>Wildmoor Residents Association</i></p> <p>Is it not the job of the county council and its geological team to know and determine where sub-groups of the Mercia Mudstone strata are?</p>	<p>B047-2295</p> <p>We do have information about Mercia Mudstone and its sub-groups, but we currently have little information to indicate where this might be of good enough quality to be used for brick making or other commercially attractive purposes. This is something we are hoping to refine as we develop the Minerals Local Plan and some of our consultees could be well placed to help us with this, for example the Earth Heritage Trust, the Mineral Products Association or the company which currently makes bricks in Worcestershire.</p> <p>We currently have two brickworks in the county near to Hartlebury and Waresley. These are operated by Weinerberger and currently have planning permission to work enough clay to last until approximately 2034 at Hartlebury and 2059 at Waresley²⁷. When operating at full capacity they can produce over 2 million bricks per week, and although there are some imports and</p>

²⁷ "Ensuring adequate and steady supply of Industrial and Energy Minerals", October 2012, available on www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
	<p>exports across the county boundary due to bricks being a commercial commodity, this essentially makes Worcestershire a net exporter of bricks. We think this means it is unlikely that another brickworks would be commercially attractive to develop in the county, but we intend to develop the policy framework to ensure that any applications which come forward could be assessed.</p>
<i>Herefordshire and Worcestershire Earth Heritage Trust</i>	B048-800
<p>Herefordshire & Worcestershire Earth Heritage Trust is a local geological conservation charity that maintains a geological records centre at the University of Worcester. We have paper copies of BGS maps at the standard 1:50,000 scale which show divisions in the Mercia Mudstone Group as well as copies of BGS mapping at 1:10,000 with more detail of local features. Our GIS system has geological mapping at 1:50,000 scale. This could all be used as a local resource and we could produce maps and reports at reasonable cost, certainly very competitively compared with commercial consultancies. Not all of the Mercia Mudstone is clay. We could identify the clay rich areas in the Mercia Mudstone and such things as skerry beds (sandstone) within the Mercia Mudstone that would make it unsuitable for brick making. In addition we could draw on local knowledge in some areas where local pits have been dug for this purpose in years gone by.</p>	<p>Noted, thank you.</p> <p>We also have digital geological maps from BGS at 1:50,000 scale but we have no information to help us understand the variance in the commercial viability of the deposits. It would be useful for us to meet with you to look at your more detailed 1:10,000 maps and to discuss how we might interpret the digital geological information to refine the opportunity area for clay.</p>

No comment responses:

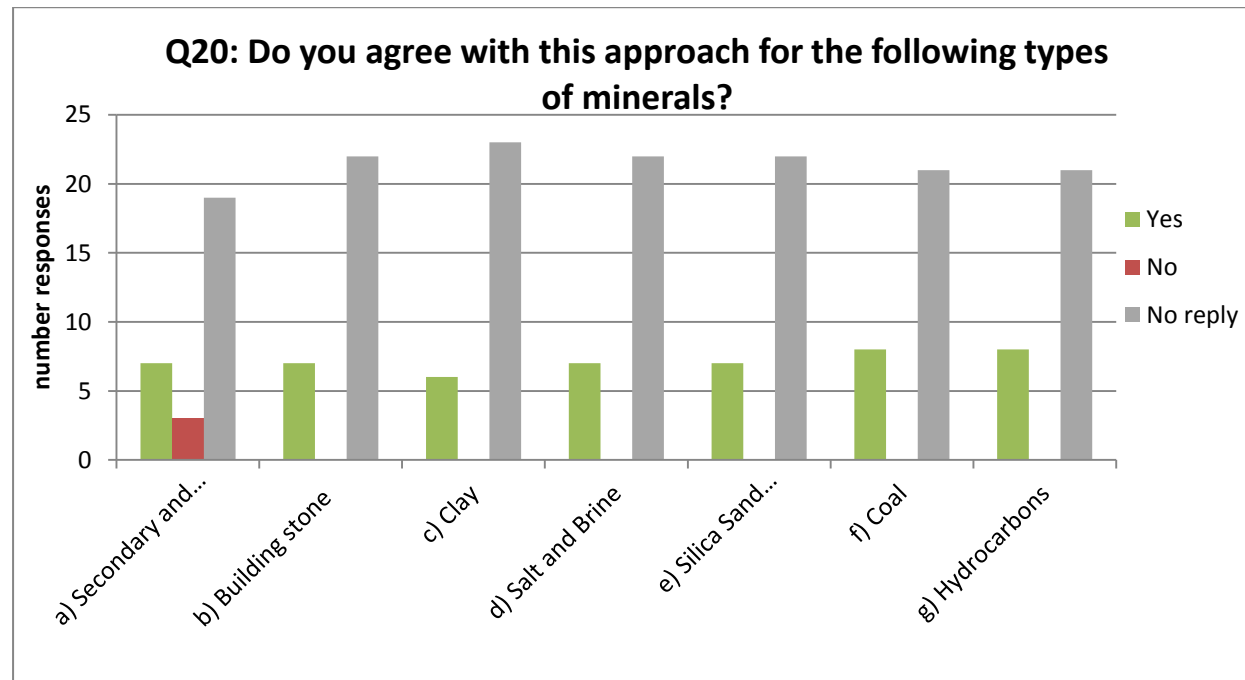
<i>Natural England</i>	B040-717
No comments	Noted
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comments	Noted

Questions 20 and 21: Areas of search for industrial or energy minerals.

In Section 11 we have set out why we have not identified areas of search for industrial or energy minerals.

Question 20: Do you agree with this approach for each of the following types of minerals?

	Yes	No
a) Secondary and recycled aggregates	<input type="checkbox"/>	<input type="checkbox"/>
b) Building stone	<input type="checkbox"/>	<input type="checkbox"/>
c) Clay	<input type="checkbox"/>	<input type="checkbox"/>
d) Salt and Brine	<input type="checkbox"/>	<input type="checkbox"/>
e) Silica Sand (alternatives for aggregates are addressed below)	<input type="checkbox"/>	<input type="checkbox"/>
f) Coal	<input type="checkbox"/>	<input type="checkbox"/>
g) Hydrocarbons	<input type="checkbox"/>	<input type="checkbox"/>



Summary of comments	Initial officer response
(Q20) Do you have any other information about any of these types of minerals in the county?	
<p><i>English Heritage</i> (section b, building stone) We also note the reference to the English Heritage Strategic Stone Study Database (SSSD) and agree that it would be appropriate to further collate this information to inform future small scale minerals development and mineral safeguarded areas for building stone, as mentioned in the emerging Minerals Plan. The availability of traditional building and roofing stone is fundamental to the upkeep of our local built heritage. <i>[This comment also appears above in question 1]</i></p>	<p>B025-716 nq We published a background document <i>Building Stone in Worcestershire</i> alongside this consultation²⁸. Due to the timescales involved in preparing the main consultation document, we were not able to incorporate its findings in the main consultation, but this document sets out further analysis of the Strategic Stone Study and we will consider this further as we develop the Minerals Local Plan. If you have any comments on the <i>Building Stone in Worcestershire</i> background document, please let us know.</p>
<p><i>Mr Tom Meikle (telephone conversation with Marianne Joynes)</i> (section g, hydrocarbons) The consultation document states that there is not a history of oil extraction in Worcestershire. However, Mr Meikle is aware that there was a "nodding donkey" oil well in the 1970s near Elmley Castle / Hinton on the Green (SO998414). Further seismic exploration also took place over Mr Meikle's land in Wick parish in the 1970s. However, the presence of historic interest in oil in the county should not be seen as an encouragement for new extraction.</p>	<p>B029-2393 nq We are aware that two exploratory boreholes for hydrocarbons have been drilled in Worcestershire. These are known as Collington 1 (near the village of Collington on the border between Herefordshire and Worcestershire in the north west of the county) and Netherton 1 (near Elmley Castle). Collington 1 was drilled in 1967 to a depth of 1720m and was subsequently abandoned because no hydrocarbons were discovered. Netherton was drilled in 1974 to a depth of 2327m and also abandoned because no hydrocarbons were discovered there either²⁹. To the best of our knowledge, no further exploratory wells have been drilled in the county. We have also consulted the Archive and Archaeology Service to see whether they hold any records of hydrocarbon exploration or extraction in the area you mention. This search did not turn up any additional information about historic oil exploration, and based on this information and the BGS data above, we believe that the oil well you recall was the Netherton Borehole drilled by Ultramar in August 1974. We are anecdotally aware that seismic surveys have been undertaken in the county at various times but do not have</p>

²⁸ Available on www.worcestershire.gov.uk/mineralsbackground.

²⁹ Please refer to the Herefordshire and Worcestershire Resources and Constraints document produced by BGS, this document is available on the web at www.bgs.ac.uk/downloads/start.cfm?id=2617

Summary of comments	Initial officer response
	<p>any information on their findings, unfortunately the BIS (and earlier Department of Energy) licenses do not require operators to share their findings with the council.</p> <p>The information we have available from the BGS concludes that "the prospects for discovery of oil and gas in Herefordshire and Worcestershire are very low. [Two] exploration wells have been drilled in the county, none of which discovered oil or gas. The lack of source rocks in the Worcester Basin indicates that it is not prospective for oil and gas.³⁰" We are preparing a background document looking further at oil and gas issues for Worcestershire and will publish this on our website³¹ as soon as possible.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>The 'opportunity' area for clay needs refining and definition sooner rather than later so policy does not become just a convenience in particular site-specific locations</p>	<p>Following the results of this consultation we think we may need to refine the areas of search and the opportunity area for clay.</p> <p>Clay is widely found across the county, but we currently have little information to indicate where this might be of good enough quality to be used for brick making or other commercially attractive purposes. This is something we are hoping to refine as we develop the Minerals Local Plan and some of our consultees could be well placed to help us with this, for example the Earth Heritage Trust, the Mineral Products Association or the company which currently makes bricks in Worcestershire.</p> <p>We currently have two brickworks in the county near to Hartlebury and Waresley. These are operated by Weinerberger and currently have planning permission to work enough clay to last until approximately 2034 at Hartlebury and 2059 at Waresley³². When operating at full capacity they can produce over 2 million bricks per week, and although there are some imports and exports across the county boundary due to bricks being a commercial</p>

³⁰ Please refer to the Herefordshire and Worcestershire Resources and Constraints document produced by BGS, this document is available on the web at www.bgs.ac.uk/downloads/start.cfm?id=2617

³¹ www.worcestershire.gov.uk/mineralsbackground

³² "Ensuring adequate and steady supply of Industrial and Energy Minerals", October 2012, available on www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
	commodity, this essentially makes Worcestershire a net exporter of bricks. We think this means it is unlikely that another brickworks would be commercially attractive to develop in the county, but we intend to develop the policy framework to ensure that any applications which come forward could be assessed.
<i>Herefordshire and Worcestershire Earth Heritage Trust</i>	B048-800
As mentioned in Q 11, there is a large project underway led by Herefordshire and Worcestershire Earth Heritage Trust to identify sources of building stone used in historic buildings across the county.	<p>We published a background document <i>Building Stone in Worcestershire</i> alongside this consultation³³ which mentions the Earth Heritage Trust project. Due to the timescales involved in preparing the main consultation document, we were not able to incorporate its findings in the main consultation, but this document sets out further analysis of the Strategic Stone Study and we will consider this further as we develop the Minerals Local Plan.</p> <p>If you have any comments on the <i>Building Stone in Worcestershire</i> background document, please let us know. Any additional information that you can provide from the One Thousand Years of Building With Stone Project would also be welcome.</p>
(Q21) Do you have any additional comments to make on this topic?	
<i>Droitwich Spa Town Council</i>	B005-564 nq
<p>Pursuant to Minute No 159(3) – Planning Committee 11 November 2013, the Committee considered the second consultation on the emerging Minerals Local Plan.</p> <p>It was noted that the Minerals Local Plan would be used by the County Council to guide where mineral workings should be developed and to make decisions about planning applications for mineral extraction and processing in the county. The Plan addressed commercial extraction first and foremost, although tourism was one of the issues to be worked up in the next stage of the plan.</p>	Noted and agreed. We recognise the importance of protecting the potential of using brine deposits for spa bathing and souvenir salt production to the council and we will incorporate your comments into the next consultation draft. We will develop policies that would enable applications for brine working to be assessed and we will bear in mind that small scale works such as for spa bathing or souvenir production would be viewed favourably by the town council, but we will ensure the policies are rigorous enough to minimise the risk of further subsidence being caused by brine extraction.

³³ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>It had been suggested by Councillor Mrs P E Davey at the last meeting that a presentation be made to the Committee at this meeting, however as this second stage document only made passing reference to the brine deposits, together with a statement that due to problems of subsidence it was unlikely that the salt deposits will be worked commercially in the foreseeable future, then it was recommended that the Committee confirms that it wishes to see brine used in spa bathing and for possible souvenir salt production and therefore requests that the new plan should not contain any proposals that would prejudice this objective.</p> <p>RESOLVED: That Worcestershire County Council be advised that the Town Council wishes to see brine used in spa bathing and in the possible souvenir salt production and therefore requests that the new Minerals Local Plan should not contain any proposals that would prejudice this objective.</p>	
<i>National Farmers' Union, West Midlands Region</i>	B017-857 nq
<p>Supply of building stone for historic buildings and stone walling will be required from time to time by farm businesses. It may be appropriate to extract small supplies of building stone for local and farm based projects and the plan should enable this.</p> <p>We agree with the location criteria policies approached to extraction as outlined on page 50.</p>	<p>We published a background document <i>Building Stone in Worcestershire</i> alongside this consultation³⁴. Due to the timescales involved in preparing the main consultation document, we were not able to incorporate its findings in the main consultation.</p> <p>We are aware of the need for local stone, and this will be carried through into the draft policies in the next consultation.</p> <p>Support noted.</p>
<i>Severn Trent Water</i>	B021-1688 nq

³⁴ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>The Areas of Search cover a wide area that includes Severn Trent assets and infrastructure such as water mains, sewers, pumping stations and treatment works. As part of further assessment work we will be happy to work with you to identify the location of such assets to avoid unnecessary consequences.</p> <p>Another concern is the presence of water supply borehole sites and associated Source Protection Zones in the principal aquifer which is a fundamental source of water supply. We have identified 16 borehole sites with associated SPZs within the Areas of Search but although not all are in current use we need to be assured that the Plan has no detrimental impact on the quality or quantity of water abstracted either during or after mineral & aggregate extraction.</p> <p>We strongly suggest that hydrological and hydro-geological assessments is carried out to identify any impact together with groundwater modelling which is usually carried out by the Environment Agency.</p>	<p>Following the results of this consultation we think we may need to refine the areas of search. Any additional information you can provide to assist with this will be most welcome. However, the areas of search are large areas which indicate where there may be commercially attractive amounts of mineral resources over a large enough area that mineral workings in the area could collectively be restored and contribute to integrated networks of green infrastructure. They are not site specific allocations and we are not proposing that any given area could or must be worked. We anticipate developing the policy framework to ensure infrastructure assets such as those you mention would be protected rather than necessarily using them to refine the areas of search themselves.</p> <p>Thank you for bringing up Source Protection Zones. We acknowledge that this is an issue which the Minerals Local Plan should take into account and we will give consideration to how we might do this as we develop the plan. We may be able to incorporate Source Protection Zones as an issue to be addressed through policy criteria, or it might be possible to use them as a consideration in defining the restoration profiles for each area of search. Any information you can provide on boreholes or source protection zones would be helpful.</p> <p>Agreed. Hydrological and hydro-geological assessments will be considered under the site-specific location policies that will be developed for the next consultation draft. These issues, while not mentioned explicitly in table 10 (p.61) do contribute to items f) subsidence and land stability, g) flood risk, h)soil resources, i) water quality and quantity and may have implications for restoration and after care schemes, especially under the high-level restoration priorities of flood alleviation and water quality.</p> <p>Although we do not intend to carry out countywide hydrological or hydrogeological assessments at this stage, we are preparing a background paper to address water and flooding issues.</p>

Summary of comments	Initial officer response
<p><i>Mineral Products Association</i> (section b, building stone) Whilst we note what you say about dimension stone being small scale that is a statement of the historic circumstances of the industry, and not necessarily of the future. Although it might be considered unlikely for a new dimension stone operation to be proposed in the county, we believe that you should be as flexible as possible and encourage any proposal of any size. In other words, you should not limit successful applications to small scale proposals or those which are just for heritage purposes or for local markets.</p>	<p>B020-1899 nq</p> <p>We published a background document <i>Building Stone in Worcestershire</i> alongside this consultation³⁵. Due to the timescales involved in preparing the main consultation document, we were not able to incorporate its findings in the main consultation.</p> <p>We are aware of the ongoing need for local stone, and this will be carried through into the draft policies in the next consultation.</p> <p>We note your concern that we should not limit building stone to only small scale proposals and we will consider this as we develop the policy framework.</p>
<p><i>Mineral Products Association</i> (section e, silica sand) Again, you should seek to implement national policy for industrial minerals and provide for at least 10 years reserves at each production site, and 15 years where significant new investment is planned. And any policy should be positive in its encouragement of new operations.</p>	<p>B020-1899 nq</p> <p>Worcestershire's current production of industrial minerals is fairly limited. We have no sites dedicated to producing silica sand for industrial purposes, though there are operators working these resources as aggregates. We are aware that the silica sands in the Wildmoor Formation in Worcestershire were historically important as naturally bonded moulding sands for iron founding but this industry appears to be virtually extinct. We do not think that there is a specific commercial need for the silica sand resources from the county for industrial purposes. It would be very helpful if you direct us to any evidence that there is a specific demand for industrial/silica sand in Worcestershire.</p> <p>The silica sand resources in the county form part of the large solid sand deposits in the north of the county. As such, they are part of the Stour Corridor and Junction 4a areas of search. Although the areas of search are proposed for aggregate resources and we do not intend to allocate sites or areas of search specifically for silica sand; this would establish the principle of working in these areas subject to other policy criteria. We agree that it is important to support new development, and we intend to develop positive draft location/criteria policies that will apply to individual proposals and be</p>

³⁵ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
	applied on a site-by-site basis.
<i>Mr Tom Meikle (telephone conversation with Marianne Joynes)</i>	B029-2393 nq
<p>Oil and fracking seem to be linked with sand and gravel in the plan and Mr Meikle feels this is not appropriate. The right implications need to be considered to ensure that oil or fracking will not be "let in by the back door" by only having the same considerations as sand and gravel.</p> <p>Mr Meikle was concerned that new technology such as fracking means that regulation / legislation struggles to keep pace, and we need to do everything we can to ensure that we have appropriate controls in place.</p> <p>Mr Meikle referred to online videos which suggested that</p>	<p>We have considered aggregates separately from conventional and unconventional hydrocarbons (which encompass oil and fracking) in as far as the plan relates to defining suitable locations for mineral working. However, at this stage we have highlighted the issues which would need to be considered through the policy framework for all types of mineral development together.</p> <p>Whilst we agree that hydrocarbon exploration and workings can be substantially different from aggregates workings, we think that many of the issues which need to be addressed could be similar, for example for all types of minerals we will need to consider things like transport impacts, visual impacts, potential for subsidence, impacts on water quality and biodiversity. Where the issues overlap we think it provides a much simpler policy framework to address all types of minerals by over-arching policies but we will remain alert to any issues which would require special consideration for any individual mineral type and address these as separate issues in subsequent drafts as necessary.</p> <p>We are producing a background paper on oil, gas and unconventional hydrocarbons using the best information that is currently available. We recognise that the available data is likely to continue evolving both during the development of the plan and after the plan has been adopted, and it is important to ensure that the policies are robust enough to withstand changing circumstances. The background paper on oil, gas and unconventional hydrocarbons will be updated regularly as new information becomes available. However, we think that by developing over-arching policies the majority of likely issues should be addressed, and we will also develop monitoring indicators to ensure that we are alerted if the plan needs to be amended to address new technologies, issues or legislation.</p> <p>We agree that concerns about the environmental impacts of fracking need to</p>

Summary of comments	Initial officer response
<p>where fracking has taken place, people can sometimes "light their water". MJ referred to the Institute of Quarrying seminar on fracking which she attended in January 2014, where Professor Peter Styles (Keele University) suggested that the geology of some areas meant that gases naturally leak from the rocks and the earliest records of people being able to "light their water" significantly pre-date fracking. This was intended to highlight that although this is a real concern, it may not be a simple issue. Mr Meikle promoted the importance of testing before and after to ensure any implications could be monitored against baseline conditions.</p> <p>Mr Meikle questioned whether the feasibility of underground CO₂ storage is impacted by fracking.</p>	<p>be adequately addressed. In many cases, the types of issues you highlight arise due to poor well management and a lack of oversight. We agree that testing, monitoring and oversight are critical to the success of any mineral development and we will develop the policy framework in the plan to address this.</p> <p>Both the policy and regulatory framework that exist at the national level are also intended to address this. We are producing a background paper on oil, gas and unconventional hydrocarbons using the best information that is currently available, but in the meantime Hampshire County Council has produced an excellent Q&A document about unconventional hydrocarbons which is available here: documents.hants.gov.uk/mineralsandwaste/onshoreoilandgas-faq.pdf Please note that at this stage this link should only be considered as a source of information recommended by officers and must not be regarded as the policy of Worcestershire County Council, its Members or senior management.</p> <p>We intend to address underground gas storage as part of the background paper on oil, gas and unconventional hydrocarbons but we have no information on this matter at the time of writing.</p>
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p>	<p>B038-2286</p>
<p>We believe that there may be some contribution to be made from recycled materials.</p>	<p>Recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we need to give this due consideration to ensure that we make the most of the resources we have available. This issue overlaps with areas addressed in the Worcestershire Waste Core Strategy and we believe that while it may be necessary to address recycled materials to some extent in the Minerals Local Plan, it is not necessary to repeat what has already been covered in the Waste Core Strategy. The amount of mineral we think we need to plan for takes into account that there will be some use of recycled and secondary aggregates.</p>

Summary of comments	Initial officer response
and also, river dredging. We would ask The County Council to consider these aspects	We don't have any information about the nature and amount of material that might be produced through river dredging, and this potential resource has not been identified as significant using the area of search methodology. However, we don't want to rule it out completely and in the case where an application did come forward, the policy framework would address this. As river dredging touches many areas including waste, the environment and river management, it is not appropriate for the Minerals Local Plan to be the sole point of reference or to encourage or discourage it solely based on mineral development requirements. We intend to consult the Environment Agency on these matters as the plan develops.
<i>The Coal Authority</i>	B045-2184
Given the limited coal resources in Worcestershire, The Coal Authority is satisfied that there is no need for the Minerals Local Plan to identify areas of search for energy minerals. We can confirm that there are no licences for Coal Bed Methane extraction within the County.	Noted, thank you.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623,683 B
The demand for primary aggregates could be significantly reduced by maximising the use of secondary and recycled materials in construction projects wherever possible. It is understood that national guidelines indicate that around 20% of total aggregates required could be met from secondary and recycled materials. Given the importance of secondary and recycled materials it is suggested that the Minerals Local Plan include extracts from the Waste Core Strategy indicating tonnage levels and where recycled aggregates will be produced.	Recycled and secondary aggregates can provide a useful source of material to minimise the amount of primary minerals which need to be extracted, and we need to give this due consideration to ensure that we make the most of the resources we have available. This issue overlaps with areas addressed in the Worcestershire Waste Core Strategy and we believe that while it is necessary to address recycled materials to some extent in the Minerals Local Plan, it is not necessary to repeat what has already been covered in the Waste Core Strategy as this already forms part of the development plan. However, the methods we have used to establish the amount of mineral we think we need to plan for takes into account that there will be some use of recycled and secondary aggregates (see the Local Aggregates Assessment for Worcestershire - June 2013) ³⁶ .

³⁶ Available from www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p><i>Malvern Hills AONB Partnership</i> (section b, building stone) The AONB Partnership has previously raised the issue of small scale extraction of local building stone and this is included in the policies of the soon-to-be-published Malvern Hills AONB Management Plan (2014-19). We are pleased to see that the issue of extracting stone for local repair has been included in the plan, although it appears to be restricted to the safeguarding section rather than the extraction proposals.</p>	<p>B049-802A nq We are pleased that the AONB partnership has maintained its support for small-scale extraction of building stone. We would like to positively support and encourage proposals of this nature to come forward, and we plan to work with the Earth Heritage Trust and their One Thousand Years of Building With Stone project in order to acquire better data about historic quarries in the county that may be encouraged through the plan. We realise that the availability of local building stones is important for preserving the distinctive character of many parts of the county, and we will consider refining our approach to building stone in light of your comments in subsequent drafts.</p>
<p><i>Crothorne Parish Council</i> The consultation document states that there is not a history of oil extraction in Worcestershire. However, Crothorne Parish Council is aware that there was a "nodding donkey" oil well in the 1970s near Elmley Castle / Hinton on the Green (SO998414). Further seismic exploration also took place over land in the parish in the 1970s.</p>	<p>B051-558 nq We are aware that two exploratory boreholes for hydrocarbons have been drilled in Worcestershire. These are known as Collington 1 (near the village of Collington on the border between Herefordshire and Worcestershire in the north west of the county) and Netherton 1 (near Elmley Castle). Collington 1 was drilled in 1967 to a depth of 1720m and was subsequently abandoned because no hydrocarbons were discovered. Netherton was drilled in 1974 to a depth of 2327m and also abandoned because no hydrocarbons were discovered there either³⁷. To the best of our knowledge, no further exploratory wells have been drilled in the county.</p> <p>We have also consulted the Archive and Archaeology Service to see whether they hold any records of hydrocarbon exploration or extraction in the area you mention. This search did not turn up any additional information about historic oil exploration, and based on this information and the BGS data above, we believe that the oil well you recall was the Netherton Borehole drilled by Ultramar in August 1974.</p>

³⁷ Please refer to the Herefordshire and Worcestershire Resources and Constraints document produced by BGS, this document is available on the web at www.bgs.ac.uk/downloads/start.cfm?id=2617

Summary of comments	Initial officer response
<p>Although WCC may feel it is unlikely that there will be applications for oil and fracking, for gas, proper procedures need to be in place in the event that applications are made.</p> <p>Oil and fracking seem to be linked with sand and gravel in the plan and the Parish Council feels this is not appropriate. The right implications need to be considered to ensure that oil or fracking will not be "let in by the back door" by only having the same considerations as sand and gravel.</p>	<p>BGS concluded that "the prospects for discovery of oil and gas in Herefordshire and Worcestershire are very low. [Two] exploration wells have been drilled in the county, none of which discovered oil or gas. The lack of source rocks in the Worcester Basin indicates that it is not prospective for oil and gas.³⁸" We agree that in light of the recent central government focus on fracking and unconventional hydrocarbons we will need to address these issues in the plan whether we feel it is likely we will receive this type of application or not, and we are producing a background paper on oil, gas and unconventional hydrocarbons using the best information that is currently available. We recognise that the available data is likely to continue evolving both during the development of the plan and after the plan has been adopted, and it is important to ensure that the policies are robust enough to withstand changing circumstances. However, we think that by developing over-arching policies which apply to all types of minerals the majority of likely issues should be addressed, and we will also develop monitoring indicators to ensure that we are alerted if the plan needs to be amended to address new technologies, issues or legislation</p> <p>We have considered aggregates separately from conventional and unconventional hydrocarbons (which encompass oil and fracking) in as far as the plan relates to defining suitable locations for mineral working. However, at this stage we have highlighted the issues which would need to be considered through the policy framework for all types of mineral development together.</p> <p>Whilst we agree that hydrocarbon exploration and workings can be substantially different from aggregates workings, we think that many of the issues which need to be addressed could be similar, for example for all types of minerals we will need to consider things like transport impacts, visual impacts, potential for subsidence, impacts on water quality and biodiversity. Where the issues overlap we think it provides a much simpler policy</p>

³⁸ Please refer to the Herefordshire and Worcestershire Resources and Constraints document produced by BGS, this document is available on the web at www.bgs.ac.uk/downloads/start.cfm?id=2617

Summary of comments	Initial officer response
<p>We are concerned that new technology such as fracking means that regulation / legislation struggle to keep pace, and we need to do everything we can to ensure that we have appropriate controls in place. Cropthorne Parish Council feel that environmental testing before and after, to ensure any implications could be monitored against baseline conditions, is important.</p>	<p>framework to address all types of minerals by over-arching policies but we will remain alert to any issues which would require special consideration for any individual mineral type and address these as separate issues in subsequent drafts as necessary.</p> <p>We agree that concerns about the environmental impacts of fracking need to be adequately addressed. We also agree that testing, monitoring and oversight are critical to the success of any mineral development and we will develop the policy framework in the plan to address this.</p> <p>Both the policy and regulatory framework that exist at the national level are also intended to address this. We are producing a background paper on oil, gas and unconventional hydrocarbons using the best information that is currently available, but in the meantime Hampshire County Council has produced an excellent FAQ document about unconventional hydrocarbons that may address some of your concerns which is available here: documents.hants.gov.uk/mineralsandwaste/onshoreoilandgas-faq.pdf Please note that at this stage this link should only be considered as a source of information recommended by officers and must not be regarded as the policy of Worcestershire County Council, its Members or senior management.</p> <p>We recognise that fracking is still an emerging technology in the UK and that the available data and legislation is likely to continue evolving both during the development of the plan and after the plan has been adopted, and it is important to ensure that the policies are robust enough to withstand changing circumstances. The background paper on oil, gas and unconventional hydrocarbons will be updated regularly as new information becomes available. However, we think that by developing over-arching policies the majority of likely issues should be addressed, and we will also develop monitoring indicators to ensure that we are alerted if the plan needs to be amended to address new technologies, issues or legislation.</p>

No comment responses:

<i>Natural England (Q20)</i>	B040-717
No comment	Noted
<i>Worcestershire Wildlife Trust (Q20)</i>	B044-1081
No comment	Noted
<i>WCC Environmental Policy</i>	B059-2004
No further comments	Noted.
<i>Natural England (Q21)</i>	B040-717
No Comment	Noted.
<i>Worcestershire Wildlife Trust (Q21)</i>	B044-1081
No comment	Noted.

Question 22: Assessing aggregate resources.

In Section 11, we set out a step-by-step guide to how we have assessed aggregate resources to define areas of search, and further detail of all the resources we assessed is set out in the background report "Analysis of Mineral Resources in Worcestershire" which is available on www.worcestershire.gov.uk/mineralsbackground

A number of respondents have brought sites forward in their responses to this question, these sites are presented at the end of this question in order to best display the complete information about them.

Summary of comments	Initial officer response
(Q22) Do you have any additional information about the resources we have assessed in Step 2, or do you think that there are other deposits we should assess?	
<i>Mineral Products Association</i>	B020-1899 nq
Whilst the promotion of AoS is understandable, we know of at least one of our members who is actively pursuing a new site. The plans in the consultation document are too small to know how the areas have been selected, but this fact suggests you may be excluding viable sites with your approach unless there will be a flexible policy that allows equal consideration of sites outside of the AoS, or you change your approach to include a mix of Preferred	We agree that the scale of the maps and figures presented in the draft consultation does not allow for precise identification of the areas of search and we are aware that the mapped information on mineral resources may not have been as easy to follow as we hoped. We will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have. However, more detailed analysis of mineral resources in the county is available on our website at

Summary of comments	Initial officer response
<p>Areas and AoS. We suggest that you publish the AoS boundaries at a larger scale so consultees can carry out a reality check on your assumptions. And we would certainly argue that you should not determine applications made outside of AoS as unsustainably located merely because they are outside an arbitrary AoS.</p> <p>You also use inaccurate estimations of resource quantities in the AoS assessments. The industry uses a density figure of 1.64 t/m³ for sand and gravel, which takes account of processing losses. The equivalent figures for crushed rock vary depending on the geology but range from 2.2 t/m³ – 2.5 t/m³. Again, these figures are net of processing losses.</p> <p>The position of constraints also needs to be clarified since we are not certain that permission is likely to be forthcoming in the AoS if there are significant constraints in any event. Perhaps this is something we could include in a meeting with the MPA.</p>	<p>http://www.worcestershire.gov.uk/mineralsbackground under the 'Analysis of Mineral Resources' heading.</p> <p>Following the responses we have received to this consultation, we intend to identify areas of search in accordance with a more refined version of the methodology set out in Section 11 and policy criteria will be developed for the next consultation. Several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. A number of operators have proposed sites as part of this consultation process and we will be looking more closely at these in due course. We will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required in order to maximise the deliverability of required provision. We anticipate that the policy framework we develop will be able to address any sites that come forward on sites outside of the areas of search, though we are still considering how this type of site will be handled in the draft plan.</p> <p>Thank you for bringing this to our attention. We will revisit these assumptions and attempt to clarify our methodology for the next consultation draft.</p> <p>Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most</p>

Summary of comments	Initial officer response
	benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out". We think that the policy framework will set the criteria for how these "constraints" should be avoided, managed or mitigated and that this will influence site location and the design of mineral developments. We welcome the opportunity to discuss the draft plan further with you.
<i>Pershore Town Council</i>	B035-634
We have concerns about the area of search approach as opposed to site specific.	Concerns noted. More specific information about your concerns would usefully help us address them. However, a number of operators have proposed sites as part of this consultation process and we will be looking more closely at these in due course. We will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required in order to maximise the deliverability of required provision. We anticipate that the policy framework we develop will be able to address any sites that come forward on sites outside of the areas of search, though we are still considering how this type of site will be handled in the draft plan.
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
We STRONGLY object to the inclusion of the Lower Severn Corridor: South West in the Areas of Search shown on Table 9 (p.59) of the Consultation document and disagree with the analysis of the assessment of aggregate background papers, particularly Appendix 19 the Longdon Hinterland. 19/7 refers to land at Queenshill (sp). The analysis in the background document is WRONG. The land is not capable of producing the 780,000 tonnes referred to in the County document. A detailed geological assessment was undertaken by the Cemex and showed the majority of this site as having 'no mineral'. Only 29.9 ha of the site is shown as containing mineral and Cemex have applied for the extraction of 403,000 tonnes (although our assessment is that there is significantly less than that figure). Based on this detailed	We acknowledge that some of the data used in assessing the mineral resources in the county is quite old or has some limitations. Each mapped deposit has been assessed to identify the significance of the mineral resource using information from the British Geological Survey (BGS) (presented in documents called 'memoirs') and previous planning applications. The amount and quality of information varies significantly for different deposits and different parts of the county and where a planning application has been submitted it is often the most recent and most detailed information available. We believe that the areas of search approach we have used to date was as robust as possible, but we agree that further refinements can be made following responses received to this consultation and that this will help us to bring a robust plan forward. The area you refer to is the subject of a current planning application at Holdfast (Cemex, 2011). This falls within the wider deposit area mapped by

Summary of comments	Initial officer response
<p>assessment the land fall into the category of 'Not significant' as defined by Table 7 of the Consultation Document and should be EXCLUDED from the areas of search. Furthermore, this site was considered for inclusion in the last Minerals Local Plan and was rejected as unacceptable and in an area where mineral extraction "would not normally be permitted". We do not consider that there has been a material change in circumstances since that time and therefore, the land should be considered suitable for consideration. Areas 19/2 and 19/6 are severely compromised by residential development and are full of heritage assets including listed buildings, historic parkland, irreplaceable natural habitats. The exclusion of these assets would result in the area being less than 200ha and therefore they cannot be considered as "key' resources. Furthermore, 19/2 and 19/6 are remote from the river and would result in all aggregate being removed by road. The weight limit on the Mythe Bridge means that all traffic would have to go through Upton and across the Bridge to gain access to the A38 and the Motorway. This would result in considerable congestion on the highway network and a huge impact on residential amenity. These areas should therefore, be excluded from your areas of search.</p>	<p>the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013³⁹. Whilst the BGS memoirs provided a small amount of information on this deposit, we felt that the further information provided by the Cemex application was useful in assessing the resource, although we acknowledge that there are some unanswered questions about this. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p> <p>We agree that access and heritage issues are important and we will develop the policy framework to ensure the types of issues you raise are addressed as part of all planning applications. For reference, the current application for the site at Holdfast proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry.</p> <p>Any decisions we make need to be based on credible, robust and up to date evidence or the Minerals Local Plan will not be found sound when it is submitted to the Secretary of State for examination. The preparatory work for the adopted plan was undertaken between 1990 and 1997 and because of policy changes, new data, and major shifts in the way we approach restoration, sustainability, and planning we think that the preparatory work you refer to is no longer robust enough for us to rely on to stand up to these new, more rigorous expectations. Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. Most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints under the new policy framework.</p>

³⁹ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<i>Mrs Christine Daniell</i>	B037-2396
<p>See response to Q.1. QUEENHILL/HOLDFAST 19.7 should be classed as NOT significant. Present figures are incorrect.</p> <p>19.2 If areas of lane, roads and gardens are moved than the area is below 200 ha and access poor.</p>	<p>The area you refer to is the subject of a current planning application at Holdfast (Cemex, 2011). This falls within the wider deposit area mapped by the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013⁴⁰. Whilst the BGS memoirs provided a small amount of information on this deposit, we felt that the further information provided by the Cemex application was useful in assessing the resource, although we acknowledge that there are some unanswered questions about this. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p> <p>We acknowledge that some of the data used in assessing the mineral resources in the county is quite old or has some limitations. Each mapped deposit has been assessed to identify the significance of the mineral resource using information from the British Geological Survey (BGS) (presented in documents called 'memoirs') and previous planning applications. The amount and quality of information varies significantly for different deposits and different parts of the county and where a planning application has been submitted it is often the most recent and most detailed information available. We believe that the areas of search approach we have used to date was as robust as possible, but we agree that further refinements can be made following responses received to this consultation and that this will help us to bring a robust plan forward.</p> <p>Available hectareage for all resource areas was calculated using the methodology and assumptions set out in the "Analysis of Mineral Resources in Worcestershire" document using the best information we had available⁴¹. As part of the calculation we decided to halve the resource potential when estimating the resource volume because we recognised the need to avoid</p>

⁴⁰ Available on www.worcestershire.gov.uk/mineralsbackground.

⁴¹ See Chapter 3 in the Analysis of Mineral Resources in Worcestershire, October 2013, available on www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
	<p>spurious accuracy, minimise the risk of overestimating the resources and to allow for the following factors:</p> <ul style="list-style-type: none"> • Many resource areas are overlain by dispersed development and it is therefore unlikely that the whole resource area would be worked. • Information about depth is limited in detail and the quality and depth can vary across the resource area. • Constraints that will be set out in criteria-based policies have not been applied to the assessment of resource areas; it is possible therefore that some parts of the resource areas would be constrained from being fully worked. <p>Not all resource areas will be affected equally by all of these factors. We think that this will lead to an overestimate of the resource in some areas and an underestimate in others, averaging out across the county.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>We object to the inclusion of the Lower Severn Corridor: South West in the Areas of Search shown on Table 9 and disagree with the 'Analysis of Mineral Resources in Worcestershire' background paper in particular, and also Appendix 19: Analysis of aggregate resources in ECA 19: Longdon Hinterland. 19/7 refers to land north of 'Queenshill'. This should read Queenhill. This site largely relates to Manor Farm, Holdfast which is the subject of a planning application. The detailed geological tests undertaken by the applicant shows large parts of this area contain no mineral and therefore the application area has been reduced to 29.9 ha and is for the extraction of up to 403,000 tonnes of sand and gravel. Based on this detailed assessment the land falls into the category of 'Not significant' as defined by Table 7. It should therefore, be excluded from the areas of search. 19/2 and 19/6 are both areas severely compromised by</p>	<p>We acknowledge that some of the data used in assessing the mineral resources in the county is quite old or has some limitations. Each mapped deposit has been assessed to identify the significance of the mineral resource using information from the British Geological Survey (BGS) (presented in documents called 'memoirs') and previous planning applications. The amount and quality of information varies significantly for different deposits and different parts of the county and where a planning application has been submitted it is often the most recent and most detailed information available. We believe that the areas of search approach we have used to date was as robust as possible, but we agree that further refinements can be made following responses received to this consultation and that this will help us to bring a robust plan forward.</p> <p>The area you refer to specifically is the subject of a current planning application at Holdfast (Cemex, 2011) and we note that the area should be referred to as Queenhill not Queenshill. This falls within the wider deposit area mapped by the British Geological Survey which we have assessed as</p>

Summary of comments	Initial officer response
<p>development notably the hamlets of Newbridge Green and Longdon Heath and the historic parkland of Ham Court and the surrounding large houses. The exclusion of these developed areas together with the land of high landscape value would result in these areas being less than 200ha and therefore should NOT be regarded a key resource. They should therefore, be removed from the areas of search. Furthermore, 19/2 and 19/6 are remote from the river and would result in the aggregate being removed by road. The weight limit on the Mythe Bridge would require all transport to go through Upton and across the Upton Bridge to reach the A38 and thence the motorway network. This would result in considerable congestion on the highway network and would not then meet your requirements for acceptable development. These areas should therefore be removed from your areas of search.</p>	<p>resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013⁴². Whilst the BGS memoirs provided a small amount of information on this deposit, we felt that the further information provided by the Cemex application was useful in assessing the resource, although we acknowledge that there are some unanswered questions about this. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p> <p>We agree that access issues are important and we will develop the policy framework to ensure the types of issues you raise are addressed as part of all planning applications. Whilst current transport networks and their ability to support development will need to be considered at application stage, in some cases it can be possible and appropriate for planning conditions and obligations to be put in place to secure improvements to transport links. We must also remember that there is likely to be demand for mineral resources on the west side of the River Severn and therefore we should not assume that any minerals that might be extracted from the area you refer to would automatically require access to the A38 or motorway network. For reference, the current application for the site at Holdfast proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry.</p>
<p><i>Malvern Hills AONB Partnership</i></p>	<p>B049-802B</p>
<p>The AONB Unit is alarmed at the potential for any extraction but also at the amount of extraction that could potentially take place in the 2 AONBs using this methodology. In order to meet the target of 1.63 million tonnes of crushed rock over the next 10 years a volume of 615,000m³ would need to be extracted from either the Malvern Hills AONB and/or the Cotswolds AONB. This must be absolutely a last resort. Whilst we appreciate that minerals can only be extracted where they are</p>	<p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Site-specific location policies will ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p>

⁴² Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>found, there needs to be an assessment of supply on a regional or national basis to assess whether this provision can be met in some other way. The national importance of these landscapes requires a more co-ordinated approach to working with surrounding counties to meet the necessary provision.</p>	<p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, and we are actively discussing the issue of crushed rock provision with them to establish whether there are any other avenues available for provision of Worcestershire's crushed rock requirements from outside of the AONBs.</p> <p>We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p>
<p><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p>	<p>B050-1504 A</p>
<p>Whilst we are supportive of promoting Areas of Search we believe that the Plan should go further with identifying specific sites where promoted by Industry and also identifying Preferred Areas that can provide greater certainty for mineral operators moving forward.</p> <p>We note that a significant amount of work has been done in the Analysis of Mineral Resources in Worcestershire. However, the Plans within the background document and the MLP are at a very small scale that makes it difficult to interpret.</p>	<p>Support for Areas of Search approach noted. We are still considering how we will incorporate sites that have been put forward by the industry in the plan, including extensions to existing sites and we recognise that these types of site present excellent opportunities to address the shortfall in our landbank levels. The areas of search will be refined based on feedback received during this consultation and we will take your comments into account. We will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required in order to maximise the deliverability of required provision. We anticipate that the policy framework we develop will be able to address any sites that come forward on sites outside of the areas of search, though we are still considering how this type of site will be handled in the draft plan.</p> <p>We agree that the scale of the maps and figures presented in the draft consultation does not allow for precise identification of the areas of search and we are aware that the mapped information on mineral resources may not have been as easy to follow as we hoped. We will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have. However, more detailed analysis of the mineral resources in the county is available on our website at http://www.worcestershire.gov.uk/mineralsbackground under the 'Analysis of Mineral Resources' heading.</p>

Summary of comments	Initial officer response
<p>Lafarge Tarmac wish to promote, for allocation, extensions to their Clifton Quarry that would be required to maintain a continuity of supply during the Plan period. A southern extension to the existing quarry is available, and a larger eastern extension, east of the A38, is also available, these two extension areas have a potential reserve of 2 million tonnes. Mineral from the eastern area would be transported by conveyor to the existing plant site. Restoration of the two areas would complement the existing restoration of Clifton Quarry to a mix of agriculture and enhance wildlife water body.</p>	<p>The areas of search will be refined based on feedback received during this consultation, and we are considering several ways of taking this forward including master planning, concept planning, and 'corridor plans' which should help provide the level of detail you seek.</p> <p>We welcome the promotion of new sites through this consultation. The proposed extensions to Clifton Quarry are covered in more detail below.</p>
<p align="center">Some respondents made comments about specific areas that they would like to see removed from the areas of search in the non-questionnaire responses. These comments are collated here:</p>	
<p><i>Charlton Parish Council</i></p>	<p>B024-2392 nq</p>
<p>Following a telephone conversation with one of your colleagues yesterday it was suggested that I email you to express my concerns about possible mineral extraction locally rather than completing your questionnaire. I write in my capacity as Chairman of Charlton Parish Council.</p> <p>I understand that there are key minerals that are subject to further investigations between Fernhill Farm, Charlton and Jubilee Bridge on the South side of the river. Extraction of minerals from this area would involve the transport of materials along narrow winding country roads either through the middle of the village of Fladbury</p>	<p>Thank you for bringing your concerns to our attention. Based on the feedback and comments we have received during this consultation, we think we may need to refine the areas of search. We will be considering a number of ways that we might be able to do this. The approach proposed in the Second Stage Consultation aimed to establish "areas of search" by grouping the mineral resources which we think are "key" or "significant" into areas which could provide green infrastructure gains through restoration, and highlight which issues might be most relevant for each area of search. The mineral resource you refer to has been assessed as resource area 16/1 and is considered to be a key resource as it contains an estimated 6.63 million tonnes of sand and gravel⁴³. This resource forms part of the "Avon Corridor: Central" area of search in the second stage consultation. The smaller areas</p>

⁴³ More detailed analysis of the mineral resources in the county is available on our website at <http://www.worcestershire.gov.uk/mineralsbackground> under the 'Analysis of Mineral Resources' heading.

Summary of comments	Initial officer response
<p>to the A44 or alternatively through the middle of the villages of Cropthorne or Charlton to the B4084. Fields in the area are also subject to flooding from time to time. For these reasons I believe the extraction of minerals from this area is not practical and would ask that these proposals are deleted from any further mineral extraction plans.</p> <p>There are also some minerals identified to the South East of Charlton although these are not thought to be significant. Again the road infrastructure to this area is totally inappropriate for extraction of these and in view of the fact that the source is not significant I believe that this proposed site be deleted from further plans.</p>	<p>you mention to the south east of Charlton have been assessed as resource areas 5/3 and 5/4. At this stage their size and the lack of information on their depth means that we think they are "not significant", and they have not been included as part of an area of search.</p> <p>We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport, including water and rail transport, which will consider these issues in more depth and inform the development of draft policies for the next consultation. We have also received comments from the Highways Agency (please refer to our response to them in question 24) regarding the Strategic Road Network in Worcestershire. We agree that access issues are important and we will develop the policy framework to ensure the types of issues you raise are addressed as part of all planning applications. Whilst current transport networks and their ability to support development will need to be considered at application stage, in some cases it can be possible and appropriate for planning conditions and obligations to be put in place to secure improvements to transport links. It may also be possible to access and transport some minerals by waterway which might otherwise be inappropriate by road, and the policy framework we develop will address this.</p> <p>We are developing a background paper to address water and flooding issues and we will develop policies to address these issues. Flood alleviation is one of the high level strategic restoration priorities proposed and this has been identified as a significant factor which should influence the design of mineral site restoration in the Avon Corridor Central area of search.</p>
<p><i>Mr John Corbet-Milward</i></p>	<p>B028-2391A nq</p>
<p>Whereas I fully understand the need for aggregate material to fulfil the needs of the building industry in this overcrowded country, I wish to lodge my profound objection to the proposal to extract gravel from what</p>	<p>Thank you for bringing the local importance of the Ham and its extension to our attention. We agree that the methods used so far potentially undervalue some existing local assets, and we will be working to find a way to address this across the county.</p>

Summary of comments	Initial officer response
<p>amounts to being an extension of the protected Ham adjacent to Upton upon Severn.</p> <p>The ham and its extension are areas of outstanding interest and should be left undisturbed: it is the preferred grazing area of thousands of swans at certain times of the year and my understanding is that there are greater deposits on the other side of the river which could be exploited.</p> <p>Notwithstanding the above, consideration should be taken into account of the seriously negative impact of the movement of heavy trucks down country lanes and of the likely damage to adjacent houses, including my own which has remained relatively undisturbed for more than 500 years.</p>	<p>We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport which will consider these issues in more depth and inform the development of draft policies for the next consultation. Whilst current transport networks and their ability to support development will need to be considered at application stage, in some cases it can be possible and appropriate for planning conditions and obligations to be put in place to secure improvements to transport links. It may also be possible to access and transport some minerals by waterway which might otherwise be inappropriate by road, and the policy framework we develop will address this. We have also received comments from the Highways Agency (please refer to our response to them in question 24) regarding the Strategic Road Network in Worcestershire. We agree the transportation section may require refinement.</p>
<p><i>Crothorne Parish Council</i></p>	<p>B051-558 nq</p>
<p>We understand that there are key minerals that are subject to further investigations between Fernhill Farm, Charlton and Jubilee Bridge on the South side of the river. Extraction of minerals from this area would involve the transport of materials along narrow winding country roads either through the middle of the village of Fladbury to the A44 or alternatively through the middle of the villages of Crothorne or Charlton to the B4084. Fields in the area are also subject to flooding from time to time. For these reasons I believe the extraction of minerals from this area is not practical and would ask that these proposals are deleted from any further mineral extraction plans.</p>	<p>Based on the feedback and comments we have received during this consultation, we think we may need to refine the areas of search. We will need be considering a number of ways that we might be able to do this. The approach proposed in the Second Stage Consultation aimed to establish "areas of search" by grouping the mineral resources which we think are "key" or "significant" into areas which could provide green infrastructure gains through restoration, and highlight which issues might be most relevant for each area of search. The mineral resource you refer to has been assessed as resource area 16/1 and is considered to be a key resource as it contains an estimated 6.63 million tonnes of sand and gravel⁴⁴. This resource forms part of the "Avon Corridor: Central" area of search in the second stage consultation. The smaller areas you mention to the south east of Charlton have been assessed as resource areas 5/3 and 5/4. At this stage their size</p>

⁴⁴ More detailed analysis of the mineral resources in the county is available on our website at <http://www.worcestershire.gov.uk/mineralsbackground> under the 'Analysis of Mineral Resources' heading.

Summary of comments	Initial officer response
<p>There are also some minerals identified to the South East of Charlton although these are not thought to be significant. Again the road infrastructure to this area is totally inappropriate for extraction of these and in view of the fact that the source is not significant I believe that this proposed site be deleted from further plans.</p>	<p>and the lack of information on their depth means that we think they are "not significant", and they have not been included as part of an area of search.</p> <p>We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport, including water and rail transport, which will consider these issues in more depth and inform the development of draft policies for the next consultation. We have also received comments from the Highways Agency (please refer to our response to them in question 24) regarding the Strategic Road Network in Worcestershire. We agree that access issues are important and we will develop the policy framework to ensure the types of issues you raise are addressed as part of all planning applications. Whilst current transport networks and their ability to support development will need to be considered at application stage, in some cases it can be possible and appropriate for planning conditions and obligations to be put in place to secure improvements to transport links. It may also be possible to access and transport some minerals by waterway which might otherwise be inappropriate by road, and the policy framework we develop will address this.</p> <p>We are developing a background paper to address water and flooding issues and we will develop policies to address these issues. Flood alleviation is one of the high level strategic restoration priorities proposed and this has been identified as a significant factor which should influence the design of mineral site restoration in the Avon Corridor Central area of search.</p>

No comment responses:

<i>Natural England</i>	B040-717
No comment	Noted
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comment	Noted

Sites Submitted by Industry

A number of operators have proposed sites as part of this consultation process and these are set out below. We will be looking more closely at these in due course and have not set out individual responses to these at this stage. We will consider them as we develop the draft plan and consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required in order to maximise the deliverability of required provision.

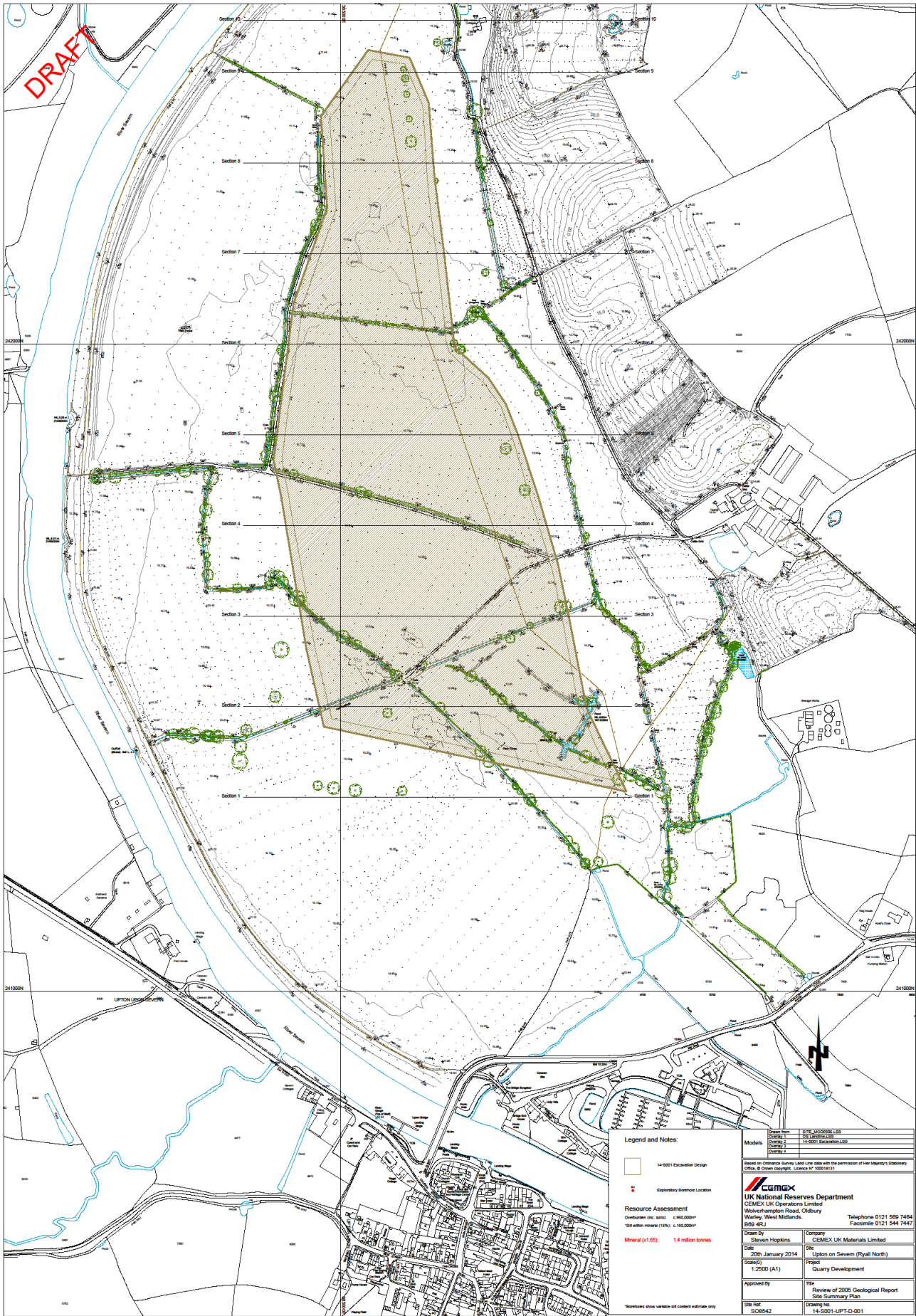
Cemex (response ref: B057-1793 nq)

As referred to above the Company wishes to propose a Preferred Area for the winning and working of sand and gravel. This area is based on the current Preferred Area illustrated by Map 6S Ryall North. The area the Company seeks to promote is illustrated by drawing nos. 14-S001-UPT-D-001, see attached. It has been defined using Map 6S as a starting point and subjecting that area and its surroundings to a resource proving exercise involving the drilling of 44 exploratory boreholes. The results of this drilling programme has identified a sand and gravel reserve of sufficient quality of 1.4 million tonnes, net of processing losses (silt) over an area of 33 hectares. At current rates of production/sales at Ryall House Farm the Ryall North deposit could contain sufficient sand and gravel to maintain approximately 6 years of production.

The Company is in the process of drafting a geological assessment of the site in support of its proposed adoption as a Preferred Area and will submit this information to the MPA shortly.

The site would be worked as a satellite to its existing Ryall House Farm aggregate processing operation, in effect a replacement for the existing Ripple Quarry whose reserves of sand and gravel are nearing exhaustion. Road access would be taken from the A4104, but 'as raised' aggregate would be exported from the site by barge to Ryall House Farm as is currently the case at Ripple Quarry. The road access would, therefore, only be required for light vehicle access and for the delivery/removal of mobile plant, which would be regular but not frequent. As with Ripple Quarry there would no need for an aggregate processing plant at the site as processing would take place at Ryall House Farm. Restoration would be to a landscaped lake, again as is the case at Ripple Quarry. The Company is of the view that there are no overriding constraints to this site being worked for sand and gravel, that it makes best and sustainable use of an existing and permitted facility at Ryall House Farm, has the potential to realise both biodiversity and leisure gains compared to the existing situation and will make a significant contribution to the County's predicted consumption of aggregates over the Plan period.

Please refer to the site plan on the next page.



DRAFT

Legend and Notes:

- 14-5001 Excavation Design
- 14-5001 Quarry Boundary Location

Resource Assessment

Overburden (m³ stock): c. 850,000m³
 10% within reserve (10%): c. 85,000m³

Mining (x1.05) 1.4 million tonnes

*Figures show variation of content estimate only.

Model:	14-5001	14-5001	14-5001
Scale:	1:2500	1:2500	1:2500
Author:	14-5001	14-5001	14-5001
Based on Ordnance Survey Land Line data with the permission of Her Majesty's Stationery Office. © Crown copyright. Licence No. 1000140131			
UK National Reserves Department CEMEX UK Operations Limited Waverley Road, Chisbury Weyley, West Midlands, B95 4RJ Telephone 0121 550 7494 Facsimile 0121 544 7447			
Drawn by:	Steven Hopkins	Company:	CEMEX UK Materials Limited
Date:	20th January 2014	Site:	Upton on Severn (Ryall North)
Scale:	1:2500 (A1)	Project:	Quarry Development
Approved by:		Title:	Review of 2005 Geological Report Site Summary Plan
Drawing No.:	508542	Drawing No.:	14-5001-UPT-D-001

Carter Jonas LLP (on behalf of Croome Estate) (response ref: B043-126)

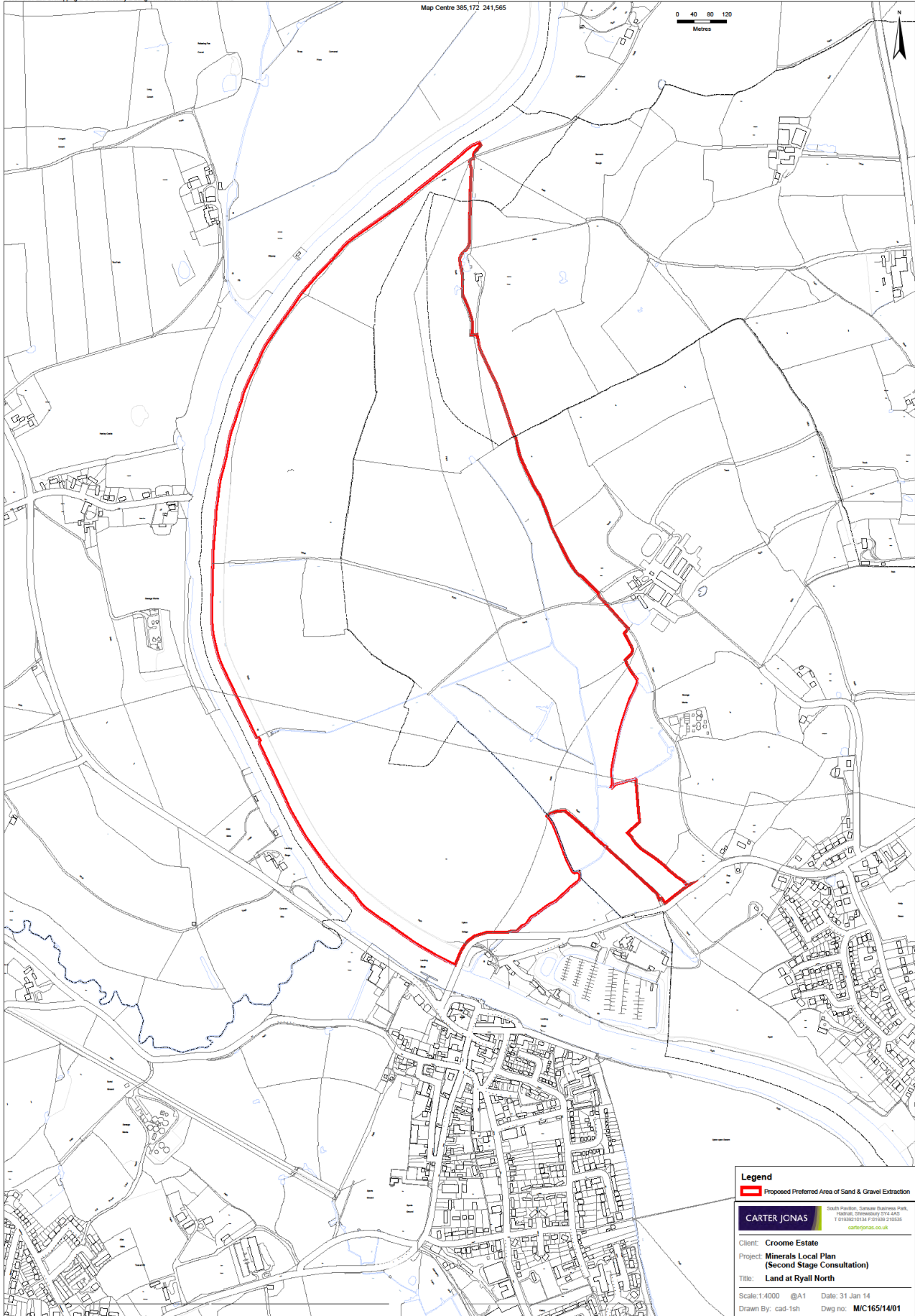
Land at Ryall North, near Upton upon Severn, Worcestershire.

With reference to Cemex's proposal that a preferred area for the winning and working of sand and gravel be established upon land referred to as Ryall North. The Ryall North land is that which currently features as a Preferred Area for mineral extraction within the 1997 Hereford and Worcester Minerals Local Plan and is illustrated by map 6S "Ryall North".

During the intervening period since the Preferred Area was first established, the land has since been subject to considerable efforts in support of preparing a planning application for extraction, with such efforts being aborted upon the emergence of the economic recession and associated downturn in the market for construction products in c.2007. The area suitable for mineral extraction has been defined by Cemex using map 6S as a starting point and subjecting that area and its surroundings to a resource proving exercise involving the drilling of 44 exploratory boreholes. The broader area within such drilling works were undertaken is that shown edged red on the enclosed drawing M/C165/14/01 (attached to email submission), with the land and mineral owned and controlled by the Croome Estate accounting for approximately 2/3 of the overall ownership. The results of this drilling programme has identified a sand and gravel reserve of sufficient quality of 1.4 million tonnes, net of processing losses (silt) of an area of 33 hectares. At current rates of production/sales at Ryall House Farm the Ryall North deposit could contain sufficient sand and gravel to maintain approximately 6 years of production. The Company is in the process of drafting a geological assessment of the site in support of its proposed adoption as a Preferred Area and will submit this information to the MPA shortly.

The site would be worked as a satellite to its existing Ryall House Farm aggregate processing operation, in effect a replacement for the existing Ripple quarry whose reserves of sand and gravel are nearing exhaustion. Road access would be taken from the A4104, but "as raised" aggregate would be exported from the site by barge to Ryall House Farm as is currently the case at Ripple quarry. Road access would therefore only be required for light vehicle access and for the delivery/removal of mobile plant, which would be regular but not frequent. As with Ripple Quarry, there would be no need for an aggregate processing plant at the site as processing would take place at Ryall House Farm. Restoration would be to a landscaped lake, again as is the case at Ripple quarry. Cemex are of the view that there are no overriding constraints to this site being worked for sand and gravel, that it makes best and sustainable use of an existing and permitted facility at Ryall House Farm, has the potential to realise both biodiversity and leisure gains compared to the existing situation and will make a significant contribution to the county's predicted consumption of aggregates over the plan period. In their capacity as freehold owner of land and mineral at Ryall North and a stakeholder in potentially affording the future extraction of mineral at this location, the Croome Estate fully supports Cemex in such assertions as to why the land should be allocated as a preferred area for sand and gravel extraction in the emerging Minerals Local Plan.

Please refer to the site plan on the next page.



Legend
Proposed Preferred Area of Sand & Gravel Extraction

CARTER JONAS South Parkton, Sarslaw Business Park,
Hemel Hempstead, Herts SG9 6AG
T 01992 10134 F 01529 210336
carterjonas.co.uk

Client: **Croome Estate**
Project: **Minerals Local Plan
(Second Stage Consultation)**
Title: **Land at Ryall North**

Scale: 1:4000 @A1 Date: 31 Jan 14
Drawn By: cad-1sh Dwg no: **M/C165/14/01**

Mr Andrew Morris – Strong Farms (response ref: B054-2398 nq)

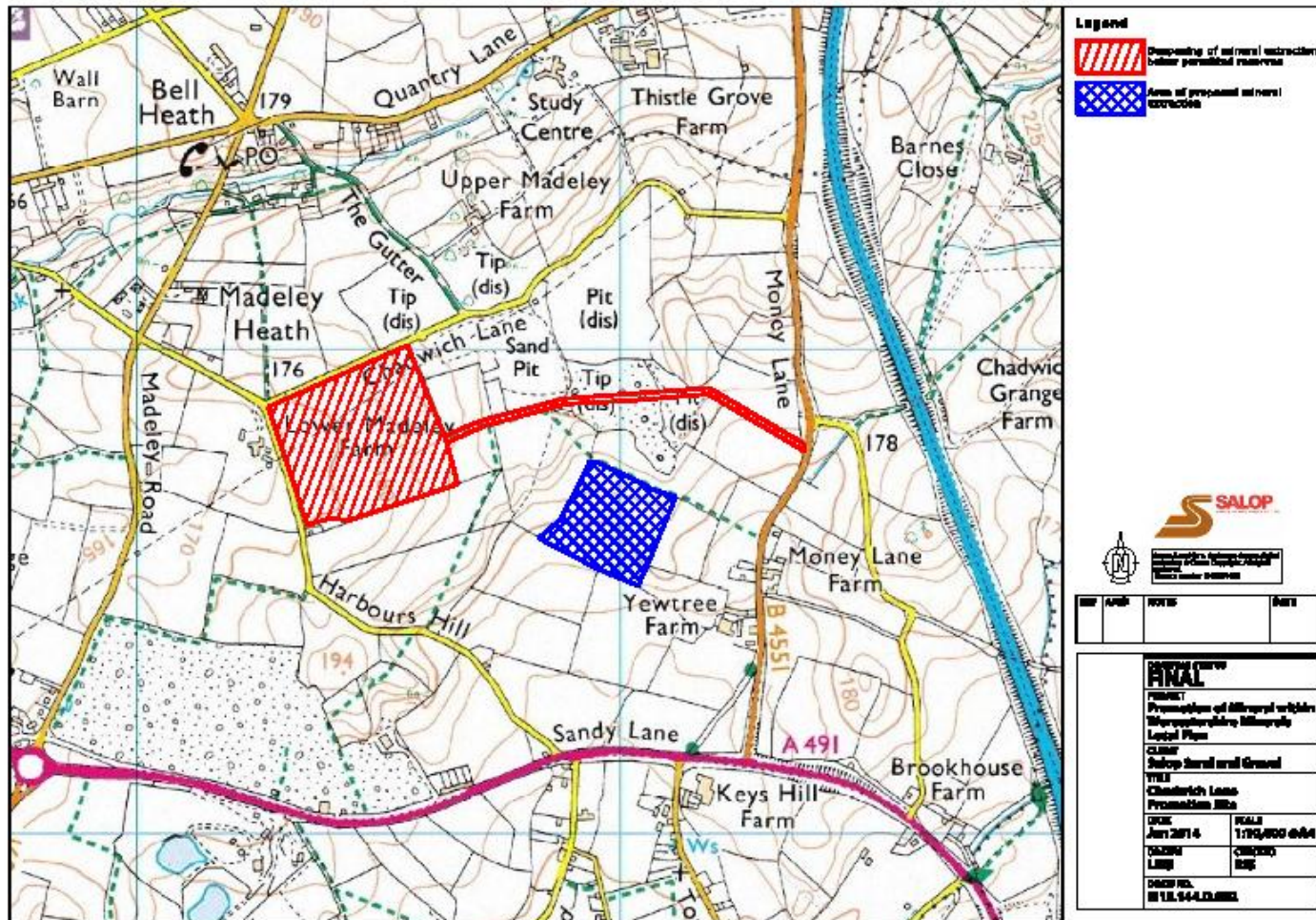
A client is looking at the potential of allocating Strong Farms as per the boundary attached [below]. The site covers approximately 55 hectares located off the Wolverley Road, Wolverley at National Grid Ref SO 841791 located to the north of Kidderminster. The site consists of 4th River Terrace Deposits, Glacial sands and gravels and Upper Mottled Sandstone, as per the geological map based on detailed site investigation and laboratory gradings.



Pleydell Smithyman Chadwick Lane (response ref: B053-2397 nq)

We are writing on behalf of Salop Sand and Gravel co Ltd. Please find attached [below] a plan Reference N° M13.144.D.002 which illustrates the location of potential mineral that Salop Sand and Gravel wish to promote for consultation within the Worcestershire Draft Mineral Local Plan.

The deposit includes both the deepening of the permitted Chadwick Lane development and also a potential extraction to land in the immediate locality. The potential tonnage deposit of sand and gravel is not currently known

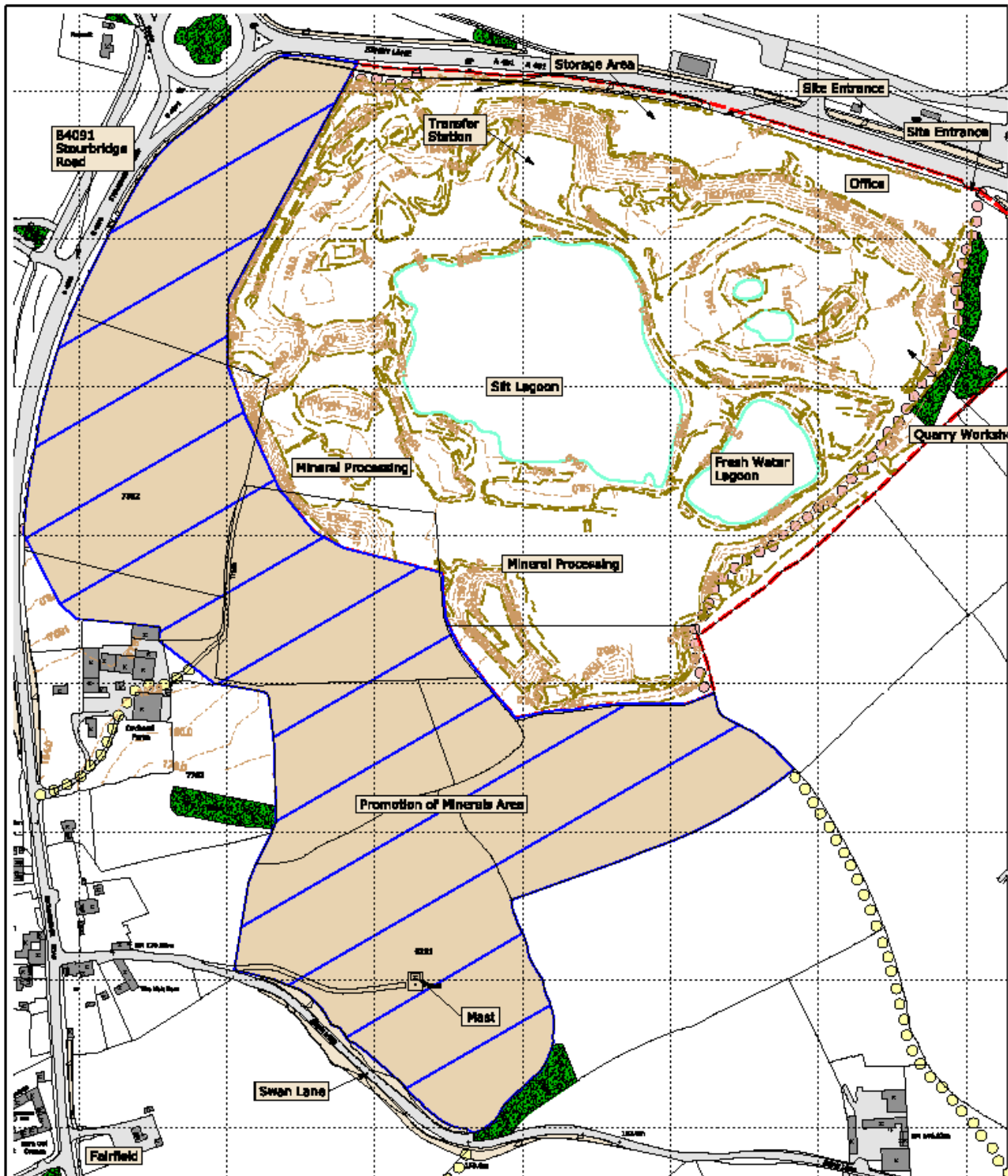


Pleydell Smithyman Wildmoor Quarry (response ref: B052-2397 nq)



Please find attached [on the next page] a plan Reference N° M13.144.D.001 which illustrates the location of mineral that the owners of Wildmoor Quarry, Broadley Parton Limited, wish to promote for consultation with the Worcestershire Draft Minerals Local Plan.

The land is located adjacent to the existing Wildmoor Quarry. The deposit principally comprises sand which is used in casting as a naturally bonded moulding sand within the foundry industry. Other uses of the extracted sand include general building supplies and blending with imported sand materials to create building supply products.

The potential deposit comprises approximately 1 million tonnes.



Legend

-  Wildmoor Quarry
Currently Permitted Planning Boundary
-  Existing on-site buildings,
quarrying activities and
disturbed ground
-  Land to be promoted for mineral
extraction within the Worcestershire
Minerals Local Plan



Small geographical names highlighted in the
map are of the Ordnance Survey. All other
names are the property of the copyright holder.
© Crown Copyright. All Rights Reserved.

DRAWING STATUS
FINAL

PROJECT
Promotion of Mineral within
Worcestershire Minerals
Local Plan

CLIENT
Braceley and Parton Ltd

TITLE
Wildmoor Quarry
Promotion SBA

DATE
Jan 2014

SCALE
1:2500 @ A3

DRAWN
GR

CHECKED
RJS

DRAW NO.
N13.144.D.001

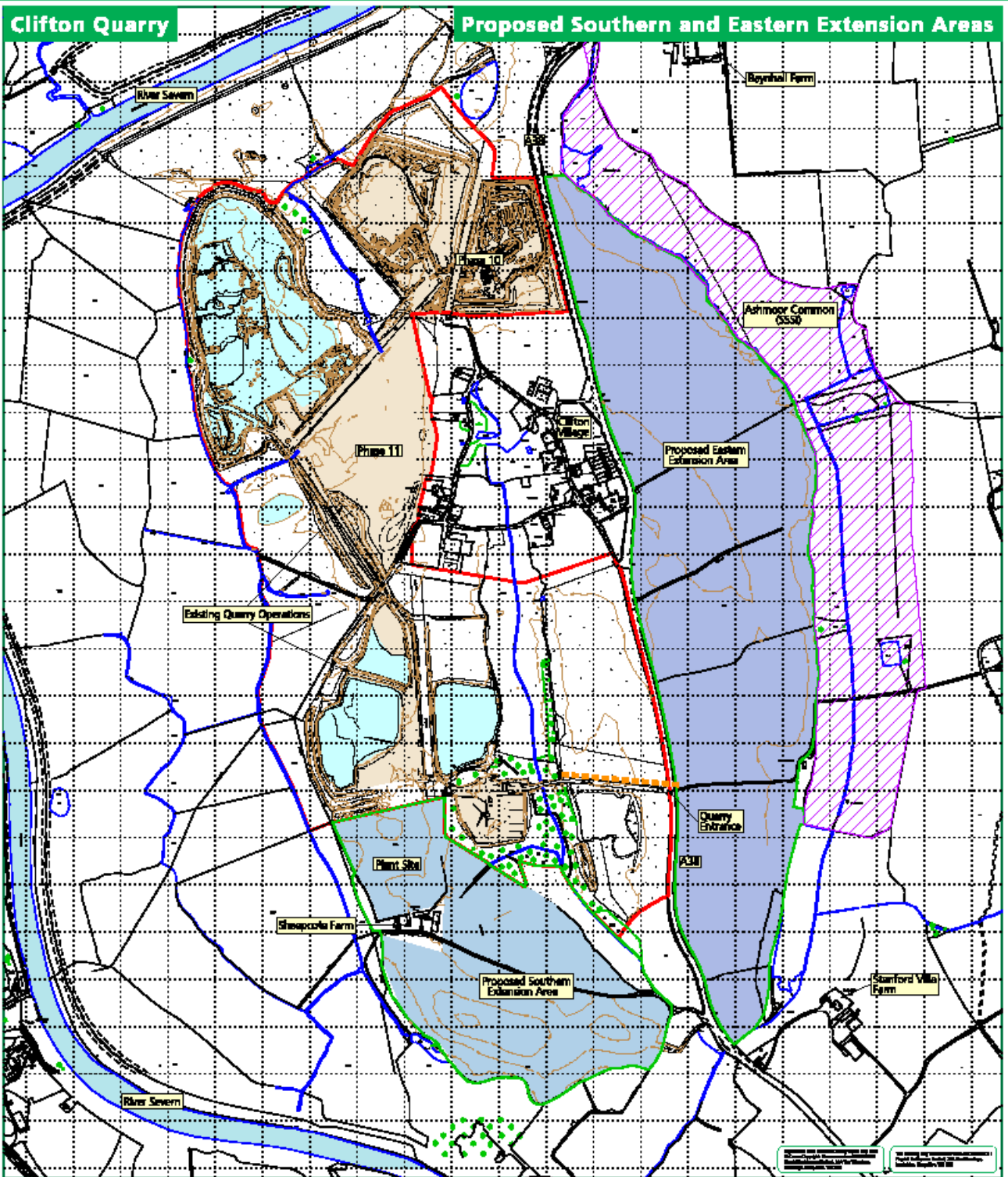
Heaton Planning Ltd on behalf of Lafarge Tarmac (response ref: B050-1504B nq)

Further to my previous email with the completed questionnaire on behalf of Lafarge Tarmac we also wish to promote two extensions to the existing operations at Clifton Quarry. The two extensions have in the order of two million tonnes of saleable reserve that would ensure the longer term continuity of reserves at Clifton Quarry through the Plan period. We note that the preferred approach of the MLP is for Areas of Search but we believe that the allocation of sites would ensure the deliverability of year on year mineral supply throughout the Plan period. Please find attached plan identifying the proposed extension areas, Lafarge Tarmac would welcome the opportunity of discussing these in greater detail in due course.

Please refer to the site plan attached on the next page.

Clifton Quarry

Proposed Southern and Eastern Extension Areas



Legend

- Permitted Planning Boundary
- Proposed Extension Area
- Proposed Eastern Extension Area
- Proposed Southern Extension Area
- Ashmoor Common (SSSI)
- Potentially route of new conveyor linking the Eastern Extension Area with the existing Processing Plant Site between A31

Area of Proposed Extension Areas -- 73.2 Ha

Potential tonnage of Sand and Gravel -- 3.5 million saleable tonnes within the Extension Areas



Proposed Extensions Limited
200, The Village, Leek, Staffordshire, ST13 7JL
Tel: 01527 522222
Fax: 01527 522222
www.proposedextensions.co.uk



Clifton Quarry

Proposed Southern and Eastern Extension Areas

Drawn By S.B./D.L./J	Date 10/08/05
Date January 2004	Drawn by S.B./D.L./J 01527 522222 01527 522222



Moreton C Cullimore (response ref: B023-1833 nq)

We would like to register our interest in developing the mineral resource at Bow Farm, Ripple [refer to the site plan on the next page] and wish it to be included in the 19/8 area of interest in the Area of Search called the Lower Severn Corridor: South East.

The above new MLP needs to consider the serious shortage of suitable sand and gravel resources within the county for future supplies. Moreton C Cullimore (Gravels) Ltd, a long established sand and gravel producer, own the freehold and minerals beneath Bow Farm, Ripple consisting of approximately 200 acres (80 hectares) near the M5/M50 interchange. The quartz sand and gravel deposit is suitable for high quality concrete use, is very clean and lacking in lignites, which have occurred in workings further north at Charlton. It is similar to quality of sand and gravel worked by the company at Mathon, Herefordshire in the past.

There is approximately 2m tonnes, the majority of which lies east of the River Severn on the western boundary of Bow Farm. This site links with land owned by the company in Gloucestershire from Ripple Brook to the A38 at Twynning.

With the general shortage of sand and gravel for the construction industry, including concrete tiles, high class concrete to BS.EN206-1 and BS.EN8500-2 standards, there is a desperate need of supply with land at Ryall finishing within the next 2 years and Charlton already finished.

Primary work on water monitoring commenced over a year ago on the upper terrace of the site. The proposal would be to convey it onto adjoining land in Gloucestershire with access to the A38 or, alternatively, via a road from company land in Gloucestershire with a bridge over Ripple Brook. Our aim is to bring forward an application for approval when Ryall finishes in 2015/2016. There are serious shortages in Worcestershire which will become more so if new sites are not quickly brought in

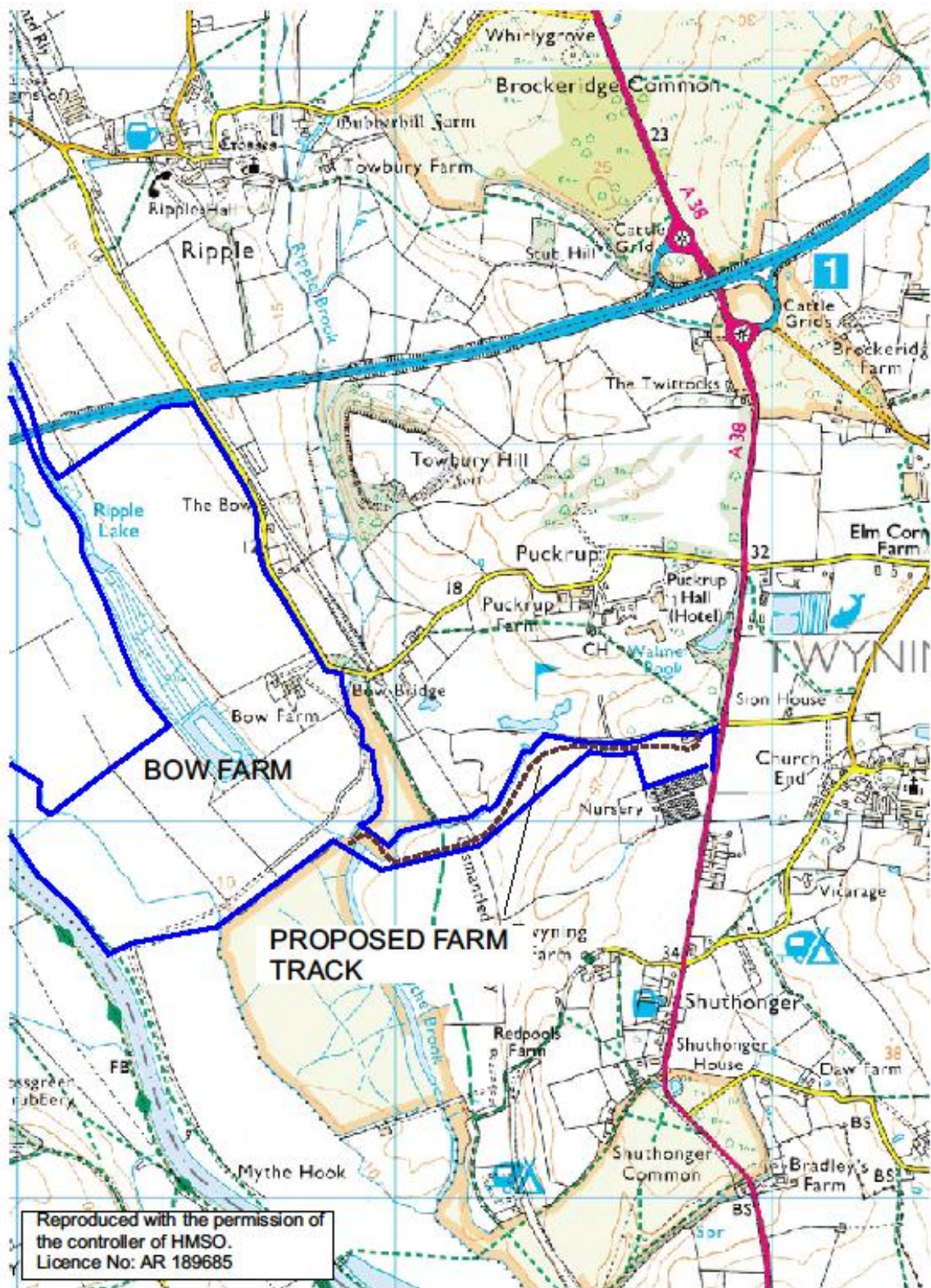
We would use traditional methods of hydraulic back-actor machines, 25/30 dumpers, pumps, loading shovels and field conveyors, with stockpiles near the old railway line to the east for winter supplies when flooding occurs and the river is too high to barge (and is too costly), and there is a road across to the A38 making the site viable. There is a need for Worcestershire and Gloucestershire to work together to supply mainly in a 30-40 mile radius of the site.

The company operates 30 tipping lorries with 15-20 steel bodied vehicles and we regularly move clay from construction sites for land recovery. As experienced farmers we have successfully restored agricultural land, receiving an award for this type of work. Restoration could take the form of a mixture of agricultural land, biodiversity around the osier beds and perhaps a small lake or two on land for birds.

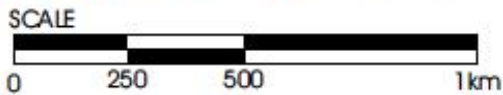
Bow Farm was purchased some years ago as a future reserve but now clients, including Monier Redland at South Cerney, Cirencester, Glos, who bought similar quartz sand from the Mathon site in the 80/90's are desperate to have a continual long-term supply. Other resources are in Devon/Dorset. We have many clients needing plastering sand, building sand, concreting sand, aggregate and

decorative materials. Bow Farm reserves could provide materials for the next 20 years, dependant on demand, which is now desperately required.

Please include this site as a priority future area in the Worcestershire Minerals Local Plan.

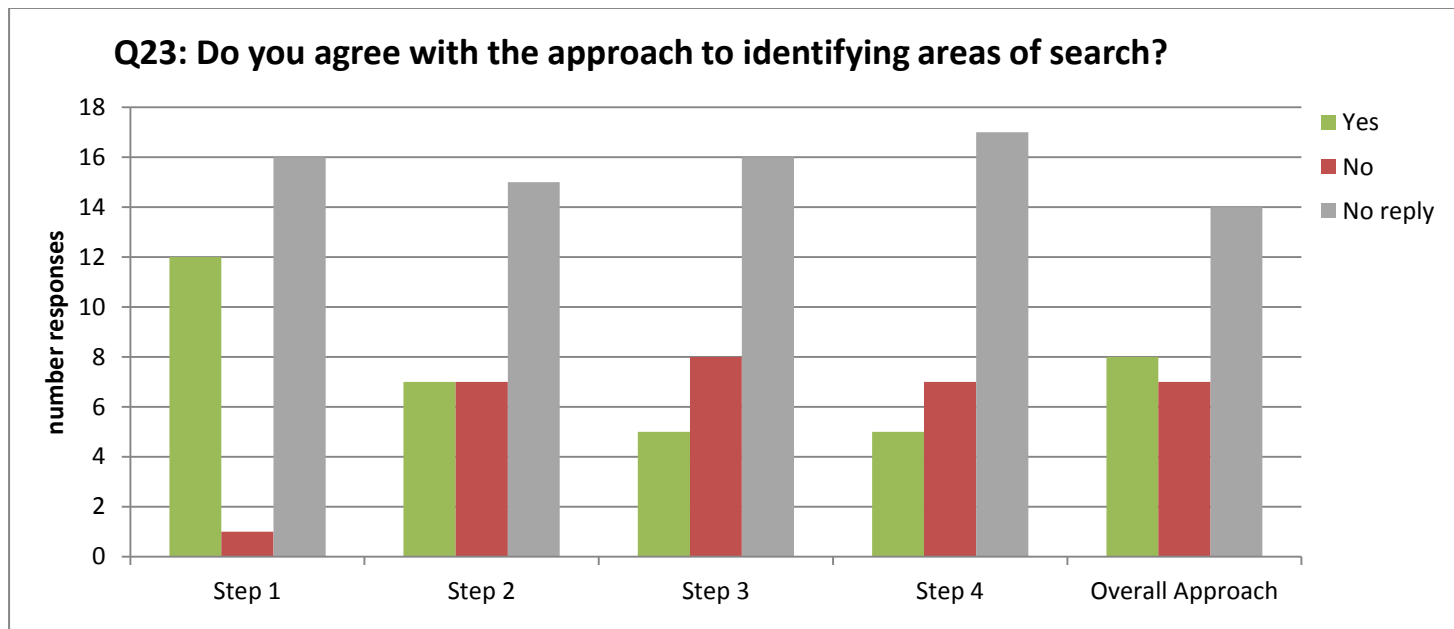


**BOW FARM, RIPPLE.
PROPOSED FARM TRACK**



Question 23: Do you agree with the approach to identifying areas of search?

	Yes	No
Step 1	<input type="checkbox"/>	<input type="checkbox"/>
Step 2	<input type="checkbox"/>	<input type="checkbox"/>
Step 3	<input type="checkbox"/>	<input type="checkbox"/>
Step 4	<input type="checkbox"/>	<input type="checkbox"/>
Overall Approach	<input type="checkbox"/>	<input type="checkbox"/>



Summary of comments	Initial officer response
(Q23) Do you have any comments to make on this method?	
<i>Wyre Forest District Council</i>	B007-1968 nq
The approach to identifying areas of search is supported together with the issues identified in relation to the	Support for general approach noted. Areas of search will be refined in subsequent consultations based on responses and additional information

Summary of comments	Initial officer response
<p>location of minerals development. The identification of a significant area of solid sand deposits within the District is noted. It is also noted that there is an area of search for informal recreation within the District which has arisen from the County Council's green Infrastructure work and that the restoration led-approach to the Minerals Local Plan could enable the delivery of additional recreational space within this area. However, the District Council reserves the right to comment on any more detailed proposals as they emerge.</p>	<p>received during this consultation process.</p> <p>Any additional comments that the District would like to provide at later stages would be appreciated.</p>
<p><i>Cotswolds Conservation Board</i></p>	<p>B006-740 nq</p>
<p>Whilst the cooperative approach to restoration would be welcomed, neighbouring Counties, particularly Gloucestershire, have considerable reserves of crushed rock, notably in the Forest of Dean. The Board would wish to be reassured that the "Duty to Cooperate" as required by the Localism Act has included discussions with neighbouring minerals authorities regarding the provision of crushed rock from less environmentally sensitive areas than Bredon Hill.</p>	<p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county (including Bredon Hill), but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Site-specific location policies will ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p> <p>Following the results of this consultation we realise that the areas of search may need to be refined, and this will include taking into account the findings of the Habitats Regulations Assessment which accompanied the consultation to ensure our approach is legally compliant and will not promote development which would have significant effects on the Bredon Hill or any other Special Areas of Conservation (SAC) in or around the county, and will also need to consider whether or not the Malvern Hills Acts mean that it is not appropriate for the Malvern Hills to be included as an area of search.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, and we are actively discussing the issue of crushed rock provision with them to establish whether there are any other avenues available for provision of Worcestershire's crushed rock requirements from outside of the AONBs.</p>

Summary of comments	Initial officer response
	<p>We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p>
<p><i>Gloucestershire County Council</i></p>	<p>B018-2185 nq</p>
<p>The consultation documentation identifies the requirements and framework needed to meet the future minerals provision. In particular the documents highlight that there is a significant provision for aggregates to meet a steady and adequate supply of aggregates. It is noted that the emerging approach in the Worcestershire Minerals Local Plan is the consideration of the allocation of Areas of Search. It is acknowledged that the background evidence papers provide a useful starting point at a broad brush level. However at this stage these potentially cover extensive areas of Worcestershire so it is not clear which of these will be taken forward into the more formal stages of the plan.</p> <p>It is also unclear as to whether there will be focus on preferred areas or specific site allocations as advocated in the CLG guidance as these can then fully test whether the future provision for aggregates can be met and would provide a degree of certainty to both industry and local communities. Gloucestershire County Council has concerns as to how this deliverability of the required provision can be demonstrated without the allocation of specific sites. Unless Worcestershire County Council have evidence as to where/if this is not possible to allocate sites, it is considered that this would be a more appropriate way of meeting these requirements. Otherwise this could potentially put pressures on neighbouring authorities such as Gloucestershire.</p>	<p>We agree that we will need to refine the areas of search in light of the comments we have received during this consultation.</p> <p>The National Planning Policy Framework requires us to plan for a steady and adequate supply of aggregates by making provision for land-won minerals and that this should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate. The recently published National Planning Practice Guidance expands on this, stating that mineral planning authorities should plan for steady and adequate supply in one or more of the following ways (in order of priority):</p> <ul style="list-style-type: none"> • designating Specific Sites where viable resources are known to exist, landowners are supportive of mineral development and the proposal is acceptable in planning terms, • designating Preferred Areas which are areas of known resources where planning permission might reasonably be anticipated, and/or • designating Areas of Search where knowledge of mineral resources may be less certain but within which planning permission may be

Summary of comments	Initial officer response
<p>Related to this issue is that there are a number of potential Areas of Search identified in the evidence base which are either near to or abuts the boundary with Gloucestershire. As it is unclear which of these broad areas might be taken forward into the formal stages of the plan it is difficult to comment on potential cross</p>	<p>granted, particularly where there is a potential shortfall in supply. It also suggests that in exceptional circumstances it may be appropriate to rely largely on policies which set out the general conditions against which applications will be assessed.</p> <p>In the second stage consultation we proposed to designate areas of search for aggregate minerals as we did not feel we had the level of information required to designate specific sites or preferred areas. We intend to rely on policy criteria for industrial and energy minerals for the reasons set out on pages 49-51 of the consultation document.</p> <p>Following the responses we have received to this consultation, we intend to identify areas of search in accordance with a more refined version of the methodology set out in Section 11 and policy criteria will be developed for the next consultation. Several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. We have also received some suggestions for specific sites or preferred areas, and we will consider whether it remains appropriate to only designate areas of search or whether a mixture of the above three options is required in order to maximise the deliverability of required provision.</p> <p>Cooperation with neighbouring authorities in order to meet our apportionment (especially of crushed rock) is something that we are taking very seriously, and we would like to meet with you to discuss these matters as we work towards the next draft of the plan.</p> <p>We agree that there are a number of cross-boundary issues to be considered, and we welcome the opportunity to discuss these with you further in preparation for the next consultation. We think it might be useful to meet with you to look at the potential cross-boundary site you mention and we will contact you in due course to discuss this.</p>

Summary of comments	Initial officer response
<p>boundary issues. For example there could be critical issues to deliverability of such sites in terms of transportation, amenity, restoration, landscape and environmental impact in general. Indeed you will be aware from our 'duty to co-operate' meeting in 2013 that there is an interest in working land within one of your areas of search north of Tewkesbury but there would be potential issues affecting Gloucestershire (such as access) should this land be pursued for minerals working. The same of course applies should any land be suggested in Gloucestershire which is near to the administrative boundaries. Therefore Gloucestershire County Council urges you to consider very carefully such cross-boundary issues through the preparation of the next stages of the plan.</p>	
<p><i>English Heritage</i></p>	<p>B025-716 nq</p>
<p>Figure 38 illustrates identified 'areas of search' in relation to the historic environment as a restoration principle. English Heritage welcomes the opportunity to work with you and be involved in ensuring a positive legacy for the historic environment as a result of minerals development. We would encourage you to consider the historic environment as an overarching restoration principle.</p> <p>We would encourage you to continue working with your conservation and archaeology officers in the county and district councils to further enhance the consideration given to the historic environment through the emerging Minerals Plan, particularly through the application of HLC and HER.</p>	<p>Support for the historic environment as an over-arching restoration principle noted. We used the Historic Environment Assessment which was carried out for the District Authorities in Worcestershire (except Wyre Forest) to inform the methodology set out for the Historic Environment on pages 90-92. Whilst we felt this had validity at the area of search level to inform the restoration profiles in Appendix 2, we did not feel this method was robust enough to define corridors where the historic environment should be an over-arching priority at this stage. We realise that this method assesses the <i>potential</i> presence of historic assets and not explicitly existing assets – identifying known assets that may benefit from a restoration scheme is one area that we intend to do more work on in preparation for the next draft. We will continue to work with conservation and archaeology officers in consultation with English Heritage to explore how the Historic Landscape Characterisation and Historic Environment Record or other sources could be used to refine this method and potentially lead to defining the historic environment as one of the over-arching restoration priorities in the spatial strategy.</p>

Summary of comments	Initial officer response
<p><i>Mr Adrian Buckmaster</i></p> <p>Step 2 It does not address the proximity to dwellings unless they are in a concentrated development. There seems nothing about how close excavation might be to houses unless it becomes unsafe.</p> <p>Step 4 should not have included 19/7 as it is too small to be a significant resource as defined by CEMEX's planning application. 19/7 lacks road access to the major road networks as passing through Upton upon Severn is</p>	<p>B032-2394</p> <p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>The area you refer to is the subject of a current planning application at Holdfast (Cemex, 2011). This falls within the wider deposit area mapped by the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013⁴⁵. We</p>

⁴⁵ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
<p>not practical the Mythe bridge is too small. Much of 19/7 should be excluded as it is too close to houses.</p>	<p>will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.</p> <p>We agree that access issues are important and we will develop the policy framework to ensure the types of issues you raise are addressed as part of all planning applications. For reference, the current application for this site proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry. We have addressed your concerns regarding proximity of workings to homes above.</p>
<p><i>Fladbury Parish Council</i></p>	<p>B033-575</p>
<p>The Parish Council does not agree with the 'area of search' approach and would prefer that specific sites are identified and considered in more detail. Area of search is not an efficient or productive approach, identifying large areas is a less than satisfactory approach.</p> <p>Objections to those areas identified in the Fladbury area</p>	<p>Disagreement with the 'areas of search' approach noted. In the second stage consultation we proposed to designate areas of search for aggregate minerals as we did not feel we had the level of information required to designate specific sites or preferred areas. Following the responses we have received to this consultation, we intend to refine the areas of search and provide further clarity about how possible sites will be worked based on the comments received during this consultation. This detail may come in the form of spatial masterplanning, concept planning or corridor planning, which in combination with the draft policy criteria should provide the level of detailed guidance you seek for individual sites. We believe that this approach will help us deliver multiple green infrastructure benefits in a joined-up way. However, several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. We have also received some suggestions for specific sites or preferred areas from industry stakeholders, and we will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required. We will be considering ways of managing this so that all options would be in line with the restoration-led approach.</p> <p>We note your objections to mineral development in the Fladbury area. We</p>

Summary of comments	Initial officer response
<p>relate sustainable transport issues, flood risk, archaeology and loss of high quality agricultural and horticultural land.</p>	<p>think that most of the criteria previously used as "sieve" test, such as those you mention, can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out". We will be developing detailed policy wording for the next stage of consultation which will ensure these issues are addressed. Flood alleviation, the historic environment and horticulture and food production are all restoration priorities.</p>
<p><i>Mrs Anne Pearson</i></p>	<p>B034-2395</p>
<p>The approach to identifying areas of search is a rather crude method, based on old technology. The Holdfast site application by Cemex, further investigation has shown their application to be full of errors and unsubstantiated assumptions. I am surprised that the Holdfast site has been quoted in the document when Cemex have failed to answer questions set out over 3 years ago. It makes a mockery of Draft objective 8) - to Involve all those affected as openly and effectively as possible.</p>	<p>We acknowledge that some of the data used in assessing the mineral resources in the county is quite old or has some limitations. Each mapped deposit has been assessed to identify the significance of the mineral resource using information from the British Geological Survey (BGS) (presented in documents called 'memoirs') and previous planning applications. The amount and quality of information varies significantly for different deposits and different parts of the county and where a planning application has been submitted it is often the most recent and most detailed information available. We believe that the areas of search approach we have used to date was as robust as possible, but we agree that further refinements can be made following responses received to this consultation and that this will help us to bring a robust plan forward.</p> <p>The area you refer to is the subject of a current planning application at Holdfast (Cemex, 2011). This falls within the wider deposit area mapped by the British Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013⁴⁶. Whilst the BGS memoirs provided a small amount of information on this deposit, we felt that the further information provided by the Cemex application was useful in assessing the resource, although we acknowledge that there are some unanswered questions about this. We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and</p>

⁴⁶ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
	incorporated in an area of search.
<i>Pershore Town Council</i>	B035-634
<p>Concerns about area of search as opposed to site specific. By not going for site specific proposals, there is the potential to raise concerns amongst the community without all the facts of that area being known. For example, an area may be identified that has serious access implications.</p> <p>We are particularly concerned about the area of search Avon Corridor West and would object to the inclusion of the Pensham sites identified as 16/5 and 16/12. These sites have been grouped together with resources at Birlingham but there is no link between these sites. It is therefore illogical to work the Pensham sites where there are limited resources but major access constraints.</p>	<p>Disagreement with the 'areas of search' approach noted. In the second stage consultation we proposed to designate areas of search for aggregate minerals as we did not feel we had the level of information required to designate specific sites or preferred areas. Following the responses we have received to this consultation, we intend to refine the areas of search and provide further clarity about how possible sites will be worked. This detail may come in the form of spatial masterplanning, concept planning or corridor planning, which in combination with the draft policy criteria should provide the level of detailed guidance you seek for individual sites. We believe that this approach will help us deliver multiple green infrastructure benefits in a joined-up way. However, several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. We have also received some suggestions for specific sites or preferred areas from industry stakeholders, and we will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required. We will be considering ways of managing this so that all options would be in line with the restoration-led approach.</p> <p>We note your concerns about the Avon Corridor West area of search and in particular the inclusion of resource areas 16/5 and 16/12. The Green Infrastructure led approach which we are proposing means that although the Pensham resources and the Birlingham resources are not contiguous and are on opposite sides of the River Avon, we feel that these areas are closely linked as part of the River Avon corridor. If sites are worked and restored taking into account Green Infrastructure principles, they could have meaningful benefits at the landscape scale for restoration priorities such as water quality, flood alleviation and habitat quality and fragmentation.</p> <p>We appreciate your concerns about access constraints for the Pensham resources. Although current transport networks and their ability to support</p>

Summary of comments	Initial officer response
	<p>development will need to be considered at application stage, in some cases it can be possible and appropriate for planning conditions and obligations to be put in place to secure improvements to transport links. It may also be possible to access and transport some minerals by waterway which might otherwise be inappropriate by road, and the policy framework we develop will address this. An example of this already exists in the county with mineral being extracted from Ripple Quarry which is relatively inaccessible by road, with material being transported by barge along the River Severn to Ryall Quarry for processing and onward transportation.</p>
<i>Tewkesbury Borough Council</i>	B036-703
<p>In terms of making appropriate provision for minerals in Worcestershire it is important that this is fully met so that it does not place undue pressure on surrounding authorities to pick up any shortfall in provision.</p> <p>It is unclear the extent to which there is mineral industry interest in extracting at the areas of search identified in the current WMLP document. It is noted that the WMLP identifies market areas likely to generate demand for minerals - to do this a 15km threshold is used. This has not been fully justified given that the Mineral Products Association state a figure of 80% of products being used within 48km of source. Although the WMLP acknowledges the potential for new strategic scale development at Ashchurch MOD site and adjacent to</p>	<p>Agreed. As virtually all of Worcestershire's mineral resources suitable for use as crushed rock aggregate are located within designated landscapes (the Malvern Hills and Cotswolds AONBs), we think it is important that we ensure that these areas are protected from unacceptable harm from minerals extraction, although mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, including the provision of crushed rock. We recognise that this is a major issue that we have yet to satisfactorily address. We will continue to work on this in the coming months and hope that the next consultation on the draft plan will provide additional clarity on this issue.</p> <p>A number of industry respondents have put sites forward as part of this consultation. These can be found in question 22 above. These are all either within or on the edges of the areas of search we consulted on, showing that there is interest from the minerals industry to extract in at least some of these areas.</p> <p>Step 4 on pages 57-58 is intended to indicate where demand for mineral resources can be considered highly likely. We appreciate that mineral products often travel longer distances and that good transport links could lead to increased demand over greater distances, but we used a lower</p>

Summary of comments	Initial officer response
<p>Cheltenham (as set out in the draft Joint Core Strategy being prepared by Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils) the potential for other generators of demand, such as potential development around Gloucester City also needs to be factored into decision making given the accessibility provided by the M5 corridor. Additionally, the measure should not be one of straight line proximity but instead it should be considered in terms of accessibility (ref. paras 11.43-11.45). To this end the map on page 58 needs to be expanded to show the areas of influence and revised to indicate the accessibility of demand generators rather than just proximity.</p> <p>Paragraphs 11.26 - 11.28 are overlain by Fig.17 and cannot be read.</p>	<p>threshold as an indication of where market pull was likely to be most strongly felt. This resulted in Figure 21 which indicates that there is likely to be market demand for minerals from across Worcestershire, and therefore we have not excluded any resources from consideration on the basis of lack of likely demand.</p> <p>We acknowledge that both this and the rest of the method used to identify areas of search (paragraphs 11.24-11.49 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport which will consider these issues in more depth and inform the development of draft policies for the next consultation. We have also received comments from the Highways Agency (please refer to our response to them in question 24) regarding the Strategic Road Network in Worcestershire. We agree that the transportation section may require further refinement, thank you for bringing some of these specific issues to our attention.</p> <p>Noted. We apologise for this formatting error. The text should have read:</p> <p>11.25 Deposits have been assessed to identify the significance of the mineral resource using information from the British Geological Survey (BGS) (presented in documents called 'memoirs') and previous planning applications. The boundary of the resource areas assessed has been altered to exclude previously worked areas, motorways and motorway junctions.</p> <p>11.26 The amount and quality of information varies significantly for different deposits and different parts of the county.</p> <p>Resource areas where some depth information is available Calculating the volume</p> <p>11.27 Where some information on the depth of resources is available (either</p>

Summary of comments	Initial officer response
	<p>from BGS memoirs or planning histories), we have estimated the potential resource volume using the following approach:</p> <p>Resource area x estimated depth ÷ 2 = estimated resource volume in m³.</p> <p>11.28 To avoid spurious accuracy, minimise the risk of overestimating the resources and to allow for the following factors, as part of the calculation above we decided to halve the resource potential when estimating the resource volume because:</p> <ul style="list-style-type: none"> • Many resource areas are overlain by dispersed development and it is therefore unlikely that the whole resource area would be worked. • Information about depth is limited in detail and the quality and depth can vary across the resource area. • Constraints that will be set out in criteria-based policies have not been applied to the assessment of resource areas; it is possible therefore that some parts of the resource areas would be constrained from being fully worked. <p>11.29 Not all resource areas will be affected equally by all of these factors. At this stage we think that this will lead to an overestimate of the resource in some areas and an underestimate in others, averaging out across the county.</p>
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
<p>See above. Some excellent work has already been done in the preparation of the Approved Minerals Plan. We suggest that this work is updated to reflect the provisions of the NPPF and used to reduce the areas of search.</p>	<p>Any decisions we make need to be based on credible, robust and up to date evidence or the Minerals Local Plan will not be found sound when it is submitted to the Secretary of State for examination. The preparatory work for the adopted plan was undertaken between 1990 and 1997 and because of policy changes, new data, and major shifts in the way we approach restoration, sustainability, and planning we think that the preparatory work you refer to is no longer robust enough for us to rely on to stand up to these new, more rigorous expectations. Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. Most of the</p>

Summary of comments	Initial officer response
	criteria previously used as "sieve" criteria can no longer be seen as absolute constraints under the new policy framework.
<i>RSPB</i>	B039-1782
<p>The RSPB strongly supports 'identifying areas where there is the greatest ability to achieve restoration priorities' as a driver to guide where mineral development should happen. We are particularly pleased to see that 'habitat quality and fragmentation' has been identified as a key issue in this respect in Table 6.</p> <p>The location of mineral sites within Worcestershire will be a key factor in their potential to contribute to establishing a coherent and resilient ecological network within the County. The RSPB strongly supports the use of clusters of mineral resources of over 200ha in size, providing a scale at which there is 'realistic potential to deliver strategic restoration benefits' and to 'develop a landscape-scale approach to restoration' (para. 11.40). Figure 26 goes on to recognise that this is 'the scale at which the buffering, expansion or creation of habitats is considered to become most beneficial'. It would be useful if this benefit could also be highlighted in paragraph 11.40. It would also be worth noting that habitat creation on this scale is also beneficial in terms of long-term management. For example, 200 ha is usually the minimum scale required for a site to be considered for development as an RSPB reserve.</p> <p>This is a groundbreaking, exemplar approach to the location of mineral development, which should significantly enhance the potential of mineral sites to achieve restoration priorities. Mineral development is a temporary land use and it is the quality of the restoration and after use that will be the lasting legacy for the</p>	<p>Support noted, thank you.</p> <p>Support for the methodology used to establish the areas of search noted. However, despite the areas of search being identified as clusters of resources of 200ha or more, this does not necessarily mean that all 200ha+ would be worked as one site or restoration purely for habitat creation but should incorporate the green infrastructure restoration priorities appropriate for the area. We will consider how the scale of sites might influence future management and whether this is something which should be addressed through the policy framework.</p> <p>Thank you. We agree that the quality of restoration and after care schemes will contribute to the long-term enhancement of the county's landscape, and we are looking forward to further developing and refining this approach.</p>

Summary of comments	Initial officer response
<p>County.</p> <p>In theory, individual mineral developments, or clusters of mineral developments, would need to be permitted at this scale (i.e. 200ha or larger) in order to fulfil the aspiration for delivering strategic restoration benefits. It would be useful to know if it is the intention of the Mineral Planning Authority (MPA) to encourage individual - or clusters of - mineral developments / planning applications at this scale.</p> <p>As outlined in response to Q9, two of the Areas of Search cover parts of two Areas of Outstanding Natural Beauty (AONBs) – the Malvern Hills and the Cotswolds. This section of the Cotswolds AONB also includes a Special Area of Conservation (SAC). As such, it might not be appropriate to pro-actively encourage mineral development within these areas.</p>	<p>We do not anticipate that the areas of search will be worked in full – in fact, in our calculations we have assumed that half of every area could be compromised by existing development and that the full 200+ hectares would not be available for development. We recognise that the resource areas will not necessarily be affected equally by all of these factors, meaning that we may have overestimated the resource in some areas and underestimated in others, averaging out across the county. This assumption may be further refined as we develop the draft policies and refine the areas of search, but the intention behind the areas of search is to encourage development across the areas of search over the life of the plan in order to secure the greatest possible benefits through coherent and complementary restoration schemes over a landscape scale.</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs and SPA/SACs in the county. As detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy, but we will carefully consider the findings of the Habitats Regulations Assessment Scoping Report which was published alongside this consultation to ensure our proposals will avoid Likely Significant Effects on the Bredon Hill Special Area of Conservation.</p>
<i>Natural England</i>	B040-717
No comments, although it seems logical	Noted, thank you.
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>We agree that the starting point must be the BGS data but we are concerned that there are significant inaccuracies and errors in your Step 2 which have resulted in some areas wrongly being included in your areas of search (see above).</p>	<p>We believe you are referring to your response to question 22. Please refer to our comments above.</p>

Summary of comments	Initial officer response
<p>Furthermore, the Green Infrastructure assessments for each Environment area does not seem to reflect the reality that some areas start at a higher quality than others nor is there any clear assessment of the difference between 'protect and enhance' and 'restore and enhance'.</p> <p>Furthermore, there is no explanation of how the Priority Levels for restoration relate to each other. For example, would a priority level 1 for flood alleviation outweigh a priority level 1 biodiversity quality area or indeed, if a proposal doesn't meet each of its level 1 priorities would it be disallowed as a matter of course? A detailed raft of policies needs to be prepared to understand how this restoration approach might be implemented.</p>	<p>We agree that the methods used so far potentially undervalue some existing local assets, and we will be working to find a way to address this across the county. However, we think that the policy framework will ensure that existing assets will be considered and avoided, mitigated or compensated as appropriate, but that site restoration provides an opportunity to enhance the environment through enabling green infrastructure benefits to be realised.</p> <p>Table 22 indicates the relative importance of each high-level restoration priority for each area of search. Additionally, Appendix 2 contains restoration profiles for each corridor which describes our approach to each priority in each area of search in more detail. We have also attempted to set out an example of how these priorities might be applied in the "worked example" which can be found on pages 98 to 107.</p> <p>We think that the high level restoration priorities are not incompatible with each other and will be able to deliver multiple benefits. For example, if both flood alleviation and habitat quality and fragmentation were identified as level 1 priorities (determining factors) in an area of search, we might expect the restoration scheme to be developed to address both of these issues. This might result in, for example, restoring a site to wetland habitat which would enable natural floodwater storage or functional floodplain processes.</p> <p>However, we agree that greater clarity could and should be provided in subsequent drafts, and we hope that the draft policies that will be developed based on the feedback we have received during this consultation will provide the clarity you seek.</p>
<p><i>Carter Jonas LLP (on behalf of Croome Estate)</i></p>	<p>B043-126</p>
<p>Whilst the BGS data utilised is recognised as a valuable resource, it is recognised as being inherently "broad brush" when defining available resources in any particular geographic location. In order to be effective in delivering truly feasible prospects for extraction, the Plan should seek to support such data with location specific data provided by land owners and mineral operators.</p>	<p>Other respondents have raised issues with the level of detail available from BGS data, however this is the best data that we had available to us at the time of preparing the consultation draft. We agree that such data should be supported on specific sites with additional information provided by operators and landowners. We have received some information along with sites that have been proposed during this consultation (please refer to the 'sites submitted by industry section above), but we do not expect that we will</p>

Summary of comments	Initial officer response
	receive comparable information about every area of search prior to the plan being produced.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
<p>Step 2 It is noted that previously worked areas have been excluded from the resource areas. To minimise the need for new sites the South Worcestershire authorities consider that comprehensive working of permitted reserves in existing quarries should be encouraged. Also, subject to conformity with the constraints criteria, extensions to existing quarries should be examined prior to identifying new quarries.</p> <p>Step 3 Paragraph 11.39 - There does not appear to be a clear explanation about why “significant resource areas” have been excluded from the potential areas of search if they are more than 500 metres from the key resource areas.</p> <p>Paragraph 11.40 – Only resources over 200 hectares have been included in the potential areas of search because the County consider it is only possible to deliver</p>	<p>We agree that comprehensive working of permitted reserves should be encouraged. We have had several industry respondents propose new sites, some of which are extensions to existing permissions. However, we think that both extensions to existing quarries and new sites need to be considered on their own merits against the policy framework, and whilst we recognise that extensions to existing sites can be beneficial in maximising the exploitation of resources and enable re-use of existing plant and equipment, we also need to remain conscious of the potential for cumulative impacts on neighbouring communities and the risk of stifling competition if extensions are prioritised over new sites. We are working to find a way to balance these considerations in the draft plan.</p> <p>The method we proposed in step 3 excluded significant resources where they were more than 500m from key resource areas as we wanted to define areas of search as clusters which could meaningfully be worked and restored over the life of the plan to enable coherent landscape scale green infrastructure benefits to be realised. We felt that beyond this distance significant resources may not contain enough mineral resource to be attractive as a standalone site and including them as areas of search could have led to piecemeal development which would not present the same opportunities for landscape scale gains.</p> <p>Following comments received to this consultation, we think we need to reappraise whether these assumptions are robust and refine the method for defining the areas of search.</p> <p>As explained previously, when we state that we want the plan to be restoration-led, this does not mean that restoration opportunities have been the only factor in defining the location of the areas of search, rather it means</p>

Summary of comments	Initial officer response
<p>strategic restoration benefits on sites of this size and above. This approach, however, would exclude the consideration of other significant mineral resources on smaller sites. As outlined in our response to the First Consultation, whilst the identification of restoration opportunities should be a factor in the identification of preferred areas, we do not consider it to be the primary driver, as implied in the consultation document. The reason for this is that all proposals for mineral development, whatever their size, should be accompanied by detailed reclamation and aftercare proposals and all planning consents should be conditional on reclamation proposals being completed within a reasonable timescale.</p> <p>The County have identified restoration priorities and set out detailed restoration profiles for each of the proposed areas of search in Appendix 2 of the consultation document. We note with disappointment that none of the South Worcestershire authorities (Malvern Hills, Worcester and Wychavon) have been involved in the preparation of these restoration priorities and profiles.</p>	<p>that we want restoration to be considered at the start of the process, to inform how sites are worked and developed to ensure that mineral working results in planned benefits and minimises harm.</p> <p>Please refer to our responses to your comments elsewhere to this effect. The vision of this restoration-led plan is to provide robust guidance to applicants regarding what sorts of restoration might be acceptable on the sites they bring forward in order to secure multiple green infrastructure benefits for the county, and we think that identifying large areas of resources can help direct development so that these gains are most easily realised in an integrated way at the landscape scale, rather than isolated pockets across the county. We are not suggesting that it is only possible to deliver strategic benefits on individual sites of 200ha or more, but we identified 200ha as the level which might enable strategic benefits to be more realistically achieved across a suite of sites in the area of search as they are developed and restored over the life of the plan.</p> <p>We agree that all proposals should be accompanied by detailed reclamation and aftercare schemes and we anticipate developing a policy framework which is able to address any proposals that come forward for sites outside of the areas of search, though we are still considering how this type of site will be handled in the plan.</p> <p>Whilst we agree that engagement with local authorities in and around Worcestershire is essential in developing the Minerals Local Plan, we are sure that you will understand that the timing of this can be difficult. We felt it was important to formulate our ideas to the extent that they could be understood and meaningfully commented on by other parties including the District Councils in Worcestershire. The proposals are by no means finalised and we will be refining the methods used, the areas of search proposed and developing the policy framework following the comments we have received. We would welcome further engagement with the South Worcestershire authorities to ensure we address your concerns and grasp any opportunities you can highlight now that we have established the broad approaches to developing the plan.</p>

Summary of comments	Initial officer response
<p>The South Worcestershire authorities disagree with the proposed approach not to identify sites or preferred areas in the Minerals Local Plan. NPPF states that Local Plans should “allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”. The identification of preferred areas for sand & gravel and crushed rock extraction would help ensure that appropriate levels of planned and future supplies can be maintained, provide greater certainty for the minerals industry and help reduce uncertainty for local communities.</p>	<p>The National Planning Policy Framework requires us to plan for a steady and adequate supply of aggregates by making provision for the land-won minerals and that this should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate. The recently published National Planning Practice Guidance expands on this, stating that mineral planning authorities should plan for steady and adequate supply in one or more of the following ways (in order of priority):</p> <ul style="list-style-type: none"> • designating Specific Sites where viable resources are known to exist, landowners are supportive of mineral development and the proposal is acceptable in planning terms, • designating Preferred Areas which are areas of known resources where planning permission might reasonably be anticipated, and/or • designating Areas of Search where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly where there is a potential shortfall in supply. <p>It also suggests that in exceptional circumstances it may be appropriate to rely largely on policies which set out the general conditions against which applications will be assessed.</p> <p>In the second stage consultation we proposed to designate areas of search for aggregate minerals as we did not feel we had the level of information required to designate specific sites or preferred areas. We intend to rely on policy criteria for industrial and energy minerals for the reasons set out on pages 49-51 of the consultation document.</p> <p>Following the responses we have received to this consultation, we intend to identify areas of search in accordance with a more refined version of the methodology set out in Section 11 and policy criteria will be developed for the next consultation. Several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. We have also received some suggestions for</p>

Summary of comments	Initial officer response
	<p>specific sites or preferred areas, and we will consider whether it remains appropriate to only designate areas of search or whether a mixture of the above three options is required in order to maximise the deliverability of required provision.</p> <p>However, we are also considering ways of taking forward the areas of search and restoration priorities to provide the level of detail and clarity that you seek. This might include masterplanning, concept planning, or 'corridor planning', and in conjunction with the draft policies that will be developed over the coming months, this should provide greater certainty about what mineral working would mean in each area for the minerals industry and local communities.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 A nq</p>
<p>The South Worcestershire authorities disagree with the proposed approach not to identify preferred areas in the Minerals Local Plan. The identification of preferred areas for sand & gravel and crushed rock extraction (rather than broad areas of search) would help ensure that appropriate levels of planned and future supplies can be maintained, provide greater certainty for the minerals industry and help reduce uncertainty for local communities.</p> <p>Further, some of the broad areas of search proposed in the second stage consultation document appear to potentially overlap with proposed site allocations in the SWDP. A consequence of the approach proposed in the consultation document would be to potentially introduce more uncertainty regarding the deliverability of proposed SWDP housing allocations. We would therefore welcome the opportunity to meet with officers responsible for developing the Minerals Local Plan to clarify the</p>	<p>Please refer to the response immediately above as these comments appear to be broadly the same.</p> <p>Whilst we note your concern, it is national policy that mineral resources should be safeguarded and the Second Consultation included proposals for how this might be implemented. Whatever method is finally adopted, it is very possible that safeguarded resources and possible Local Plan allocations might overlap. The fact that a resource is safeguarded does not mean that it will necessarily be worked; it may well however, mean that the mineral value of the site may need to be assessed before development is permitted and it may be that as a result the Mineral Planning Authority objects to a proposal and could ask the Secretary of State to call it in. It is likely therefore that</p>

Summary of comments	Initial officer response
<p>Step 3/4 - Housing legend out of date. Market demand is not relevant in areas of search (only location of minerals). Location to small housing development too limited. More information about areas of search should already be known by MPA.</p>	<p>Market demand is critical to forecasting mineral demand, and this is directly tied to housing development, especially for aggregates. Step 4 on pages 57-58 is intended to indicate where demand for mineral resources can be considered highly likely. We appreciate that mineral products often travel a distance of up to 48km from source, but we used a lower threshold as an indication of where market pull was likely to be most strongly felt. This resulted in Figure 21 which indicates that there is likely to be market demand for minerals from across most of Worcestershire, and therefore we have not excluded any resources from consideration on the basis of lack of likely demand.</p> <p>The objective of this consultation was to gather further information about the draft plan. Some respondents have provided additional information or documentation that we will incorporate as we draft policies for the next phase of consultation. We also appreciate that some information may have changed between the writing of this draft and the receipt of comments.</p>
<p><i>Malvern Hills AONB Partnership</i></p>	<p>B049-802B</p>
<p>We consider that a minimum size of 200ha is far too large if sites are being considered in the Malvern Hills AONB. If there were exceptional circumstances for allowing extraction then sites would be likely to be small scale to minimise their landscape impact. We understand that the 200ha size allows for a more strategic approach to restoration, but there would be very significant and unacceptable impacts during the extraction period.</p>	<p>The vision of this restoration-led plan is to provide robust guidance to applicants regarding what sorts of restoration might be acceptable on the sites they bring forward in order to secure multiple green infrastructure benefits for the county, and we think that identifying large areas of resources (200ha+) can help direct development so that these gains are most easily realised in an integrated way at the landscape scale, rather than isolated pockets across the county. We are not suggesting that individual sites must be 200ha or more, but we identified 200ha as the level which might enable strategic benefits to be more realistically achieved across a suite of sites in the area of search as they are developed and restored over the life of the plan.</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy. We will keep this in mind as we develop the policy</p>

Summary of comments	Initial officer response
	<p>framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p> <p>We have received several responses supporting the limited small-scale extraction of building stone within the AONB, and we intend to address this through the draft policies that will be developed for the next consultation.</p>
<p><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p> <p>The overall approach to the identification of areas of search is logical. However, due to the constraints to the sieving process we have some concerns that resource areas that have not been included within the Areas of Search may exist. The policies within the Plan should allow mineral sites to come forward that are not included within the Areas of Search if the resource is proven and they can be developed appropriately.</p>	<p>B050-1504A</p> <p>We are pleased that you find the overall approach acceptable, and we agree that the method has some limitations. The objective of the plan is to deliver strategic green infrastructure benefits through establishing co-ordinated strategic restoration priorities, and we felt that this was best achieved by identifying clusters of resources of 200ha or more.</p> <p>You are correct that this means there are some resource areas which are not included within areas of search. We agree that there is scope to include policies that address sites that might come forward outside of the areas of search, and these will be developed for the next phase of consultation. We anticipate that these policies will require applicants to demonstrate comparable restoration benefits to areas of search and how the restoration scheme proposed contributes to the overall green infrastructure approach.</p>
<p><i>Cemex</i></p> <p>Process of Site Identification</p> <p>The third paragraph of paragraph 145 of the NPPF, quoted above, continues to advise MPAs that the provision of land won aggregates should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate. Traditionally MPAs have relied on a mixture of sites proposed by landowners and/or industry and its own resources to identify sufficient sites and areas. It is acknowledged that the MPA did issue a 'call for sites', but insufficient reserves were identified by this approach to provide a steady and adequate supply of aggregates for the life of the Plan. In</p>	<p>B057-1793 nq</p> <p>Agreed.</p>

Summary of comments	Initial officer response
<p>such circumstances the MPA would have little option but to identify a series of Areas of Search using what data is available, which appears to be the approach the MPA has adopted.</p> <p>The only means by which the Areas of Search have been identified within the plan document itself seems to be Figure 22, which is wholly inadequate for the purposes of potential developers to determine whether a particular site lies within an Area of Search or not, due to its scale. For the exercise to be of any practical assistance in the provision of a steady and adequate supply of aggregates potential Areas of Search need to be defined at such a scale that a developer can determine whether a site may not may not lie within it, which is not currently the case within the draft Development Plan. This is of particular importance with regard to the highly prescriptive approach the MPA is taking as illustrated by Figure 14, i.e., if a site does not lie within a proposed Area of Search it is not an appropriate location for the winning and working of minerals.</p>	<p>We agree that the scale of the maps and figures presented in the draft consultation does not allow for precise identification of the areas of search and we are aware that the mapped information on mineral resources may not have been as easy to follow as we hoped. The intention of this consultation was to gather feedback on the overall approach and not necessarily on the specific areas we have identified. That being said, Appendix 2 contains the restoration profiles for each area of search, along with a larger scale map of each area, and the consultation website also contains detailed analysis maps for each mineral resource on our website at http://www.worcestershire.gov.uk/mineralsbackground under the 'Analysis of Mineral Resources' heading. We will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have.</p> <p>Following the responses we have received to this consultation, we intend to identify areas of search in accordance with a more refined version of the methodology set out in Section 11 and policy criteria will be developed for the next consultation. Several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. A number of operators (including Cemex) have proposed sites as part of this consultation process and we will be looking more closely at these in due course. We will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required in order to maximise the deliverability of required provision. We anticipate that the policy framework we develop will be able to address any sites that come forward on sites outside of the areas of search, though we are still considering how this type of site will be handled in the draft plan.</p>

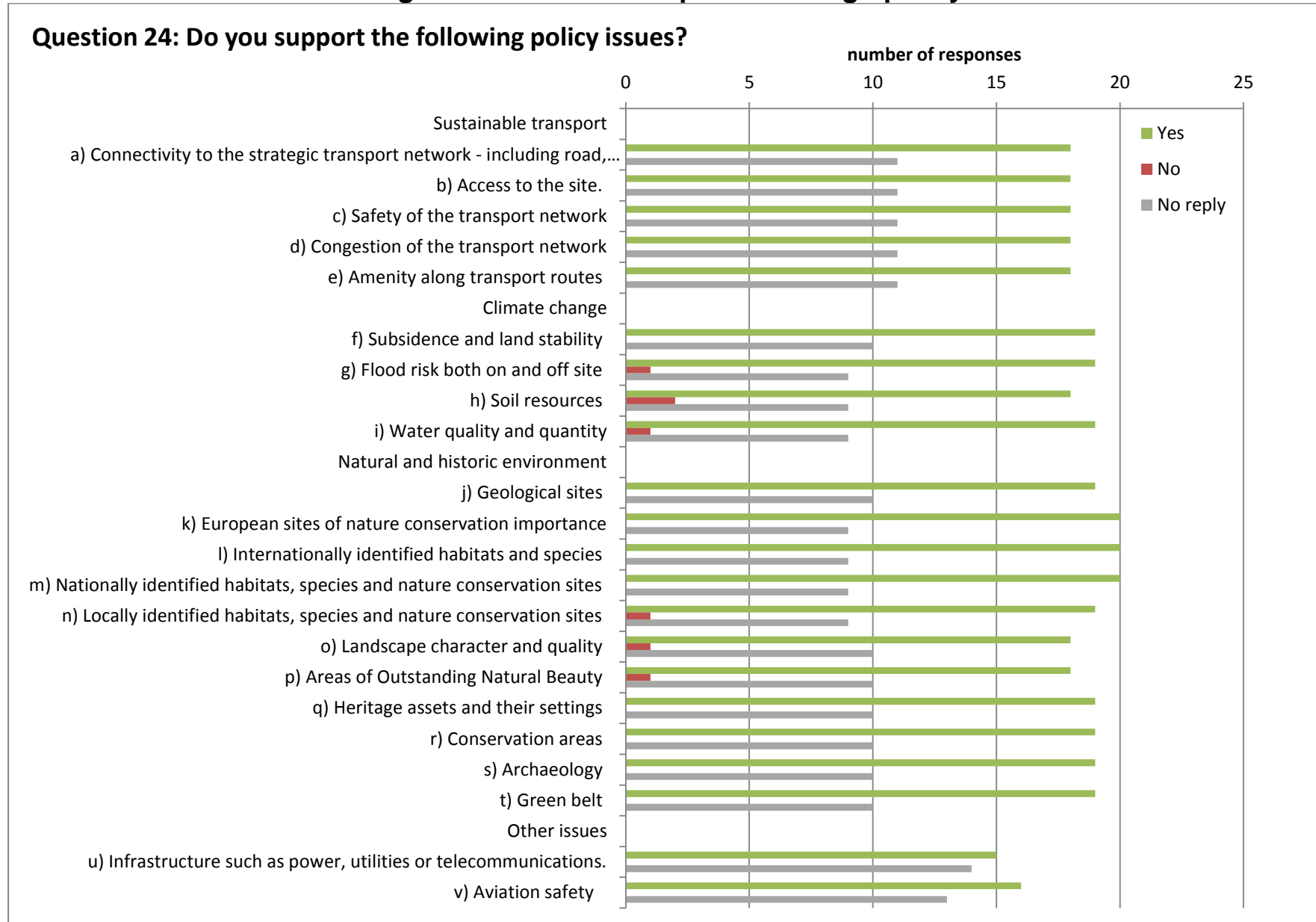
Summary of comments	Initial officer response
<p>The Company is also concerned regards the estimates of aggregate resource regards sand and gravel. Industry generally uses a conversion factor of 1.64t/m³ which accounts for processing losses. It is not familiar with the terms “gravel with sand natural” or “sand with gravel wet” referred to by paragraph 11.31 of the document, but the adoption of a factor of 1.92t/m³ to 2.0t/m³ appears to imply that a proportion of the tonnage is water and not aggregate. This is very likely to lead to the overestimation of the quantity of a reserve. It is also noted that there seems to be no assessment of or reference to the quality of a resource as a constraining factor, a sand and gravel deposit will need to have the right balance between coarse and sand content, silt, clay and/or lignite contamination to make it a commercially viable prospect.</p> <p>The Company is concerned that the approach adopted by the MPA to the identification of potential aggregate resources does not seem to acknowledge its own limitations, i.e., that the BGS data set used is relatively coarse grained and individual ‘pockets’ of potential resource might not be identified, and that the call for sites exercise only truly represents a ‘snapshot’ of what landowners and/or industry might propose. Indeed, the BGS Mineral Resource Information for Development Plans for Herefordshire and Worcestershire states that;</p> <p>“The variability of sand and gravel deposits means that, in comparison to other bulk minerals, it is more difficult to infer the location and likely extent of potentially workable resources from geological maps.”</p>	<p>Thank you for bringing this to our attention. We will revisit these assumptions and attempt to clarify our methodology for the next consultation draft.</p> <p>As you note, we have produced an Analysis of Mineral Resources in Worcestershire, looking in detail at the geological information we have available through BGS and planning history to estimate the <u>quantity</u> of resources we have available in the county. However, we recognise that this is an overview and reliant on a number of assumptions, and we have very little information on the <u>quality</u> of those resources. We would appreciate any additional information you might be able to provide about resource quality in the county.</p> <p>The National Planning Policy Framework requires us to plan for a steady and adequate supply of aggregates by making provision for land-won minerals and that this should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate. The recently published National Planning Practice Guidance expands on this, stating that mineral planning authorities should plan for steady and adequate supply in one or more of the following ways (in order of priority):</p> <ul style="list-style-type: none"> • designating Specific Sites where viable resources are known to exist, landowners are supportive of mineral development and the proposal is acceptable in planning terms, • designating Preferred Areas which are areas of known resources where planning permission might reasonably be anticipated, and/or • designating Areas of Search where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly where there is a potential shortfall in supply.

Summary of comments	Initial officer response
<p>Over the life of a Development Plan economic factors such market conditions, competition, corporate objectives, the tax environment, and the spatial demand for aggregates amongst a host of other contributory issues will ebb and flow, rendering sites more or less attractive to work for aggregates at any given time. The Plan should acknowledge this by abandoning the overly prescriptive approach illustrated by Figure 14; that if a site is not within an Area Of Search it is by definition not appropriate. There should be an acceptance that the MPA has reached its conclusions on the basis of limited data, and that other parties may well be in a position at some stage during the Plan period to demonstrate that a site does contain a viable reserve, i.e., acknowledging the possibility of ‘windfall’ sites. The MPA is urged to identify any Preferred Areas that may be appropriate (the Company will, as part of this representation, propose such an Area), identify Areas of Search within which it should be possible to bring forward further reserves, and to devise locational criteria against which to assess both proposals within Areas of Search and ‘windfall’ sites. Such an approach would wholly reflect the hierarchical approach to identifying reserves of aggregates advised by the third paragraph of paragraph 145 of the NPPF.</p>	<p>It also suggests that in exceptional circumstances it may be appropriate to rely largely on policies which set out the general conditions against which applications will be assessed.</p> <p>In the second stage consultation we proposed to designate areas of search for aggregate minerals as we did not feel we had the level of information required to designate specific sites or preferred areas. We intend to rely on policy criteria for industrial and energy minerals for the reasons set out on pages 49-51 of the consultation document.</p> <p>Following the responses we have received to this consultation, we intend to identify areas of search in accordance with a more refined version of the methodology set out in Section 11 and policy criteria will be developed for the next consultation. Several respondents have raised questions about the deliverability of this method, and provided useful comments that we will be considering as we determine how to take this forward and refine the areas of search in the subsequent draft. We have also received some suggestions for specific sites or preferred areas, and we will consider whether it remains appropriate to only designate areas of search or whether a mixture of the above three options is required in order to maximise the deliverability of required provision.</p> <p>We agree that there is scope to include policies that address sites that might come forward outside of the areas of search, and these will be developed for the next phase of consultation. We anticipate that these policies will require applicants to demonstrate comparable restoration benefits to areas of search and how the restoration scheme proposed contributes to the overall green infrastructure approach in an important way.</p>

No comment responses:

<i>Worcestershire Wildlife Trust</i>	B044-1081
No comment	Noted

Questions 24 and 25: Enabling new mineral development through policy criteria.



Summary of comments	Initial officer response
(Q24) Please give details of any additional considerations which should inform any of these topics. Please specify which topic your comment refers to by quoting the relevant letter code.	
<p><i>Highways Agency</i></p> <p>(Sections a through e) The Strategic Road Network (SRN) in Worcestershire is comprised of the M5, M42 and M50 motorways and the A46 trunk road. In light of this the HA's primary concerns are that likely impact of the Minerals Local Plan is properly assessed on the SRN.</p> <p>The HA requests that we are fully consulted on the development of these policies to ensure that adequate consideration is given to the assessment of the impacts of any proposal sites on the SRN. It is also worth noting there is a general presumption against new accesses to the motorway network. For trunk roads there is a graduated and less restrictive approach to the formation or intensification of use of access to the remainder of the strategic road network. However, the preference will always be that new development should make use of existing junctions.</p>	<p>B003-2372 nq</p> <p>Noted. We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport which will consider these issues in more depth and inform the development of draft policies for the next consultation.</p> <p>We will consult the HA again at the next stage of consultation to ensure that adequate consideration is given to the assessment of the impacts of proposed sites on the SRN, and we welcome any additional input you might have.</p>
<p><i>Springfield Lane Association</i></p> <p>(Section p) There should no abstraction of minerals in or under or adjacent to the Cotswold Area of Outstanding Natural Beauty, other than closely controlled and screened quarrying for stone along traditional lines.</p> <p>There should be no abstraction of minerals of any kind in or under or adjacent to the Broadway Conservation Area.</p>	<p>B014-2390 nq</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Appendix 1 sets out in detail the constraints applied in the current Minerals Local Plan and examines them in light of the current regulatory and policy context. In short, we would like to take a positive approach to enabling development where it is designed to meet the policy criteria and we do not feel that the current regulatory context allows us to definitively rule areas out.</p>

Summary of comments	Initial officer response
	<p>This might mean that some parts of the areas of search proposed would not be able to be worked, but we do not think that it would rule out the whole of any area. However, we will keep this in mind as we develop the policy framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p> <p>We have received several responses supporting the limited small-scale extraction of building stone within the AONB, and we intend to address this through the draft policies that will be developed for the next consultation.</p>
<i>Broadway Parish Council</i>	B022-539 nq
<p>(Section p) There should be no extraction of minerals within the Cotswold Area of Outstanding Natural Beauty or the Broadway Conservation Area, unless it is carefully controlled quarrelling along traditional lines.</p>	<p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Appendix 1 sets out in detail the constraints applied in the current Minerals Local Plan and examines them in light of the current regulatory and policy context. In short, we would like to take a positive approach to enabling development where it is designed to meet the policy criteria and we do not feel that the current regulatory context allows us to definitively rule areas out. This might mean that some parts of the areas of search proposed would not be able to be worked, but we do not think that it would rule out the whole of any area. However, we will keep this in mind as we develop the policy framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p> <p>We have received several responses supporting the limited small-scale traditional extraction of building stone within the AONB, and we intend to address this through the draft policies that will be developed for the next consultation.</p>

Summary of comments	Initial officer response
<p>It would also be appropriate if the Wychavon Emerging Minerals Plan attributed the same weight to the Cotswold AONB (Broadway/Bredon) area as to Malvern Hills in terms of protection.</p>	<p>We think you mean the emerging <i>Worcestershire</i> Minerals Local Plan. Although our intention is to draft policies that will ensure that the AONB designations in the county are given equal weight, there are different considerations which apply to these areas meaning that they may need to be treated differently. Part of Bredon Hill is a European designated habitat (Special Area of Conservation) which means that development which would cause likely significant effects on the important habitats or species cannot be promoted in the Plan. There are five private acts of parliament relating to the Malvern Hills, three of which make specific reference to quarrying. The express intention of the Malvern Hills Act 1924 is to control quarrying. There are also Ministerial planning decisions and House of Lords Judgements relating to these acts. As such the legislative framework around quarrying in the Malvern Hills is nationally unique and will require careful consideration in the development of the Minerals Local Plan.</p>
<p><i>English Heritage</i></p>	<p>B025-716 nq</p>
<p>(Sections o and q) English Heritage welcomes the many references to the historic environment throughout the emerging Minerals Plan, especially in reference to the need for protection and conservation of heritage assets and the use of Historic Landscape Character assessments (HLC), Historic Environment Record (HER) and SSSD.</p> <p>We note that there is no HLC for Wyre Forest District which would have been a positive inclusion in the evidence base.</p>	<p>Thank you, support noted.</p> <p>We agree that HLC assessments for Wyre Forest would strengthen the evidence base, but Wyre Forest District Council did not participate in the county-wide exercise that developed the HLC and so we do not have this information for that area.</p>
<p><i>North Worcestershire Water Management</i></p>	<p>B030-1952</p>
<p>As previously stated in section 10.</p>	<p>Noted. Please see our response to your comments on questions 17 and 18.</p>
<p><i>Worcestershire Archive and Archaeology Service</i></p>	<p>B031-509</p>
<p>Yes but strongly suggest rewording to make the Historic Environment Issues clearer. Issues to be addressed through policy criteria q and s are a confused and are in effect the same.</p>	<p>Noted, thank you for the suggested re-wording. The next stage of consultation for the Minerals Local Plan will include draft policy wording, and we will draw on the suggested wording you have provided as we draft this. We would welcome your further input at the next stage.</p>

Summary of comments	Initial officer response
<p>Why are Heritage Assets and Archaeology treated separately? Suggest rewording along the lines of... Heritage Assets and their Settings. – Policies will need to assess and protect a broad range of heritage assets and historic and designed landscapes from substantial harm or loss of significance. This will apply to all such heritage assets and their setting, whether nationally designated or not. The principle register of known heritage assets is the County Historic Environment Record. Due to their scale and nature, mineral workings can have a unique impact on the historic environment, particularly subsurface archaeological remains. Policies will require desktop and site assessments of the archaeological potential of the location. Policies will need to ensure that significant heritage assets and their settings are not unacceptably adversely affected, and will address the potential to protect or record Heritage Assets. Consideration will need to be given to the potential severity of the impact, the relative importance of the features and the opportunities to improve the understanding of the historic environment potential of an area.</p>	
<p><i>Mrs Anne Pearson</i></p>	<p>B034-2395</p>
<p>I agree with all these considerations. I also firmly believe that virtually all of them would be compromised by mineral extraction from ECA 19/2: the Longdon Hinterland.</p>	<p>Support for policy areas noted. We note your concerns about ECA 19/2. Following the results of this consultation we think that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this. Any changes to the method will be applied equally across the county, and at this stage we cannot say whether this will result in ECA 19/2 being retained in or removed from the areas of search.</p>
<p><i>Tewkesbury Borough Council</i></p>	<p>B036-703</p>
<p>We are generally supportive that consideration will be given to flood and water management both on and off</p>	<p>Support for the general approach to flood and water management noted. We are developing a background paper to address water and flooding issues and</p>

Summary of comments	Initial officer response
<p>site but we would like to see this extended and strengthened to more explicitly include cumulative impacts of not just multiple extraction sites affecting a catchment area but also the impacts in combination with other development. The NPPF (para 143) refers to cumulative impacts and para 100 refers to development being safe without increasing flood risk elsewhere (with or without other development contributing). Although this is partly referred to in WMLP para 11.55 it needs to be translated into policy. This also applies for Qu.17, which needs to refer to the implications beyond Worcestershire's boundary as there are downstream implications as the Severn and Avon rivers flow through Gloucestershire.</p>	<p>we will develop policies to ensure that WFD and Flood Risk betterment are addressed within the plan.</p> <p>You raise an important issue about the downstream effects on flood risk and from flood alleviation efforts. We will consult with the Environment Agency and downstream authorities regarding this issue to ensure that any effects are addressed in the background document and through the draft policies.</p> <p>Please also refer to our responses to your comments in Question 31.</p>
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p>	<p>B038-2286</p>
<p>Water quality should also include reference to Nitrate Protection Zones.</p> <p>National Footpaths such as The Severn Way should be included.</p> <p>A buffer zone around residential properties should also be included.</p>	<p>Thank you for raising Nitrate Protection Zones. We acknowledge that this is an issue which the Minerals Local Plan should take into account and we will give consideration to how we might do this as we develop the plan. We may be able to incorporate Nitrate Protection Zones as an issue to be addressed through policy criteria, or it might be possible to use them as a consideration in defining the restoration profiles for each area of search.</p> <p>The Severn Way is a long distance footpath which follows the Severn from its origin to the sea. The footpath is a public right of way, and is afforded the same protection as all public rights of way. Public rights of way are identified as an issue that will be addressed through policy criteria in Table 5 (item h) – specifically the protection of current routes.</p> <p>We recognise the value of such features for tourism, and we are intending to strengthen the references to the importance of tourism for Worcestershire's economy in the spatial portrait section of the Plan.</p> <p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause</p>

Summary of comments	Initial officer response
	<p>concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p>
<i>Mrs Christine Daniell</i>	B037-2396
The detail is very important and should not be ignored.	We agree that detailed information is critical, both to assist us in drafting policies for the next consultation, and in the plan in order to provide clarity for applicants and communities. We hope that the next draft will provide the level detail you seek.

Summary of comments	Initial officer response
<p><i>RSPB</i></p> <p>Soil Resources (issue (h) in Table 10): The RSPB acknowledges the need to protect and enhance the best and most versatile (BMV) agricultural land, where appropriate. However, in order to make a significant contribution to (i) delivering local and national biodiversity targets and (ii) establishing a coherent and resilient ecological network, it is essential that the Plan takes a more flexible approach towards the restoration of BMV agricultural land.</p> <p>The Essex Minerals Plan, for example, specifically states in its Vision that ‘the focus of after-use will shift from purely agricultural uses, important though they remain, towards enhancement of the local environment by means of increased provision for biodiversity...’. The Essex Minerals Plan also highlights the relatively large biodiversity gain that would result from the biodiversity-led restoration of its site allocations (‘a 6% increase in land managed primarily for wildlife’) compared to the relatively small loss of agricultural land (‘just 0.2% of the county’s agricultural resource’). In a similar fashion, the Surrey Minerals Plan states that ‘the MPA will not always expect agriculture to be the main after-use on this [BMV] land’. Instead, the Surrey Minerals Plan requires this land to be ‘restored to a condition and quality such that, if required, the land and soil would be in a state capable of supporting agriculture, i.e. Standard 3(2) set out in Schedule 5 of the Town & Country Planning 1990 Act’ . The RSPB encourages Worcestershire to take a similar approach to Surrey in relation to BMV agricultural land, by focussing on the long-term potential of the soils, rather than the immediate after-use of a particular block of land. Suggested wording for Strategic Objective SO8 (in line</p>	<p>B039-1782</p> <p>We agree that a flexible approach to restoration is needed, and we will consider how safeguarding the long term potential of best and most versatile soils could be incorporated in the policy framework and references to soil resources and best and most versatile agricultural land can be strengthened in the document. The best-practice examples you provide give a helpful indication of how we might be able to develop this.</p> <p>We are keen to ensure that the plan we develop will be deliverable, including ensuring that sites which include biodiversity or other green infrastructure gains can be managed to ensure these gains are not lost over time, and we are conscious that landowners may need at least part of their land to provide an income following mineral extraction. This might result in more productive areas alongside biodiversity focused areas, but it might also include options such as lower intensity grazing across the larger area to enable farming alongside biodiversity, or investigating emerging opportunities such as biodiversity offsetting schemes which could fund land management for biodiversity. We will consider your suggestions closely.</p> <p><i>Please note that this response is referred to in the RSPB's response to Question 26.</i></p>

Summary of comments	Initial officer response
<p>with the NPPF, para. 143) is as follows: • “Safeguard the long term potential of best and most versatile soils”. This approach allow for moving BMV soils off-site to enable biodiversity-led restoration whilst upgrading lower quality agricultural land elsewhere.</p> <p>Habitats, species and designated nature conservation sites (issues k-n in Table 10): The RSPB supports the proposed policy criteria requirements, especially the recognition given to priority habitats and the ‘networks of and links between these’. However, the text for issue (n) – locally identified habitats, species and nature conservation sites – indicates that mitigation of impacts is an acceptable alternative to protection of these sites. Following the principles of the mitigation hierarchy, consideration should only be given to mitigation once all unavoidable impacts have been minimised. The proposed policy criteria requirements should go also go well beyond avoiding unacceptable adverse effects. For example, all mineral developments should be required to deliver a net-gain in biodiversity. In terms of identifying where minerals will be worked, priority should be given to those locations that can maximise this net-gain in biodiversity by making a significant contribution to the creation of a coherent and resilient ecological network.</p> <p>Aviation safety (issue (v) in Table 10): Whilst the RSPB recognises the need to ‘address the potential risk to aviation safety from bird-strike’, it is important that a pragmatic approach is taken to dealing with this issue. The lack of available inert-fill means that, in most cases,</p>	<p>Your support for the policy criteria is appreciated. We will consider the points you raise with regard to the mitigation hierarchy and encouraging net-gain in biodiversity as we develop the policy framework.</p> <p>We agree that a pragmatic approach must be taken with respect to bird-strike. We are preparing a background document on bird strike risk that will be available on our website⁴⁷ when it is completed.</p>

⁴⁷ www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p>mineral extraction below the water table will result in a 'wet' restoration – either open water or some form of wetland habitat. The main bird-strike risks are associated with large areas of open water near airfields. Careful design of wetland habitat in these areas, on the other hand, can result in a negligible increase in bird-strike risk compared to alternative land uses such as agriculture.</p>	
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p>	<p>B041-595</p>
<p>See above. a) – e) We consider that schemes should only be considered if they have direct access to an A-road and are within 5 minutes of a Motorway junction.</p> <p>g) risk of extending flood plain and increasing surface water flash flooding.</p> <p>l) nitrate vulnerability zones</p>	<p>We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport, including water and rail transport, which will consider these issues in more depth and inform the development of draft policies for the next consultation. We have also received comments from the Highways Agency (please refer to our response to them in question 24) regarding the Strategic Road Network in Worcestershire. We agree that access issues are important and we will develop the policy framework to ensure that transport and access issues are addressed as part of all planning applications.</p> <p>Whilst current transport networks and their ability to support development will need to be considered at application stage, in some cases it can be possible and appropriate for planning conditions and obligations to be put in place to secure improvements to transport links. It may also be possible to access and transport some minerals by waterway which might otherwise be inappropriate by road, and the policy framework we develop will address this.</p> <p>We intend to develop a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.</p> <p>Thank you for raising Nitrate Protection Zones. We acknowledge that this is</p>

Summary of comments	Initial officer response
<p>q) a buffer zone around listed buildings, other heritage assets, and all residential properties.</p> <p>The Severn Way, a national footpath runs along the western bank of the Severn. We consider that NO mineral development should be undertaken on this side of the river to protect this national asset.</p>	<p>an issue which the Minerals Local Plan should take into account and we will give consideration to how we might do this as we develop the plan. We may be able to incorporate Nitrate Protection Zones as an issue to be addressed through policy criteria, or it might be possible to use them as a consideration in defining the restoration profiles for each area of search.</p> <p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "<i>A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings</i>", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance.</p> <p>Please refer to our response to Mr and Mrs Peter and Nicola Inchbald and other locations in this document for more details on this issue.</p> <p>The Severn Way is a long distance footpath which follows the Severn from its origin to the sea. The footpath is a public right of way, and is afforded the same protection as all public rights of way. Public rights of way are identified as an issue that will be addressed through policy criteria in Table 5 (item h) – specifically the protection of current routes.</p> <p>We recognise the value of such features for recreation and tourism, and we are intending to strengthen the references to the importance of tourism for Worcestershire's economy in the spatial portrait section of the consultation document.</p>

Summary of comments	Initial officer response
<i>The Coal Authority</i>	B045-2184
The Coal Authority considers it important that land stability is afforded due consideration as part of any mineral proposals in areas of past coal mining activity in the north west of the County, previously notified to the MPA.	Noted and agreed. Subsidence and land stability is considered in Table 10 as an issue to be considered through policy criteria (item f).
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
<p>Additional considerations which need to inform the location of new mineral development include:</p> <ul style="list-style-type: none"> Local Plans (including the SWDP). The identification of preferred areas for mineral extraction and planning applications should also be assessed against relevant Local Plan policies. In the case of the SWDP, this will include policies related to AONB's, Landscape Character, Green Infrastructure Network, Biodiversity and Geodiversity, Local Green Networks, Flood Risk etc . Malvern Hills Acts. As stated in the Malvern Hills Acts Background Document (October 2012) "there are five private acts of parliament relating to the Malvern Hills, three of which make specific reference to quarrying. The express intention of the Malvern Hills Act 1924 is to control quarrying. There are also Ministerial planning decisions and House of Lords Judgements relating to these acts. As such the legislative framework around quarrying in the Malvern Hills is nationally unique and will require careful consideration in the development of the Minerals Local Plan" 	<p>We agree that greater mention could have been made of current and emerging Local Plans, particularly in the Spatial Portrait, and that these Plans contain information that can help us address some of the gaps in our knowledge about specific local areas and priorities. We welcome the opportunity to discuss the next iteration of the draft plan with you.</p> <p>We are aware of the Malvern Hills Acts and the content of the Background Paper. We will be refining the areas of search and the policy criteria for the next draft.</p>

Summary of comments	Initial officer response
<ul style="list-style-type: none"> • Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. In addition to Malvern Hills (see above), the Cotswolds will require careful consideration in the development of the Minerals Local Plan. • The current Minerals Local Plan recognises that the landscape of the Abberley Hills is of such importance as to merit its exclusion from further consideration for hard rock extraction. The South Worcestershire Authorities endorse this position and would propose that the existing Abberley Hills Quarrying Policy be carried forward into the revised Minerals Local Plan • Worcestershire Green Infrastructure Strategy and Implementation Plan 	<p>Noted. We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Appendix 1 sets out in detail the constraints applied in the current Minerals Local Plan and examines them in light of the current regulatory and policy context. In short, we would like to take a positive approach to enabling development where it is designed to meet the policy criteria and we do not feel that the current regulatory context allows us to definitively rule areas out, even AONBs. This might mean that some parts of the areas of search proposed would not be able to be worked, but we do not think that it would rule out the whole of any area. However, we will keep this in mind as we develop the policy framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p> <p>Noted. We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on landscapes. However, as detailed on page 125 (appendix 1), mineral working is not specifically excluded from any landscape, even those with protection through designation under current National Policy such as AONBs. The Abberley Hills are not a designated landscape and there is no justification to retain the Abberley Hills policy as it stands in the current Minerals Local Plan. However, the potential crushed rock resources in the Abberley Hills are limited in size and were "screened out" from inclusion as areas of search following the methodology in Section 11.</p> <p>The Second Stage Consultation was developed with the Green Infrastructure approach in mind at all times, although it is most prominent in sections 11 and 12 which address where minerals will be worked and how mineral workings will be restored. The approach is also embedded in the vision which states that <i>"Mineral workings will be restored to maximise social, environmental and economic gains, through coordinated restoration that</i></p>

Summary of comments	Initial officer response
<ul style="list-style-type: none"> • Visual impact of the working and impact on residential amenity • Cumulative environmental and community impact of proposed and existing sites in an area. The identification of preferred areas for mineral extraction should also be subject to testing of environmental acceptability through a Sustainability Appraisal / Strategic Environment Assessment and Habitats Regulations Assessment. 	<p><i>delivers networks of green infrastructure in an integrated way".</i></p> <p>Appendix 2 sets out the draft restoration profiles for each area of search. These are directly derived from the green infrastructure approach, considering the issues of landscape, flood alleviation, habitat quality and fragmentation, water quality, geodiversity, horticulture and food production, the historic environment, and access and recreation using the methodology which is outlined in Section 12.</p> <p>We anticipate that the next draft consultation will contain further details regarding how this will be implemented.</p> <p>We agree that references to visual impact of workings can be strengthened throughout the plan.</p> <p>Impacts on residential amenity will be addressed through policy criteria as set out in table 5 and table 24. Specifically, these issues include noise and vibration, air quality and dust, visual intrusion, light pollution, odour, and amenity along transport routes.</p> <p>The areas of search are large areas which indicate where there may be commercially attractive amounts of mineral resources over a large enough area that mineral workings in the area could collectively be restored as an integrated network of green infrastructure over the life of the plan and beyond. We recognise that if a lot of sites were to be developed in a particular area this could lead to cumulative impacts and this will be addressed as we develop the policy framework.</p> <p>A Sustainability Appraisal (SA) (incorporating the requirements for Strategic Environmental Assessment) and a Habitats Regulations Assessment (HRA) are being prepared to assess the Minerals Local Plan. An Initial SA and an HRA scoping report were published and consulted on alongside the Second Stage Consultation. Further SA and HRA will be undertaken at each stage of developing the Minerals Local Plan, and these will assess any proposed</p>

Summary of comments	Initial officer response
	<p>areas of search or preferred areas for extraction.</p> <p>Following the results of this consultation we agree that we may need to refine the areas of search to give a greater level of certainty and we will be considering ways in which we might be able to do this.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>A list of issues does little to involve people in the consultation. Far better would have been to ask people to prioritise their issues perhaps on a 1 - 10 basis.</p> <p>(h) Regarding choice of higher/lower grade agricultural land it should always be necessary to require it to be restored to its original quality unless a change of use e.g. leisure is preferred by local community. Upgrading other areas as compensation is not appropriate.</p> <p>(o)-(p) It is almost pointless listing such issues when in Appendix I comparing past and current proposals such factors are not listed or can be ignored due to 'working practices'.</p>	<p>Asking people to prioritise issues formed part of the workshop we held on the first stage of consultation in November 2012. We found this to be useful at the very early stage of developing the plan and the direction we should take, but at this stage we think that each of these issues deserves to be considered and policies developed to ensure they are adequately addressed. Prioritising the issues would risk undervaluing the importance of some of the issues. We were more concerned at this stage to ensure we had captured all of the aspects relating to each issue to be developed in detailed policies, and we have had some very useful responses to this consultation.</p> <p>Section 12, and particularly item i in Table 24 sets out our thinking about soil resources and agricultural land restoration. Our intention is not necessarily to "upgrade other areas as compensation" but rather to ensure that land is either re-instated to original quality, or to safeguard the long term potential of best and most versatile agricultural land and conserve soil resources for the future if the site is to be put to an alternative use.</p> <p>Appendix 1 of the consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria to identify and allocate preferred sites can no longer be seen as absolute constraints in defining where minerals should or should not be worked. Even in designated landscapes such as Areas of Outstanding Natural Beauty, national policy does not completely rule out mineral working. However, this does not mean that we think the issues are not important.</p>

Summary of comments	Initial officer response
	<p>Modern working practices and mitigation measures mean that many impacts can be satisfactorily dealt with, and we will develop policies to ensure that proposals will only be allowed where the issues are satisfactorily addressed. For example, measures such as careful site design to locate plant and machinery in the least obtrusive position, screening the site with appropriate planting, and requiring progressive restoration to minimise the "working" area at any given time can minimise the impacts of mineral working on the landscape.</p>
<i>Malvern Hills AONB Partnership</i>	B049-802B
<p>e) If extraction was undertaken in the AONB it could have significant impacts on transport corridor as well as the visitor experience.</p> <p>p) The protection for AONBs needs to be much stronger than this. The key issue is to consider alternative sources of crushed rock outside the AONBs (and if necessary outside the county) to address the key requirements of sections 115 and 116 of the NPPF. Development in AONBs must be in exceptional circumstances and in the public interest. Quarrying in one of the most popular visitor attractions in the county would have significant, and most likely unacceptable, social, economic and environmental effects.</p>	<p>Noted. We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Site-specific location policies will ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, and we are actively discussing the issue of crushed rock provision with them to establish whether there are any other avenues available for provision of Worcestershire's crushed rock requirements from outside of the AONBs.</p> <p>We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p> <p>We recognise the value of these features for tourism, and we are intending to strengthen the references to the importance of tourism for Worcestershire's economy in the spatial portrait section of the plan.</p>

Summary of comments	Initial officer response
<p><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p> <p>We are supportive that the Plan should include policies to cover the above topics. However, the Plan should avoid repeating policies that are set out within NPPF, in particular sites/assets of international/national importance.</p>	<p>B050-1504A</p> <p>We agree that national policy should not be unnecessarily repeated. However, we think it is important that the plan clearly sets out what the important issues for consideration are, and not including these matters could result in the interpretation that matters of environmental or heritage importance are not valued, rather than simply covered by national policy. We think that the Minerals Local Plan has a role to play in conveying local interpretation of national policies, and as such we intend that the Minerals Local Plan will provide locally relevant policy guidance on issues that are covered in national policy and will explain how we would like these policies to be applied in a way that is consistent with the county's strategic priorities.</p>
<p><i>Environment Agency</i></p> <p>We support the above issues. We would highlight however that whilst sand and gravel workings are classed as 'water compatible' in the NPPF, proposals coming forward in flood risk areas would also have to pass the requirements of the 'Sequential Test' (ST) as set out in paras. 3-5 of the Technical Guidance to the NPPF. This is an issue that will require consideration and guidance in emerging policy. Moreover, planning balance will have to be employed moving forward, as to locate all sand and gravel workings in Flood Zone 1 (as per the aims of the ST) would serve to reduce the ability to provide meaningful flood alleviation in the plan period. This nuance will need attention.</p>	<p>B058-719</p> <p>Support for the general approach to flood and water management noted. We are developing a background paper to address water and flooding issues and we would appreciate the opportunity to work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk and flood alleviation.</p>
<p><i>Mrs Pat Harries</i></p> <p>Applaud the proposals but am concerned about the implementation Please include protection of National Footpaths such as The Severn Way which is not mentioned above.</p>	<p>B060-2399</p> <p>The Severn Way is a long distance footpath which follows the Severn from its origin to the sea. The footpath is a public right of way, and is afforded the same protection as all public rights of way. Public rights of way are identified as an issue that will be addressed through policy criteria in Table 5 (item h) and Table 24 (item f) – specifically protecting or reinstating existing public rights of way, long distance paths, and cycling routes, and exploring opportunities to add to or enhance the existing network. This might include</p>

Summary of comments	Initial officer response
	<p>consideration of creating stopping points or points of interest along new or existing routes.</p> <p>We recognise the value of such features for tourism, and we are intending to strengthen the references to the importance of tourism for Worcestershire's economy in the spatial portrait section of the plan.</p>
<p>(Q25) if you think that there are other issues that we should consider relating to the location of mineral development, please provide details.</p>	
<p><i>Mr Adrian Buckmaster</i></p>	<p>B032-2394</p>
<p>As stated previously the proximity to dwellings. There seems nothing about how close excavation might be to houses unless it becomes unsafe.</p>	<p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See</p>

Summary of comments	Initial officer response
	Appendix 1 of the Second Stage Consultation Document for more information).
<i>Tewkesbury Borough Council</i>	B036-703
The amenity of local residents near to mineral extraction sites should be considered as well as those along transport routes.	Impacts on residential amenity will be addressed through policy criteria as set out in table 5 and table 24. Specifically, these issues include noise and vibration, air quality and dust, visual intrusion, light pollution, odour, as well as amenity along transport routes.
<i>Mrs Christine Daniell</i>	B037-2396
A national footpath - The Severn Way - should be preserved with additional policy made to encompass all the footpath networks.	<p>The Severn Way is a long distance footpath which follows the Severn from its origin to the sea. The footpath is a public right of way, and is afforded the same protection as all public rights of way. Public rights of way are identified as an issue that will be addressed through policy criteria in Table 5 (item h) and table 24 (item f) – specifically protecting or reinstating existing public rights of way, long distance paths, and cycling routes, and exploring opportunities to add to or enhance the existing network. This might include consideration of creating stopping points or points of interest along new or existing routes.</p> <p>We recognise the value of such features for tourism, and we are intending to strengthen the references to the importance of tourism for Worcestershire's economy in the spatial portrait section of the plan.</p>
<i>Natural England</i>	B040-717
Green infrastructure - including the opportunities that could be provided by the future restoration of the site.	<p>The Second Stage Consultation was developed with the Green Infrastructure approach in mind at all times, although it is most prominent in sections 11 and 12 which address where minerals will be worked and how mineral workings will be restored. The approach is also embedded in the vision which states that "<i>Mineral workings will be restored to maximise social, environmental and economic gains, through coordinated restoration that delivers networks of green infrastructure in an integrated way</i>".</p> <p>Appendix 2 sets out the draft restoration profiles for each area of search. These are directly derived from the green infrastructure approach, considering the issues of landscape, flood alleviation, habitat quality and</p>

Summary of comments	Initial officer response
	<p>fragmentation, water quality, geodiversity, horticulture and food production, the historic environment, and access and recreation using the methodology which is outlined in Section 12.</p> <p>We agree that we have not included Green Infrastructure as a heading in Table 10, although many of the aspects which together make up green infrastructure (such as flood risk, soil resources, water quality, geological sites, habitats and species, landscape character and the historic environment) are addressed individually. We will consider whether it would be appropriate to address these policy issues under the umbrella heading of Green Infrastructure in the plan.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 B</p>
<p>In order to ensure that appropriate levels of planned and future supplies can be maintained whilst also limiting the blighting effects on local communities it is considered that a limited number of preferred areas for sand & gravel and crushed rock extraction are identified. Planning permission should be granted for mineral extraction in the preferred areas, subject to the proposals meeting other relevant Development Plan policies and submission of acceptable site working and restoration proposals.</p> <p>Applications for planning permission in areas not within a preferred area for extraction should be assessed against the same criteria as those used in identifying the preferred areas to ensure consistency.</p> <p>Exceptionally, permission could be granted on sites which failed the constraints criteria if there was an overriding need to meet a specialist end-use and no suitable alternative sources had been permitted in the County or surrounding area.</p>	<p>Following the responses we have received to this consultation, we intend to identify areas of search and safeguarding areas in accordance with a more refined version of the methodology set out in Section 11 (and by extension section 13) and policy criteria will be developed for the next consultation. Several respondents have raised questions about the deliverability of the area of search method, and provided useful comments that we will be considering as we determine how to take this forward in the subsequent draft. We will consider whether it remains appropriate to only designate areas of search or whether a mixture of areas of search, preferred areas and/or specific sites is required in order to maximise the deliverability of required provision. We anticipate that the policy framework we develop will be able to address any sites that come forward on sites outside of the areas of search, though we are still considering how this type of site will be handled in the draft plan.</p> <p>We agree that comprehensive working of permitted reserves is desirable in order to make best use of the resource, but this must be balanced against other requirements, e.g. for the final land-form for a beneficial after-use if imported fill materials are not appropriate for a particular site or to protect the quality or quantity of water supplies..</p>

Summary of comments	Initial officer response
<p>To minimise the need for new sites it is considered that comprehensive working of permitted reserves in existing quarries should be encouraged. Also, subject to conformity with the constraints criteria, extensions to existing quarries should be examined prior to identifying new quarries.</p> <p>Other surface minerals To ensure a consistency of approach, it is suggested that the extraction of other surface minerals (eg salt) be considered against the same criteria as aggregates extraction.</p> <p>Coal: Coal will remain important as a contributor to the diversity and flexibility of UK electricity production into the foreseeable future. South Worcestershire contains reserves of unworked coal but further underground working is considered unlikely and does not justify the formulation of a specific policy in the minerals Local Plan. Any application for underground mining should be dealt with on its merits and take account of national guidelines in relation to coal mining, together with any other relevant Development Plan policies.</p>	<p>We also have a number of considerations to balance when it comes to considering extensions over new sites:</p> <ul style="list-style-type: none"> • the need to make the best use of the resources we have and not to sterilise useful material by overly restricting working, • making sure that the plan we propose will be deliverable: knowing where mineral operators have thought a particular resource is commercially viable in the past is one indicator of where it is likely to be viable to work in future, • impacts on the local area, making sure that we take into account the potential for cumulative effects from a number of sites in a locality. <p>We may be able to develop the policy framework in a number of ways to control cumulative impacts in an area and will be working to address these issues for the next consultation.</p> <p>We agree that the policy framework needs to be capable of assessing any applications which might come forward for minerals such as coal or salt, although we currently think it unlikely that these will be worked in the foreseeable future. We will be consulting on policy wording at the next stage.</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>Other issues should include the proximity of resident to new developments, (not just those in concentrated built development), considering all the issues that negate the health and amenity of residents in a sympathetic way.</p>	<p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by</p>

Summary of comments	Initial officer response
	<p>national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact. This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p> <p>Impacts on residential amenity will be addressed through policy criteria as set out in table 5 and table 24. Specifically, these issues include noise and vibration, air quality and dust, visual intrusion, light pollution, odour, and amenity along transport routes.</p>
<i>Malvern Hills AONB Partnership</i>	B049-802B
<p>Consideration also needs to be given to the setting of AONBs and impacts on views towards and from the Malvern Hills in particular. The AONB Unit has produced guidance on how to assess views.</p>	<p>Noted. We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county. Site-specific location policies will ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p> <p>Visual amenity has been brought to our attention by several respondents as an area that we need to strengthen in the draft plan, and we will consider the guidance you mention when we prepare draft policies.</p>
<i>Malvern Hills AONB Partnership</i>	B049-802A nq
<p>The AONB Unit is very concerned that the Local Plan has identified the Malvern Hills as an area of consideration for the extraction of crushed rock. Whilst</p>	<p>Noted. We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically</p>

Summary of comments	Initial officer response
<p>we appreciate that this type of material is only found in the Malvern Hills and Bredon Hill it seems a very drastic measure to consider mineral extraction in the only two small areas of national landscape importance in Worcestershire. The AONB Partnership would be very likely to oppose any proposal for crushed rock extraction within the AONB, even assuming that such activity would be allowable under the Malvern Hills Acts.</p> <p>It is unclear from the plan as to what alternatives have been considered, either in terms of using an alternative material or in considering sites outside the county. With the duty to cooperate with neighbouring authorities we feel that this issue needs to be considered on a regional or national basis to avoid irreparable damage to nationally protected landscapes. Given the scale of extraction proposed it is hard to see how this could be accommodated without causing significant harm to landscape character and natural beauty.</p> <p>For developments to be allowed they would need to satisfy the requirements of sections 115 and 116 of the NPPF. It would need to be shown that great weight had been given to the AONB and that any development could demonstrate exceptional circumstances and be in the public interest. The issue of public interest is particularly important in such a popular area for tourism and for recreation. Under section 116 it will be essential to demonstrate that the same provision could not be made outside the AONB, including in adjoining counties. The NPPF makes clear that the presence of an AONB is one of the issues that can override the presumption in favour of sustainable development. It is also hard to see how developments with the potential to cause so much harm to landscapes could be considered to be sustainable. We</p>	<p>excluded from AONBs or any other designated landscape under current National Policy. However, we intend to develop site-specific location policies that will ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p> <p>Following the results of this consultation we realise that the areas of search may need to be refined, and this will include taking into account the findings of the Habitats Regulations Assessment which accompanied the consultation to ensure our approach is legally compliant and will not promote development which would have significant effects on the Bredon Hill or any other Special Areas of Conservation (SAC) in or around the county, and will also need to consider whether or not the Malvern Hills Acts mean that it is not appropriate for the Malvern Hills to be included as an area of search.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, and we are actively discussing the issue of crushed rock provision with them to establish whether there are any other avenues available for provision of Worcestershire's crushed rock requirements from outside of the AONBs.</p> <p>We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p> <p>We would be happy to meet with you after we have discussed the crushed rock provisions in more detail with neighbouring MPAs.</p>

Summary of comments	Initial officer response
<p>would expect the harm to a nationally important landscape to outweigh the benefits of development.</p> <p>We would like to request a meeting with the Minerals Planning Team at your earliest convenience so that we can fully understand the potential implications for the AONB and provide further advice directly.</p>	
<i>Environment Agency</i>	B058-719
<p>Matters relating to all forms of pollution (noise, air, water, odour etc...) have been referred to in Q.17 but will need including within Table 10 and any emerging policy base. These issues appear to be absent through issues A-V.</p>	<p>For the Second Stage Consultation, we split the issues to be addressed through policy criteria into three tables: table 5 addressing how sites should be worked, table 10 addressing where minerals should be worked and table 24 addressing how sites should be restored. We felt at the time that by including a list of policy areas that we felt were relevant to specific sections of the document it would simplify matters for respondents and clarify our thinking. We now realise that this has resulted in both duplication of issues and the unintentional appearance of neglecting other issues. We agree that pollution must be addressed through policy criteria at all stages of mineral winning, working and restoration, and we hope that the draft policies prepared for the next consultation will clarify these issues.</p>
<i>WCC Environmental Policy</i>	B059-2004
<p>We also encourage consideration of potential for fragmentation/sterilisation of existing and emerging infrastructure assets including local energy sources, transport and green infrastructure.</p>	Noted.
<i>Mrs Pat Harries</i>	B060-2399
See above	Noted.

No comment responses:

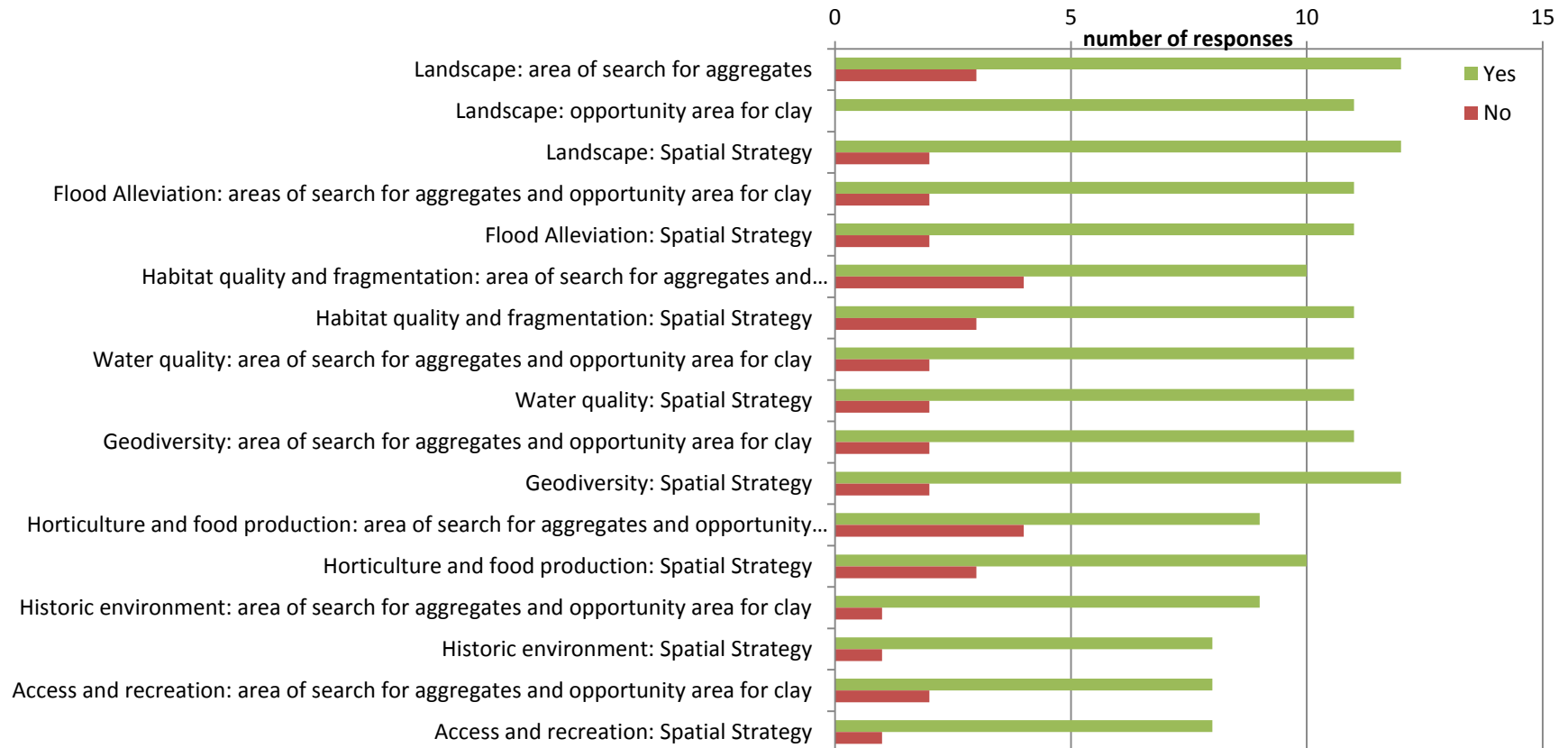
<i>Natural England</i>	B040-717
No comments	Noted
<i>Worcestershire Wildlife Trust (Q24)</i>	B044-1081
No comment	Noted
<i>Worcestershire Wildlife Trust (Q25)</i>	B044-1081
No comment	Noted.

Section 12: How will minerals be worked?

In section 12 we have set out a "step-by-step" guide to our approach for using Green Infrastructure principles to drive mineral site restoration in the county. We have set out in detail how we have identified the importance of the issues in each area of search for aggregates and the opportunity area for clay, how this has informed the spatial strategy, and alternative approaches to driving the delivery of the restoration priorities.

Questions 26 and 27: Approach to restoration of mineral workings.

Q26: Do you support the approach we have taken to the restoration priorities for each issue?



Summary of comments	Initial officer response
(Q26) Please give details of any additional considerations which should inform any of these topics. Please specify which topic your comment refers to by quoting the relevant letter code.	
<i>National Farmers' Union, West Midlands Region</i>	B017-857nq
<p>We welcome the inclusion of horticulture and food production as potential restoration options.</p> <p>We also agree that opportunities for flood alleviation and water storage should be considered. Water storage will be important to safeguard water resources and this may help the local economy if linked to clusters of horticultural and food production businesses. We do have some concerns about some of your methodology which are outlined in more detail below.</p> <p>Page 88. Approach to developing restoration priorities.</p> <ul style="list-style-type: none"> • We do not agree with the decision not to consider grade 3a and grade 3b land in Table 19. Assessment of soil type and quality can be done by relatively straight forward soil testing on a site by site basis. This would give much better information on the actual nature of the soil being considered. Table 19 is a very blunt tool and there is a significant risk that large areas of good quality land will not be considered. 	<p>Noted, thank you.</p> <p>Noted. Whilst we referred to the concept of storing flood water, we had only considered this as part of flood alleviation methods, and had not considered how this or other types of water storage might link to horticultural or food production businesses. We will consider how we might be able to integrate water storage for horticulture and food production as a restoration opportunity where appropriate.</p> <p>Whilst we agree that all of the best and most versatile agricultural land in the county is important, including grade 3a land, we do not have detailed digital information to show which areas are classified as grade 3a and which are 3b. As the majority of the county (63.5%) is classified as grade 3, we don't think this would provide a useful indicator for prioritising horticulture and food production without further refinement. We appreciate that soil assessment can be undertaken on a site-by-site basis, but we need to establish strategic priorities over broad areas, and are not working at individual site level. We intend to work with Defra to establish if further detail is available and to contribute to our knowledge as the areas of search are refined in the next consultation. This information may be used to inform the restoration plan for specific areas of search.</p> <p>We do not propose to use agricultural land quality to rule any sites out, but we will protect soil resources through the policy framework (see Table 5, item q; Table 10, item h; Table 23 restoration worked example, part f; Table 24, item i). We would welcome further discussion with you to refine the methodology and policy framework to ensure we protect high quality land as far as possible.</p>

Summary of comments	Initial officer response
<p>• We also query the proportions outlined in Table 19. We think that there should be some measure of scale within the methodology. For example, less than ¼ of the land area of a large site at grade 1 or 2 would still constitute a significant agricultural asset. Therefore we urge you to look at this table again. We also think that a site that has between ½ - ¼ of grade 1 or 2 land should be given priority level 1.</p> <p>Paragraph 12.88, Next Steps.</p> <p>• Consideration would also need to be given to the suitability of the site, including access issues, water supply and also the existing infrastructure of the farm taking on the land. Cropping post restoration is a decision that must be considered in parallel with the farmer who will be responsible for future management. For example it would be difficult to manage a field for grazing if there was no other nearby livestock infrastructure. Pasture and orchards may be located on lower quality areas and still offer biodiversity benefits whilst contribution to the local economy and food security.</p> <p>Paragraph 12.89.</p> <p>• These options need to be discussed with local farmers to ensure that they have the capacity to manage the sites</p>	<p>The method set out in Table 19 has been applied to large areas of land identified as "areas of search", rather than to individual sites. We have tried to use methodologies for each restoration priority which are comparable as far as possible and appropriate, and a similar indicator scale ('more than ½ = level 1', '¼- ½ = level 2' etc.) has also been used for the historic environment and is broadly comparable to the measures for habitat quality and fragmentation. Following this consultation we will consider whether the indicators used for each priority remain appropriate.</p> <p>However, this method as we have applied it leads to Horticulture and Food Production being identified as a level 1 priority for 5/20 areas of search, and a level 2 priority for a further 10. The only areas where restoration for horticulture and food production is not considered to be a priority at any level is in the Crushed Rock areas of search where the majority of the Malvern Hills area of search is classified as grade 4 and 5 land and Bredon Hill as grade 3 and 4 land.</p> <p>The examples given in paragraph 12.88 for further consideration are those which could be considered at a landscape scale, for example if an area has an established or historic land use pattern such as pasture or orchards. We do not intend to specify exact crops or detailed management, rather to indicate the broad patterns of agricultural use which could influence restoration proposals. Site suitability, water supply and existing infrastructure are issues that will be further considered through policy criteria and would need to be considered in detail at individual site level as applications come forward, rather than at the strategic level of the Minerals Local Plan.</p> <p>Noted and agreed. We are keen to ensure that the plan we develop will be deliverable, including ensuring that sites which include biodiversity or other green infrastructure gains can be managed to ensure these gains are not</p>

Summary of comments	Initial officer response
<p>into the future. It would be appropriate to find options that would work in harmony with the existing farm business. This could include more productive areas alongside areas focused on biodiversity.</p> <p>Figure 36 & 37.</p> <ul style="list-style-type: none"> We are concerned by the size of the very small area identified as locations where horticulture and food production is a determining factor in restoration. This demonstrates the problem with the failure to consider grade 3a land and illustrates the issues we raised with Table 19. If higher priority were given to areas of grade 1 and 2 land the area would be much higher. 	<p>lost over time, and we are conscious that landowners will want their land to provide an income following mineral extraction. As you suggest, this may result in more productive areas alongside biodiversity focused areas, but it might also include options such as lower intensity grazing across the larger area to enable farming alongside biodiversity, or investigating emerging opportunities such as biodiversity offsetting schemes which could fund land management for biodiversity.</p> <p>Following this consultation we realise that we will need to refine the areas of search, and at that point it might be possible and appropriate to have more focused consultations at a local level and we hope that local landowners will engage with future consultations on the Minerals Local Plan.</p> <p>However, landowners and farmers need to understand the implications for the use of the land following minerals extraction both from the perspective of the practicalities of returning land to productive use and in terms of policy requirements which national and local policy could impose if they agree for their land to be worked. It is not always possible to return land to its former condition: working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable; the Strategy is intended to maximise the Green Infrastructure benefits of working the site in the public as well as the landowner's interests and this will need to be taken into account by landowners both at contract negotiation and planning application stage.</p> <p>¼ of the areas of search have Horticulture and Food Production as a determining or significant factor (see Table 22 and the maps in Appendix 4 of the main consultation document). The over-arching restoration priority shown on the spatial strategy indicates where the importance of horticulture and food production could be seen as a meaningful "corridor" to guide holistic restoration schemes across more than one area of search. We are aware that further guidance needs to be provided to enable applicants to understand how to apply this and to determine which restoration priorities should take precedence in areas with more than one determining factor.</p>

Summary of comments	Initial officer response
<p>Paragraph 12.93.</p> <ul style="list-style-type: none"> • Whilst considering options on a site by site basis is an approach we would support, we strongly disagree with the statement that “identifying agriculture as an overarching priority that cuts across the River Severn corridor could risk diluting the benefits that come from augmenting habitat quality and fragmentation around this feature”. This statement fails to take into account the importance of the farmed landscape to biodiversity and landscape quality. Farming is an integral part of the River Severn Corridor and there is no justifiable reason why agricultural uses could not be a priority restoration option. 	<p>However it is not our intention to exclude proposals in any of the areas of search from incorporating agricultural aspects as part of sites' restoration schemes where appropriate.</p> <p>As noted previously, the majority of the county (63.5%) is classified as grade 3 land, and therefore we don't think this would provide a useful indicator for prioritising horticulture and food production without further refinement.</p> <p>Noted. We did not intend to deny the importance of the farmed landscape, its importance is explicitly recognised in the restoration profiles for the Lower Severn: South West, Lower Severn: South East, and Upper Severn Corridor areas of search (pages 206, 214-215, and 223-224) which set out the Landscape Types in the Severn Corridor. These include Settled Farmland on River Terrace, Estate Farmlands, Settled Farmlands with Pastoral Land Use, Principal Settled Farmlands, and Principal Timbered Farmlands. All of these Landscape Types recognise the importance of biodiversity to maintaining their integrity. We agree that farming is an integral part of the River Severn Corridor, and Horticulture and Food Production is identified as a Determining or Significant Factor in all of the Areas of Search along the Severn as set out in Tables 12 and 22 (p.68 and 95).</p> <p>We think that the high level restoration priorities are not incompatible with each other and will be able to deliver multiple benefits, but we also think that based on the comments we have received in this consultation we will need to refine the Areas of Search and provide greater clarity about how restoration priorities should be delivered.</p>
<p><i>Canal and River Trust</i></p>	<p>B011-1280</p>
<p>The Canal & River Trust welcome the priority to create and enhance the habitats along the River Severn Corridor and Stour Corridor. The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations.</p>	<p>Support noted.</p>

Summary of comments	Initial officer response
<i>North Worcestershire Water Management</i>	B030-1952
Again as in sections 10 & 11.	Please refer to our responses to your comments above .
<i>Mr Adrian Buckmaster</i>	B032-2394
<p>There is not enough emphasis on restoring the landscape to as close as possible to what it was before the excavation and too much to "enhancement" whatever that might mean.</p>	<p>In paragraph 12.24-12.25 we state that <i>"mineral extraction by its nature results in a change to the landscape. In order to ensure that the overall landscape quality of the county is not degraded by mineral workings, consideration must be given to the existing landscape character and the nature of the changes that could result from mineral extraction. Following extraction, the connectivity of the landscape needs to be re-established. Depending on the type of mineral operation and the impact on the landscape, it may be possible to restore workings to their former Landscape Type by recreating or enhancing the key characteristics. However, in some cases the scale or nature of the workings will prohibit this from being done effectively. In such circumstances it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type."</i></p> <p>Mineral extraction by its nature removes material from the landscape and therefore some degree of change is inevitable. This is something that we have stated will be addressed by policy criteria and is one of the reasons that we think landscape is an over-arching issue for our restoration strategy as part of a Green Infrastructure approach. We are actively considering this issue, and we think that we will be able to develop the restoration profiles for the areas of search to give greater certainty about when sites might be able to be restored to the former landscape type and when working might result in whole-scale change. We will seek to manage any change to ensure that it is appropriate. We will develop policies to address these issues in the Minerals Local Plan.</p>
<i>Mrs Anne Pearson</i>	B034-2395
<p>I am sure that the restoration plan will work well for low-grade agricultural land. However, to create a lake or wetland in the area ECA 19/2 Longdon Hinterland would not be appropriate. The area nearest the river is prone to</p>	<p>The restoration profiles for each area of search are located in Appendix 2, and are intended to help determine the types of restoration which would be appropriate for a given site. They do not specify the exact types of restoration which must happen and do not specify that a lake or wetland</p>

Summary of comments	Initial officer response
<p>considerable flooding annually from both the stream that runs north-south from Upton through Dogleg Copse and the stream that flows through Paradise Plantation. These two flow into the Severn and the river, in turn flows upstream when in spate.</p>	<p>must be created in resource area 19/2.</p> <p>The restoration profile for the "Lower Severn: South West" area of search which currently incorporates resource area 19/2 identifies habitat quality and fragmentation, water quality, geodiversity and the historic environments as the determining factors for restoration in that area. Flood alleviation is identified as a 3rd level priority to be integrated where possible as this area is categorised by the Environment Agency as a Policy 2 area in the River Severn Catchment Flood Management Plan (RSCFMP), meaning that they consider it to be an area <i>"of low to moderate flood risk where we [the Environment Agency] can generally reduce existing flood risk management actions. The RSCFMP considers that the current and future risks do not warrant as much intervention (for example on maintaining existing defences) and it is therefore not worth continuing. We [the Environment Agency] can allow the risk of flooding to increase in a managed way so that we do not create unacceptable risks."</i> However, the key messages identified for this area include that opportunities should be taken to restore natural storage of floodwater on undeveloped floodplains.</p> <p>Lakes and wetlands can contribute to flood alleviation by helping to slow water flow, providing additional natural storage for flood waters, and restoring natural flood plains. They also provide important habitats and contribute to biodiversity.</p> <p>Mineral extraction can lead to a change to the landscape. We think that depending on the type of mineral operation and the impact on the landscape, it may be possible to restore mineral workings to their former Landscape Type by recreating or enhancing the key characteristics but in some cases the scale or nature of the workings will prohibit this from being done effectively. In these cases it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type. We will develop policies to address these issues in the Minerals Local Plan.</p>

Summary of comments	Initial officer response
	Flood risk and flood alleviation are addressed in objectives 4 and 5. These are also identified as issues to be addressed through policy criteria related to how and where minerals are worked and site are restored in table 5 (items p, r and t), table 10 (items f and g) and table 24 (items h and j).
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
<p>See above. It is unclear what is meant by Level 1. Must the land be restored to the same level as or better than before any extraction? Must any scheme meet all the restoration priorities, only the Level 1 priorities, etc? What are the comparative values between each one? So would a Level 1 Flood alleviation restoration Priority outweigh a Horticulture and food production one? This section is very confusing and need more information about how these policies are to be implemented.</p> <p>We would like to submit more detailed information regarding the assessment of the Longdon Hinterland Background Document and will take this up separately with your Planning Officers.</p>	<p>The over-arching restoration priorities shown on the spatial strategy indicate where those particular issues can be seen as a meaningful corridor to guide holistic restoration schemes across more than one area of search.</p> <p>We think that the high level restoration priorities are not incompatible with each other and will be able to deliver multiple benefits, but we also think that based on the comments we have received in this consultation we will need to refine the Areas of Search and provide greater clarity about how restoration priorities should be delivered, particularly in areas where multiple determining factors (level 1 priorities) exist.</p> <p>We welcome any additional information you can provide.</p>
<i>Mrs Christine Daniell</i>	B037-2396
<p>This is very difficult to understand. Care should be taken when farmland in Nitrate Vulnerable Zones are considered, many of which are in the Severn basin. If the intention is to re-instate to reasonable agricultural level of production then Nitrates to fertilise will be needed. In an NVZ this will be difficult. With a burgeoning population even grade 3 agricultural land is of crucial importance.</p>	<p>We are sorry that you feel the restoration approach is difficult to understand. We hope that further refinements of the plan will aid clarity.</p> <p>Thank you for raising Nitrate Protection Zones. We acknowledge that this is an issue which the Minerals Local Plan should take into account and we will give consideration to how we might do this as we develop the plan. We may be able to incorporate Nitrate Protection Zones as an issue to be addressed through policy criteria, or it might be possible to use them as a consideration in defining the restoration profiles for each area of search.</p> <p>The importance of Grade 3 agricultural land has been raised by a number of respondents including the National Farmers' Union, West Midlands</p>

Summary of comments	Initial officer response
	Region (you may also refer to our response to their query above) and we will be considering how to address this as we develop the Minerals Local Plan.
<i>RSPB</i>	B039-1782
<p>Overall, the RSPB strongly supports the approach that has been taken on how mineral sites should be restored, the identification of high-level priorities and the importance of these issues for each areas of search / opportunity area. The RSPB recognises the merits of the Green Infrastructure (GI) approach and the fundamental principle of integrating a number of priorities and considerations.</p> <p>However, this integration of priorities and considerations should not necessarily lead to multiple after-uses on any one site, as this could potentially weaken the delivery of individual restoration priorities, such as the landscape-scale creation of priority habitat.</p> <p>Biodiversity As outlined in response to Questions 1 and 2, the minerals industry is uniquely placed to help halt the ongoing decline in biodiversity and to make a significant contribution to the creation of a coherent and resilient ecological network. For example, mineral sites, on their own, have the potential to deliver 100% of the national habitat creation targets for nine priority habitats. In many cases, this opportunity for habitat creation is dependent on mineral extraction taking place. Whilst the other high-level restoration priorities are important, they are not as uniquely dependent on mineral site restoration for their delivery. The RSPB therefore believes that biodiversity should be an over-arching consideration and that the</p>	<p>Support noted, thank you.</p> <p>One of the concepts that underpins our green infrastructure approach is that it allows us to secure multiple benefits across large areas (the areas of search) and contributes to meeting the county's strategic goals. Whilst we think that in many cases a number of priorities could be integrated on one site (for example a restoration which included a braided watercourse might provide biodiversity gains, water quality improvements and flood alleviation benefits), we recognise that it may not be appropriate to incorporate all aspects in any one scheme. We expect the draft policies to provide the necessary clarity and guidance to ensure that individual restoration priorities are not compromised in the pursuit of multiple benefits, and to guide the types of restoration which would be appropriate and highlight the key factors and links which should be taken into account as schemes are developed.</p> <p>Placing biodiversity as an over-arching consideration is an interesting concept and we would like to explore this with other members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date. However, even without placing biodiversity as the leading aspect, the habitat quality and fragmentation methodology used in this consultation resulted in this restoration priority being identified as either a determining factor or a significant component for all the areas of search, and as an over-arching priority in the spatial strategy across 13 of the 19 areas of search. If the proposed methodology and areas of search were taken forward unchanged this would still ensure that a high level of consideration would be given to biodiversity, although it is likely that we will need to refine the areas of search and possibly some of the approaches to establishing restoration priority levels as we develop the Minerals Local Plan.</p>

Summary of comments	Initial officer response
<p>Plan should promote a biodiversity-led approach to mineral site restoration.</p> <p>Figure 26 (Step 3) indicates that the key measures used for the issue of habitat quality and fragmentation are the Worcestershire Habitat Inventory and the Worcestershire Landscape Character Assessment. Whilst these provide a valid starting point, the key measures should also include:</p> <ul style="list-style-type: none"> • the overlap of an Area of Search with the : <ul style="list-style-type: none"> o Worcestershire’s Biodiversity Delivery Areas (BDAs) o Biodiversity Opportunity Map for Worcestershire ; o re-creation options for River Severn / Avon floodplain wetlands ; o heathland potential (this is mainly relevant to the ‘Stour Corridor Sandstone: South’ Area of Search). • the ‘Statements of Environmental Opportunity’ of the relevant National Character Areas (NCAs) relating to priority habitats (e.g. NCA 106 – Severn and Avon Vales - and NCA 66 – Mid Severn Sandstone Plateau). <p>The BDAs have been identified by the Worcestershire Biodiversity Partnership as the priority areas for biodiversity delivery within the County, based on the opportunity for the available resources achieve maximum</p>	<p>We appreciate that minerals sites are important for delivering biodiversity, as highlighted by the Nature After Minerals project, but we also think that other aspects of Green Infrastructure are important in Worcestershire. Many of these priorities can be integrated in holistic restoration schemes and minerals sites will be one of the key opportunities for delivering the Worcestershire Green Infrastructure Strategy. Prioritising biodiversity as an over-arching priority might run the risk of unintentionally overlooking other GI aspects without necessarily resulting in any additional biodiversity gains.</p> <p>Noted.</p> <p>Biodiversity Delivery Areas (BDAs) are addressed in the detailed text portion of the consultation document (pages 81, 82, 88) which explains the restoration profiles. They are also considered as factors in the 'worked example' which begins on page 99. Although they have been used to inform text in the restoration profiles, the BDAs were not used to define priority levels or areas of search.</p> <p>Thank you for bringing these other items to our attention – we have not used the Biodiversity Opportunity Map, the Statements of Environmental Opportunity, the National Character Areas or the re-creation options or heathland potential to date.</p> <p>These are all interesting concepts and we would like to explore these with the members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date, in order to find the best way to use these to either refine the method for prioritising habitat quality and fragmentation or to inform the restoration profiles for the areas of search.</p>

Summary of comments	Initial officer response
<p>gain. Therefore, it would make sense to prioritise biodiversity-led restoration of mineral sites in these BDAs. Nearly all of the Areas of Search overlap to some extent with one or more BDAs, apart from Junction 4a Central and Junction 4a North. Although BDAs are referred to in Appendix 2 for some Areas of Search, there should be an explicit reference to BDAs in the main document as well.</p> <p>The Plan currently identifies biodiversity as being a determining factor where the biodiversity value is already high and where habitat fragmentation is currently low. Whilst it will be important to maintain and, ideally, enhance, this high biodiversity value and to prevent habitat fragmentation in these areas, this should be achieved through policies for all mineral sites that require:</p> <ul style="list-style-type: none"> • a net-gain in biodiversity (i.e. mitigate for any damage to, or loss of, habitat and provide additional, appropriate habitat); • avoidance of adverse effects on the existing biodiversity resource of the site. <p>Maintaining this existing biodiversity resource is not sufficient to halt and reverse the country's massive and ongoing decline in biodiversity. In the words of the Lawton Review we need wildlife sites / priority habitats that are better, bigger, more and connected:</p> <ul style="list-style-type: none"> • better: improve the quality of current wildlife sites / priority habitats by better habitat management' • bigger: increase the size of current wildlife sites / priority 	<p>We agree that it is important for the Minerals Local Plan to aspire to achieve net gains for biodiversity, and this is reflected in Objective 6 "To protect and enhance the natural and historic environment" and the identification of habitat quality and fragmentation as one of the high level restoration priorities proposed. However, the green infrastructure approach means that we do not feel that it is appropriate to prioritise one area of green infrastructure above the others. We do think that it would be appropriate for the plan as a whole to strive for net gains, and that it is likely that biodiversity gains could be made at many sites, but we also think that the identified restoration priorities should drive this and that is more appropriate for any individual site to seek to realise the identified "determining factors". This might mean that biodiversity gain is not the highest priority on some sites but would be the primary driver on other sites. The issues you bring up will be addressed through policy criteria which will apply to all sites, in addition to the restoration profiles, and we will certainly strive to avoid unacceptable adverse effects on biodiversity.</p> <p>We agree that increasing biodiversity is important and the approach we are proposing is intended to implement the Lawton Review outcomes of "better", "bigger", "more" and "connected". The reason we have prioritised areas where the biodiversity value is already high and where habitat fragmentation is currently low is to ensure that existing high quality areas are not lost, but instead are enhanced or made bigger or better, and because mineral site restoration can help connect existing high quality areas through creating corridors and stepping stones. We felt that it would</p>

Summary of comments	Initial officer response
<p>habitats;</p> <ul style="list-style-type: none"> • more: create new wildlife sites / priority habitats; • connected: enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'. <p>To deliver the bigger, more and connected elements of this approach, it may actually be more appropriate to focus on areas where biodiversity value is currently low and habitat fragmentation is high, as long as habitat creation in these areas would make a significant contribution to the creation of a coherent and resilient ecological network.</p> <p>For example, sections of the Areas of Search that overlap with the floodplains of the Severn and Avon rivers may not currently have any wetland habitat. However, landscape-scale creation of wetland habitat should still be a priority in these areas, as it will help to make the network of wetland habitats along the river corridors more coherent and resilient. Therefore, we suggest that the Plan takes a slightly different approach to prioritising biodiversity, focussing more on the potential contribution that landscape-scale creation of priority habitats in the Areas of Search to make towards establishing a coherent and resilient ecological network. The BDAs provide a good starting point for developing this revised approach.</p> <p>Flood Alleviation</p> <p>The text indicates that the level of priority given to flood alleviation is based on the 'policy area' that each Area of Search falls into (para. 12.37). However, it may also be appropriate to consider 'policy areas' downstream of the Areas of Search, as flood alleviation in the Area of</p>	<p>not be appropriate to also prioritise areas with low quality habitat or high levels of fragmentation because this could lead to significant time and resources being but into creating isolated pockets of habitat which are not able to provide the same level of biodiversity gain, where other green infrastructure outcomes might be more suited. However, we think that the green infrastructure approach will be able to deliver multiple benefits and biodiversity gain can and should be significant component or integrated in restoration schemes wherever possible.</p> <p>As noted above, we will consider whether further refinement is required to the method for prioritising habitat quality and fragmentation to capture the opportunities posed by the Biodiversity Delivery Areas. We think that this can sit alongside other Green Infrastructure priorities, for example creating wetlands can contribute toward the high level strategic priorities of flood alleviation and water quality as well as habitat quality and fragmentation and that this will contribute to strengthening ecological networks in the county.</p> <p>Noted. You raise an important issue about the downstream effects of flood alleviation efforts. We intend to prepare a background document to look at water and flooding issues and will consult with the Environment Agency and downstream authorities regarding this issue.</p>

Summary of comments	Initial officer response
<p>Search may help to reduce the risk of flooding downstream. For example, the Lower Severn 'policy area' has a Policy 2 rating and the Middle Avon 'policy area' has a Policy 3 rating. However, the Cheltenham, Tewkesbury and North East Gloucester 'policy area' – which is located downstream of both these 'policy areas' has a Policy 5 rating. Therefore, it may be appropriate to discuss with the Environment Agency, the potential benefits that flood alleviation works in the Lower Severn and Middle Avon 'policy areas' may have for the Cheltenham, Tewkesbury and North East Gloucester 'policy area'.</p> <p>Horticulture and Food Production: As outlined in response to Q2 [refers to their response to question 24], the RSPB acknowledges the need to protect and enhance the best and most versatile (BMV) agricultural land, where appropriate. However, in order to make a significant contribution to (i) delivering local and national biodiversity targets and (ii) establishing a coherent and resilient ecological network, it is essential that the Plan takes a more flexible approach towards the restoration of BMV agricultural land. Please see our response to Q2 for more details.</p> <p>In the context of the Areas of Search, the RSPB acknowledges the relatively high percentage of BMV land in some of the Areas of Search in the Avon Corridor and Lower Severn Corridor and in the Carrant Brook Corridor. However, as the supporting text acknowledges (para. 12.89), within the Severn and Avon Vales BDA (which overlaps with parts of these Areas of Search) there is an over-arching aim to:</p> <ul style="list-style-type: none"> • Restore the functionality and biodiversity value of the 	<p>As noted in our response to your answer to Q24, we agree that a flexible approach to restoration is needed, and we will consider how safeguarding the long term potential of best and most versatile soils could be incorporated in the policy framework and references to soil resources and best and most versatile agricultural land can be strengthened in the document.</p> <p>As you note, we highlighted that there may be some potential conflict between aspirations for horticulture and food production and those for habitat quality and fragmentation, particularly within some of the Biodiversity Delivery Areas. We are keen to ensure that the plan we develop will be deliverable, including ensuring that sites which include biodiversity or other green infrastructure gains can be managed to ensure these gains are not lost over time, and we are conscious that landowners may need at least part of their land to provide an income following mineral extraction. This might result in more productive areas alongside biodiversity focused areas, but it might also include options such as lower intensity grazing across the larger area to enable farming alongside biodiversity, or investigating emerging opportunities such as biodiversity offsetting schemes which could fund land management for biodiversity.</p>

Summary of comments	Initial officer response
<p>wetland / floodplain ecosystem and demonstrate cost effective delivery of Water Framework Directive objectives through targeting:</p> <ul style="list-style-type: none"> • reversion of arable land to wet grassland; • creation of new wetland habitat including reedbed, fen, marsh and ditch networks; • promoting and supporting low-intensity grazing systems. <p>This issue seems to have been addressed for the Areas of Search in the Lower Severn Corridor but not in the Avon Corridor or the Carrant Brook Corridor. Given the aims of the BDA, it is not appropriate to class horticulture and food production a ‘determining factor’ in these Areas of Search, whilst only classing habitat quality and fragmentation as a ‘significant component’.</p> <p>Habitat quality and fragmentation should be given at least equal ranking to horticulture and food production in these areas. Any horticulture or food production within these areas should be compatible with the aims of the BDA.</p> <p>Access and Recreation</p> <p>The RSPB supports the approach being taken to prioritising access and recreation, as this approach will promote a greater level of equality of access for residents in different parts of the county. The RSPB supports the benefits provided by public access and informal recreation on mineral sites restored for nature conservation. However, such sites will need to be carefully designed in order to achieve an appropriate balance between public access / informal recreation provision and minimising disturbance to wildlife.</p>	<p>As noted above, we will consider whether further refinement is required to the method for prioritising habitat quality and fragmentation to capture the issues and opportunities posed by the Biodiversity Delivery Areas. Any omission in addressing the issues which apply to individual areas of search was in error and we will endeavour to capture the relevant issues for the next consultation stage.</p> <p>Noted and agreed.</p>
<i>Natural England</i>	B040-717

Summary of comments	Initial officer response
Natural England fully supports the GI led approach set out.	Support noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
<p>We also support the approach to the historic environment and access and recreation (the form boxes don't work). We are particularly supportive of the approach taken to habitat quality and fragmentation and pleased to note that it takes a strategic view to re-linking biodiverse features in the landscape through the minerals planning process. It might be useful to explore mechanisms to further weight the data from the habitat inventory with details of site designations (SSSI and LWS in particular). This might be one mechanism available to further refine the process as suggested in para 12.55. We would be happy to discuss this further if it would be helpful. We are pleased to support the findings represented in fig. 31 and the end result of the synthesis of all categories shown in fig. 7 Spatial Strategy.</p>	<p>Support for approach to historic environment, access and recreation and habitat quality and fragmentation noted and captured in the figures and graphs above.</p> <p>Your suggestion of investigating ways to "weight" the data is interesting. The RSPB also suggested some other information sources which might help us to refine the methodology. We would like to explore all of these with the members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date (including WWT and RSPB/NAM representatives), in order to find the best way to use these to refine the areas of search and restoration priorities for the next consultation.</p>
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
<p>Section 12 of the Second Consultation document seeks to address in 241 pages (pages 64 to 113 + 135 to 327) how mineral workings will be restored across the proposed areas of search. As stated clearly in the South Worcestershire authorities' response to the First Consultation, and again in earlier responses in this Second Consultation, whilst the identification of restoration opportunities should be a factor in the identification of preferred areas, we do not consider it to be the primary driver, as implied in the consultation document. The South Worcestershire Authorities consider that the process of identifying areas where</p>	<p>When we state that we want the plan to be restoration-led, this does not mean that restoration opportunities have been the only factor in defining the location of the areas of search, rather it means that we want restoration to be considered at the start of the process, to inform how sites are worked and developed to ensure that mineral working results in planned benefits and minimises harm.</p> <p>The methodology for defining areas of search is set out in detail in Section 11: where will minerals be worked? on pages 52-59. This approach is based on BGS geological data which has been assessed to determine the location, volume, tonnage, and ultimately the significance of the mineral resources in the county after motorways, motorway junctions, areas of</p>

Summary of comments	Initial officer response
<p>mineral extraction is preferred should seek the best balance of community, social, environmental and economic interests, consistent with the principles of sustainable development. Regard needs to be given to economic viability, the environmental capacity of the area and the impact on the local community.</p> <p>Restoration opportunities should be a factor in the identification of preferred areas, but should not be the primary driver. The proposed approach is premature given that at this stage it has not been determined whether any of the proposed areas of search meet criteria-based policies. Indeed, the detailed criteria-based policies do not appear to have been developed, and if they had, it is assumed that some proposed areas of search (including some in the Areas of Outstanding Natural Beauty) would be considered inappropriate for mineral extraction. The South Worcestershire authorities do not, therefore, support the proposed approach of using restoration priorities to drive the identification of preferred areas for mineral extraction.</p> <p>The South Worcestershire authorities consider that restoration priorities should only be a factor in identifying preferred areas for mineral extraction after other suitability criteria (eg, physical constraints, policy constraints and local impacts) have been met. The proposed approach to developing restoration opportunities appears to be a largely desk-based exercise based on landscape character areas and the South Worcestershire authorities are disappointed that the County Council have sought to develop detailed restoration priorities without engaging with the District Councils or reference to current and emerging Local</p>	<p>concentrated built development and previously worked areas have been excluded. Spatial analysis has then been used to define where there are concentrations of key and significant resources which could be worked over the life of the plan to enable benefits for green infrastructure to be realised through restoration.</p> <p>The portion of the document you refer to is Section 12: How will mineral workings be restored. This section attempts to set out the approach that we will take to promoting the factors that should be considered in the design of restoration plans.</p> <p>We think that the approach we are pursuing will secure the best possible balance of community, social, environmental and economic interests, and that the green infrastructure approach is entirely in line with sustainable development. Economic viability, environmental capacity and local community impacts are all addressed throughout the document, in the vision and objectives, the proposed policy criteria for how and where minerals should be worked and how sites should be restored as well as the wider approach to restoration set out in Section 12.</p> <p>You are correct that the detailed criteria-based policies have not yet been developed, although the issues that will be addressed have been consulted on (see Tables 5, 10, and 24), including landscape and impacts on the AONBs. However, we do not think the approach we have proposed is premature. Appendix 1 sets out in detail the constraints applied in the current Minerals Local Plan and examines them in light of the current regulatory and policy context. In short, we would like to take a positive approach to enabling development where it is designed to meet the policy criteria and we do not feel that the current regulatory context allows us to definitively rule areas out. This might mean that some parts of the areas of search proposed would not be able to be worked, but we do not think that it would rule out the whole of any area. However, we will keep this in mind as we develop the policy framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p>

Summary of comments	Initial officer response
Plans.	<p>Whilst we agree that engagement with local authorities in and around Worcestershire is essential in developing the Minerals Local Plan, we are sure that you will understand that the timing of this can be difficult. We felt it was important to formulate our ideas to the extent that they could be understood and meaningfully commented on by other parties including the District Councils in Worcestershire. The proposals are by no means finalised and we will be refining the methods used, the areas of search proposed and developing the policy framework following the comments we have received. We agree that greater mention could have been made of current and emerging Local Plans, particularly in the Spatial Portrait, and that these Plans contain information that can help us address some of the gaps in our knowledge about specific local areas and priorities. We welcome the opportunity to discuss the next iteration of the draft plan with you.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>(d) (e) Potential for restoration & flood alleviation in some areas very limited therefore do concerns in these areas not have an impact on the initial choice of search areas?</p> <p>(f) The more information is known prior to development the chance of suitable quality restoration. It is not just national priorities for habitat etc that matter but everyday life, features of the countryside.</p>	<p>While the potential for flood alleviation may be limited in some areas due to the nature of the site and the method of extraction, we disagree that the potential for <i>restoration</i> is limited in any area. All minerals sites must be restored, and there are a variety of ways that this can be done in order to secure multiple benefits in line with the green infrastructure approach. The restoration profiles in Appendix 2 illustrate the restoration priorities in each area, highlighting the priority level and the key messages for each aspect.</p> <p>Agreed. We hope that by pursuing this green infrastructure restoration-led approach we will be able to provide applicants with the best possible information about what kind of restoration is practical and preferable in order to secure benefits for the local community and go beyond just meeting our statutory commitments.</p>
<i>Malvern Hills AONB Partnership</i>	B049-802B

Summary of comments	Initial officer response
<p>The AONB Unit welcomes the emphasis on green infrastructure and the proposal to put landscape character at the centre of decision making.</p> <p>Access and recreation should be a determining factor (ie priority level 1) in relation to extraction in the Malvern Hills in the table on page 68.</p> <p>Figures 39 and 40 should include the Malvern Hills as an area where access and recreation is a determining factor.</p> <p>This table [on p68] also appears to lack a column relating to landscape. It needs to be made clear that the landscape element includes visual impacts as well as landscape character issues.</p>	<p>Support noted, thank you.</p> <p>The methodology put forward prioritised those areas in need of spaces for access and recreation, based on the "areas of search" for recreation identified in the Worcestershire Green Infrastructure Framework Document 3 and areas which are below targets for Accessible Natural Green Space Standards (ANGSt). The restoration profile for the Malvern Hills area of search sets out that in Malvern Hills District, 88% of households are within 2km of a 20ha+ access and recreation site. This meant that access and recreation was identified as a level 3 priority in this area. However, we agree that the methods used so far potentially undervalue existing assets, such as the Malvern Hills. We understand that the county's existing assets receive a high level of visitor pressure, and therefore the approach we had proposed was intended to help alleviate this and provide alternatives across the county. However, restoring a minerals site in or near to existing assets like the Malvern Hills could augment the existing asset and provide additional capacity for visitors. We will consider how we address this to ensure we balance encouraging continued use and enjoyment of existing assets without promoting unsustainable increases in activity.</p> <p>You are correct that Table 12 on page 68 does not contain a column relating to landscape. Pages 76-77 set out the approach we have taken to landscape restoration. Landscape Character is related to the green infrastructure approach and it establishes "the framework within which the other priorities sit". As landscape character is an expression of pattern, resulting from combinations of natural and cultural factors, it has not been given priority levels in the same way as the other restoration aspects, but instead the key characteristics of the landscape types have been highlighted in the restoration profiles for each area of search in appendix 2. Restoration schemes would be expected to fit within the landscape principles outlined. We felt that landscape could not be "prioritised", as one landscape may be different from another, but not necessarily better or</p>

Summary of comments	Initial officer response
<p>In relation to geodiversity, we are pleased that the Malvern Hills AONB has been identified as a key priority. However, we consider that the exposure of geological features should only be given limited weight in favour of mineral extraction. (12.82 – 12.83)</p>	<p>worse. However, the issues set out for criteria based policies do recognise that designations such as Areas of Outstanding Natural Beauty will need to be considered (see Table 5, item bb; Table 10, item p; Table 24, item t; and paragraph 12.33).</p> <p>We agree that landscape is an important issue which includes visual impacts as well as landscape character. Although we think landscape character is the key issue overlying restoration schemes, we understand that the policy framework will need to recognise visual impacts as well as landscape character. We will be developing detailed policy wording for the next stage of consultation and will incorporate this aspect.</p> <p>Support for geodiversity as a restoration priority noted. We agree that the potential for exposure of geological features should not in itself provide impetus for mineral extraction.</p> <p>When we state that we want the plan to be restoration-led, this means that we want the restoration priorities to be considered at the start of the process, to inform how sites are worked and developed to ensure that mineral working results in planned benefits and minimises harm. Geological features have not been used as a factor in defining the location of the areas of search.</p>
<p><i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i></p>	<p>B050-1504A</p>
<p>The provision of guidance on restoration potential and aims is helpful. It is our recommendation that this is used as a guide to operators to allow for some flexibility that can take in to consideration the wishes of landowners, or changes in circumstances during operations. The Council's restoration aims/priorities cannot override what a landowner may require as part of a restoration scheme. Such restrictions may result in the failure of sites coming forward.</p>	<p>Noted and agreed. It is our intention that the high-level restoration priorities be used as a guide to facilitate the development of restoration plans that meet the county's strategic green infrastructure aims, deliver viable sites for both operators and landowners, and deliver benefits for local communities. We anticipate that further refinements to the areas of search and the development of draft policies will provide both the guidance and the flexibility that the industry seeks.</p>
<p><i>Cemex</i></p>	<p>B057-1793nq</p>
<p>The Restoration Led Approach</p>	<p>The intention of this consultation was to highlight issues that we think are</p>

Summary of comments	Initial officer response
<p>The Company cannot support the restoration led approach mooted by the MPA. It is an overly prescriptive approach which, it appears from Figure 23 of the draft Plan, could result in otherwise acceptable sites being deemed inappropriate if a proposed restoration does not tally with the MPA's predetermined ideas as to what a restoration for a site in the particular Area of Search should entail. This is an unwarranted additional constraint at the Development Plan stage to the MPA's ability to maintain the steady and adequate supply of aggregate.</p> <p>The factors which influence a particular restoration design are often very local in their nature, and often only identified during the course of the undertaking of an Environmental Impact Assessment or planning application relating to a specific project. They are also the function of the wishes of the landowner post mineral extraction, a factor that the MPA appears to have wholly overlooked in embarking on this approach. The Company is of the view that the large size of the Areas of Search added to the coarse grain of the data used by the MPA in drawing the conclusions it has can only provide a very limited understanding of the factors influencing restoration design. It may be that the establishment of a restoration framework at the Development Plan level would be appropriate for specific sites or Preferred Areas as much more will be known about local factors and the ambitions of landowners, but to do so with large Areas of Search, and to seek to apply this in such a prescriptive manner as seems to be sought by the MPA is inappropriate, will not result in the steady and adequate provision of aggregates within the County to its</p>	<p>important, and the goal of the restoration-led plan is to set out these issues in order to better inform applicants, industry, landowners and communities so they are aware of what the key issues are likely to be in a given area at the start of the process. We do not intend to be over prescriptive, but rather provide a framework which enables restoration plans to contribute to the county's green infrastructure goals as well as having the flexibility to meet landowners' expectations.</p> <p>The strategic restoration priorities are intended to be read at a broad scale and give an indication of the issues which need to be considered in the area, but we recognise that there may be some variability across the area of search and the aspects may differ at a site-specific level. We expect that the policy framework that will be developed at the next stage will provide both clarity and flexibility for applicants.</p> <p>Further refinements of the areas of search will be undertaken as part of the next consultation. We are also considering several ways to further refine the areas of search which may include spatial masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach. We intend that setting out the restoration priorities in this way will usefully highlight the issues that applicants will need to consider and that these will directly influence the way the site is designed, during both the working and restoration phases, but we do not intend it to be overly prescriptive regarding the exact restoration which should happen on any given site.</p> <p>You are correct that Figure 23 shows that applications could be found unacceptable if they do not give appropriate consideration to the restoration priorities and do not meet the policy criteria. We would expect applications to take the restoration priorities into account in site and restoration design, although we also intend that the draft policies will allow applicants to justify deviation from the restoration priorities if site conditions or new information prove the priorities identified in the plan to be inappropriate. However, even where deviation from the specific priorities is justified, we would still expect</p>

Summary of comments	Initial officer response
<p>detriment, and will result in the Plan being found unsound.</p>	<p>the restoration to contribute towards Green Infrastructure outcomes which are appropriate to the site and its surroundings.</p> <p>Whilst we appreciate that there is little mention of landowners' aspirations in the consultation document, we consider that the proposed approach is at a strategic level and will enable enough flexibility to incorporate landowners' expectations. We are keen to ensure that the plan we develop will be deliverable, including ensuring that green infrastructure gains can be managed to ensure these gains are not lost over time, and we are conscious that landowners may need at least part of their land to provide an income following mineral extraction. This might result in, for example, more productive areas alongside biodiversity focused areas, but it might also include options such as lower intensity grazing across the larger area to enable farming alongside biodiversity, or investigating emerging opportunities such as biodiversity offsetting schemes which could fund land management for biodiversity.</p> <p>However, landowners and farmers need to understand the implications for the use of the land following minerals extraction both from the perspective of the practicalities of returning land to productive use and in terms of policy requirements which national and local policy could impose if they agree for their land to be worked. It is not always possible to return land to its former condition: working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable; the Strategy is intended to maximise the Green Infrastructure benefits of working the site in the public as well as the landowner's interests and this will need to be taken into account by landowners both at contract negotiation and planning application stage</p> <p>Following this consultation we realise that we will need to refine the areas of search, and at that point it might be possible and appropriate to have more focused consultations at a local level and we hope that local landowners will engage with future consultations on the Minerals Local Plan.</p>
<p><i>Environment Agency</i></p>	<p>B058-719</p>

Summary of comments	Initial officer response
With regards to flood risk please refer to question 24.	Please refer to our response to your comments on question 24 above.
<i>WCC Environmental Policy</i>	B059-2004
Agree, subject to comments above.	Noted. Please refer to our response to your comments above.
<i>Mrs Pat Harries</i>	B060-2399
<p>Not clear. Treating all areas the same? Some areas have huge resources & access to major roads & motorways.</p> <p>Does this mean restoring all land as before? Each area has different problems.</p> <p>If cannot restore agricultural land level to its previous level it should be refused.</p>	<p>We acknowledge that the method used to identify areas of search (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of or proximity to major transport routes. Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport which will consider these issues in more depth and inform the development of draft policies for the next consultation.</p> <p>We agree that each area has unique challenges. We have tried to capture many of these in the restoration profiles for each area of search in Appendix 2 and we will develop the policy framework to sure that restoration plans for individual sites reflect this. As explained earlier, mineral extraction can lead to a change to the landscape. This is something that we have stated will be addressed by policy criteria and is one of the reasons that we think landscape is an over-arching issue for our restoration strategy as part of a Green Infrastructure approach. We think that depending on the type of mineral operation and the impact on the landscape, it may be possible to restore mineral workings to their former Landscape Type by recreating or enhancing the key characteristics but in some cases the scale or nature of the workings will prohibit this from being done effectively. In these cases it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type. We will seek to manage any change to ensure that it is appropriate, but we have to recognise that working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable. We will develop policies to address these issues in the Minerals Local Plan.</p> <p>We expect to develop a background document to explore agriculture and forestry issues and this will look at the interaction between agricultural land</p>

Summary of comments	Initial officer response
<p>Taking permeable sand & gravel from some areas (particularly Holdfast & Queenhill) will significantly increase the flooding problems.</p>	<p>quality and mineral resources. We will consider whether we are able to refine the areas of search using agricultural land quality. We will consult with Defra to establish if restoration necessarily lowers agricultural land value and develop policies accordingly.</p> <p>We intend to develop a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.</p>
<p>(Q27) Is there anything else we should consider?</p>	
<p><i>Mineral Products Association</i></p>	<p>B020-1899nq</p>
<p>The Restoration Led Approach The MPA are enthusiastic restorers of mineral sites and wish the industry's efforts are more widely acknowledged. However, we cannot support such a detailed approach to restoration as you have done in the consultation document. Although the text and illustrations look impressive an over-prescriptive approach that tends to dictate exactly what may or may not be done on a site tends to put both landowners and operators off developing a proposal. For landowners the increased certainty of knowing to what use a site may be put is offset by potential conflict with their own long term plans for the estate, the perception that income streams will be restricted and that future development may be refused. For the operator the best restoration for a site usually only becomes apparent when detailed site planning takes place. Although it might be possible to arrange some flexibility, our concern with a prescriptive restoration strategy is that what the plan calls the worked example might be forced on all potential applications.</p>	<p>We are aware of and encourage the support of the MPA for mineral site restoration. The intention of this consultation was to highlight issues that we think are important, and the goal of the restoration-led plan is to set out these issues in order to better inform applicants, industry, landowners and communities so they are aware of what the key issues are likely to be in a given area at the start of the process. We do not intend to be over prescriptive, but rather provide a framework which enables restoration plans to contribute to the county's green infrastructure goals as well as having the flexibility to meet landowners' expectations.</p> <p>The strategic restoration priorities are intended to be read at a broad scale and give a good indication of the issues which need to be considered in the area, but we recognise that there may be some variability across the area of search and the aspects may differ at a site-specific level. We expect that the policy framework that will be developed at the next stage will provide both clarity and flexibility for applicants. Further refinements of the areas of search will be undertaken as part of the next consultation. We are also considering several ways to further refine the areas of search which may include spatial masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach. We intend that setting out the restoration priorities in this way will usefully highlight the issues that applicants will need to consider and that these will directly influence the way</p>

Summary of comments	Initial officer response
<p>Our view which has taken on board experience over many iterations of Mineral Plans across the country over</p>	<p>the site is designed, both during working and restoration phases, but we do not intend it to be overly prescriptive in the detail of the exact restoration which should happen on any given site.</p> <p>We would expect applications to take the restoration priorities into account in site and restoration design, although we also intend that the draft policies will allow applicants to justify deviation from the restoration priorities if site conditions or new information prove the priorities identified in the plan to be inappropriate. However, even where deviation from the specific priorities is justified, we would still expect the restoration to contribute towards Green Infrastructure outcomes which are appropriate to the site and its surroundings.</p> <p>Whilst we appreciate that there is little mention of landowners' aspirations in the consultation document, we consider that the proposed approach is at a strategic level and will enable enough flexibility to incorporate landowners' expectations. We are keen to ensure that the plan we develop will be deliverable, including ensuring that green infrastructure gains can be managed to ensure these gains are not lost over time, and we are conscious that landowners may need at least part of their land to provide an income following mineral extraction. This might result in, for example, more productive areas alongside biodiversity focused areas, but it might also include options such as lower intensity grazing across the larger area to enable farming alongside biodiversity, or investigating emerging opportunities such as biodiversity offsetting schemes which could fund land management for biodiversity.</p> <p>Following this consultation we realise that we will need to refine the areas of search, and at that point it might be possible and appropriate to have more focused consultations at a local level and we hope that local landowners will engage with future consultations on the Minerals Local Plan.</p> <p>We agree that there are limited ways in which mineral sites may be restored, as noted in Tables 13 and 14. Although some degree of backfill may be the</p>

Summary of comments	Initial officer response
<p>a period of 25 years suggests that detailed restoration led strategies that seek prescriptive results in advance of knowing what the site conditions are, rarely if ever achieve their objectives. Moreover, we would observe that there are only a limited number of ways in which sites can be restored and those are,</p> <ul style="list-style-type: none"> • with landfill • with water fill • without fill <p>Given that if landfill material is not generally available then the choices are further limited to have water or not to have it, in which case if the watertable is high the choice devolves to water fill only. Any land restoration carried out in those circumstances must make the best use of indigenous materials, if there are any. These limited options largely determine the eventual landuse because they represent site conditions which cannot easily be changed if at all.</p> <p>Even when we consider the alternative land use priorities for restoration, the options are limited. We have found in reading your presentation that the strategy tries to hedge its bets because we noticed that there are multiple objectives for each AoS, many of which are very similar (table 22). For example, of the 140 different restoration scenarios spread over 20 AoS (seven per AoS), a full 50% are 'determining factors'. A further 32% are a 'significant component', leaving just 17% to 'integrate where possible' and 6% 'not likely to be significant'. This means that for the majority of AoS nearly every possible permutation of restoration is expected to be reflected in the design. Indeed, so concentrated are the requirements for priorities to be the determining factor or a significant component that 95% of AoS have five or more such</p>	<p>most appropriate option in some cases, landfill is not always desirable and material is likely to become increasingly scarce. By recognising this from the outset, we can plan for the types of changes that mineral extraction and subsequent restoration might have, and establish whether it will be possible to restore sites to their original landscape type or whether whole-scale change is inevitable and needs to be managed. Whilst this might influence the end-use of a restoration, we believe that with careful planning restoration can still lead to productive landscapes which supply multiple green infrastructure benefits.</p> <p>We are aware that Table 12 and 22 (these are identical) present most restoration priorities as important to some degree in most areas of search. However, we feel that the high level priorities are not mutually exclusive, and that a restoration that prioritises flood alleviation (for example) may also secure benefits for habitat quality and fragmentation and water quality by the same or complementary means.</p> <p>The worked example and particularly Figure 43 showing how the worked example could be represented in a spatial master plan indicates that we recognise that the priorities set out in Tables 12 and 22 have been defined at the relatively large "area of search" scale but that the priorities may have differing influence depending where within an area of search an individual site lies. Further refinements of the areas of search will be undertaken as part of the next consultation – this will likely result in refinements to table 12/22. We are considering several ways to implement this approach, through</p>

Summary of comments	Initial officer response
<p>priorities. In three cases (Upper Severn, Carrant Brook Corridor & Junction 4a South) all seven are priority levels 1 and 2.</p> <p>We can see little point in devising a spatial restoration strategy that requires almost the same results in each AoS: far better to have a simple policy that lists the various priorities and requires an operator to include them if practicable, and to show why those that have been excluded are absent.</p> <p>There are also some assumptions made for priority categories that seem to us inexplicable. For example, biodiversity is priority 1 in 16 AoS and priority 2 in all others. Priority 1 is defined where landscape fragmentation is low and biodiversity quality is high (table 16). In other words, where there is more biodiversity provide more. This seems illogical to us but we do note that biodiversity improvements are expected even in priority level 3 cases (of which of course there are none anyway). This not only makes our point that the so-called restoration alternatives are non-existent but also prompts the question whether any consent to work mineral is likely in such priority 1 areas in any case given the position the mpa has taken to constraints in Appendix 1. This is a serious question that the plan needs to answer. There is no point in presenting elaborate restoration strategies that are never going to see the light of day. We would like to remind the mpa that AoS are meant to be areas "...within which planning permissions for particular sites could be granted to meet any shortfall in supply if suitable applications are made." (para 41 MPS 1 practice Guide). If planning constraints are likely to make that unlikely then the AoS need to be refined.</p>	<p>further refining the areas of search, developing the policy framework and possibly producing either spatial master plans, concept plans, or 'corridor plans' in order to better convey the restoration-led approach, whilst highlighting that there is flexibility for individual sites to take account of more local factors.</p> <p>We also expect that the draft policies will provide the appropriate guidance to allow applicants to justify alternative restoration plans if the site conditions prove to be incompatible with the priorities identified in the plan.</p> <p>We think that establishing restoration priorities for the areas of search will enable high-quality applications and provide greater certainty to applicants over the issues that they will be expected to consider both for working and restoration. Detailed policy wording will be developed for the next stage of consultation to provide further clarity.</p> <p>The approach we are proposing towards habitat quality and fragmentation is intended to implement the Lawton Review outcomes of "better", "bigger", "more" and "connected". The reason we have prioritised areas where the biodiversity value is already high and where habitat fragmentation is currently low is to ensure that existing high quality areas are not lost, but instead are enhanced or made bigger or better, and because mineral site restoration can help connect existing high quality areas through creating corridors and stepping stones. We felt that it would not be appropriate to prioritise areas with low quality habitat or high levels of fragmentation because this could lead to significant time and resources being but into creating isolated pockets of habitat which, although they might have some value in themselves, would not be able to provide the same level of biodiversity gain at a landscape scale, where other green infrastructure outcomes might be more suited. However, we think that the green infrastructure approach will be able to deliver multiple benefits and biodiversity gain can and should be significant component or integrated in restoration schemes wherever possible. For example creating wetlands can contribute toward the high level strategic</p>

Summary of comments	Initial officer response
	<p>priorities of flood alleviation and water quality as well as habitat quality and fragmentation and that this will contribute to strengthening ecological networks in the county.</p> <p>Appendix 1 sets out in detail the constraints applied in the current Minerals Local Plan and examines them in light of the current regulatory and policy context. In short, we would like to take a positive approach to enabling development where it is designed to meet the policy criteria and we do not feel that the current regulatory context allows us to definitively rule areas out. This might mean that some parts of the areas of search proposed would not be able to be worked, but we do not think that it would rule out the whole of any area. However, we will keep this in mind as we develop the policy framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p>
<i>Tewkesbury Borough Council</i>	B036-703
It is difficult to fully consider the restoration of sites without knowing the detail of the site and the way it is to be worked, and all the variations that that could entail.	We agree that the way a site will be worked and site-specific conditions will affect the restoration plan. The spatial strategy and the restoration priorities are intended to provide high-level guidance to inform the development of restoration plans for specific sites. We anticipate that the development of draft policies will provide additional clarity on these issues.
<i>Mrs Christine Daniell</i>	B037-2396
Areas which have huge resources and more easily accessible by good transport networks should be considered first.	<p>We acknowledge that the method used (paragraphs 11.43-11.45 of the main consultation document) is relatively crude and does not capture the influence of major transport routes. However, it showed that there was likely to be some demand for minerals in all areas of the county, and therefore none of the "areas of search" proposed should be ruled out due to lack of demand.</p> <p>The policy framework will be developed to ensure that site access and impacts on transport networks are properly considered, as well as promoting the use of sustainable modes of transport where possible.</p>

Summary of comments	Initial officer response
Development which takes away the permeable sand and gravel layer from ground which is on or near flood plains cannot be good.	We intend to develop a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.
<i>Worcestershire Wildlife Trust</i>	B044-1081
No. It appears to us that you have covered the important areas	Noted, thank you.
<i>Wildmoor Residents Association</i>	B047-2295
<p>The following is reflected across all aspects (e) of restoration within the spatial strategy.</p> <p>12.42-12.45 Incorporates considering restoration priorities within the SS. Within areas of solid sand restoration for flood alleviation more limited.</p> <p>12.45 This paragraph difficult to follow. If mineral / site restoration will not have significant potential and benefits for flood alleviation then it seems it needs to be an overarching priority in the SS as the serious question that needs asking is what damage will the initial quarrying in the areas of search potentially cause. Should these areas therefore be quarried in the first place. The areas of search should be influenced, driven, in part by restoration priorities and the impact of these aspects during quarrying.</p>	<p>You refer to the paragraphs on developing over-arching restoration priorities in the Spatial Strategy with respect to Flood Alleviation in the areas of search for aggregates. Our intention in highlighting over-arching priorities in the Spatial Strategy is to guide the overall emphasis of restoration schemes across corridors incorporating more than one area of search; restoration schemes for individual sites in each area of search would then be developed taking this into account alongside all the restoration priorities.</p> <p>At this stage we think that the potential to restore solid sand sites for flood alleviation may be limited by site conditions (pgph 12.44: <i>"Solid sands in Worcestershire tend to be worked in deep quarries. We think that the potential for restoring these deep workings for flood alleviation is more limited than for shallower terrace and glacial sand and gravel workings..."</i>). Without further investigation to establish whether solid sand restoration could have a beneficial outcome for flood alleviation at more than the site-specific scale, we did not feel it was appropriate to highlight flood alleviation as an over-arching priority. We will discuss these matters with the Environment Agency to ensure we have the necessary information to refine this approach, but we have retained flood alleviation as a restoration priority for individual areas of search pending further consultation with the Environment Agency as discussed in paragraph 12.45.</p> <p>We agree that areas of search and the way sites are worked should be influenced by the restoration priorities and the detailed policies we will develop for the next stage of consultation will highlight this. We also intend to</p>

Summary of comments	Initial officer response
<p>(i) Clearer improved links between water quality and areas of search as an overarching priority needed.</p> <p>(q) Where areas exist and designated to be an overarching principle in the SS issues such as the Green Belt and the original concept underpinning it should be considered particularly in the north of the county.</p>	<p>prepare a background document to look at water and flooding issues and the policies will ensure that potential impacts are considered, minimised and mitigated as necessary.</p> <p>Noted. Our approach to developing restoration priorities for the areas of search with respect to Water Quality is set out in paragraphs 12.61 to 12.74, and detailed information on how water quality has been considered in each area forms part of the restoration profiles in Appendix 2. The reasons for highlighting water quality as an overarching priority in the Avon Corridor and not for the Stour Corridor are outlined in paragraphs 12.69-12.74. If these sections do not clarify matters, please feel free to contact us with any further questions.</p> <p>The National Planning Policy Framework states that mineral extraction is not inappropriate in the Green Belt provided the development preserves the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt. Green Belt is identified as an area to be addressed through policy criteria in Table 24, item p. We intend to develop policies to ensure that working a mineral site would not conflict with national policy on green belt, and ensure consideration is given to any impacts from aspects such as site layout, haul roads and stockpiles. We do not think that the identified restoration priorities would cause any conflict with the reasons an area is designated as Green Belt.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 A nq</p>
<p>The South Worcestershire authorities also disagree with the proposed approach of using restoration priorities to drive the identification of preferred areas for mineral extraction. The South Worcestershire authorities consider that restoration priorities should be a factor in identifying preferred areas for mineral extraction after other suitability criteria (eg, physical constraints, policy</p>	<p>As explained previously, when we state that we want the plan to be restoration-led, this does not mean that restoration opportunities have been the only factor in defining the location of the areas of search, rather it means that we want restoration to be considered at the start of the process, to inform how sites are worked and developed to ensure that mineral working results in planned benefits and minimises harm.</p>

Summary of comments	Initial officer response
<p>constraints and local impacts) have been satisfied.</p> <p>The proposed approach of identifying restoration opportunities is considered premature given that it has not been determined whether any of the proposed areas of search meet criteria-based policies. Indeed, detailed criteria-based policies do not appear to have been developed, and if they had, it is assumed that some proposed areas of search (such as those in the AONB) would be ruled out.</p>	<p>The methodology for defining areas of search is set out in detail in Section 11: where will minerals be worked? on pages 52-59. This approach is based on BGS geological data which has been assessed to determine the location, volume, tonnage, and ultimately the significance of the mineral resources in the county after motorways, motorway junctions, areas of concentrated built development and previously worked areas have been excluded. Spatial analysis has then been used to define where there are concentrations of key and significant resources which could be worked over the life of the plan to enable benefits for green infrastructure to be realised through restoration.</p> <p>The portion of the document you refer to is Section 12: How will mineral workings be restored. This section attempts to set out the approach that we will take to promoting the factors that should be considered in the design of restoration plans. We think that the approach we are pursuing will secure the best possible balance of community, social, environmental and economic interests.</p> <p>You are correct that the detailed criteria-based policies have not yet been developed, although the issues that will be addressed have been consulted on (see Tables 5, 10, and 24), including landscape and impacts on the AONBs. However, we do not think the approach we have proposed is premature. Appendix 1 sets out in detail the constraints applied in the current Minerals Local Plan and examines them in light of the current regulatory and policy context. In short, we would like to take a positive approach to enabling development where it is designed to meet the policy criteria and we do not feel that the current regulatory context allows us to definitively rule areas out. This might mean that some parts of the areas of search proposed would not be able to be worked, but we do not think that it would rule out the whole of any area. However, we will keep this in mind as we develop the policy framework and refine the areas of search and consider whether removing or amending areas of search is necessary.</p>
<i>Environment Agency</i>	B058-719
We support the progressive approach to assigning restoration priorities to areas of search. It might be	Support noted.

Summary of comments	Initial officer response
<p>advantageous to allow some flexibility in future policy wording with regards to assessing sites against the identified high level restoration priorities. Assessments at the site specific level might not align with priorities identified strategically, so some flexibility would be prudent to ensure sites are not bound rigidly to such constraints. Clearly such wording will need careful consideration.</p>	<p>Your comments regarding flexibility and the potential for mismatches between high-level restoration priorities and specific site conditions echo those of several other organisations, and we agree that the draft policies must be robust but flexible enough to allow this to be addressed.</p> <p>The high-level restoration priorities are intended to be read at a broad scale, and not necessarily at a site-specific level, and we expect that the policy framework that will be developed at the next stage will provide both clarity and flexibility for applicants.</p>
<p><i>WCC Environmental Policy</i></p>	<p>B059-2004</p>
<p>Possibly visual impact, also consider implications regarding over-abstraction, climate change and health/recreation opportunities?</p>	<p>Visual impact has been raised by other respondents, and we will be considering ways of addressing as we develop detailed policies. Abstraction and its impacts are considered in relation to both how minerals are worked and how sites are restored (Table 5, item t, and Table 24, item o) and will be considered as we develop detailed policies.</p> <p>Ensuring that mineral operations are resilient to and help mitigate the impacts of climate change is one of the draft strategic objectives of the plan (objective 4, p.23) and we feel that under the green infrastructure approach climate change is well embedded in the plan. It is also identified as a key sector to be addressed through policy criteria in Table 24 (p. 111). Opportunities for individual sites to contribute to climate change mitigation and adaptation are detailed in the individual restoration profiles for the Areas of Search contained in appendix 2. Recreation opportunities are considered under the high level strategic restoration priority of "access and recreation". We agree that we may be able to strengthen references to health and will be considering ways of doing this.</p>

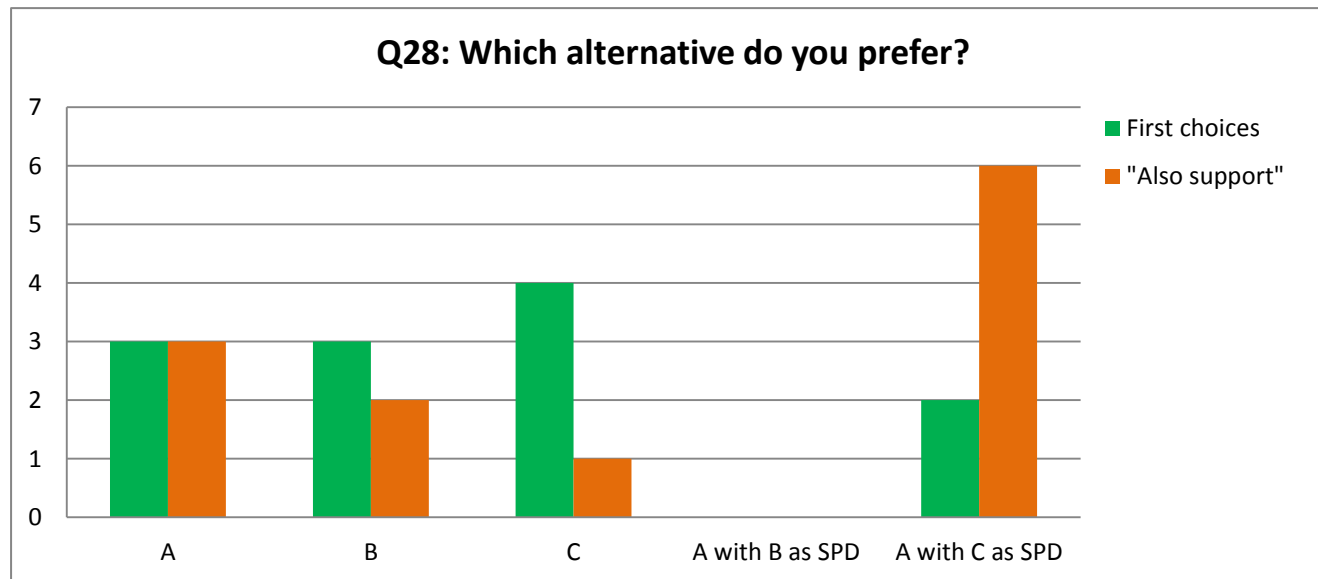
Questions 28 and 29: Policy development for restoration priorities.

In Section 12 we identified the high-level restoration priorities for each area of search and the opportunity area for clay and we now need to think about how we should drive forward the delivery of these priorities through the policy framework. We set out the alternatives that we think are realistic.

Question 28: Which of these alternatives do you prefer?

- Alternative A: Policies to ensure all proposals give proportionate weight to restoration priorities
- Alternative B: Policies for each area of search and opportunity area for clay
- Alternative C: Policies and spatial master-plans for each area of search and opportunity area for clay
- Alternative A with Alternative B as a Supplementary Planning Document
- Alternative A with Alternative C as an Supplementary Planning Document

A total of 12 respondents used the tickboxes on the questionnaire to express their preferences on this question. A number of these respondents also indicated that they would also support a second option in their explanation of why they chose that alternative. The table below collates the results of the first and second choices of all respondents who replied to this question. This is useful as it shows that respondents have a preference for Alternatives A or C, or a combination of the two.



Summary of comments	Initial officer response
(Q28) Please tell us why you prefer this alternative.	
<i>Profin Protective Finishing Ltd</i>	B010-1601
<p>(alternative A) It appears the more simple and thus, more workable approach to the restoration policies returning the land to its original condition.</p>	<p>Support for alternative A noted.</p> <p>We have stated elsewhere that returning the land to its original condition cannot always be the goal of site restoration.</p> <p>In paragraph 12.24-12.25 we state that <i>"mineral extraction by its nature results in a change to the landscape. In order to ensure that the overall landscape quality of the county is not degraded by mineral workings, consideration must be given to the existing landscape character and the nature of the changes that could result from mineral extraction. Following extraction, the connectivity of the landscape needs to be re-established. Depending on the type of mineral operation and the impact on the landscape, it may be possible to restore workings to their former Landscape Type by recreating or enhancing the key characteristics. However, in some cases the scale or nature of the workings will prohibit this from being done effectively. In such circumstances it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type."</i></p> <p>Landscape change will be addressed by policy criteria and is one of the reasons that we think landscape is an over-arching issue for our restoration strategy as part of a Green Infrastructure approach. We are actively considering this issue, and we will seek to manage any change to ensure that it is appropriate, but we have to recognise that working minerals by its nature removes material from the landscape and therefore some degree of change is inevitable.</p>
<i>Worcestershire Archive and Archaeology Service</i>	B031-509
<p>(alternative B) Alternative B would be favourable as it gives the opportunity to identify and address more site / area specific issues and will allow for consultation with other stakeholders to help formulate coordinated restoration priorities.</p>	<p>Support for alternative B noted.</p>

Summary of comments	Initial officer response
<p><i>Mr Adrian Buckmaster</i> (alternative A) I would like to see land restored to as close to what it was like before as is feasible.</p>	<p>B032-2394 Support for alternative A noted. We have responded to your comments regarding the potential for restoring land to its previous condition earlier in this document, and we believe that any of the three options presented could successfully deliver our restoration aspirations. Please also refer to the officers' response to Profin Protective Finishing Ltd. above.</p>
<p><i>RSPB</i> (alternative C)The RSPB prefers Alternative C, which includes the development of a 'spatial master-plan' for each Area of Search. Developing a spatial master-plan would be essential to ensure compliance with the requirements of the NPPF, particularly in relation to biodiversity, including:</p> <ul style="list-style-type: none"> • planning positively for the creation, protection, enhancement and management of networks of biodiversity (para. 114); • planning for biodiversity at a landscape scale (para. 117); • Identify and map components of the local ecological networks, including ... areas identified ... for habitat restoration or creation (para. 117). <p>Whilst some of these requirements might have already been developed through the County Council's existing work on Green Infrastructure and biodiversity, these requirements should also be incorporated into the Minerals Local Plan itself. As indicated in the worked example, a spatial master-plan will be able to show existing ecological network, including priority habitat, designated nature conservation sites and BDA boundaries. The spatial master-plan could provide an indication of where the creation of priority habitat would make a significant contribution to the creation of</p>	<p>B039-1782 Support for alternative C noted.</p> <p>Your extensive comments on the advantages of the spatial master-plan approach are appreciated and you identify many of the advantages that we also see in this approach. We agree that Alternative C (policies supported by spatial masterplanning) could help target mineral site locations, identify the links and varying priorities across the area of search and allow for overlaying of other restoration priorities in order to resolve potentially conflicting strategic priorities. We appreciate that your examples are focused on BMV agricultural land and on biodiversity enhancement, but we feel that this approach can also be usefully applied to other restoration priorities, and we will consider your examples as we refine the plan in the subsequent draft.</p> <p>Your support for Alternative A with Alternative C as an SPD is also noted as a second choice, and the limitations you identify are concerns we share.</p> <p>These are all interesting suggestions and we would like to explore these with the members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date in order to find the best way to use these to either refine the method for applying restoration priorities to specific sites or to inform the restoration profiles for the areas of search.</p>

Summary of comments	Initial officer response
<p>a coherent and resilient ecological network. This approach could actually help to target the location of mineral sites as well as guiding the operation and restoration of any sites that are put forward. A spatial-master plan also provides the opportunity to overlay layers for other restoration priorities. For example, it could overlay Grade 1 and 2 agricultural land with the current – and potential – ecological network. This would help to identify and resolve potential conflicts between these two restoration priorities. For example, for sites in the floodplains of the Severn and Avon Corridors, this process could help to identify opportunities for moving BMV soils to improve lower quality land outside of the floodplain, whilst enabling the floodplain sites to be restored to wetland habitat. Given that the aspiration of the Minerals Local Plan is to enable mineral development at a scale large enough to deliver strategic restoration priorities (i.e. over 200ha), the spatial master-plans would also provide a useful visual reference for what this 200ha scale would look like in each Area of Search. A pragmatic alternative might be Alternative A with Alternative C as a Supplementary Planning Document (SPD), as this might enable the Minerals Local Plan to be produced in a timelier manner whilst still enabling the provision of spatial master plans for the Areas of Search.</p>	
<i>Natural England</i>	B040-717
<p>(alternative B) The County Council has access to a large amount of information and expertise, including on the natural environment. Option B would allow the best use to be made of this information and expertise, but without being as onerous as Option C. Further concept planning or masterplanning could be</p>	<p>Support for Alternative B noted. We agree that option C would require a great deal of additional work, and we find your suggestion of using concept or master planning to develop best practice case studies interesting.</p> <p>We are considering several ways to further refine the areas of search and ensure delivery of the restoration priorities which may include spatial</p>

Summary of comments	Initial officer response
<p>undertaken as appropriate, to develop best practice case studies. Alternatively we would support alternative A, with a policy presumption towards the production of concept plans in line with the methodology developed by the Worcestershire Green Infrastructure Partnership.</p>	<p>masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach. We would like to explore these with the members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date.</p>
<p><i>Worcestershire Wildlife Trust</i> (alternative A with alternative C as SPD) It seems to us that this approach offers the best blend of early policy certainty for developers and fully worked up detail for each area. This should produce the best solution for all parties.</p>	<p>B044-1081 Support for Alternative A with Alternative C as SPD noted.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 B</p>
<p>See response to Question 26.</p>	<p>Please refer to our response to your comments in question 26.</p>
<p><i>Wildmoor Residents Association</i> (alternative B) Alternative A is too broad, not focussing sufficiently on areas of search and their key features as B does. Alternative C seems to have potential but is too vague, yet complex, to see what merits it may have in addition to Alternative B. Focus points are already determined in the restoration priorities. Alt. B should also incorporate Alt A in ensuring all proposals give proportionate weight to restoration priorities.</p>	<p>B047-2295 Support for Alternative B noted. We agree that Alternative B essentially incorporates Alternative A. The intention behind Alternative C is to provide a visual representation of the restoration priorities, mapping the focus points which are identified in the restoration profiles for each area of search to give a better indication of how these may vary across the area. There are several ways we can take this forward, and we are considering the best way to do this in light of the comments we have received during this consultation.</p>
<p><i>Herefordshire and Worcestershire Earth Heritage Trust</i> (alternative A with alternative C as SPD) It is important to have the mineral plan in place and option A is likely to be favoured by government and thus most likely to be passed by an inspector. However option C seems to offer the best method of making sure that local communities and interests are properly consulted and taken account of.</p>	<p>B048-800 Support for Alternative A with Alternative C as SPD noted.</p>

Summary of comments	Initial officer response
Supplementary guidance that is shown to have community support should be powerful – let's hope that the Council will always recognise that.	
<i>Malvern Hills AONB Partnership</i>	B049-802B
(alternative C) (ticked C and A with C as SPD in original response, only one tick allowed online so ticked C) The AONB Unit considers that a strategic masterplanning approach is required for the Malvern Hills which focuses on specific issues within the area of search. Therefore we prefer alternative C either as a stand-alone approach or as an SPD.	Support for Alternative C (or Alternative A with C as SPD) noted.
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
(alternative A) (Both A and A with C as SPD ticked on emailed submission, can only tick one online so A ticked) Alternative A is the preferred option as it is less prescriptive, allows for flexibility and out of the the proposed options we believe is most deliverable. When looking at Alternative C and Figure 43 I find it confusing, I think being so prescriptive at this stage could potentially stymie innovative restoration schemes. Alternative C could provide a useful SPD.	Support for Alternative A, or Alternative A with Alternative C as SPD noted. The intention behind Alternative C is to provide a visual representation of the restoration priorities , mapping the focus points which are identified in the restoration profiles for each area of search to give a better indication of how these may vary across the area. There are several ways we can take this forward including spatial masterplanning, concept planning, or 'corridor plans', and we are considering the best way to do this in light of the comments we have received during this consultation. We intend that setting out the restoration priorities in this way will usefully highlight the issues that applicants will need to consider and that these will directly influence the way the site is designed, during both the working and restoration phases, but we do not intend it to be overly prescriptive regarding the exact restoration which should happen on any given site.
<i>Environment Agency</i>	B058-719
(alternative C) It maximises opportunities to secure environmental betterment in a coordinated/holistic approach.	Support for Alternative C noted.
<i>WCC Environmental Policy</i>	B059-2004
(Alternative C) Prefer Alternative C because this would give the greatest certainty that appropriate restoration measures will be undertaken and also that all	Support for Alternative C or Alternative A with Alternative C as SPD noted.

Summary of comments	Initial officer response
<p>appropriate interests are addressed. Alternatively, we recognise that if this detail came forward as an SPD (for each AoS) this would provide an opportunity to promote a tailored restoration framework which is viable for each locality and provide additional time to secure community and stakeholder support for the localised restoration frameworks.</p>	
<p>(Q29) Please provide details of any other alternatives that we should consider for driving the delivery of restoration priorities.</p>	
<p><i>Canal and River Trust</i></p>	<p>B011-1280</p>
<p>The following areas of search contain canals and rivers we own and manage: Lower Severn Corridor: Central; Lower Severn Corridor: North; Lower Severn Corridor: South East; Lower Severn Corridor: South West; Upper Severn Corridor; Junction 4A: South; Stour Corridor Sandstone: Central; Stour Corridor Sandstone: South; Stour Corridor Sandstone: West. The varying strategic priorities identified for these areas of search are welcomed as many aim to ensure that mineral workings do not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network.</p>	<p>Support for strategic priorities around canals and rivers managed by the Canal and River Trust noted.</p> <p>We are also currently developing a background document <i>Water Transport</i> to explore the potential for transporting minerals in and around Worcestershire by waterway and consider any implications this might have for the waterways. This will be published on our website⁴⁸ in the near future.</p>
<p><i>Mrs Christine Daniell</i></p>	<p>B037-2396</p>
<p>Farmland which is producing good crops/grass are essential</p>	<p>Agreed. Horticulture and Food Production is identified as one of the high-level strategic restoration priorities in the spatial strategy. This priority recognises the importance of maintaining and enhancing agricultural land quality through restoration schemes, and identifies arable farming, pasture and orchards as possible restorations for minerals sites.</p>

⁴⁸ www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p><i>Worcestershire Wildlife Trust</i></p> <p>As an alternative to the above (alternative A with alternative C as SPD) it may be worth considering alternative A but with a policy presumption in favour of a 'concept plan' approach for any subsequent application. This would require substantial input from partners and the LPA as well as acceptance by industry but given the likely number of applications per year it may be a more expedient way to achieve the aim of alternative C. We'd be pleased to explore this further if the proposal seems to you to have merit. It has the advantage of being a tried and tested approach for other types of development and would deliver a similar level of site detail as alternative C but on a case-prioritised basis.</p>	<p>B044-1081</p> <p>We are considering several ways to further refine the areas of search and ensure delivery of the restoration priorities which may include spatial masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach. We would like to explore these with the members of the working group which has helped inform the development of the Green Infrastructure aspect of the Minerals Local Plan to date.</p> <p>Your suggestion of incorporating a "policy presumption in favour of a concept plan approach" is interesting. However, in order to give the restoration-led approach the weight we believe it deserves, we feel that it needs to be embedded as part of the plan (or an SPD). We are happy to explore whether there is merit in requiring concept planning on a case-by-case basis, but we are concerned that a policy <i>presumption</i> rather than a policy <i>requirement</i> could risk shifting the restoration priorities outside of the plan and rely unduly on the willingness of partners and applicants to engage in the concept planning process. That being said, we do not believe that the approaches we are considering would necessarily preclude the development of additional site-specific concept plans, and we understand that these have already been successfully developed for major development sites in the county.</p>
<p><i>Wildmoor Residents Association</i></p> <p>Figure 42 Alternatives a) b) c) indicates that cross-cutting policies would also be needed to address issues such as environment protection, aftercare, safety and amenity impacts. These issues need far greater development and clarity throughout policies in this document.</p>	<p>B047-2295</p> <p>All of the alternatives under consideration will require that the cross-cutting policies you describe be developed to address specific areas. These policy areas are listed in Table 24 (pages 111 – 113), and will be developed into draft policies for the next consultation to support whichever alternative is ultimately taken forward. We agree that these issues need further development and greater clarity, and we intend to consult on the detailed policy wording during the next phase of consultation.</p>
<p><i>WCC Environmental Policy</i></p> <p>Would encourage an approach that facilitates the incorporation of natural habitats and biodiversity gain which delivers 'alternate' end uses, for example: creating wetlands to address flood risk and water</p>	<p>B059-2004</p> <p>We agree that an approach that facilitates multiple interconnected end-uses is desirable, and we feel that the proposed approaches promote integrated green infrastructure outcomes regardless of which alternative is taken forward, and we will ensure that the text is strengthened to highlight this in the next</p>

Summary of comments	Initial officer response
<p>quality issues, or sensitively managed grasslands which can also be partly used for amenity & recreation, or the incorporation of conservation headlands and networks of small ponds rather than full agricultural reversion. In many end-uses it is possible to incorporate some element of biodiversity consideration, and we this could be more strongly demonstrated within the explanatory text in each example. It might also be more clearly stated that this approach helps projects demonstrate their commitment to being 'sustainable development' (e.g. paragraph 12.130) for which there is a presumption in favour.</p> <p>Additional text is required which sets out the rationale for deviation from the standard development hierarchy (avoid/mitigate/compensate/enhance); while we recognise that opportunities may, in some instances, outweigh the need for avoiding impacts near to high quality natural resources (e.g. by providing a more coherent and higher quality network of ecologically functional sites post-restoration), the criteria which merit this scenario should be more clearly set-out (as is inferred in paragraph 12.55).</p>	<p>consultation draft.</p> <p>We agree that following this approach will help applicants to demonstrate that their proposals constitute sustainable development in line with the NPPF, as indicated in paragraph 7.7 and Figure 8 (p25-26). We would expect applications to take the restoration priorities into account in site and restoration design, although we also intend that the draft policies will allow applicants to justify deviation from the restoration priorities if site conditions or new information prove the priorities identified in the plan to be inappropriate. However, even where deviation from the specific priorities is justified, we would still expect the restoration to contribute towards Green Infrastructure outcomes which are appropriate to the site and its surroundings.</p> <p>We agree that additional detail is required to clarify our approach to the development hierarchy you highlight (avoid/mitigate/compensate/enhance). We think the approaches we have proposed are consistent with it, but we recognise that we have addressed the traditional steps in the hierarchy in a non-traditional way, with issues that fit the avoid – mitigate – compensate stages being covered in sections 10 and 11 (where and how minerals are worked), and the compensate and enhance stages being addressed in section 12 on restoration. We think our approach to the hierarchy is cyclical rather than linear, meaning that opportunities for enhancement through restoration can be considered at the start of the process and influence the avoidance or mitigation measures which might be necessary. This is reflected in the document through the Green Infrastructure approach, but we recognise that this needs to be clarified further in the next consultation draft.</p>

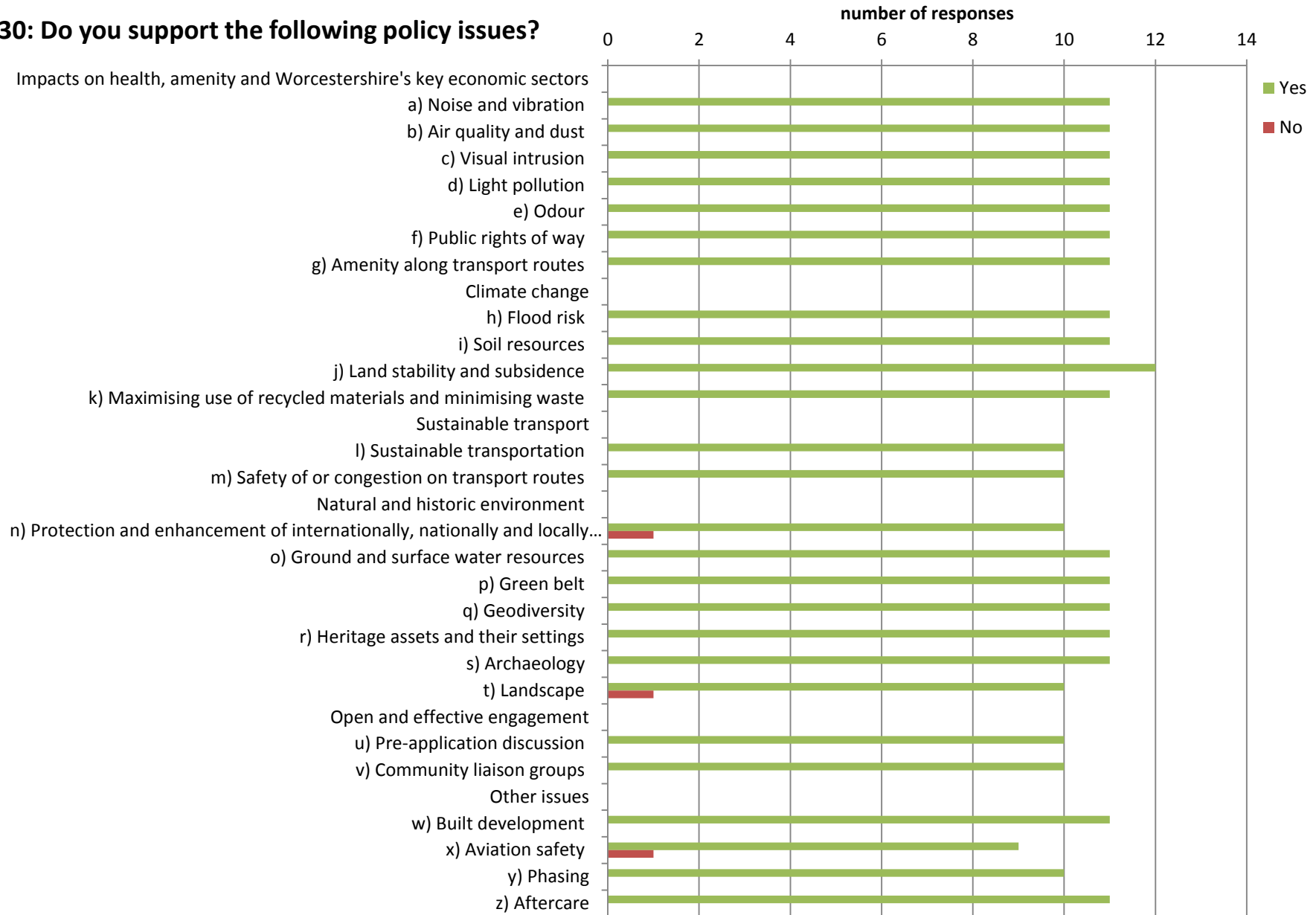
No Comment Responses

<i>Natural England</i>	B040-717
No comment	Noted.

Questions 30 and 31: Restoration plans.

We would expect all proposals to include a restoration plan setting out how strategic restoration priorities would be addressed. Restoration plans would also need to address cross-cutting site-specific issues. We have identified the cross-cutting issues that we think restoration plans should address in section 12. We propose to enable new mineral development where it is demonstrated that all of the issues to be addressed through policy criteria relating to the restoration of mineral workings have also been adequately addressed. Further detail of what these policies might contain is set out in section 12 of the consultation document.

Q30: Do you support the following policy issues?



Summary of comments	Initial officer response
(Q30) Please give details of any additional considerations which should inform any of these topics. Please specify which topic your comment refers to by quoting the relevant letter code.	
<i>Worcestershire Regulatory Services</i>	B008-689nq
<p>Table 11 considers Water Quality as an important consideration in restoration. This is welcomed.</p> <p>A lot of mineral resources have been exploited historically and the resultant quarries or pits used as landfill sites. The Management of these historic landfill sites is dependent on surrounding ground conditions. It is important that the impacts on surrounding land uses are taken into consideration where options for restoration are being considered. Re-watering a quarry next to a landfill site will have a dramatic impact on leachate and ground gas regimes underground which could give rise to major pollution of ground and surface water as well as explosive or toxic levels of gas in peoples' homes or business premises nearby. The requirement to consider the effect of restoration proposals on wider area must be included in this section.</p> <p>Additionally the Table on page 74 makes reference to surface water impact assessment in terms of quality. No consideration is given to ground water quality or the risk to human health from either resource. Consequently it is recommended that the requirement to ensure 'All controlled waters are not impacted to cause significant pollution or harm as described under the Water Resources Act or Part 2A of the Environmental Protection Act 1990. Page 102 on water quality should</p>	<p>Support noted.</p> <p>You raise an interesting point about the potential for mineral working and restoration to impact on existing surrounding land uses. Table 24 sets out the policy criteria we think will need to be addressed relating to how mineral workings are restored, and item o, relating to ground and surface water resources, states that changes to abstraction, dewatering and impacts on the water table will need to be considered. However, we will consider whether your comments relating to potential impacts on nearby existing landfill require specific policy measures to be put in place.</p> <p>Whilst you are correct that historically quarries and pits have been used as landfill sites, we do not expect this to be the case in the future. The Waste Core Strategy identifies that there is no need for additional landfill space up to 2027, although new sites could be developed if a shortfall in capacity is identified or the proposal is essential for operational or safety reasons or is the most appropriate option, meaning that some backfill could be allowed if it is shown to be necessary.</p> <p>Ground water quality is addressed on page 83 in the detailed section for the Water Quality high-level restoration priority. Paragraphs 12.61 through 12.66 set out the methodology based on the Water Framework Directive which does seek to protect groundwater and groundwater dependant ecosystems. We agree that we have not given this issue the prominence it deserves, and that we can strengthen the references to ground water throughout this section, in the restoration profiles for each area of search and in the policy framework. Thank you for bringing this to our attention.</p>

Summary of comments	Initial officer response
<p>therefore also make reference to the requirement to ensure restoration does not deteriorate the wider water quality of an area (in terms of all water resources) so that Groundwater is included.</p>	
<p><i>Mr Tom Meikle (Telephone conversation with Marianne Joynes)</i></p>	<p>B029-2393nq</p>
<p>(section q) In Cropthorne Parish, there is significant geological interest where 2 ice-age periods overlap, including some fossilized bones. A small corner of a pub garden is designated as a geological SSSI but the geological interest may be present over a much wider area. MJ stated that geological SSSIs would be given equal weight to biological SSSIs and have already formed part of our thinking about where geology/geodiversity should be important considerations in restoration schemes.</p>	<p>We intend to give geological SSSIs equal weight to biological SSSIs when drafting policy criteria. These have already informed our thinking about where geology or geodiversity should be an important consideration for restoration schemes. This is set out on pages 85 to 87 in the "Geodiversity" section.</p> <p>We agree that the methods used so far potentially undervalue some existing local assets, and we will be working to find a way to address this across the county. It is useful to have these areas of local importance brought to our attention.</p>
<p><i>Worcestershire Archive and Archaeology Service</i></p>	<p>B031-509</p>
<p>Amend (r) and remove (s):</p> <p>Heritage assets and their settings – policies will need to consider harm to Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, Registered Battlefields, and assets recorded on the County Historic Environment Record. Consideration should also be given to the potential to conserve or restore heritage assets and improve the understanding of their significance and settings, promote the sustainable management of heritage assets and their settings which are identified as being at risk, and explore opportunities to re-use, integration, improvement of the management or improvement of public access to heritage assets as part of the restoration proposal. Due to their scale and nature, mineral workings can have a unique impact on archaeological remains. Policies should address the</p>	<p>Thank you for your suggestions for re-wording items (r) and (s). Table 24 is a list of issues to be addressed through policy criteria that will be drafted for the next consultation. We will consider your comments in drafting these policies.</p>

Summary of comments	Initial officer response
potential to protect or record archaeological features, including opportunities to improve the understanding of the archaeological potential of an area as part of restoration proposals.	
<i>Mr Adrian Buckmaster</i>	B032-2394
(Section n) protection but not enhancement	The National Planning Policy Framework requires us to both protect and enhance the natural and historic environment, for example paragraph 114 states that "Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure..." We will ensure that the policy framework we develop will protect existing natural and historic assets in line with legal requirements such as the Habitats Directive and with national policy, but we think that the approaches we have proposed mean that mineral site restoration can also help to enhance these assets, such as by linking or expanding networks of habitats, or improving the setting of heritage assets..
<i>Mrs Anne Pearson</i>	B034-2395
I reiterate my previous comments	Noted.
<i>Mrs Christine Daniell</i>	B037-2396
This is too complex to adequately 'tick' boxes.	We produced a summary document which was composed of extracts from the main consultation document and gave an overview of the issues the new Minerals Local Plan will address and how we used the comments you made on the first consultation on the Minerals Local Plan to develop the approaches proposed. We hoped that the summary document would provide an overview and enough information to help people decide which sections they wanted to look at in more detail. However, the issues which the Minerals Local Plan needs to address are complex and we realise that some of the areas we are consulting on require specialist knowledge. For that reason, we included a variety of question types in the consultation, including tick boxes and free-answer boxes where respondents can give us more information. We are sorry that you feel this issue was too complex but we hope that the next consultation draft will provide additional clarity. Developing the Minerals Local Plan will ultimately involve a series of consultations and meetings with

Summary of comments	Initial officer response
	various stakeholder groups to reach the final version of the plan.
<i>RSPB</i>	B039-1782
Please see the RSPB's response to Q24, as the issues raised in Table 24 (Q30) are very similar to the issues raised in Table 10 (Q24).	Noted. Please refer to our response to your comments on Question 24.
<i>Natural England</i>	B040-717
Natural England particularly supports the inclusion of the natural and historic environment policy issues, and the inclusion of soils.	Noted, thank you.
<i>The Coal Authority</i>	B045-2184
Although future coal extraction operations have been identified as unlikely in the County, The Coal Authority considers it important that policy is in place within the Minerals Local Plan which encourages the highest quality restoration following mineral extraction operations and seeks to ensure that there are no future land instability problems.	Noted and agreed. Land instability is an issue that we intend to address through policy criteria, and it is listed in Table 24 (page 111) as item (j): Land stability and subsidence, as well as in Table 5, item r, and Tabel 10, item f, relating to how and where minerals are worked. These policies will be drafted in preparation for the next consultation.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
For successful restoration, the end use of the site should be decided upon before excavation takes place. All proposals for mineral development should therefore be accompanied by detailed reclamation and aftercare proposals. Planning consents should be conditional on reclamation proposals being completed within a reasonable timescale.	Agreed. Elsewhere you have told us that our approach is premature, but we feel that the restoration-led plan will provide applicants and local communities with a greater level of certainty regarding the restoration possibilities of mineral sites and that it will assist applicants with developing detailed restoration and aftercare plans that ensure delivery of the strategic green infrastructure approach. The intention of the Minerals Local Plan is to ensure that all proposals for mineral development are accompanied by detailed restoration and aftercare proposals. In fact, this is required by legislation, and our intention is to provide local-level guidance to clarify how restoration plans should seek to deliver the county's strategic priorities.
In restoring sites, it should be recognised that there may be opportunities to increase and enhance woodland	Agreed. Habitat Quality and Fragmentation (which addresses biodiversity, habitats, woodland cover and other issues) and Access and Recreation

Summary of comments	Initial officer response
<p>cover, biodiversity and habitats, public access and in some cases provide sports and recreation provision.</p> <p>Where there are extensive mineral workings in river valleys, this may have the potential to make significant contributions to retaining and improving landscape character and meeting local biodiversity targets.</p>	<p>(which addresses access to green space, sport provision and tourism) are both identified as high-level strategic restoration priorities. Specific opportunities to incorporate both of these into restoration plans are set out in the Restoration Profiles for each Area of Search which are contained in Appendix 2.</p> <p>Agreed. Please refer to <i>Section 12: How will mineral workings be restored</i> for extensive detail on the high-level restoration priorities (including flood alleviation, water quality and habitat quality and fragmentation, all of which have direct bearing on river valleys) as well as the Restoration Profiles in Appendix 2 for detailed information about each Area of Search and the way the restoration priorities may work together within the framework of the landscape character and secure improvements to it.</p>
<p><i>Wildmoor Residents Association</i></p> <p>Issues cannot be argued against, it is their impact that is important. What priorities do people have on a 1-10 basis?</p> <p>Unless the restoration plans are legally binding on developers / landowners they will continue to be as they are now, that is having little impact on the outcome of restoration.</p>	<p>B047-2295</p> <p>We agree that the impact of issues is important. Whilst much of the focus of section 12 is looking at opportunities for delivering green infrastructure which benefits communities as well as the environment and the economy through mineral site restoration, we remain very aware that first and foremost the Minerals Local Plan needs to provide a policy framework that will ensure that any impacts and effects from minerals working are acceptable. We will be developing detailed policy wording which will set out how we expect to manage each of these issues as part of the next stage of consultation.</p> <p>Asking people to prioritise issues formed part of the workshop we held on the first stage of consultation in November 2012. We found this to be useful at the very early stage of developing the plan and the direction we should take, but at this stage we think that each of these issues deserves to be considered and policies developed to ensure they are adequately addressed. Prioritising the issues would risk undervaluing the importance of some of the issues. We were more concerned at this stage to ensure we had captured all of the aspects relating to each issue to be developed in detailed policies, and we have had some very useful responses to this consultation.</p> <p>We have given a lot of emphasis to restoration in this consultation because</p>

Summary of comments	Initial officer response
	<p>we agree that it is a vitally important aspect of the mineral development process. As a pivotal aspect of the plan, it will be a key part of decision making when individual proposals come forward. Conditions will be imposed as part of any planning permissions to require operators/landowners to comply with agreed restoration and aftercare schemes, and as such would be a legally binding aspect of the planning permission. Enforcement action could then be taken if the conditions of the planning permission are not complied with.</p> <p>We are aware that some of the older mineral sites in the county were permitted without restoration schemes and worked with minimal, often without any, conditions. In some cases the results of this have been unacceptable to everyone. We expect the Plan to specify that future mineral workings should be worked and restored in accordance with contemporary best practice, so the failures of the past should not be repeated.</p>
<p><i>Malvern Hills AONB Partnership</i> (Section t) We consider that the landscape issue identified here does not go far enough in protecting AONBs. Councils are required to have regard to the conservation and enhancement of natural beauty in AONBs under the provisions of the CROW Act 2000. AONBs should, in our view, be treated in a similar way as statutory wildlife and heritage sites ie given protection in the mineral planning process. Extraction in the AONBs must be truly exceptional and all other avenues must have been explored, including alternative ways to make the same provision and opportunities outside the county.</p>	<p>B049-802B</p> <p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Site-specific location policies will be developed to address the issues identified in Table 10 (p.61-63). This table specifically identifies AONBs as one area that will need to be addressed through policy criteria, including ensuring that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced. Our intention is to use comments received during this consultation to assist us with drafting the detailed policies. We are also actively discussing the issue of crushed rock provision with surrounding authorities to establish whether there are any other avenues available for provision of Worcestershire's crushed rock requirements from outside of the AONBs.</p>
<p><i>Crothorne Parish Council</i> (section q)</p>	<p>B051-558nq</p> <p>We intend to give geological SSSIs equal weight to biological SSSIs when</p>

Summary of comments	Initial officer response
<p>In Cropthorne Parish, there is significant geological interest where 2 ice-age periods overlap, including some fossilized bones. A small corner of a pub garden is designated as a geological SSSI but the geological interest may be present over a much wider area.</p>	<p>drafting policy criteria. These have already informed our thinking about where geology or geodiversity should be an important consideration for restoration schemes. This is set out on pages 85 to 87 in the "Geodiversity" section.</p> <p>We agree that the methods used so far potentially undervalue some existing local assets, and we will be working to find a way to address this across the county. It is useful to have these areas of local importance brought to our attention.</p>
<p><i>Environment Agency</i></p>	<p>B058-719</p>
<p>We agree to all the above criteria</p>	<p>Support noted.</p>
<p>(Q31) If you think that there are other issues that we should consider relating to the restoration of mineral workings, please provide details.</p>	
<p><i>Tewkesbury Borough Council</i></p>	<p>B036-703</p>
<p>Opportunities for flood and surface water management betterment should be investigated as part of the approach to restoration, which should be included in any such policy. Please also see response to Qu.24 on this issue.</p>	<p>Flood alleviation and water quality are both identified as high-level strategic restoration priorities.</p> <p>We are developing a background paper to address water and flooding issues and we will develop policies to ensure that WFD and Flood Risk betterment are addressed within the plan.</p>
<p><i>Worcestershire Wildlife Trust</i></p>	<p>B044-1081</p>
<p>We don't believe that there are any further issues but our position is based on the assumption that wider biodiversity and habitat networks (i.e. those outside the designated assets) would be taken into account as per bullet 4 of part n). Failure to recognise wider biodiversity features would fundamentally undermine the landscape-scale restoration aspiration laid out in this consultation.</p>	<p>Noted.</p> <p>We believe that the Green Infrastructure approach provides a robust framework to ensure that features in the wider landscape are respected, including biodiversity assets and networks. We have also used Biodiversity Delivery Areas and the Worcestershire Green Infrastructure Strategy to assist in the development of the approach to developing restoration priorities for Habitat Quality and Fragmentation. Enhancing wildlife corridors and linking and buffering existing assets are encouraged in the Natural Environment White Paper, and we have used these ideas of corridors and networks to identify the areas we think have the greatest potential to benefit habitat quality at the landscape scale.</p>

Summary of comments	Initial officer response
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 B</p>
<p>The South Worcestershire Authorities recognise that it may sometimes be appropriate to use inert materials to raise the land surface to its original levels. However, if the practice of landfill is allowed, schemes need to be properly designed at the outset and properly managed during the life of the working. It would be important to determine that the highway network was capable of coping with the additional traffic, that landfill operations would not pose a threat of pollution to water sources, would not adversely affect the amenities of neighbouring properties and would not prejudice the proposed after-use of the site.</p> <p>Where the proposed after-use was agriculture, every effort needs to be made to restore the land to the highest possible quality. In the case of the best and most versatile agricultural land, it should be restored to a high standard.</p>	<p>We agree that where inert (landfill) materials are required as part of a restoration scheme, they must be properly designed and managed in line with the Worcestershire Waste Core Strategy. The Waste Core Strategy identifies that there is no need for additional landfill space up to 2027, although new sites could be developed if a shortfall in capacity is identified or the proposal is essential for operational or safety reasons or is the most appropriate option, meaning that some backfill could be allowed if it is shown to be necessary. Any materials that would be permitted would be tightly controlled by the Environment Agency. We realise that we haven't specifically addressed landfill in the consultation draft, but we do not feel that at this stage it is helpful to repeat the contents of the Waste Core Strategy as this already forms part of the development plan and must be complied with.</p> <p>Agreed. Horticulture and Food Production is identified as an over-arching priority in the spatial strategy, and is identified as a determining or significant factor for restoration in 15 of the 20 Areas of Search. We will consider how safeguarding the long term potential of best and most versatile soils could be incorporated in the policy framework and references to soil resources and best and most versatile agricultural land can be strengthened in the document.</p> <p>The methodology for determining whether Horticulture and Food Production is considered a determining factor for restoration is set out on pages 87 to 90, and is based on agricultural land quality as determined by Natural England. The only areas where restoration for horticulture and food production is not considered to be a priority at any level is in the Crushed Rock areas of search where the majority of the Malvern Hills area of search is classified as grade 4 and 5 land and Bredon Hill as grade 3 and 4 land. The spatial strategy is intended to deliver high standards of restoration in all areas and across all restoration priorities.</p>

Summary of comments	Initial officer response
<p>Proposals for minerals extraction where the method of working would result in lakes being formed must be able to demonstrate that a lake(s) would be appropriate in the landscape and be accompanied by proposals for the maintenance of the lake(s).</p>	<p>Mineral extraction can lead to a change to the landscape, and we have indicated the types of excavations and their impacts on restoration potential in Table 14 (page 71). Landscape change is something that we have stated will be addressed by policy criteria and is one of the reasons that we think landscape is an over-arching issue for our restoration strategy as part of a Green Infrastructure approach. We think that depending on the type of mineral operation and the impact on the landscape, it may be possible to restore mineral workings to their former Landscape Type by recreating or enhancing the key characteristics but in some cases the scale or nature of the workings will prohibit this from being done effectively. In these cases it may be more appropriate to embrace the opportunity for whole-scale landscape change and restore the site to a different landscape type.</p> <p>We are actively considering this issue, and we think that we will be able to develop the restoration profiles for the areas of search to give greater certainty about when sites might be able to be restored to the former landscape type and when working might result in whole-scale change. We will seek to manage any change to ensure that it is appropriate. We will develop policies to address these issues in the Minerals Local Plan.</p> <p>However, lakes are not the only possible outcome where excavation is close to or below the water table. If large lakes are not appropriate it may be possible to create a wetland or a series of smaller ponds. Any of these types of water bodies could provide multi-functional benefits addressing a number of the strategic restoration priorities: for example, they may form part of a flood alleviation scheme, address habitat quality and fragmentation issues, water quality, improve the setting of the historic environment, or contribute toward access and recreation goals. Securing multiple benefits from site restoration is a critical part of the Green Infrastructure approach that we are pursuing. The restoration profiles set out in Appendix 2 provide additional detail about what sorts of restoration might be appropriate in a given Area of Search.</p>
<p>Proposals for mineral extraction where the proposed</p>	<p>Agreed. All restoration proposals are statutorily required to be accompanied</p>

Summary of comments	Initial officer response
<p>after-use is nature conservation, forestry or outdoor recreation must be accompanied by proposals for the long-term management of the scheme.</p>	<p>by an aftercare plan covering a period of at least five years post-completion of the restoration plan. We are keen to ensure that the plan we develop will be deliverable, including ensuring that sites which include biodiversity or other green infrastructure gains can be managed to ensure these gains are not lost over time. We are conscious that landowners may need at least part of their land to provide an income following mineral extraction. This might result in more productive areas alongside biodiversity or recreation focused areas, but it might also include options such as lower intensity grazing across the larger area to enable farming alongside biodiversity, or investigating emerging opportunities such as biodiversity offsetting schemes which could fund land management. We think that the integrated nature of the Green Infrastructure approach provides the best opportunity for gains to be realised and maintained as part of a holistic restoration scheme which meets both our strategic aims and landowners aspirations.</p>
<p><i>Wildmoor Residents Association</i></p>	<p>B047-2295</p>
<p>Issues are not just relevant for restoration but all aspects of working aggregates. It seems throughout e.g. impacts on health, amenity & Worcestershire's key economic sectors that all issues are surmountable (see Appendix 1, Column 3). This depends on your perspective i.e. are you personally affected by the development / are you responsible for it for your job / or are you a developer? (g) as an example does seem to consider impact of amenity along transport routes in a more critical and constructive way. This is needed throughout.</p>	<p>We agree that careful consideration of the impacts of mineral development on the surrounding landscape and inhabitants is of critical importance to the success of the plan and we have tried to ensure that health and amenity issues are addressed throughout. We are pleased that you feel we have addressed this appropriately in item (g), and we feel that the other items in this section (a through f, Table 24, p.111) also address the issues you raise, but these will be strengthened as detailed policy wording is developed for the next stage of consultation.</p> <p>We agree that many of these issues are not confined to site restoration and need to be considered through all phases of mineral working. For the Second Stage Consultation, we split the issues to be addressed through policy criteria into three tables: table 5, table 10 and table 24. We felt at the time that by including a list of policy areas that we felt were relevant to specific sections of the document it would simplify matters for respondents and clarify our thinking. We now realise that this has resulted in both duplication of issues and the unintentional appearance of neglecting other issues. The policy criteria in Table 24 are intended to provide support for the objectives of the plan as set out on page 37 to 40, relating to the restoration stage, but the</p>

Summary of comments	Initial officer response
	<p>issues are identified in relation to the objectives of the plan in Table 1 (page 24) with issues to be addressed through policy criteria for how and where minerals are worked in Table 5 (p40-43) and Table 10 (p61-63).</p> <p>We think that the policy framework will establish what would be seen as an “acceptable” mineral development and set thresholds or criteria which must be met for an application to be approved. We are encouraged by government policy to set a positive, enabling policy framework, meaning that if development is correctly designed and controlled then all the issues should indeed be surmountable and allow development to take place without unacceptable impacts on health, amenity, Worcestershire’s key economic sectors or the environment.</p> <p>The policy framework will be key in decision making when individual proposals come forward. Conditions will be imposed as part of any planning permissions to require operators/landowners to comply with policy requirements, and as such would be a legally binding aspect of the planning permission. Enforcement action could then be taken if the conditions of the planning permission are not complied with.</p>
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 A nq</p>
<p>The South Worcestershire authorities are disappointed that the County Council has sought to develop detailed restoration priorities without engaging with the District Councils and without reference to policies in current and emerging Local Plans. We would therefore request more effective engagement with the Districts in the preparation of the draft Minerals Local Plan prior to the next stage of public consultation.</p>	<p>Whilst we agree that engagement with local authorities in and around Worcestershire is essential in developing the Minerals Local Plan, we are sure that you will understand that the timing of this can be difficult. We felt it was important to formulate our ideas to the extent that they could be understood and meaningfully commented on by other parties including the District Councils in Worcestershire. The proposals are by no means finalised and we will be refining the methods used, the areas of search proposed and developing the policy framework following the comments we have received. We would welcome further engagement with the South Worcestershire authorities to ensure we address your concerns and grasp any opportunities you can highlight now that we have established the broad approaches to developing the plan is welcome. We agree that greater mention could have</p>

Summary of comments	Initial officer response
	<p>been made of current and emerging Local Plans, particularly in the Spatial Portrait, and that these Plans contain information that can help us address some of the gaps in our knowledge about specific local areas and priorities. We welcome the opportunity to discuss the next iteration of the draft plan with you.</p>

No Comment Responses

<i>Worcestershire Wildlife Trust</i>	B044-1081
No further comments	Noted
<i>Natural England</i>	B040-717
No Comments	Noted
<i>WCC Environmental Policy</i>	B059-2004
No comment	Noted

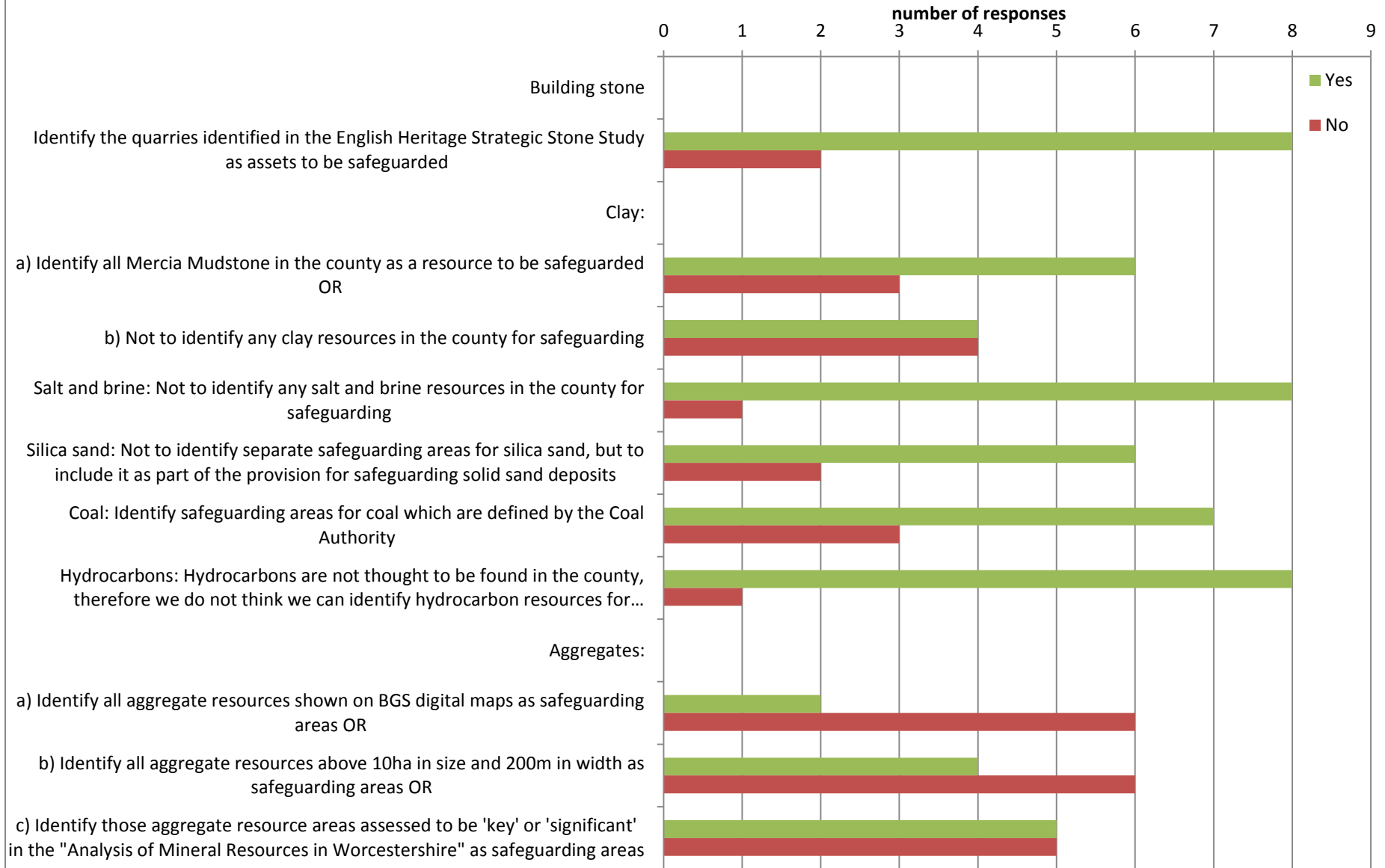
Section 13: How will we safeguard minerals for future use?

Minerals can only be worked where they are found. If built development, such as roads, housing estates or business parks, takes place on top of mineral resources this can effectively "sterilise" them by inhibiting future extraction. We need to identify specific mineral resources of local and national importance and set out policies to ensure that they are not needlessly sterilised by non-mineral development.

Questions 32 and 33: Approaches to mineral safeguarding.

There are several alternatives which could be used to identify Mineral Safeguarding Areas for minerals of national or local importance. It may be appropriate to use a different approach for different mineral resources. In Section 13 we have set out approaches that we consider are appropriate for each of the kinds of minerals listed, but we would like to know what you think.

Q32: Do you support the approaches proposed for each type of mineral resource?



Summary of comments	Initial officer response
(Q32) Please tell us why you agree or disagree with the proposed approaches.	
<i>Wyre Forest District Council</i>	B007-1968 nq
The approach set out to safeguarding mineral resources is supported, however, the District Council reserves the right to comment further once more detailed proposals emerge.	Support for the general approach noted. We welcome any additional information you would like to provide.
<i>English Heritage</i>	B025-716 nq
The emerging Minerals Plan offers a variety of options to calculate the amount of minerals resources that will be identified/ safeguarded over the Plan period. English Heritage anticipates that the preferred option in future iterations of the emerging Minerals Plan will be in line with the principles of sustainable development.	Support noted, agreed.
<i>Mrs Anne Pearson</i>	B034-2395
In the case of ECA 19/2 and surrounding areas, Upton upon Severn and other settlements were purposely built on the sand and gravel banks of land to protect them from flood water. This is why it is important in this flood plain NOT to remove any further sand and gravel. They should be left as a protection for the existing dwellings. No further houses should be built unless well away from areas liable to flood.	<p>We intend to develop a background document looking at water and flooding issues and will work with the Environment Agency to ensure we fully consider the potential impact of mineral working and restoration on flood risk.</p> <p>The Minerals Local Plan will not identify where any new houses should be built, but needs to set out policies to ensure that mineral resources are not inadvertently sterilised by other types of development. Any new housing proposals will be assessed by the local city, borough or district council against the development plan for the area and national policy.</p>
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
We suggest that c) could be varied to become an acceptable approach but should be amended to state the following: "Identify those aggregate resource areas assessed to be 'key' in the "(REVISED) Analysis of Minerals Resources as subject to the 'Sieve Test' mapping" as safeguarding areas"	Support for a revised option c noted. However, as we have stated elsewhere in this document, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints in defining where minerals should or should not be worked. We do not expect to apply sieve criteria to Mineral Safeguarding Areas. We will

Summary of comments	Initial officer response
	of course use the most up to date evidence possible and take into account any revisions to the Analysis of Mineral Resources.
<i>Mrs Christine Daniell</i>	B037-2396
c) Only proposals of above 200 ha which have been subjected to a sieve test and on land which has few constraints should be considered.	<p>Section 13 considers how we should safeguard the county's mineral resources. The Minerals Local Plan needs to set out policies to ensure that mineral resources are not inadvertently sterilised by other types of development.</p> <p>It is national policy that Mineral Local Plans should identify specific mineral resources of local and national importance and set out policies to ensure that they are not needlessly sterilised by non-mineral development. This is usually referred to as a "safeguarding" policy. Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>Whilst we think that identifying areas of mineral resources over 200ha may be appropriate to enable Green Infrastructure gains through mineral working and restoration, we think that we need to safeguard resources of less than this scale, as they could still be valuable for future use. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
We suggest a variation of Option c) but amended to state "key" areas only i.e. 200 ha of uncompromised land and subject to the environmental 'sieve test' outlined above.	<p>Support for a revised option c noted. However, as we have stated elsewhere in this document, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints in defining where minerals should or should not be worked. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p> <p>Section 13 considers how we should safeguard the county's mineral resources. It is national policy that Mineral Local Plans should identify</p>

Summary of comments	Initial officer response
	<p>specific mineral resources of local and national importance and set out policies to ensure that they are not needlessly sterilised by non-mineral development. This is usually referred to as a “safeguarding” policy. Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>Whilst we think that identifying areas of mineral resources over 200ha may be appropriate to enable Green Infrastructure gains through mineral working and restoration, we think that we need to safeguard resources of less than this scale, as they could still be valuable for future use. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p>
<i>Worcestershire Wildlife Trust</i>	B044-1081
<p>We agree with the analysis carried out by the council for all mineral types. With respect to aggregates it appears to us to be sensible to take the ‘middle ground’ approach to resource identification. The other options being either too restrictive or potentially ineffective in securing adequate reserves.</p>	<p>Support noted for all mineral types and option b for aggregates.</p>
<i>The Coal Authority</i>	B045-2184
<p>The Coal Authority notes that this Second Consultation Minerals Local Plan proposes to safeguard the surface coal resources in the north west of the County identified in Figure 45, based on the GIS Surface Coal Resource Plan that we originally provided to the MPA in August 2009. We welcome that the Council has prepared this document on the best available data and their commitment to define a MSA for surface coal. However, the Council is aware that we subsequently re-issued our surface coal resource GIS data to MPAs and LPAs in June 2013. In the latest data issue there is no surface coal resource identified in Worcestershire County, due to the definitions being slightly different between the datasets. Accordingly, using this most up-to-date data,</p>	<p>We are aware of the re-issued surface coal GIS, however it was made available after the Second Stage Consultation document was already substantially complete. We will take the new data into account in refining our approach for the next consultation</p>

Summary of comments	Initial officer response
<p>The Coal Authority would not now expect the MPA to define a coal MSA in the Worcestershire Minerals Local Plan.</p>	
<p><i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i></p>	<p>B046-681,1623, 683 B</p>
<p>Whilst Mercia Clay is important to make bricks, Figure 44 indicates that it covers around 50% of the County. Without further information on which sub-groups of Mercia Clay are more important than others, it is suggested that there is not a blanket approach to safeguarding clay resources in the County.</p> <p>Coal will remain important as a contributor to the diversity and flexibility of UK electricity production into the foreseeable future. South Worcestershire contains reserves of unworked coal but further underground working is considered unlikely and does not justify the identification of safeguarding areas.</p>	<p>Following the results of this consultation we think we may need to refine our approach to clay, both for the opportunity area and safeguarding.</p> <p>It is national policy that Mineral Local Plans should identify specific mineral resources of local and national importance and set out policies to ensure that they are not needlessly sterilised by non-mineral development. This is usually referred to as a “safeguarding” policy. Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>We do have some information about Mercia Mudstone and its sub-groups, which as you say is widely found across the county, but we currently have little information to indicate where this might be of good enough quality to be used for brick making or other commercially attractive purposes. This is something we are hoping to refine as we develop the Minerals Local Plan and some of our consultees could be well placed to help us with this, for example the Earth Heritage Trust, the Mineral Products Association or the company which currently makes bricks in Worcestershire.</p> <p>Please refer to the Coal Authority's comments above regarding coal safeguarding areas in Worcestershire. We intend to consult the 2013 GIS data mentioned above and refine our approach accordingly.</p>

Summary of comments	Initial officer response
<p>In relation to Aggregates, it is considered that Option C which safeguards resource areas assessed to be “key” or “significant” would be the most appropriate. This approach would result in more focused safeguarding areas and would offer the lowest burden on developers.</p>	<p>Support for approach C noted.</p>
<p><i>Wildmoor Residents Association</i></p> <p>(ticked option c) Aggregates - Search areas above 10ha and 200m width too broad areas to be safeguarded. The "key" and "significant" areas in the Analysis need also to be prioritised in importance.</p>	<p>B047-2295</p> <p>As described in the "Analysis of Mineral Resources" background document, a minimum size threshold (larger than 10ha and 200m in width) was used to help filter out deposits that are unlikely to contain significant amounts of mineral resources or that are likely to be unviable to work. This was the first step in the analysis that determined whether a deposit was considered 'key' or 'significant'. Support for prioritising "key" and "significant" resources noted.</p>
<p><i>Herefordshire and Worcestershire Earth Heritage Trust</i></p> <p>Building Stone – yes do safeguard the locations identified in the Strategic Stone Study, BUT bear in mind that Worcestershire was a pilot project area for the SSS and limited time was spent in reviewing the relevance of the quarries. The new project being run (2013-2016) by Herefordshire & Worcestershire Earth Heritage Trust will provide much more detail that will enable the quarries to be assessed, as well as linking quarries to buildings through paper and site research. This should eventually be a better database to use for Worcestershire than the SSS, or should at least be used in conjunction with the SSS and developers, property owners and conservationists should be referred to it for more definitive detail on particular buildings. The project will not cover every stone building but will cover buildings representative of all the stone types across the county and relate these to specific quarries or pits wherever possible. The SSS used the British Geological Survey records of all pits found over the years through surveying, but there was no time to verify their links to</p>	<p>B048-800</p> <p>We agree that there are limitations to the SSS data, and we would welcome the opportunity to discuss the information that is coming to light through the One Thousand Years project and how we might be able to use it to assist us in refining the safeguarding areas for building stone.</p>

Summary of comments	Initial officer response
<p>buildings or even to confirm that they were dug for building stone, as opposed to say for local aggregate use – so this may include a lot of irrelevant locations not linked to buildings. It also had a summary of known large pits – this will be too scant and not include many locations which the new project seeks to locate.</p> <p>Clay – there is too much Mercia Mudstone in Worcestershire and it is too common in other counties too, to make it worth protecting all of it as a resource.</p> <p>Aggregate – there are too many small locations shown on BGS mapping – it would clog up your system. The option of only including ‘key’ localities though, may exclude the contribution that could be made by smaller scale extraction for local use. The middle option therefore seems best.</p>	<p>Following the results of this consultation we think we may need to refine our approach to clay, both for the opportunity area and safeguarding.</p> <p>We do have some information about Mercia Mudstone and its sub-groups, which as you say is widely found across the county, but we currently have little information to indicate where this might be of good enough quality to be used for brick making or other commercially attractive purposes. This is something we are hoping to refine as we develop the Minerals Local Plan and some of our consultees, including yourselves, have indicated that they may be able to help us with this.</p> <p>Support for approach B noted.</p>
<i>Malvern Hills AONB Partnership</i>	B049-802B
<p>The Malvern Hills AONB Management Plan 2009-2014 includes the following strategic objective – “DO1 – Encourage the recycling, re-use and investigation of extraction of small quantities of locally distinctive building materials such as Malvern stone, where this is needed to help retain local distinctiveness in the built environment.” Therefore we welcome the inclusion of a recognition of this issue under section 13.9.</p>	<p>Support for inclusion of safeguarding of building stone sites noted. We intend to work with the Earth Heritage Trust as outlined above to help refine our approach to safeguarding the most important locations, and we would also welcome any information on this issue that the AONB Partnership might be able to contribute.</p>

Summary of comments	Initial officer response
<p>In relation to Mercia mudstone, we would expect there to be enough opportunities outside the AONB so as to avoid any need to consider sites within the AONB boundary. It is questionable, therefore, as to the benefits of safeguarding land within the AONB for this purpose.</p> <p>Aggregates – We note that Map A on page 118 includes the Suckley Hills for the first time in the report as an potential safeguarded area for crushed rock. It is unclear why it had not been referred to before in developing the strategy. Much of the Suckley Hills are located within the Malvern Hills AONB, but do not have the same protection under the Malvern Hills Acts. The AONB Unit would be opposed to significant extraction in these hills where the necessary materials may be available from elsewhere, including outside the county.</p>	<p>Following the results of this consultation we think we may need to refine our approach to clay, both for the opportunity area and safeguarding.</p> <p>We do have some information about Mercia Mudstone and its sub-groups, which as you say is widely found across the county, but we currently have little information to indicate where this might be of good enough quality to be used for brick making or other commercially attractive purposes. This is something we are hoping to refine as we develop the Minerals Local Plan and some of our consultees have indicated that they may be able to help us with this. We will consider the relationship with the AONB as we refine our approach.</p> <p>While the Suckley Hills are not identified as an Area of Search as you say, they, like many other parts of the county, are identified in the second stage consultation as a potential safeguarding area.</p> <p>The Malvern Hills and Bredon Hill are the main resources of rock suitable for use as crushed rock aggregate. However, there are some smaller deposits such as the Suckley Hills, Lickey Hills and Abberley Hills, but these are limited in size and were "screened out" from inclusion as areas of search following the methodology in Section 11.</p> <p>It is national policy that Mineral Local Plans should identify specific mineral resources of local and national importance and set out policies to ensure that they are not needlessly sterilised by non-mineral development. This is usually referred to as a "safeguarding" policy. Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p>
<p><i>Mrs Pat Harries</i></p>	<p>B060-2399</p>
<p>Variation to Option C Must be < 200 unconstrained land & have been subject to SIEVE test</p>	<p>Support for a revised option c noted. However, as we have stated elsewhere in this document, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan, how each of the issues is now placed in the national</p>

Summary of comments	Initial officer response
	<p>regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints in defining where minerals should or should not be worked. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p> <p>Section 13 considers how we should safeguard the county's mineral resources. It is national policy that Mineral Local Plans should identify specific mineral resources of local and national importance and set out policies to ensure that they are not needlessly sterilised by non-mineral development. This is usually referred to as a "safeguarding" policy. Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>Whilst we think that identifying areas of mineral resources over 200ha may be appropriate to enable Green Infrastructure gains through mineral working and restoration, we think that we need to safeguard resources of less than this scale, as they could still be valuable for future use. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p>
(Q33) If you think that there are other approaches which we should consider, please provide details.	
<i>Mineral Products Association</i>	B020-1899 nq
<p>Mineral Safeguarding</p> <p>Whilst your approach to this subject broadly accords with BGS guidance we have several reservations. The emphasis of national guidance is to safeguard all mineral resources of economic importance. The maps produced by BGS show these economic resources at a scale useful to strategic planning. The BGS reports on mineral resource define a resource as potentially workable (subject to detailed testing and evaluation). What this means is that the economic value of the resource has already been established. There is therefore no reason to change those boundaries unless the mpa is in</p>	<p>Following the responses we have received to this consultation, we intend to identify areas of search and safeguarding areas in accordance with a more refined version of the methodology set out in Section 11 (and by extension section 13) and policy criteria will be developed for the next consultation. We think from your comments that you support Alternative A, which would identify all aggregate resources shown on BGS mapping as safeguard areas. We will consider your comments as we develop our approach.</p> <p>However for clarity, all three options for safeguarding which we proposed in the consultation would safeguard more than just the areas of search: at the least, Alternative C would safeguard all "key" and "significant" resources (not all of which form part of an area of search in the consultation), or Option B</p>

Summary of comments	Initial officer response
<p>possession of more detailed information that can discount areas. If you follow the alternative approaches of only designating effectively your AoS or parts thereof, you will of necessity leave out large areas of potentially workable resources and expose them to sterilisation. For example, although you have identified AoS for large quantities of material, say 2 Mt or more, who is to say that a smaller area of resource might not yield a useful 50,000 t of sand and gravel if extracted prior to development?</p> <p>A further problem which we see with your proposals is your advocacy of development thresholds in table 26. This is contrary to the BGS advice since a half hectare site may not yield much aggregate in itself, but it might well sterilise a much larger resource if located in the middle of a big patch of sand and gravel. We believe that you have not given sufficient weight to the dangers of proximal development but only considered what might come from prior extraction. We strongly advocate not adopting development thresholds but follow the BGS advice closely.</p>	<p>would safeguard all resources larger than 10ha or 200m wide.</p> <p>We agree that smaller resource areas might yield useful amounts of minerals and we will consider the best means of ensuring this can be safeguarded through the policy framework.</p> <p>The thresholds for minor development that appear in table 26 are defined in the Town and Country Planning Order 2010. We agree that these thresholds might risk inadvertently allowing small-scale development which could sterilise a larger resource and we will carefully consider how to prevent this issue. We will return to the BGS advice for further guidance on this issue as we develop policies.</p>
<p><i>The Coal Authority</i></p>	<p>B045-2184</p>
<p>As discussed with the Council, whilst there is no longer a requirement to define a surface coal resource MSA, The Coal Authority has also provided the MPA with GIS data illustrating the spatial extent of coal mining legacy features and hazards in Worcestershire, focussed in the north west of the County. Whilst not advocating that these areas should be defined as a MSA, we consider that the Minerals Local Plan should acknowledge the coal mining legacy, as a potential development constraint, and resulting opportunity to achieve prior</p>	<p>Noted. We agree that this should potentially be treated as a constraint as opposed to an opportunity area, and will refine our methodology in light of your comments and the new GIS data. Please also refer to our response to your comments in question 32.</p>

Summary of comments	Initial officer response
extraction of any remnant surface coal as part of remedial measures to address unstable land.	

No comment responses:

<i>Natural England (Q32)</i>	B040-717
No Comments	Noted
<i>Natural England (Q33)</i>	B040-717
No Comments	Noted
<i>Worcestershire Wildlife Trust</i>	B044-1081
No Comment	Noted

Questions 34 and 35: Do you support the circumstances identified where the County Council will not object to development proposals in Mineral Safeguard Areas? If you think that there are other circumstances or additional considerations which we should take into account, please provide details.

Once Mineral Safeguarding Areas have been identified, a policy is needed to set out how non-mineral development in those areas should address minerals issues. This will ensure that the mineral resources are not needlessly sterilised by non-mineral development.

Question 34: In Section 13 we have set out a range of circumstances where we think that non-mineral development could be appropriate in Minerals Safeguarding Areas (as long as it is in accordance with other aspects of the development plan).

- | | Yes | No |
|--|--------------------------|--------------------------|
| a) Where the proposed development would not sterilise mineral resources of national or local importance. This could include: | <input type="checkbox"/> | <input type="checkbox"/> |
| i) requiring applicants to demonstrate that the development itself would not prevent future working, OR | <input type="checkbox"/> | <input type="checkbox"/> |
| ii) requiring applicants to demonstrate that the resource itself is not of national or local importance: the policy would need to include criteria for defining national and local importance, but as current information about the significance of resources is limited this may be a useful approach. | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Where a) cannot be demonstrated, the mineral is extracted before the non-mineral development takes place: this would need to make allowance for the practicability and environmental feasibility of this as a solution and must consider the current or potential future value of the mineral. | <input type="checkbox"/> | <input type="checkbox"/> |

Summary of comments	Initial officer response
(Q34) Please tell us why you support or do not support the proposed approaches.	
<i>Mr Adrian Buckmaster</i>	B032-2394
b would promote the excavation of gravel without the requirement to restore but instead result in the building of	The purpose of safeguarding policies is to ensure that mineral resources are not needlessly sterilised by other types of development. As such, parts

Summary of comments	Initial officer response
houses	<p>a and b in Table 25 set out how we would expect minerals to be considered if other types of development are proposed and refer only to circumstances where the County Council would <i>not</i> object to non-mineral development in a Mineral Safeguarding Area.</p> <p>In cases where the applicant is not able to demonstrate that either the non-mineral development would not sterilise the resource or the resource is not of national or local importance, then the council would require the mineral to be extracted prior to the non-mineral development taking place to ensure that the resource is made use of and not simply sterilised by development. Our intention is not to provide a 'loophole' for developers who wish to build houses, but rather ensure that if housing (or non-mineral) development is proposed on a site, the mineral deposits it overlays are not sterilised.</p>
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
Land value is not a planning matter.	<p>We agree that land value is not a planning matter. We think that your comment picks up on the statement in Table 25 that where part a is not demonstrated, that the mineral should be extracted before the non-mineral development takes place but that this would need to "consider the current or potential future value of the mineral".</p> <p>We have very little information at present to help us understand the value of mineral contained in a specific deposit. We have tried to address viability through analysis of mineral resources, and we have asked industry to help us identify viable deposits by giving us the evidence that we need. Issues of economic viability are primarily determined by the minerals industry as they ultimately decide whether a site contains deposits that are viable enough to merit submitting an application. However, viability can change over time, depending on the market price of minerals compared to the cost of extraction, and therefore we must ensure that our safeguarding policies recognise the potential future value and need for the mineral, and not just whether it is considered viable in the current climate.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
None of these are appropriate as it will blight vast tracts of landespecially b) – value is not a land use planning	We do not think that the policy issues proposed would blight vast tracts of land. Safeguarding a resource does not mean that it would necessarily be

Summary of comments	Initial officer response
<p>issue. It is for the County to decide the appropriate planning use of the site not its value.</p>	<p>appropriate to work minerals in these areas, or that they would ever be worked, but it allows them to be assessed and protected if this is appropriate when other types of development are proposed.</p> <p>We agree that land value is not a planning matter. We think that your comment picks up on the statement in Table 25 that where part a is not demonstrated, that the mineral should be extracted before the non-mineral development takes place but that this would need to "consider the current or potential future value of the mineral".</p> <p>We have very little information at present to help us understand the value of mineral contained in a specific deposit. We have tried to address viability through analysis of mineral resources, and we have asked industry to help us identify viable deposits by giving us the evidence that we need. Issues of economic viability are primarily determined by the minerals industry as they ultimately decide whether a site contains deposits that are viable enough to merit submitting an application. However, viability can change over time, depending on the market price of minerals compared to the cost of extraction, and therefore we must ensure that our safeguarding policies recognise the potential future value and need for the mineral, and not just whether it is considered viable in the current climate.</p>
<p><i>Worcestershire Wildlife Trust</i></p>	<p>B044-1081</p>
<p>We are pleased to support the proposals under section a) above but we do not feel qualified to respond to section b.</p> <p>There are a number of issues raised by b) that require further work before the proposed approach can be adopted. That said there does seem to be merit in further researching this option as a way of securing future GI enhancements for proposed development (i.e. those benefits that can accrue as a result of minerals working). Clearly this would have inherent timing issues but the long term benefit of delivering development post minerals might offset that to some extent.</p>	<p>Support for approach A noted.</p> <p>We agree that the final approach to safeguarding will require further clarification. We have received feedback during this consultation that will help us refine our approach for the next consultation. We agree that it would be desirable to secure GI enhancements for proposed development, but we may be limited in what we can require through a safeguarding policy. Its purpose is to ensure mineral resources are assessed and either protected or extracted if this is appropriate when other types of development are proposed, and the larger development and any GI enhancements would be determined by the relevant Local Planning Authority, rather than by the</p>

Summary of comments	Initial officer response
	Mineral Planning Authority.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
<p>The proposed circumstances where the County Council would not object to development proposals in Mineral Safeguarding Areas is consistent with Policy SWDP32 in the draft South Worcestershire Development Plan which was prepared with advice from the County Council. To assist developers, further guidance from the County Council on what resources are of national or local importance would be helpful. Also, guidance on what might constitute “practicability and environmental feasibility”.</p>	<p>Support noted. We expect that the feedback received during this consultation will help us refine our approach for the draft plan, and that this will provide the further guidance regarding the importance of mineral reserves you seek.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>Can foresee difficulties with regard to a) ii where developers could extract just for financial gain even where the resource is not of national or local importance. The overall picture is of greater consequence than individual gain.</p>	<p>The purpose of safeguarding policies is to ensure that mineral resources are not needlessly sterilised by other types of development. As such, parts a and b in Table 25 set out how we would expect minerals to be considered if other types of development are proposed and refer only to circumstances where the County Council would <i>not</i> object to non-mineral development in a Mineral Safeguarding Area. Part a) ii would allow the non-mineral development to take place without extracting the mineral if sufficient evidence is provided to show that the mineral deposit is not nationally or locally significant.</p> <p>In cases where the applicant is not able to demonstrate that either the non-mineral development would not sterilise the resource or the resource is not of national or local importance, then the council would require the mineral to be extracted prior to the non-mineral development taking place to ensure that the resource is made use of and not simply sterilised by the development. Our intention is not to provide a 'loophole' for developers, but rather ensure that if non-mineral development is proposed on a site, the mineral deposits it overlays are not sterilised.</p>

Summary of comments	Initial officer response
<p>(Q35) If you think that there are other circumstances or additional considerations which we should take into account, please provide details.</p>	
<p><i>Mr and Mrs Peter and Nicola Inchbald</i></p> <p>The SWDP land use allocations, other land uses especially agricultural land classification and environmental constraints.</p>	<p>B038-2286</p> <p>Noted. We plan to meet with the South Worcestershire councils to discuss the SWDP land allocations in relation to mineral resources and other issues raised in response to this consultation.</p> <p>As we have stated elsewhere in this document, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan (such as agricultural land classification and environmental constraints), how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints in defining where minerals should or should not be worked. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p>
<p><i>Longdon Queenhill and Holdfast Parish Council</i></p> <p>Overlay other land uses and environmental constraints.</p>	<p>B041-595</p> <p>The purpose of safeguarding policies is to ensure that mineral resources are not needlessly sterilised by other types of development. Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>As we have stated elsewhere in this document, Appendix 1 of the main consultation document highlighted the constraints which formed part of the "sieve test" approach in the current Minerals Local Plan (such as agricultural land classification and environmental constraints), how each of the issues is now placed in the national regulatory and policy context and what this means for how we will deal with the issues in the new Minerals Local Plan. We think that most of the criteria previously used as "sieve" criteria can no longer be seen as absolute constraints in defining where minerals should or should not be worked. We do not expect to apply sieve criteria to Mineral Safeguarding Areas.</p>

Summary of comments	Initial officer response
<i>WCC Environmental Policy</i>	B059-2004
Support if exemptions in Table 26 are taken account of	Support noted.

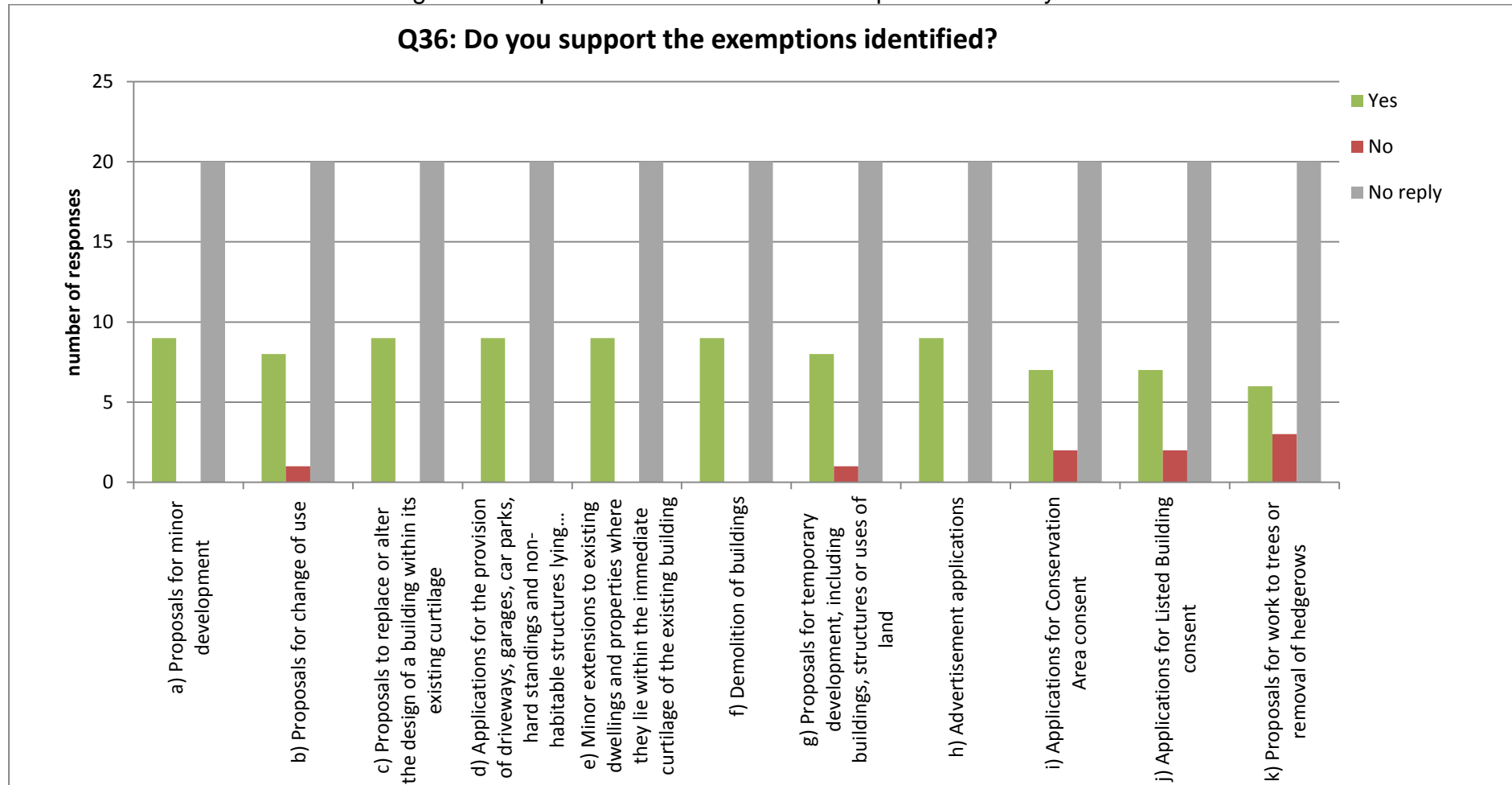
No comment responses:

<i>Natural England (Q34)</i>	B040-717
No comments	Noted.
<i>Natural England (Q35)</i>	B040-717
No comments	Noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comment	Noted.

Questions 36 and 37: Exemptions.

We think that it would be inappropriate to require all non-minerals development in Minerals Consultation Areas to be referred to the County Council as there are some types of development which are very unlikely to prevent future working. We therefore think we should develop policies to exclude some types of development from being referred to the County Council when they are proposed in Mineral Safeguarding Areas.

In Section 13 we have set out a range of exemptions where we would not expect the County Council to be consulted.



Summary of comments	Initial officer response
(Q36) Please tell us why you support or do not support the proposed exemptions (with reference to the relevant letter code where applicable).	
<i>Wyre Forest District Council</i>	B007-1968 nq
The list of exempt developments is considered to be appropriate.	Support noted.
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
Safeguarding areas should NOT include conservation areas, listed buildings or removal of historic landscape.	<p>The purpose of safeguarding policies is to ensure that mineral resources are not needlessly sterilised by other types of development. With regard to identifying mineral safeguarding areas in designated areas, the National Planning Practice Guidance states that "Safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so", while the NPPF states that defining a Mineral Safeguarding Area does not create a presumption that the resources defined will be worked (paragraph 143). Safeguarding a resource does not mean it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>This means that any other development, including perfectly legitimate development within a conservation area or designated landscape, must take account of the presence of the mineral at that site. While we are obliged to consider all areas as potential safeguarding areas, national policy and guidance allow us to define what would constitute suitable safeguarding areas for Worcestershire. We intend to develop robust policies that will ensure that there are no unacceptable adverse impacts on listed buildings, conservation areas or historic landscapes due to mineral safeguarding or any required extraction.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
i), j) and k) no minerals safeguarding areas should be allowed to impact on listed buildings and conservation areas.	The purpose of safeguarding policies is to ensure that mineral resources are not needlessly sterilised by other types of development. With regard to identifying mineral safeguarding areas in designated areas, the National Planning Practice Guidance states that "Safeguarding mineral resources should be defined in designated areas and urban areas where necessary to

Summary of comments	Initial officer response
	<p>do so", while the NPPF states that defining a Mineral Safeguarding Area does not create a presumption that the resources defined will be worked (paragraph 143). Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p>This means that any other development, including perfectly legitimate development within a conservation area or designated landscape, must take account of the presence of the mineral at that site. While we are obliged to consider all areas as potential safeguarding areas, national policy and guidance allow us to define what would constitute suitable safeguarding areas for Worcestershire. We intend to develop robust policies that will ensure that there are no unacceptable adverse impacts on listed buildings or historic landscapes due to mineral safeguarding or any required extraction. Items i), j) and k) in Table 26 are included as types of development which we think could take place without needlessly sterilising mineral resources.</p>
<i>Worcestershire Wildlife Trust</i>	B044-1081
We are pleased to support the proposed exemptions because they offer a sensible balance between needing to safeguard the minerals resource and creating undue burdens on District Councils and developers.	Support noted.
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
The South Worcestershire authorities do not think it would be appropriate to require all non-minerals development in Minerals Consultation Areas to be referred to the County Council because some types of development are unlikely to prevent future mineral working. It is considered that the proposed exemptions a to k would be appropriate.	Support for proposed exemptions noted.
<i>Wildmoor Residents Association</i>	B047-2295

Summary of comments	Initial officer response
(a) Areas that have had mineral extraction should be the responsibility of the County Council where there are different proposals for the development of the area within safeguarding areas. This should not be time limited to ensure the mpa has the overview.	The County Council is only responsible for "county matters", broadly this means applications for minerals, waste or the County Council's own development will be determined by the County Council. Applications for other types of development on former minerals sites are likely to be the responsibility of the relevant city, borough or district council to determine. However, you raise an interesting point and we will consider whether there is any opportunity available to us to incorporate your suggestions.
<p data-bbox="188 475 947 504"><i>Herefordshire and Worcestershire Earth Heritage Trust</i></p> <p data-bbox="188 510 925 609">Presumably, areas that are protected for conservation purposes (trees, listed buildings, etc would not be considered for mineral extraction anyway.</p>	<p data-bbox="992 475 1133 504">B048-800</p> <p data-bbox="992 510 2029 893">The purpose of safeguarding policies is to ensure that mineral resources are not needlessly sterilised by other types of development. With regard to identifying mineral safeguarding areas in designated areas, the National Planning Practice Guidance states that "Safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so", while the NPPF states that defining a Mineral Safeguarding Area does not create a presumption that the resources defined will be worked (paragraph 143). Safeguarding a resource does not mean that it would necessarily be appropriate to work minerals in these areas, or that they would ever be worked but it allows them to be assessed and protected if this is appropriate.</p> <p data-bbox="992 935 2045 1311">This means that any other development, including perfectly legitimate development within a conservation area or designated landscape, must take account of the presence of the mineral at that site. While we are obliged to consider all areas as potential safeguarding areas, national policy and guidance allow us to define what would constitute suitable safeguarding areas for Worcestershire. We intend to develop robust policies that will ensure that there are no unacceptable adverse impacts on listed buildings, conservation areas or historic landscapes due to mineral safeguarding or any required extraction. Items i), j) and k) in Table 26 are included as types of development which we think could take place without needlessly sterilising mineral resources.</p>
<p data-bbox="188 1327 562 1356"><i>WCC Environmental Policy</i></p> <p data-bbox="188 1362 954 1425">Support the exemptions except for K as this may impact on minerals restoration proposals</p>	<p data-bbox="992 1327 1151 1356">B059-2004</p> <p data-bbox="992 1362 2007 1425">Support for exemptions noted. Item k in Table 26 is included as a type of development which we think could take place without needlessly sterilising</p>

Summary of comments	Initial officer response
	mineral resources. However, you raise an interesting point and we will consider whether there is any opportunity available to incorporate your suggestions.
(Q37) If you think that there are other exemptions or additional considerations we should consider, please provide details.	
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
<p>Whilst it is recognised that viability can change over time, depending on the market price of minerals compared to the cost of extraction, it would be helpful if the Minerals Local Plan could indicate areas where minerals extraction is unlikely to be economically viable in the foreseeable future. These “unviable” deposits could also then be excluded from Mineral Consultation Areas and reduce the need for unnecessary consultations.</p> <p>Consideration should also be given to providing exemptions for sites allocated for development in adopted Local Plans.</p>	<p>We put forward three alternatives for safeguarding aggregates in consultation:</p> <ul style="list-style-type: none"> • Alternative a - to safeguard all resources mapped by BGS, • Alternative b - to safeguard all resources above 10ha in size and 200m wide, effectively "screening out" those which we think will be too small to be commercially viable • Alternative c – to safeguard the resources which we identified as "key" or "significant" through our analysis of resources, effectively screening out everything which we think is not likely to be viable, but risking some important deposits being lost due to lack of good data about the resource. <p>We think your suggestion most closely aligns to Alternative C, and we will consider this alongside other responses as we develop our approach.</p> <p>We are still developing our approach to safeguarding and we will consider your suggestion of including exemptions for specific allocated sites in adopted Local Plans.</p>

No comment responses:

<i>Natural England (Q36)</i>	B040-717
No comment	Noted.
<i>Natural England (Q37)</i>	B040-717
No comment	Noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comment	Noted.

Question 38: Do you have any other comments to make on the application of Mineral Consultation Areas and the requirement for prior extraction?

Summary of comments	Initial officer response
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
In accordance with the NPPF, the draft SWDP already includes a policy (SWDP32) to safeguard the use of minerals by consulting the County Council on proposals for development within Minerals Consultation Areas. Some of the broad areas of search proposed in the consultation document potentially overlap with proposed site allocations in the SWDP. The South Worcestershire authorities would welcome the opportunity to meet with officers responsible for developing the Minerals Local Plan to clarify the boundaries of the proposed areas of search.	We expect to refine the areas of search based on the comments received during this consultation, and we welcome the opportunity to discuss these boundaries and the implications of the SWDP site allocations with you.

No comment responses:

<i>Natural England</i>	B040-717
No comments	Noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comments	Noted.

Questions 39, 40 and 41: Approach to safeguarding infrastructure assets.

The National Planning Policy Framework sets out a range of infrastructure which supports mineral working that should also be safeguarded. Our approach to each of these assets is set out in Section 13.

Question 39: Do you support the proposed approach to safeguarding infrastructure assets: Existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials?

	Yes	No
Worcestershire is not a coastal county and there are currently no rail links to quarries in Worcestershire. We therefore do not propose to identify any rail or sea links to safeguard.	<input type="checkbox"/>	<input type="checkbox"/>
Wharfages exist at two mineral sites in the county. We propose to identify such facilities as assets which should be safeguarded. In general we propose to safeguard wharfages at hub/processing sites but not to safeguard wharfages at "satellite sites" which have been fully worked.	<input type="checkbox"/>	<input type="checkbox"/>

Question 40: Do you support the proposed approach to safeguarding infrastructure assets: Existing, planned and potential sites for concrete batching, the manufacturing of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material?

	Yes	No
Batching plants are not "County Matters", they are permitted and regulated by the District Councils (and the Environment Agency). We therefore do not current hold a database of concrete batching facilities. Further investigation is needed into the location of these assets. Once this information has been collated we propose to identify such facilities as assets which should be safeguarded.	<input type="checkbox"/>	<input type="checkbox"/>

We are not aware of any facilities in the county for the manufacturing of coated materials, or other concrete products. We therefore do not propose to identify any such facilities to safeguard. However, policies could safeguard any such developments permitted during the life of the plan.

Facilities for the handling, processing and distribution of recycled aggregate materials are safeguarded by policy WCS 16 in the Waste Core Strategy. We are not aware of any facilities for substitute or secondary aggregate materials. However, policies could safeguard any such developments permitted during the life of the plan.

Summary of comments	Initial officer response
(Q41) If you think that there are other potential assets or additional considerations which we should take into account, please provide details.	
<i>Mineral Products Association</i> The treatment given to rail in table 27 is plainly inadequate. Just because there are no current rail depots in the county does not mean that there never will be. On the contrary, if you proceed with this policy of not safeguarding sites, it will become a self-fulfilling prophecy that there are no rail depots. We believe that you need to examine all potential rail depot sites and then safeguard them. There cannot be many candidates and it would signal that the mpa was serious in seeking alternatives supply options should the required level of local aggregates not be realised.	B020-1899 nq Thank you for bringing the importance of considering safeguarding potential rail depot sites to our attention. We are preparing a background paper on rail transportation that should help address these issues. This paper will be available on our website in due course.
<i>Mr and Mrs Peter and Nicola Inchbald</i> Wharfages and Batching plants are only temporary structure and should be removed once the development has been completed at any one site. Their safeguarding may lead to a concentration of mineral extraction in a few areas contrary to NPPF.	B038-2286 We note your concerns about the possibility of unintentional concentration of workings. We intend that the policy framework will address cumulative impacts of workings, and we will consider how to take this forward and ensure that it applies to safeguarding as well. Batching plants and wharfages are two separate pieces of infrastructure. As stated on page 121 of the second stage consultation,

Summary of comments	Initial officer response
	<p>"Batching plants are not 'county matters', they are permitted and regulated by the District Councils and the Environment Agency". We are preparing a background paper on batching plants in the county that will inform the future policy, including safeguarding of these assets.</p> <p>Wharfages currently exist at two mineral sites in the county and are proposed in a further application at Holdfast (Cemex, 2011). The current application for this site proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry. The Second Stage Consultation proposes to "safeguard wharfages at hub/processing sites but not to safeguard wharfages at 'satellite sites' which have been fully worked". We hope that this approach will allow us to maximise the use of existing infrastructure.</p> <p>We agree that the safeguarding of these assets could potentially be time-limited and we will be considering the best way of taking this forward.</p>
<i>Mrs Christine Daniell</i>	B037-2396
Batching plants should be removed at the end of development as wharfages are temporary.	<p>Batching plants and wharfages are two separate pieces of infrastructure. As stated on page 121 of the second stage consultation, "Batching plants are not 'county matters', they are permitted and regulated by the District Councils and the Environment Agency". We are preparing a background paper on batching plants in the county that will inform the future policy, including safeguarding of these assets.</p> <p>Wharfages currently exist at two mineral sites in the county and are proposed in a further application at Holdfast (Cemex, 2011). The current application for this site proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry. The Second Stage Consultation proposes to "safeguard wharfages at hub/processing sites but not to safeguard wharfages at 'satellite sites' which have been fully worked". We hope that this approach will allow us to maximise the use of existing</p>

Summary of comments	Initial officer response
	<p>infrastructure.</p> <p>We agree that the safeguarding of these assets could potentially be time-limited and we will be considering the best way of taking this forward.</p>
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>Wharfages only useful during the life of the development should be removed once workings complete.</p>	<p>Wharfages currently exist at two mineral sites in the county and are proposed in a further application at Holdfast (Cemex, 2011). The current application for this site proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry. The Second Stage Consultation proposes to "safeguard wharfages at hub/processing sites but not to safeguard wharfages at 'satellite sites' which have been fully worked". We hope that this approach will allow us to maximise the use of existing infrastructure.</p> <p>We agree that the safeguarding of these assets could potentially be time-limited and we will be considering the best way of taking this forward.</p>
<i>Wildmoor Residents Association</i>	B047-2295
<p>Facilities for handling, processing & distribution of recycled aggregate materials should not require policies to safeguard in the MLP. Policies in relation to these aspects can be found with the WCS and should be kept to with the MPA retaining the overview.</p>	<p>Agreed, this is noted in Table 27.</p>
<i>Heaton Planning Ltd on behalf of Lafarge Tarmac</i>	B050-1504A
<p>The Plan should be clear that if a concrete batching plant or asphalt plant are located within an operational quarry then the County Council are usually the determining authority.</p>	<p>We agree that where concrete or asphalt batching plant are located within an operational quarry this would usually be considered "ancillary" to the quarry and the County Council is likely to be the determining authority. We will need to consider how safeguarding requirements differ between this scenario and any plant located on industrial land. We are preparing a background paper on concrete batching plants that will inform the future policy, including safeguarding these assets.</p>

Summary of comments	Initial officer response
<p><i>Mrs Pat Harries</i></p> <p>Wharfeage & Batching Plants should relate to the life of the development & should then be removed.</p>	<p>B060-2399</p> <p>Batching plants and wharfages are two separate pieces of infrastructure. As stated on page 121 of the second stage consultation, "Batching plants are not 'county matters', they are permitted and regulated by the District Councils and the Environment Agency". We are preparing a background paper on concrete batching plants in the county that will inform the future policy, including safeguarding of these assets.</p> <p>Wharfages currently exist at two mineral sites in the county and are proposed in a further application at Holdfast (Cemex, 2011). The current application for this site proposes to install a temporary wharf for the minerals to be removed by barge along the River Severn to the existing processing facility at Ryall Quarry. The Second Stage Consultation proposes to "safeguard wharfages at hub/processing sites but not to safeguard wharfages at 'satellite sites' which have been fully worked". We hope that this approach will allow us to maximise the use of existing infrastructure.</p> <p>We agree that the safeguarding of these assets could potentially be time-limited and we will be considering the best way of taking this forward.</p>

No comment responses:

<i>Natural England</i>	B040-717
No comments	Noted.
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comment	Noted

Questions 42 and 43: Policy development for safeguarding infrastructure assets

We propose to develop a policy that addresses safeguarding appropriate infrastructure assets. However, we think that it would be inappropriate to prevent all development, and we have set out in Section 13 the issues which a policy might address and where development might be considered appropriate.

Question 42: Do you support the policy issues identified?

Assets to be safeguarded: Policies could be developed to safeguard infrastructure assets from development on or adjacent to the asset and could state that the County Council would oppose proposals and will expect District Councils to refuse permission on the grounds that it would compromise the achievement of the Minerals Local Plan. This could specify the kinds of infrastructure assets to be safeguarded.

Yes No

Circumstances where development might be appropriate: Policies could set out circumstances where development on or adjacent to infrastructure assets might be considered appropriate, such as:

- where the proposed development would not prevent, hinder or unreasonably restrict the operation of the infrastructure asset;
- where there is no longer a need for the infrastructure asset;
- where suitable alternative provision for the infrastructure asset is made.

Summary of comments	Initial officer response
(Q42) Please give details of any additional considerations which should inform either of these issues.	
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
It is not clear what infrastructure assets the proposed policy would seek to safeguard or the implications of such a policy. The South Worcestershire authorities would like clarification on the purpose of the proposed policy and would wish to be involved in the development of any such policy, particularly	Noted. In keeping with the NPPF, pages 115 and 121 of the Second Stage Consultation document lists the following types of infrastructure as assets to be considered for safeguarding: - existing, planned and potential rail heads and rail links to quarries - wharfage and associated storage, handling and processing facilities

Summary of comments	Initial officer response
<p>as it would involve planning applications determined by the District Councils.</p>	<p>for the bulk transport of minerals</p> <ul style="list-style-type: none"> - existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material. <p>These assets are also listed in questions 39 and 40 of the consultation questionnaire. The purpose of safeguarding is set out in the National Planning Practice Guidance which states that "minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance". It goes on to state that safeguarding infrastructure sites is important as it ensures that "sites for these purposes [storage, handling and transport] are available should they be needed; and [to] prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes" (Paragraphs 002 and 006). We agree that District Councils have an important role to play in these types of applications, and we welcome your input in assisting with the development of these safeguarding policies.</p>
<p>(Q43) If you think that there are other issues or additional considerations which we should take into account regarding safeguarding infrastructure assets, please provide details.</p>	
<p><i>Severn Trent Water</i></p>	<p>B021-1688 nq</p>
<p>Although it is likely that the Environment Agency will offer guidance regarding the consequences and safeguards of development it would be appreciated if you could keep STW informed of the issues raised and the steps in place to identify the potential impact to the SPZs.</p>	<p>Noted and agreed. We will keep you informed of next steps in the process.</p>
<p><i>WCC Environmental Policy</i></p>	<p>B059-2004</p>
<p>Refer to response to Q25</p>	<p>Please refer to our response to <i>WCC Environmental Policy</i> in question 25 above .</p>

No comment responses:

<i>Natural England (Q42)</i>	B040-717
No comments	Noted
<i>Worcestershire Wildlife Trust (Q42)</i>	B044-1081
No comment	Noted
<i>Natural England (Q43)</i>	B040-717
No comments	Noted
<i>Worcestershire Wildlife Trust (Q43)</i>	B044-1081
No comment	Noted

Section 14: Next Steps

In Section 14 we set out the steps we will take following this consultation and what we intend to include in the next consultation.

Question 44: Are there any other matters you think we need to address in the next consultation?

Summary of comments	Initial officer response
<p><i>Centre for Radiation, Chemical and Environmental Hazards</i></p> <p>The Centre for Radiation, Chemical and Environmental Hazards (CRCE) is part of Public Health England (PHE). We are aware from your main consultation document (Objective 7: Protect and Enhance Health Amenity) that you will be considering the following areas:</p> <ul style="list-style-type: none"> • Air quality • Dust • Noise • Vibration and seismic instability • Visual intrusion • Light pollution • Safety • Public rights of way • Access and informal recreation <p>We note that individual proposals will address the above issues on a site by site basis, an approach we support. We look forward to receiving and reviewing individual proposals in due course.</p>	<p>B015-2387 nq</p> <p>Support for general approach noted, thank you.</p>
<p><i>Marine Management Organisation</i></p> <p>Although Worcestershire County Council does not fall within tidal reach aggregate activity may take place, such as transport of minerals for use via inland waterways, to or from, the marine environment. The MMO would</p>	<p>B016-2190 nq</p> <p>Marine-dredged minerals are mentioned in the safeguarding section of the consultation document in the context of the need to safeguard "...<i>storage, handling and processing facilities for the bulk transport by rail, sea, or inland waterways of minerals, including recycled, secondary and marine-dredged</i></p>

Summary of comments	Initial officer response
<p>therefore recommend reference to marine aggregates be included within the minerals plan and highlights three documents for consideration:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. <p>The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, such as Worcestershire, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>	<p><i>minerals".</i></p> <p>Other respondents have requested that we include more information about the origins of Worcestershire's supply of aggregates and the importance of regional and national flows. We agree that we may need to include a reference to the role that imported (ie. from outside Worcestershire) marine sourced aggregates play in ensuring Worcestershire's supply.</p> <p>The Local Aggregates Assessment for Worcestershire 2013⁴⁹ includes consideration of marine-won aggregate imports, and we will ensure that future reviews continue to consider the role of marine-sourced supplies.</p>
<p><i>Worcestershire Archive and Archaeology Service Service</i></p>	<p>B031-509</p>
<p>General comments WAAS agrees that the document is welcome and in terms of addressing the historic environment (HE), is</p>	<p>Noted, thank you.</p>

⁴⁹ Available on our website www.worcestershire.gov.uk/mineralsbackground

Summary of comments	Initial officer response
<p>going to be valuable tool in the identification, management and understanding of the historic environment in the county. We have identified a few small points that need clarifications, correction or improvement, some of which have been covered in the questions above.</p> <p>We also have the following observations regarding the document: Section 10.5 Additional Information and guidance: The reference to Archaeology and Aggregates in Worcestershire should have the link to the report added http://archaeologydataservice.ac.uk/archives/view/worcsagg_eh_2007/</p> <p>Appendix 2 Avon Corridor: Central (p142): Can we check the priority figure in Table 7 – it looks low. I would have expected more than half?</p>	<p>Noted and agreed.</p> <p>The portion of the Avon Corridor: Central area of search to the north of the river, around Fladbury, Lower Moor and Upper Moor, is shown as having high potential for the presence of heritage assets, but the portion to the south of the river (more than half of the area of search) is shown as having medium potential, and therefore the historic environment was deemed to be a significant component for this area of search, rather than a determining factor. We hope that this type of variability across an area of search will be highlighted and able to be addressed, whichever option is taken forward for driving the delivery of the restoration priorities.</p> <p>We are aware that some further work needs to be undertaken to refine the methodology, particularly with regard to the Historic Environment and we look forward to working with you on this. In addition, following the comments received in response to this consultation, we are likely to need to make some changes to the areas of search. The restoration profiles will be updated accordingly.</p>

Summary of comments	Initial officer response
<p>Junction 4a: Central (p238). Table 7 gives priority 2 to HE but summary table on Table 1 (p233) shows it as Priority 1 as does table in main text (Table 12).</p> <p>Note Junction 4a: South and Junction 4a: North are both scored priority 1. This looks a little high to me (given low evidence base – unless the latter has been used as a 'safety-net criteria' when setting priorities as seems to be the case for the three Stour Corridor areas) We can provide more dynamic archaeological pictures for the document if this is useful.</p> <p>Overall the integration of the Historic Environment (HE) is excellent. One issue that recurs throughout, however, is the mixing or splitting of terminology that could create confusion and needs to be addressed now. The term "Historic Environment" is probably good to stick with as the general coverall, however, it's confusing to refer to "Heritage Assets" and "Archaeological Features" as distinct entities. The mix of terms is evident throughout the document, but particularly focused in the HE section (pages 61-63) and we have advised alternate wording in the question responses above.</p>	<p>Thank you for bringing this to our attention. You are correct in stating that Table 7 on page 238 shows the Historic Environment as a significant component for the Junction 4a Corridor: Central and that Table 1 on page 233 and Table 12 on page 68 show the Historic Environment as a determining factor. We have checked the data and this should have been shown as a determining factor in all parts of the document.</p> <p>Following the comments received in response to this consultation, we are likely to need to make some changes to the areas of search and some of the methodologies used. The restoration profiles will be updated accordingly.</p> <p>Noted. The priorities were based on the proportion of the area of search which were categorised in each Character Zone in the Historic Environment Assessment, although this was a visual assessment of proportion rather than by digital analysis. We are aware that some further work needs to be undertaken to refine the methodology, particularly with regard to the Historic Environment. More information about these areas would be useful, and we look forward to working with you on this. In addition, following the comments received in response to this consultation, we are likely to need to make some changes to the areas of search. The restoration profiles will be updated accordingly.</p> <p>Noted. Thank you for your suggestions about re-wording these terms for consistency and accuracy.</p>

Summary of comments	Initial officer response
<p>The diagram (below) <i>[this refers to figure 6a: high level strategic restoration priorities, which first appears on page 21 of the Second Stage Consultation]</i> appears a number of times, and also needs editing to reflect my points set out above. I'm not convinced "Historic Landscape Character" should be a separate term, but I can see how along with "Heritage Assets" it nests below "Historic Environment". I suggest removing "Archaeological Features" from the diagram for the reasons already stated. That will leave "Historic Environment" as the higher level term with "Heritage Assets" and "Historic Landscape Character" (the setting of heritage assets) below.</p> <p>Assuming there will be a glossary, then a definition of "Heritage Assets" can be included to clarify the intricacies, but keeping the use of representative terminology simple. (Example of amendments diagram in original emailed comments.)</p>	<p>Noted. We will take your suggestions about re-wording these terms into account.</p> <p>Noted and agreed. The inclusion of a glossary is a good suggestion.</p>
<p><i>Mr Adrian Buckmaster</i></p>	<p>B032-2394</p>
<p>It is to be expected that you will have many concerns if you do not address the proximity to dwellings. There seems nothing about how close excavation might be to houses unless it becomes unsafe.</p>	<p>Whilst we understand that proximity of a mineral working to schools or houses (often termed "sensitive receptors" in planning jargon) can cause concern, we don't think that imposing arbitrary distances is the best way to address the issues. We think that it is better to ensure proper controls are in place to ensure that any potential impacts (such as noise or dust) are minimised or mitigated, whatever the distance from "sensitive receptors". The adopted Hereford and Worcester Minerals Local Plan contained a policy which required "A buffer strip of 200m from the boundary of a potential working area to the nearest main walls of the nearest property in a settlement group of 6 or more dwellings", but we now think that a buffer strip is only one method by which impacts can be managed. It is not, in itself, supported by national policy, and does not provide for consideration of impacts beyond the buffer distance. We think that if appropriate working practices are adopted working reasonably close to properties may not have an adverse impact.</p>

Summary of comments	Initial officer response
	<p>This will be dependent on both the physical features of the site (including topography, planting, predominant wind direction) and the working practices (including the number of days and hours of operation), and these issues need to be taken into account. Instead of setting a minimum distance we think it is more appropriate to require applicants to demonstrate that there will be no unacceptable adverse impacts on properties or "sensitive receptors". The distance and size thresholds which were used in the adopted Minerals Local Plan are not clearly justified and practical application of the existing policy has always been a challenge, particularly when determining whether properties in more remote areas should be considered a cluster of 6. (See Appendix 1 of the Second Stage Consultation Document for more information).</p>
<p><i>Tewkesbury Borough Council</i></p>	<p>B036-703</p>
<p>Some of the maps set out in the document are very difficult to read in places (for example, but not exclusively, those on pgs. 13, 14, 52, 55, 56, 118). Larger maps with a better quality resolution showing more context should be included in future consultations.</p> <p>Notwithstanding the NPPF (para 145), the strategy of identifying areas of search, rather than specific sites or preferred areas, means there is a difficulty in making detailed comments regarding the potential impacts on our administrative area if working were to take place.</p> <p>It is also unclear whether the plan is deliverable in terms of landowner/industry interest in working any of the areas identified.</p>	<p>Noted and agreed. We are aware that the mapped information on mineral resources may not have been as easy to follow as we hoped, and we will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have. We agree that larger maps and better quality resolution will also be required for those unable to use web-based mapping.</p> <p>Following the results of this consultation we think we may need to refine the areas of search and we will consider ways of doing this based on feedback received during this consultation. We anticipate that these revised areas will contain further detail, and these will be consulted on in due course.</p> <p>We have tried to address viability through analysis of mineral resources, and we have asked industry and landowners to help us identify viable deposits by giving us the evidence that we need. You may refer to responses in section 11 of this document, specifically question 22 where respondents have proposed sites they would like us to consider. Issues of economic viability are primarily determined by the minerals industry as they ultimately decide whether a site contains deposits that are viable enough to merit submitting an application. However, viability can change over time, depending on the</p>

Summary of comments	Initial officer response
	<p>market price of minerals compared to the cost of extraction, and therefore we must ensure that the Minerals Local Plan recognises the potential future value and need for the mineral, and not just whether it is considered viable in the current climate.</p> <p>We will give specific consideration to issues of deliverability in the next consultation document.</p>
<i>Mr and Mrs Peter and Nicola Inchbald</i>	B038-2286
<p>We consider that the Areas of Search need to be considerably reduced to reflect the environmental constraints within the County.</p> <p>Detailed implementation policies are required for the public to see HOW a restoration led approach may work in practice.</p> <p>These documents are quite confusing and the figurative plans are difficult to read.</p>	<p>The approach proposed in the Second Stage Consultation aimed to establish "areas of search" by grouping resources into areas which could provide green infrastructure gains through restoration, and highlight which issues might be most relevant for each area of search. Following the results of this consultation we think we may need to refine the areas of search and we will consider ways of doing this based on feedback received during this consultation.</p> <p>We agree that detailed implementation policies and plans are required. This consultation set out the options that we thought were potential ways forward. The next consultation will contain draft policies which will address these issues in more detail, and should provide the clarification you seek. We will develop the plan taking into account the comments we have received, and we are considering several ways to further refine the areas of search which may include spatial masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach. We intend that setting out the restoration priorities in this way will usefully highlight the issues that applicants will need to consider and that these will directly influence the way the site is designed, during both the working and restoration phases.</p> <p>We are sorry that you found the documents confusing and difficult to read.</p> <p>We produced a summary document which was composed of extracts from the main consultation document and gave an overview of the issues the new Minerals Local Plan will address and how we used the comments we</p>

Summary of comments	Initial officer response
	<p>received on the first consultation on the Minerals Local Plan to develop the approaches proposed. We hoped that the summary document would provide an overview and enough information to help people decide which sections they wanted to look at in more detail. However, the issues which the Minerals Local Plan needs to address are complex and we realise that some of the areas we are consulting on require specialist knowledge. For that reason, we included a variety of question types in the consultation, including tick boxes and free-answer boxes where respondents can give us more information. We are sorry that you feel the documents were confusing, but we hope that the next consultation draft will provide additional clarity. Developing the Minerals Local Plan will ultimately involve a series of consultations and meetings with various stakeholder groups to reach the final version of the plan.</p> <p>We agree that the scale of the maps and figures presented in the draft consultation does not allow for precise identification of the areas of search and we are aware that the mapped information on mineral resources may not have been as easy to follow as we hoped. We will be looking into developing a web-based mapping tool for the next stage of consultation, but whether we are able to do this will depend on the terms of the data licences we have. We agree that larger maps and better quality resolution will also be required for those unable to use web-based mapping.</p>
<p><i>Mrs Christine Daniell</i></p> <p>The area of search should be much reduced to those with less constraints and with good access. Concentrating on these areas and producing proper, accurate information is paramount. The miscalculations of the Holdfast/Queenhill proposal highlight just how wrong a blanket, less detailed, approach can be.</p>	<p>B037-2396</p> <p>The approach proposed in the Second Stage Consultation aimed to establish "areas of search" by grouping resources into areas which could provide green infrastructure gains through restoration, and highlight which issues might be most relevant for each area of search. Following the results of this consultation we think we may need to refine the areas of search and we will consider ways of doing this based on feedback received during this consultation.</p> <p>The area which is the subject of a current planning application at Holdfast (Cemex, 2011) falls within the wider deposit area mapped by the British</p>

Summary of comments	Initial officer response
	Geological Survey which we have assessed as resource area 19/7 in the Analysis of Mineral Resources in Worcestershire, October 2013 ⁵⁰ . We will revisit this assessment to ensure our estimates are as accurate as possible in determining whether the deposit should be considered significant and incorporated in an area of search.
<i>Longdon Queenhill and Holdfast Parish Council</i>	B041-595
<p>Yes – significantly reduced areas of search to reflect the constraints outlined above. An intermediate stage between Areas of Search and Restoration Priorities.</p> <p>Introduction of Comparative testing between Areas identified. Detailed Implementation Policies Retention of Sieve Test including the Buffer Zone around residential properties.</p>	<p>The approach proposed in the Second Stage Consultation aimed to establish "areas of search" by grouping resources into areas which could provide green infrastructure gains through restoration, and highlight which issues might be most relevant for each area of search.</p> <p>Your suggestion of an 'intermediate' stage between Areas of Search and Restoration Priorities is interesting. We will be refining the areas of search based on the feedback received during this consultation and we are considering several ways of taking this forward including spatial masterplanning, concept planning, or 'corridor plans' in order to better convey the restoration-led approach.</p> <p>We think that most of the criteria previously used as "sieve" test, such as those you mention, can no longer be seen as absolute constraints, and we would prefer to take a positive approach to refining areas by where most benefit can be gained and where the information on deliverability is most robust, rather than screening areas "out". Please refer to our responses to your previous comments regarding the sieve test and buffer zones for more detail on these issues.</p>
<i>South Worcestershire Authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council)</i>	B046-681,1623, 683 B
The Second Consultation document indicates that the County Council will continue to cooperate with neighbouring authorities. The South Worcestershire authorities wish to highlight the importance of effective	Noted and agreed.

⁵⁰ Available on www.worcestershire.gov.uk/mineralsbackground.

Summary of comments	Initial officer response
engagement with authorities within Worcestershire in the preparation of the draft Minerals Local Plan in advance of the next consultation	
<i>Wildmoor Residents Association</i>	B047-2295
<p>Appendix I detailing constraints in the new approach compared to the previous MLP has not been considered sufficiently in this consultation.</p> <p>Although it is probably too late to change the approach real consultation where people / organisations can prioritise their priorities would be a great improvement not merely rubber stamping issues which cannot be argued against.</p>	<p>Noted. Please see our response to your other comments on Appendix 1.</p> <p>Asking people to prioritise issues formed part of the workshop we held on the first stage of consultation in November 2012. We found this to be useful at the very early stage of developing the plan and the direction we should take, but at this stage we think that each of these issues deserves to be considered and policies developed to ensure they are adequately addressed. Prioritising the issues would risk undervaluing the importance of some of the issues. We were more concerned at this stage to ensure we had captured all of the aspects relating to each issue to be developed in detailed policies, and we have had some very useful responses to this consultation.</p> <p>Open days were held for the Second Stage Consultation to allow residents and local groups the opportunity to engage with the consultation and ask questions of the officers developing the plan.</p>
<i>Malvern Hills AONB Partnership</i>	B049-802B
Much more consideration needs to be given to potential impacts on AONBs.	<p>We agree that we will need to give careful consideration to potential impacts that minerals extraction may have on the AONBs in the county, but as detailed on page 125 (appendix 1), mineral working is not specifically excluded from AONBs or any other designated landscape under current National Policy.</p> <p>Site-specific location policies will ensure that the natural beauty of the Cotswolds AONB and Malvern Hills AONB is conserved and enhanced.</p> <p>We are still engaging in discussions with neighbouring mineral planning authorities regarding several important issues, and we are actively discussing the issue of crushed rock provision with them to establish whether there are any other avenues available for provision of Worcestershire's</p>

Summary of comments	Initial officer response
<p>We would welcome a meeting with County Council officers as soon as possible to discuss AONB issues in more detail.</p>	<p>crushed rock requirements from outside of the AONBs.</p> <p>We recognise that this is a major issue for both the Cotswolds AONB and the Malvern Hills AONB and that we have yet to satisfactorily address your concerns. We will continue to work on this in the coming months and hope that the next draft plan will provide additional clarity on this issue.</p> <p>Noted and agreed.</p>
<i>Environment Agency</i>	B058-719
<p>We would welcome early discussion/consultation on emerging policy wording/base.</p>	<p>Noted and agreed. The next consultation stage will include draft policy wording for comment.</p>
<i>Mrs Pat Harries</i>	B060-2399
<p>Reduce the areas of search to those with less environmental constraint & good access to major roads & motorways</p>	<p>Following this consultation we realise that we will need to refine areas of search and we are considering ways of taking this forward based on feedback received during this consultation.</p> <p>Sustainable transport is an issue that will be addressed through policy criteria, and we are preparing background documents on transport which will consider these issues in more depth and inform the development of draft policies for the next consultation. We have also received comments from the Highways Agency (please refer to our response to them in question 24) regarding the Strategic Road Network in Worcestershire. We agree that the transportation section may require further refinement.</p>

No comment responses:

<i>Natural England</i>	B040-717
No comments	Noted
<i>Worcestershire Wildlife Trust</i>	B044-1081
No comments.	Noted.
<i>WCC Environmental Policy</i>	B059-2004
None	Noted.

Other comments and no comment responses

This section contains feedback received from organisations with no comment or that did not fit into the categories above.

Summary of comments	Initial officer response
<p><i>Civil Aviation Authority</i></p> <p>While the CAA has a duty to provide aviation safety advice when requested, it is not a statutory consultee for planning applications (unless its own property is affected). In order to reduce the time devoted to unnecessary consultations, the following guidance aims to clarify requirements.</p> <p>Other than the consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about:</p> <ul style="list-style-type: none"> • Strategic Planning Documents (e.g. Local Development Framework and Core Strategy documents) other than those with direct aviation involvement (e.g. Regional Renewable Energy Plans); • Waste Plans; • Screening Options; • Low-rise structures, including telecommunication masts. With the exception of wind turbine developments, the CAA is unlikely to have any meaningful input related to applications associated with structures of a height of 100 feet or less that are situated away from aerodromes or other landing sites; • Orders affecting Rights of Way or Footpaths; • Sub-surface developments; • General planning applications not affecting CAA property. • Solar Photovoltaic Panels (SPV) 	<p>B001-863 nq</p> <p>Noted. Your guidance has been passed to the appropriate individuals in our Development Control team.</p>

Summary of comments	Initial officer response
<p>In all cases where the above might affect an airport, the airport operator is the appropriate consultee. Where the above might affect a NATS installation the consultee is:</p> <p>NATS Mailbox 27 NATS Corporate and Technical Centre 4000 Parkway Whiteley, Fareham Hants PO15 7FL</p> <p>Please be advised that we will no longer respond to future correspondence received regarding the above subjects. Where consultation is required under Section 110 of the Localism Act 2011 the CAA will only respond to specific questions (but will nevertheless record the receipt of all consultations).</p> <p>It is necessary to consult the CAA in the following situations:</p> <ul style="list-style-type: none"> • When a Local Planning Authority is minded to grant permission for a development to which a statutorily safeguarded airport or NATS Plc has objected, write to: Aerodrome and Air Traffic Standards Division Civil Aviation Authority Aviation House Gatwick Airport West Sussex RH6 0YR • When a Local Planning Authority is considering a proposed development involving wind turbines, write to: Renewal Energy Project Officer Directorate of Airspace Policy Civil Aviation Authority 	

Summary of comments	Initial officer response
<p>CAA House 45-59 Kingsway London WC2B 6TE email: windfarms@caa.co.uk (preferred option)</p> <ul style="list-style-type: none"> When a development involves structures of a height of 90 metres or more, lasers or floodlights, write to: Off Route Airspace 5 Directorate of Airspace Policy Civil Aviation Authority CAA House 45-59 Kingsway London WC2B 6TE Email: marks.smailes@caa.co.uk <p>Further information on consultation requirements can be found on the CAA website, including document entitled Guidance on CAA Planning Consultation Requirements.</p> <p>Further information on Solar Photovoltaic Panels can be found on the CAA website including document entitled Guidance on Photovoltaic systems.</p> <p>Please could you ensure that your Planning Officers are aware of these principles and the revised policy and that any associated procedures are amended with immediate effect.</p>	
<i>Wyre Forest District Council</i>	B007-1968 nq
<p>The District Council will be undertaking a plan review commencing with an issues and options consultation in Summer 2015. It is important that the implications of the Minerals Local Plan are considered, particularly for any site specific allocations. The County Council will be consulted as part of this process. Under the Duty to Cooperate, the District</p>	<p>Support noted, thank you. We welcome your input regarding site specific allocations and the next consultation draft.</p>

Summary of comments	Initial officer response
<p>Council is committed to working with the County Council throughout the plan preparation process.</p> <p>In summary, the District Council is supportive of the Worcestershire Minerals Local Plan Second Consultation. The Council reserves the right to submit more detailed comments at the next stage of consultation which it is understood will set out more detailed proposals.</p>	
<i>Cotswolds Conservation Board</i>	B006-740 nq
<p>Table 5 includes: <i>“bb. Landscape – the consideration of landscape character [and scenic beauty²] will be an important factor in this issue. Designations such as Areas of Outstanding Natural Beauty will also have an influence on working practices and site design.”</i></p> <p>2 – (Bold text above) Board’s suggested wording to be included, in accordance with NPPF 115.</p>	Suggested change in wording noted.
<i>Cotswolds Conservation Board</i>	B006-740 nq
<p>Paragraph 10.5 should include reference to AONB Management Plans. The Cotswolds AONB Management Plan is referred to in paragraph 7.2.</p>	<p>Paragraph 10.5 was a list of documents and guidance which were brought to our attention during the first stage of consultation on the Minerals Local Plan, rather than a comprehensive list of the documents which have informed our approach so far. However, we note your suggestion and will refer to the AONB management plans as appropriate in developing the Plan.</p>
<i>Worcestershire Regulatory Services</i>	B008-689 nq
<p>Table 24, page 111 under amenity and later on page 112 under sustainable transport needs amending. AQMAs must be considered and all traffic generated from any mineral working should avoid AQMAs or potential AQMA sites as discussed above.</p>	Noted and agreed.

Summary of comments	Initial officer response
<p><i>WCC Environmental Policy</i></p> <p>Having been involved in the emergence of this document from the outset, the Council's Environmental Policy team are fully supportive of the landscape-led approach that underlies it.</p> <p>General responses:</p> <ol style="list-style-type: none"> 1. Figure 5 is difficult to understand. 2. Fig 7 - unclear how the over-arching restoration priorities have been arrived at. 3. I fully support Fig 8 but the path for industrial and energy minerals is not clear. 4. 10.4 very difficult to understand, this applies to other paras where this diagram has been used. 5. 10.5 Add the Worcestershire Landscape Character Assessment and web address http://www.worcestershire.gov.uk/cms/landscape-character-assessment.aspx 	<p>B059-2004</p> <p>Support noted.</p> <p>Figure 5 (page 18) was presented in this manner in order to avoid inadvertently presenting one issue as more important than another by placing the issues in list or table form. We felt that graphically, the "wordle" approach gave each issue equal weight. This is not likely to appear in the final Plan.</p> <p>Section 12 explains the restoration-led approach in detail, and an explanation is provided for each priority, setting out the approach to developing restoration priorities in the Spatial Strategy. Figure 7 (page 22) is the spatial strategy presented as part of the draft vision of the plan.</p> <p>We are sorry that you did not find Figure 8 clear. We expect that the next stage of consultation will set out our proposals and draft policy wording. We hope that this will provide the clarification you seek.</p> <p>Noted. We have used this means of presenting the issues identified in the previous consultation in order to avoid giving artificial or unintentional weight to any one item by not placing them in a list. This is not likely to appear in the final Plan.</p> <p>Paragraph 10.5 was a list of documents and guidance which were brought to our attention during the first stage of consultation on the Minerals Local Plan, rather than a comprehensive list of the documents which have informed our approach so far. However, we note your suggestion and will refer to the Worcestershire Landscape Character Assessment as appropriate in developing the Plan.</p>

Summary of comments	Initial officer response
6. Page 42, Natural & Historic Environment z. Add battlefields and historic parks and gardens. Also add these to similar paras eg. page 62, q.	Revised wording noted.
7. 11.25 part of text obscured.	Noted. We apologise for this formatting error. Please refer to our response to Tewkesbury Borough Council who raised this under question 23.
8. Fig 24 and table 12 - should we include a mention of visual impact (& Fig 27)	Yes. This has been brought up by other respondents and we intend to revise wording appropriately.

No Comment Responses:

Summary of comments	Initial officer response
<i>Harborough District Council</i>	B002-2242 nq
No comments at this time	Noted
<i>Hereford and Worcester Fire and Rescue</i>	B009-1945 nq
Further to your letter dated 11 November 2013, I confirm with reference to legislative fire safety requirements, the Fire and Rescue Service have no comments to make at this stage with regard to the proposed development. Full consultation will take place under Building Regulations following a full plan submission.	Noted
<i>Warwickshire County Council</i>	B026-704 nq
Thank you for consulting Warwickshire County Council on the above plan. I can confirm that at this stage, Warwickshire do not wish to make any comments.	Noted
<i>East of England Aggregates Working Party</i>	B027-2214nq
I was informed of your request to Essex County Council, who formerly undertook the Secretariat role, for the AWP to comment on the above Plan a week ago. The meeting of the AWP was held on Wednesday 29 th January 2014 and the WMLP was discussed at that meeting. I have been asked to make the following comment to you:	Noted

Summary of comments	Initial officer response
<p><i>Notwithstanding any comments that individual members of the AWP may make on the Plan, the EEAWP does not believe that the content of this Plan will have any significant impact on the AWP area and, therefore, does not have any real comment to make.</i></p>	
<p><i>Trish Haines, Worcestershire County Council Chief Executive</i></p>	<p>B055-508 nq</p>
<p>No comments</p>	<p>Noted</p>
<p><i>Tewkesbury Environmental Health</i></p>	<p>B056-711 nq</p>
<p>With reference to the Minerals: Second Stage Consultation. Environmental Health has no comment to make on the proposals, however I should advise you that the contact details you have are rather out of date. Please update your records with the following contact details:</p> <p>Mr David Steels Environmental Health Manager Tewkesbury Borough Council Council Offices Gloucester Road Tewkesbury GL20 5TT david.steels@tewkesbury.gov.uk</p>	<p>Noted, we have updated our consultation database accordingly.</p>
<p><i>Sandwell Metropolitan Borough Council</i></p>	<p>B012-697B nq</p>
<p>Thank you for your email. The online questionnaire was sent in error, before I had chance to look at the questions. I have now had a chance to look at them and have no comments to make, therefore Sandwell acknowledges the consultant.</p>	<p>Noted.</p>
<p><i>Network Rail</i></p>	<p>B061-1944</p>
<p>It is appreciated that at this stage the Minerals Local Plan is an outline document identifying areas where these developments are to take place, therefore there is no specific information for us to comment on at present. When such site specific information is available please will you ensure that this department is consulted on the proposals in order to pass comment to protect the railway infrastructure.</p> <p>During consideration of any specific areas, please will you give consideration to rail borne transport to and from site as an alternative to road transport.</p> <p>Many thanks for informing us of your proposal.</p>	<p>Noted.</p> <p>Support for rail-borne transport noted. We are preparing background documents looking at transport issues, including water and rail transport, and would like to encourage sustainable modes of transport where possible.</p>