

# Worcestershire Minerals Local Plan

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## Response Document:

- Call for Sites 2014
- Call for Sites, Resources and Infrastructure 2015
- Consultation on Background Documents 2015

## February 2016

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Contact: Marianne Joynes,  
Worcestershire County Council, Strategic Planning and  
Environmental Policy, Economy and Infrastructure Directorate,  
County Hall, Spetchley Road, Worcester, WR5 2NP  
Email: [minerals@worcestershire.gov.uk](mailto:minerals@worcestershire.gov.uk)  
Tel: 01905 766734

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# Introduction

The council ran an initial "Call for Sites" consultation in summer 2014 (focused on aggregate minerals) with a further expanded Call for Sites consultation (for potential sites for all mineral types, as well as mineral resources and essential infrastructure that supports mineral working which should be safeguarded) taking place in summer 2015. These were designed to give landowners and operators an opportunity to submit specific sites to be considered in the new Minerals Local Plan. The consultation in summer 2015 also included opportunity to comment on background evidence documents.

This document sets out the Council's initial response to the submissions received as part of these consultations. All responses received up to the close of the consultation on 22<sup>nd</sup> August 2014 for the first call for sites consultation and 25<sup>th</sup> September 2015 for the second call for sites consultation have been included as a matter of priority. Submissions made after the second consultation closed have been accepted, with a final deadline of 27<sup>th</sup> November 2015 set for late submissions.

The document is organised in two parts:

- specific site proposals, and
- general points and responses to background evidence documents.

# Summary of responses

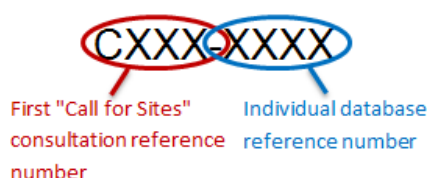
Some specific site allocations were received as part of the Second Stage Consultation; these have already been set out in the Second Stage Consultation Response Document which is available at:

[www.worcestershire.gov.uk/download/downloads/id/521/minerals\\_local\\_plan\\_second\\_stage\\_consultation\\_responses.pdf](http://www.worcestershire.gov.uk/download/downloads/id/521/minerals_local_plan_second_stage_consultation_responses.pdf)

## Notes on how the responses section is organised

The responses section includes all responses received. Original copies of the responses can be viewed on request.

Each response was allocated an individual response reference number in the format CXXX-XXXX. Responses to the second "Call for Sites" are in the format DXXX-XXXX.



Further copies of this document are available on our website [www.worcestershire.gov.uk/minerals](http://www.worcestershire.gov.uk/minerals), or on request.

If you would like any further details please contact:

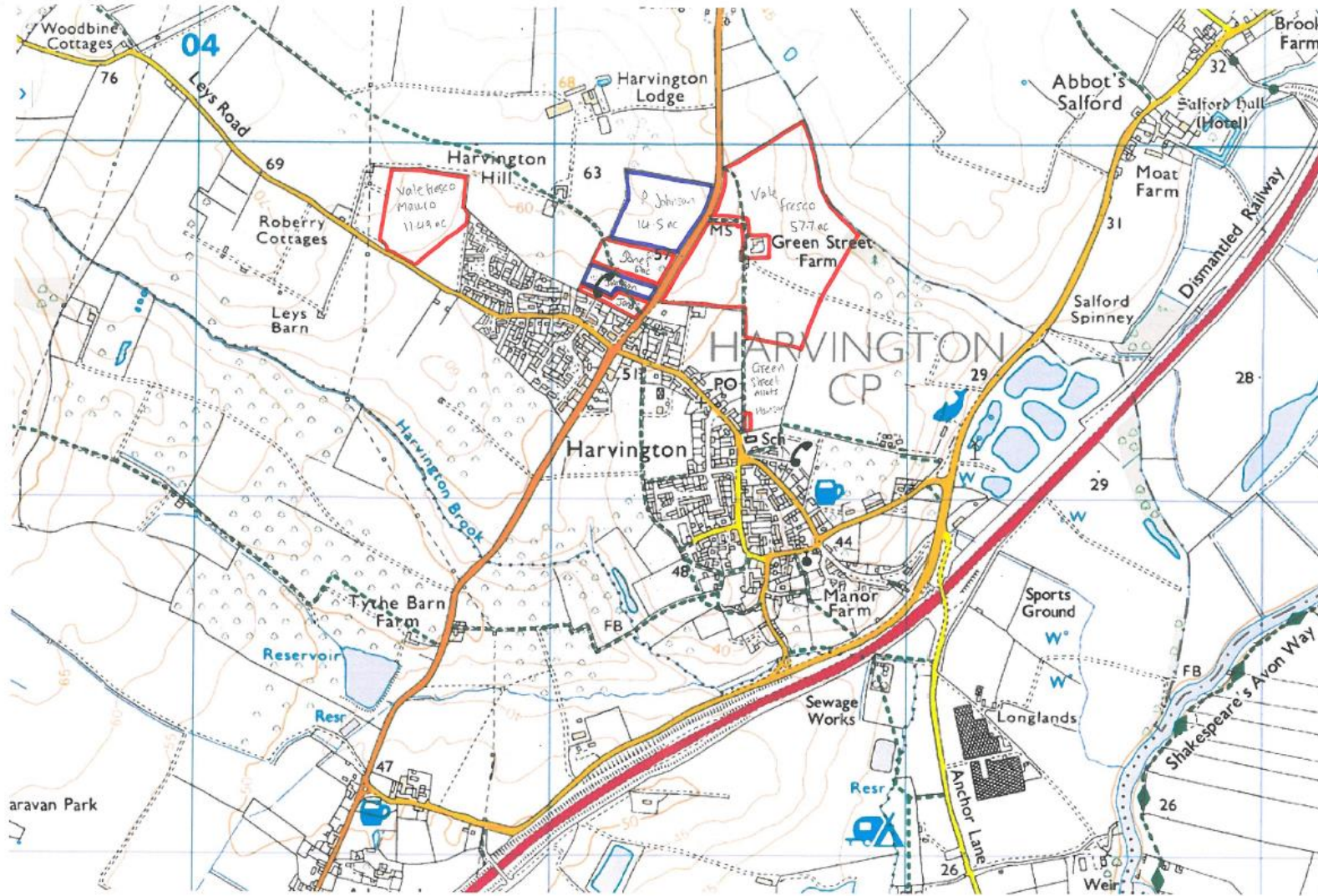
Marianne Joynes  
Principal Planner (Minerals and Waste Policy)  
Economy and Infrastructure Directorate  
County Hall  
Spetchley Road  
Worcester  
WR5 2NP  
01905 766374

[minerals@worcestershire.gov.uk](mailto:minerals@worcestershire.gov.uk)

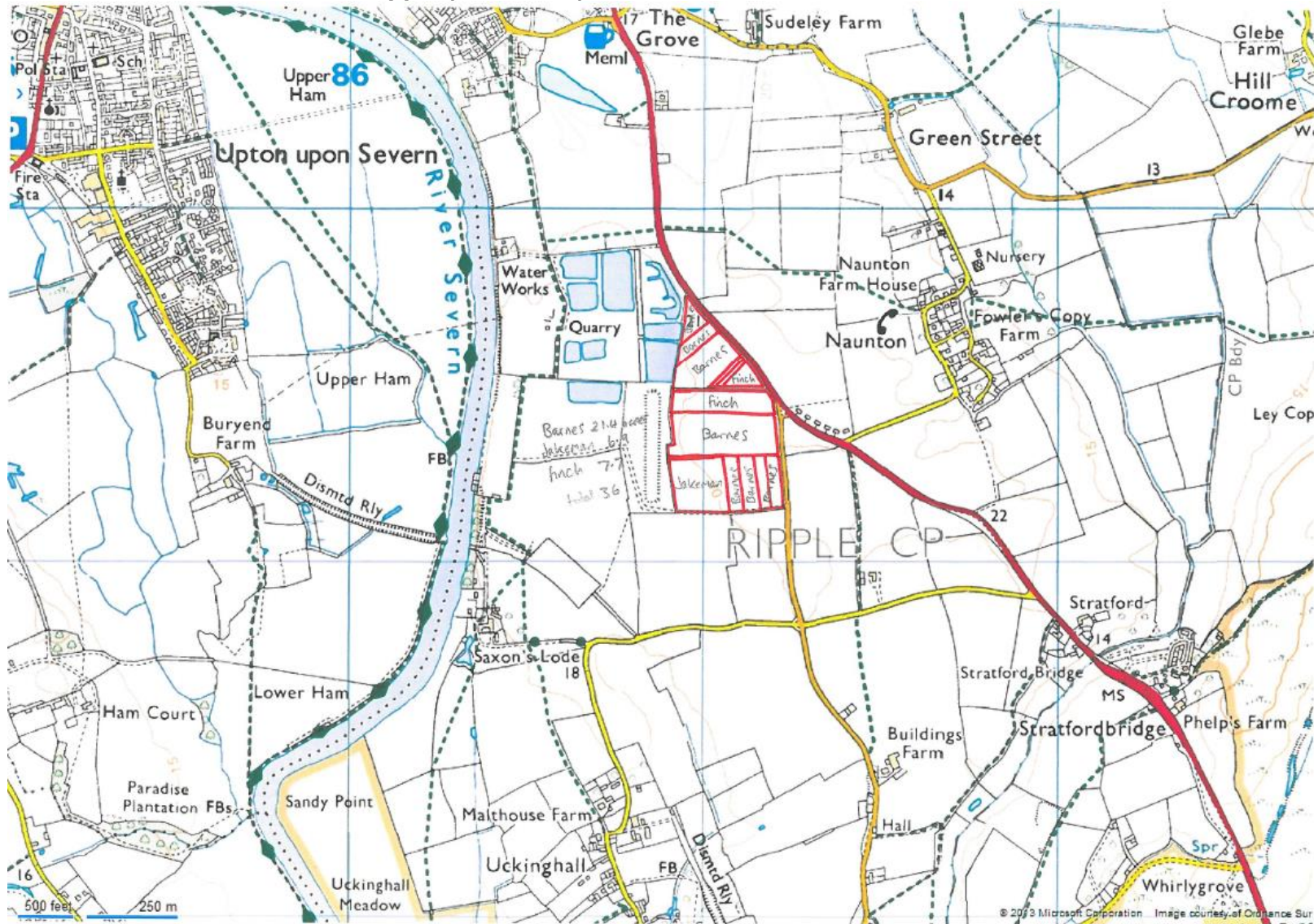
# Site Submissions

| Summary of comments   | Initial officer response  |
|---|---|
| <p data-bbox="188 394 483 421"><b>Diocese of Worcester</b></p> <p data-bbox="188 430 461 458"><b>First Call for Sites:</b></p> <p data-bbox="188 467 1429 564">Further to your letter to the Worcester Diocesan Board of Finance Limited regarding mineral sites in Worcestershire, I enclose plans and details of the sites under their ownership to be considered for mineral extraction.</p> <p data-bbox="188 608 1285 673">We are the agent acting for the Diocese of Worcester who manage their land and properties.</p> <p data-bbox="188 715 1339 742">Below are the details of the five sites/areas we believe suitable for mineral extraction:</p> <ol data-bbox="237 786 1205 959" style="list-style-type: none"> <li>1. Harvington, Evesham – Approximately 99.65 acres of land (see attached plan)</li> <li>2. Ripple – Approximately 37.62 acres (see attached plan)</li> <li>3. Severn Stoke – Approximately 28.07 acres (see attached plan)</li> <li>4. Wolverley – Approximately 205.77 acres (see attached plan)</li> <li>5. Ombersley – Approximately 100.24 acres (see attached plan)</li> </ol> <p data-bbox="188 1000 1361 1066">All the above sites are owned by the Worcester Diocesan Board of Finance Limited c/o Halls (Midlands) LLP, 4 Foregate Street, Worcester WR1 1DB</p> <p data-bbox="188 1107 748 1134">All sites have access off public highways.</p> <p data-bbox="188 1176 1346 1241">Sites are shown on the British geological map for minerals of Hereford and Worcester contain substantial gravel and sand deposits.</p> <p data-bbox="188 1283 1196 1310">If you require any further information, please do not hesitate to contact me.</p> | <p data-bbox="1462 394 1619 421"><b>C015-1157</b></p> <p data-bbox="1462 430 2047 488">Thank you for your response, submitting sites for consideration at:</p> <ul data-bbox="1462 496 1738 654" style="list-style-type: none"> <li>- Harvington, Evesham</li> <li>- Ripple</li> <li>- Severn Stoke</li> <li>- Wolverley</li> <li>- Ombersley</li> </ul> <p data-bbox="1462 691 2051 962">Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed.</p> |

Diocese of Worcester sites at Harvington, Evesham (C015-1157)

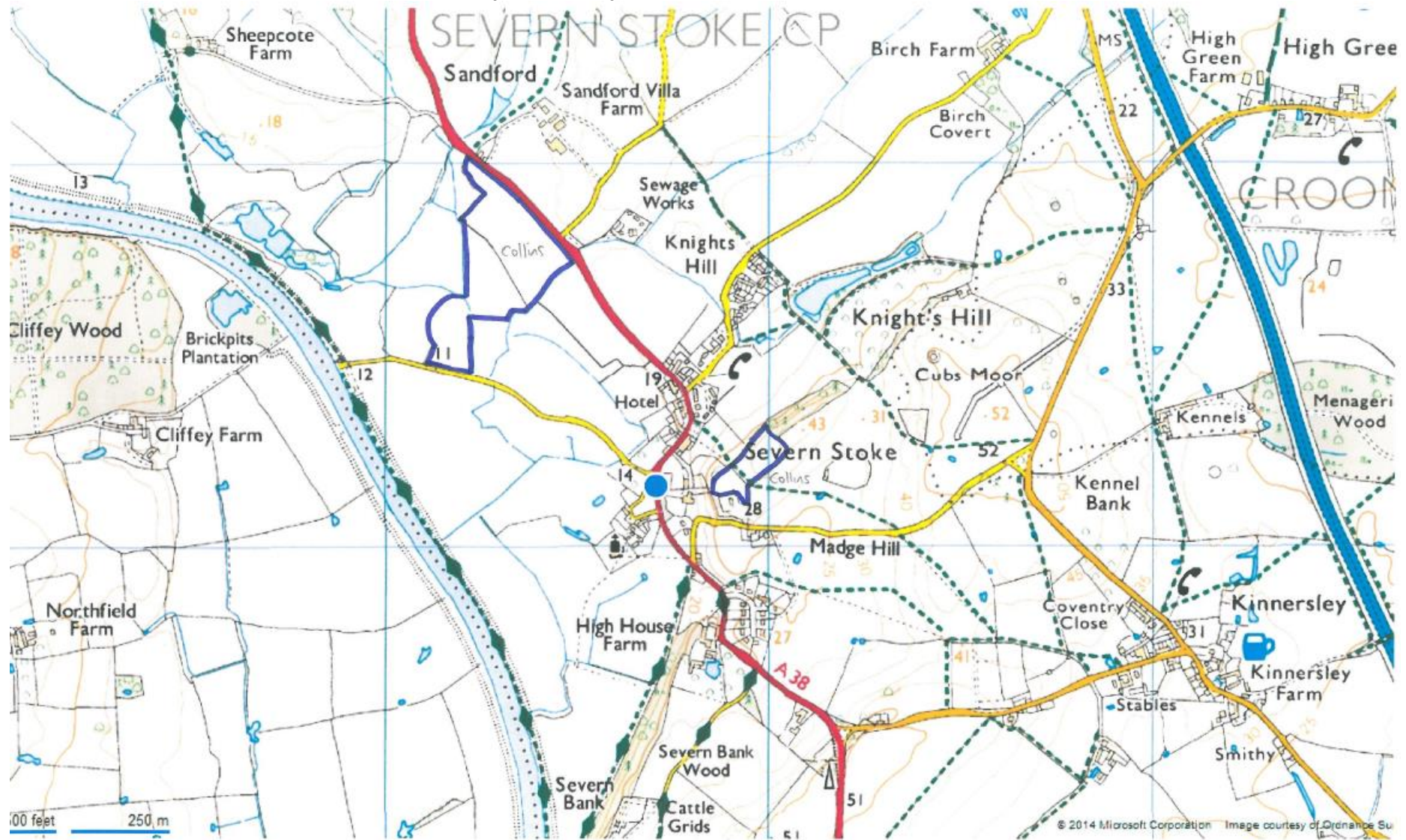


Diocese of Worcester sites at Ripple (C015-1157)

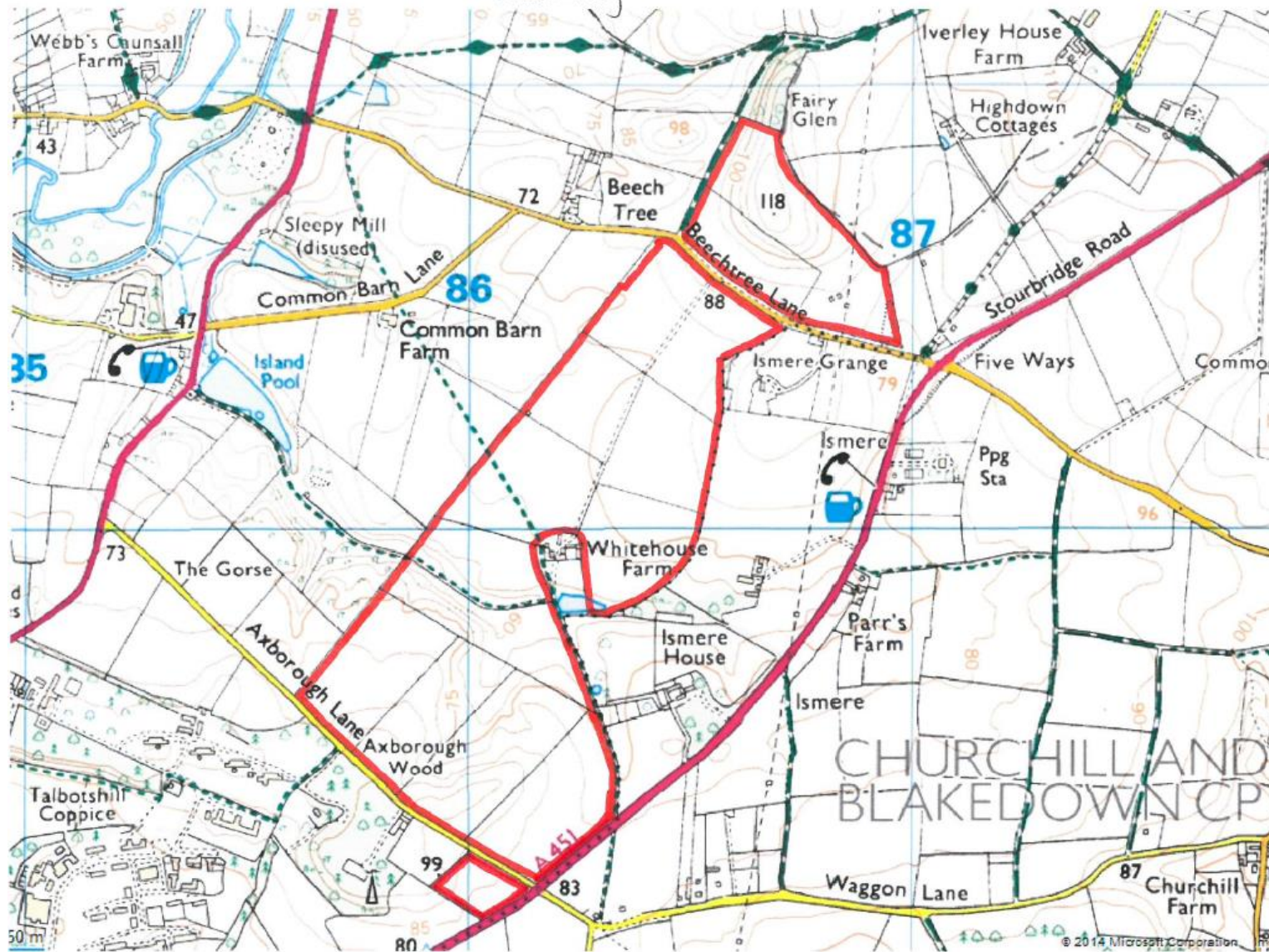




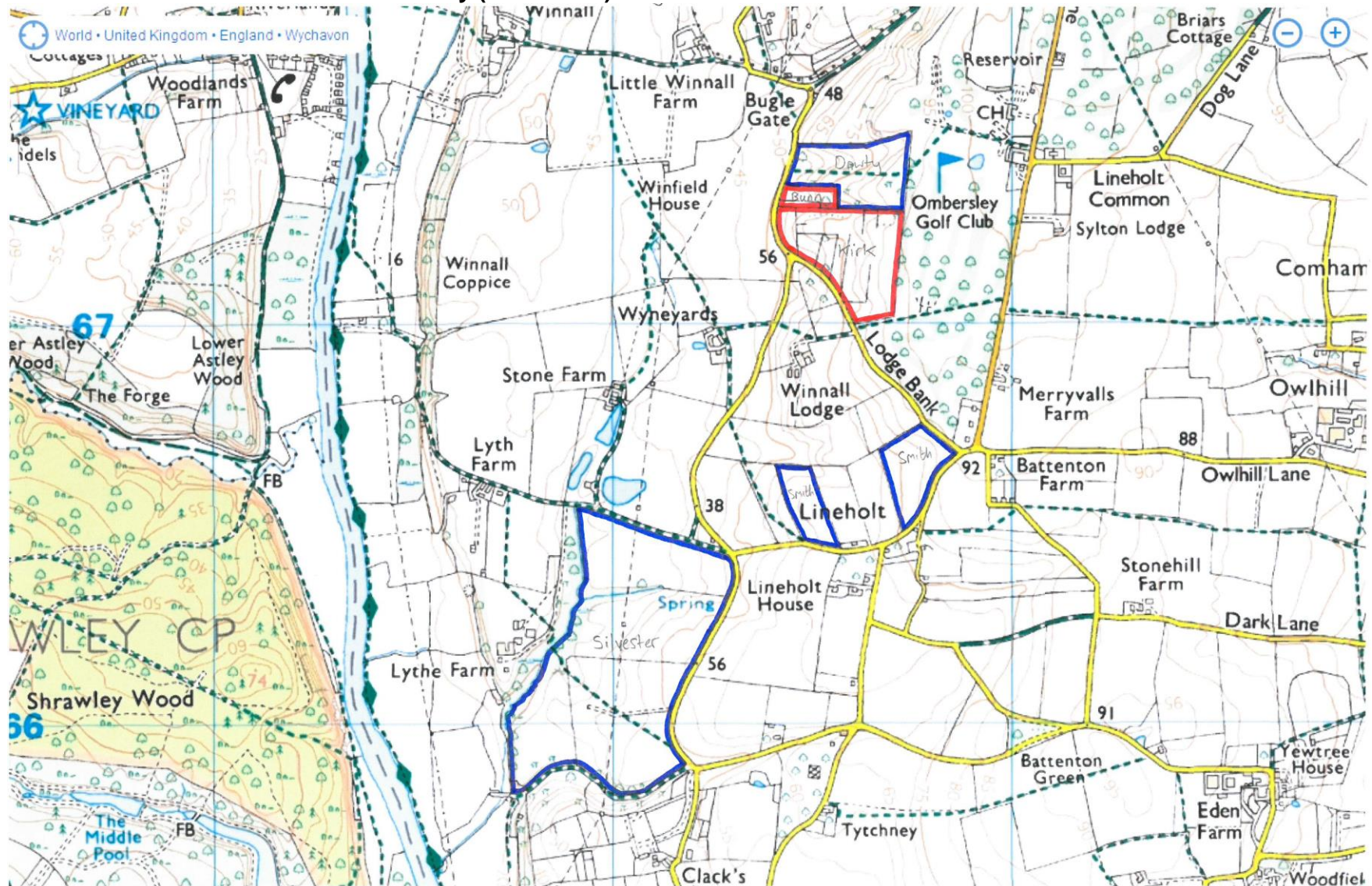
Diocese of Worcester sites at Severn Stoke (C015-1157)



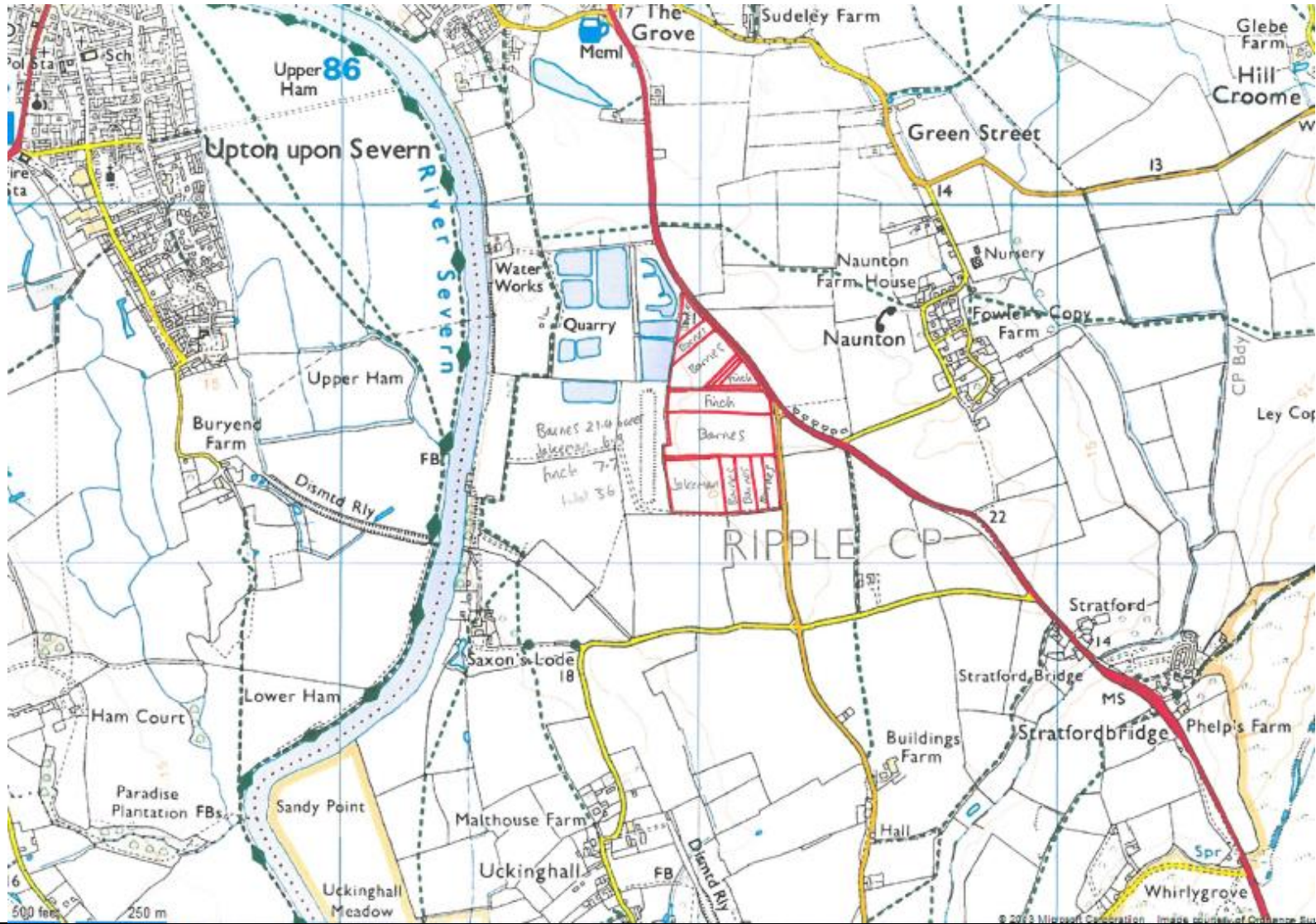
Diocese of Worcester sites at Wolverley (C015-1157)



### Diocese of Worcester sites at Ombersley (C015-1157)

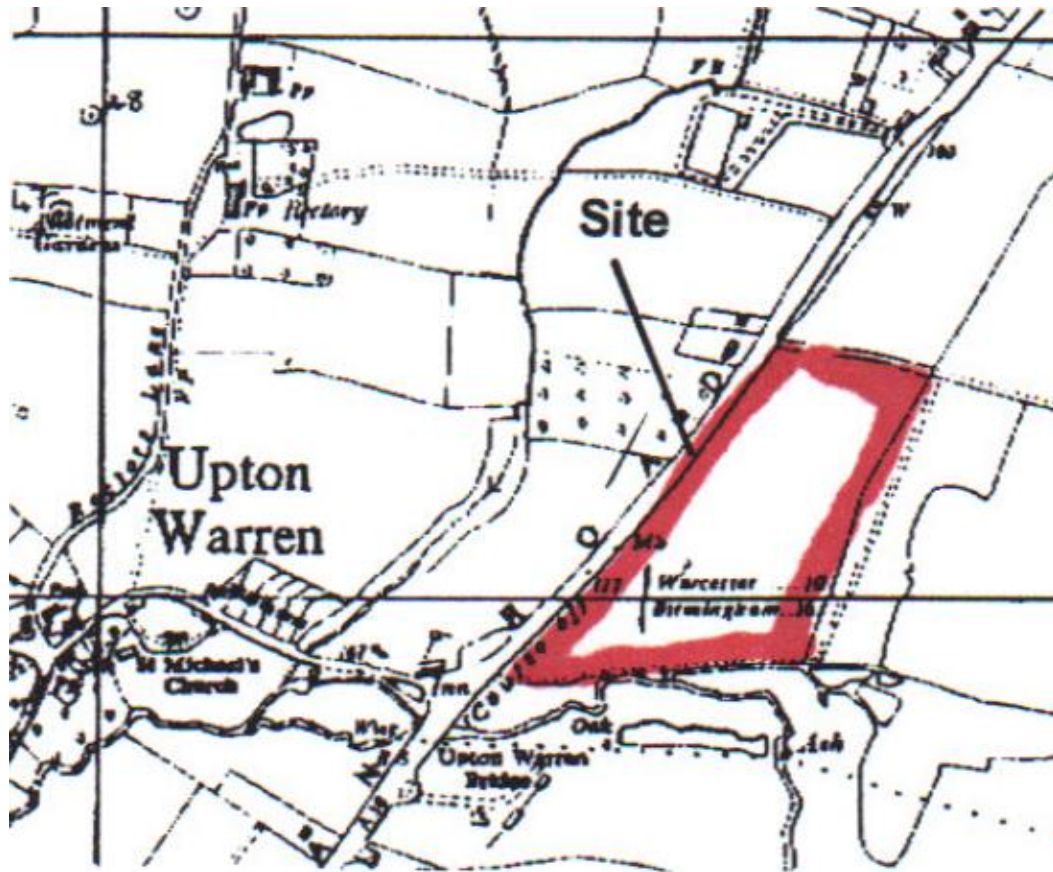


| Diocese of Worcester   | D015-1157   |
|--|---|
| <p><b>Second Call for Sites (D015-1157):</b><br/>I understand that the deadline for the call for mineral sites within Worcestershire has been extended until 25th September 2015.</p> <p>We have recently had strong interest in one of our sites in Ripple from Cemex, who have carried out a trial pitting program on the land to identify its suitability for Mineral extraction. They have estimate that there is approximately 420,000 to 700,000 tonnes of sand and gravel present based on an average of 2-3 metre thickness across the site.</p> <p>Cemex contact details are as follows:</p> <p>Cemex House, Abbots Park, Monks Way, Preston Brook, Nr Runcorn, Cheshire, WA7 3GH.</p> <p>The land is owned by the Worcester Diocesan Board of Finance Limited, c/o Hall (Midlands) LLP, 1 Kings Court, Charles Hastings Way, Worcester, WR5 1JR.</p> <p>The site would be access off the main road and via the neighbouring Cemex Ryall Quarry site. As the site lies adjacent to a current Cemex quarry, it is an ideal site for them to use as expansion. Material on the site will most likely be processed at the neighbouring Ryall site. Once all mineral working has completed, Cemex will reinstate the land to its previous condition.</p> <p>I attach two plans of the land, one OS map and one plan provided by Cemex.</p> <p>Cemex will also be submitting evidence for this site to be included in the mineral plan themselves.</p> <p>Please do not hesitate to contact me if you require any further information.</p> | <p>Thank you for this additional information regarding the site you submitted at Ripple (see C015-1157 above).</p> <p>This will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed.</p> |



|  |                  |
|--|------------------|
| <p>Hanbury Marquees</p>  | <p>C011-2411</p> |
| <p>Please find the attached Mineral evaluation for Greenfields Farm, Upton Warren,</p> |                  |

| Hanbury Marquees   | C011-2411  |
|--|--|
| <p>Bromsgrove, Worcestershire, B617EZ. The field (of 15acres) in question is about 200 yards from Webbs Garden Centre on the A38 in Upton Warren. (The attached report includes a plan)</p> <p>The anticipated recoverable mineral tonnage is 142,000 tonnes</p> <p>Tim Dunkley and myself (Sandra Hudson) are the landowners and we would both support mineral workings. We would be happy to be left with a hole for conversion into a fishing lake if this was deemed acceptable and/or would take advice from you on this.</p> <p>The site is accessed by the A38 Road</p> <p>We would take advice on the processing options.</p> <p>Please can you confirm receipt of this and please do not hesitate to contact us if you require any further information</p> <p>We look forward to hearing from you soon.</p> | <p>Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, submitting a site for consideration at Greenfields Farm.</p> <p>Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed</p> |



Scale c. 1/10000

Tony Rowley Associates Ltd

D009-2296

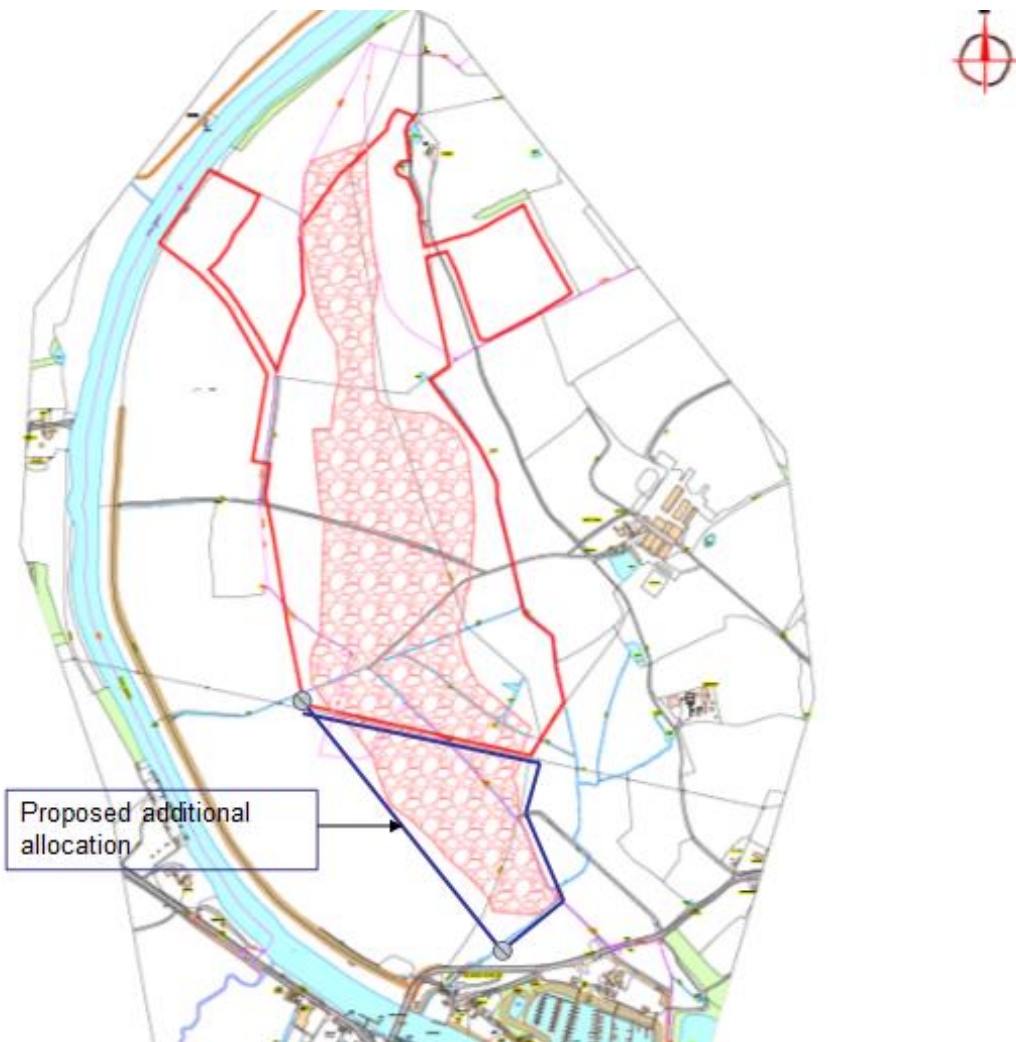
I act on behalf of the Surman family in connection with sand and gravel bearing land at Ryall Court Farm, Ryall, Upton upon Severn.

Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, submitting a site for consideration at Ryall Court Farm.

In response to your consultation and call for sites I forward details of the land at Ryall Court Farm which I would request that you consider as a proposed allocation in the

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| Tony Rowley Associates Ltd  | D009-2296   |
| <p>draft Worcestershire MLP, I also forward additional information as follows:</p> <ul style="list-style-type: none"> <li>• Location plan attached;</li> <li>• Quantity of minerals is some 400,000 tonnes of sand and gravel. I have some borehole information on this site but also see the geological information supplied by Cemex on the planning application for the adjoining land to the north;</li> <li>• Cemex propose to work the sand and gravel on the main site to the north subject to planning permission and the proposed allocation is seen as an extension to this site. Confirmation has been received from Cemex that they wish to conclude negotiations for a lease of the Surman land;</li> <li>• The Surman family own the land in question and other land included in the Cemex planning application site. In addition the Surman family farm the remainder of the land in the application site;</li> <li>• The Surman family are happy with proposals put forward by the Upton Rowing Club and others including local councils for the site to be restored to a water based leisure after-use;</li> <li>• It is proposed that sand and gravel is removed from the site by barge using the River Severn. Other light servicing traffic required during mineral extraction and as required for after-use can be gained from the Upton Road;</li> <li>• Processing of sand and gravel would take place at the main Ryall Quarry with material transported from this site by barge.</li> </ul> <p>I trust the foregoing information is of interest. Should you wish to discuss any matters arising from this submission please do not hesitate to contact me. I am happy to meet at County Hall if you feel this may be of benefit.</p> | <p>Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed</p> |



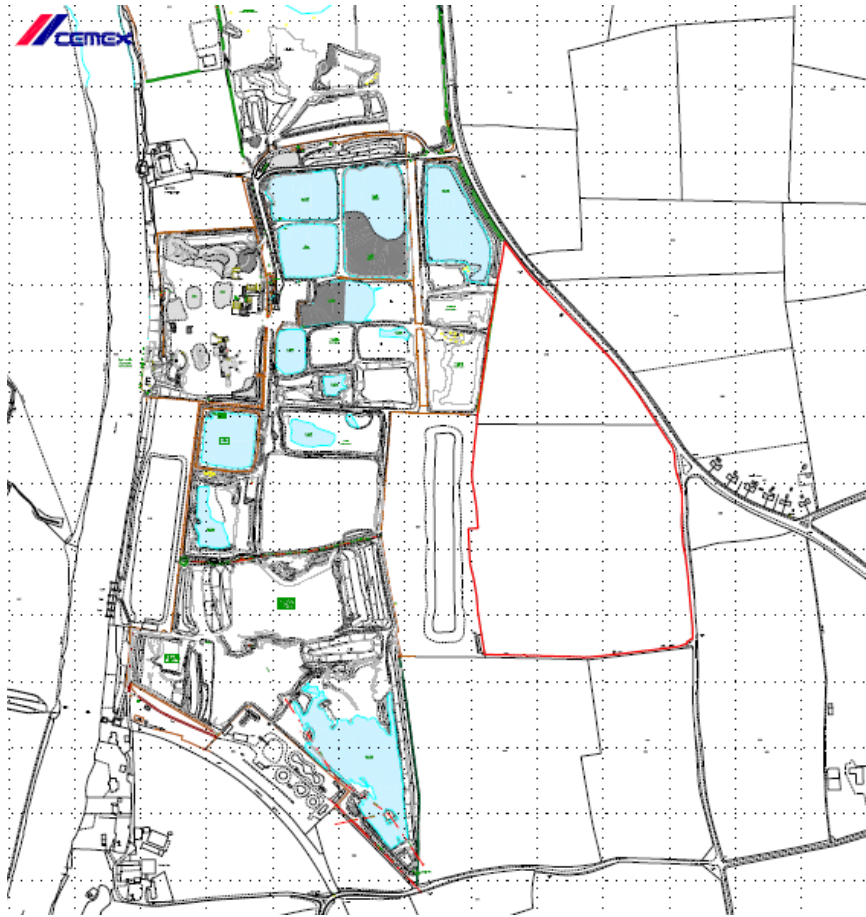


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| Cemex  | D020-1793  |
| Further to the above CEMEX UK Operations Ltd., acting on behalf of CEMEX UK Materials Ltd., wish to identify three sites which it considers may contain, subject to further field work assessment, a commercially viable sand and gravel resource. These | Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, |

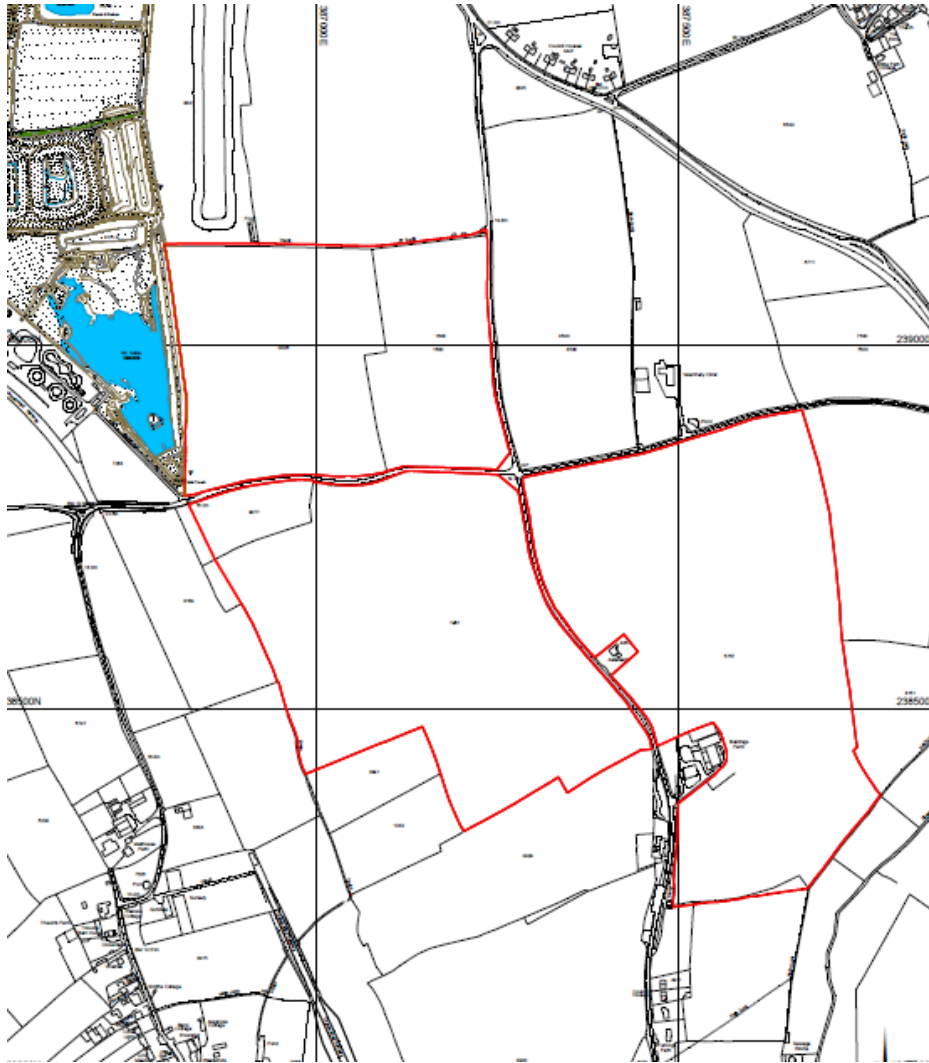
| Cemex  | D020-1793   |
|--|---|
| <p>sites are Ryall East, Land NE of Uckinghall and Land South of Ryall North.</p> <p>Ryall East</p> <p>The extent of this potential sand and gravel resource is illustrated by drawing no. 15_C020_RYL_003, attached. It has been subject to a physical assessment to prove the presence and quality of the mineral, and while this assessment is ongoing, preliminary findings indicate the site may contain in the region of 750 000 tonnes of commercially recoverable sand and gravel. This material is of a quality suitable for the production of a wide range of course and fine aggregate products, and for use in the manufacture of concrete. It is not proposed that the site be worked as a 'stand alone' operation given the potential size of the potential deposit, rather that it be worked as an extension to the Company's adjacent Ryall House Farm Quarry operation, with 'as raised' material hauled over land to the existing aggregate processing facility. At current rates of production the site would contain sufficient material to maintain sales from the Ryall House Farm site for three years. Restoration would be likely to be back to agricultural use, possibly at a lower level. It is expected that the assessment of the reserve will have been completed during October; the Company is happy to pass this work onto the Minerals Planning Authority in support of this submission when it becomes available.</p> <p>Land NE of Uckinghall Lane</p> <p>The extent of this potential sand and gravel resource is illustrated by drawing no. 15-S125-WORCS-D-002, attached. It has been subject to a preliminary desk top assessment to prove the presence of the mineral; findings indicate the site may contain in the region of 1 million tonnes of commercially recoverable sand and gravel. This material appears to be of a quality suitable for the production of a wide range of course and fine aggregate products, and for use in the manufacture of concrete. It is not proposed that the site be worked as a 'stand alone' operation given the potential size of the potential deposit, rather that it be worked as an extension to the Company's adjacent Ryall House Farm Quarry operation, with 'as raised' material hauled over land to the existing aggregate processing facility. At current rates of production the</p> | <p>submitting sites for consideration at Ryall East, Land North East of Uckinghall and Land South of Ryall North.</p> <p>Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed</p> |

| Cemex   | D020-1793 |
|---|-----------|
| <p>site would contain sufficient material to maintain sales from the Ryall House Farm site for four years. Restoration would be likely to be back to agricultural use, possibly at a lower level. The Company is currently considering undertaking a field based assessment of the initial desk top work to provide a more robust evidence base regards the potential resource; it expects this to be available by the end of 2015.</p> <p>Land South of Ryall North</p> <p>The extent of this potential sand and gravel resource is illustrated by drawing no. 14_C060_RYLN_013, attached. It has been subject to a desk top assessment to prove the presence of the mineral; preliminary findings indicate the site could contain in the region of 300 000 tonnes of commercially recoverable sand and gravel. It is not proposed that the site be worked as a 'stand alone' operation given the potential size of the potential deposit, rather that it be worked as an extension to the Company's adjacent Ryall House Farm Quarry operation, with 'as raised' material transported by river barge to the existing aggregate processing facility utilising the infrastructure currently proposed as part of the Ryall North Quarry development proposal. At current rates of production the site would contain sufficient material to maintain sales from the Ryall House Farm site for an additional year, or 8 years when coupled to the existing Ryall North proposal to which this site would form a natural extension. Restoration would be likely to be water based; the Company has been advised previously by the Upton-upon-Severn Rowing Club that the water body that could be created by working the proposed site in conjunction with the Ryall North proposal would allow for the creation of a 1km long competition rowing lake, which would be the only such facility in the West Midlands region . There appears to be a body of support for the provision of such a facility from both local educational establishments and national sporting bodies. The Company is currently considering undertaking a field based assessment of the initial desk top work to provide a more robust evidence base regards the potential resource; it expects this to be available by the end of 2015.</p> |           |

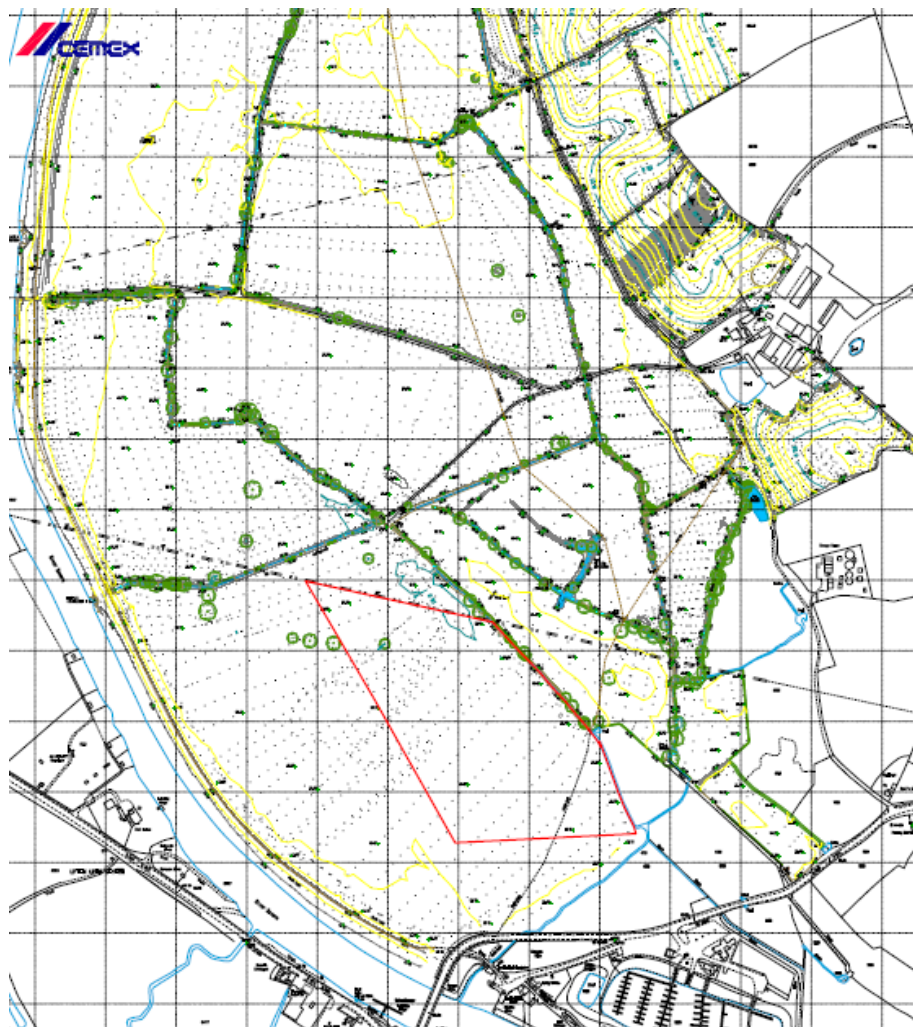
Cemex site at Ryall East



Cemex site at land NE of Uckinghall Lane

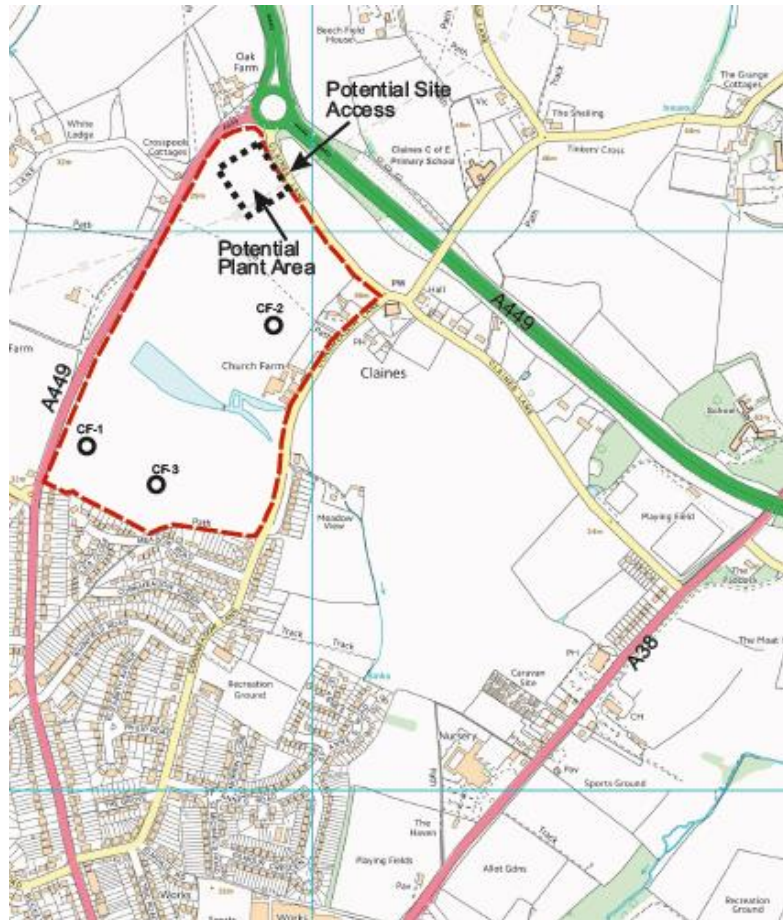


Cemex site at land South of Ryall North



|  |  |
|--|--|
| <p>Greenfield Associates</p>   | <p>D022-2441</p>   |
| <p>1. Location Map attached<br/>         2. The site lies in an area that is known to be underlain by sand and gravel. This is confirmed by the published (BGS) geological maps. The attached plan shows the location of three boreholes that were drilled to determine the presence of the potential sand and</p> | <p>Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, submitting a site for consideration at Greenfields</p> |

| Greenfield Associates  | D022-2441  |
|--|--|
| <p>gravel reserves. These boreholes proved between 2.0m and 3.6m of high quality quartzitic terrace sands and gravels to be present with a sand to gravel ratio of 60:40. These mineral deposits are covered by a unit of mainly soils and sub soils no more than 1.2m thick. The preliminary reserve estimates indicate that some 410,000 tonnes of saleable sand and gravel may be available on the site.</p> <p>3. The site is currently being promoted independently by the landowner (Mr Peter Philips), but there are multiple mineral operators who wish to take the site forward, subject to planning being granted. The land is available without any restrictions and a planning application can be prepared at short notice for mineral extraction. There are no designated features within the site, such as SSSI's, SAM's etc and the site is not located on a flood plain. The site is crossed by a major oil pipeline where no excavation is assumed with 10m. A landscape scheme would be designed to ensure that there were no direct views in to the site from any adjacent properties. This could include soil bund construction, tree planting and other mitigation measures.</p> <p>4. The landowner is fully aware that there may be a range of restoration options available following any mineral development. These may include agricultural land restoration via the importation of fill materials, community restoration options, including employment and tourism options, recreation and biodiversity including wetland areas and woodland planting. Alternatively there could be a mix of schemes that cover the site.</p> <p>5. The site has excellent access on to the A449 Worcester by-pass via about 100m of Claines Lane. This then gives access in to Worcester, which is the main market for the sands and gravels.</p> <p>6. It is proposed that the mineral would be extracted in a series of short operations and stockpiles would be created adjacent to a mobile low-level wash plant. This plant would be located near to the site entrance, in the northern part of the site – see attached plan. The washed sands and gravels will be sold as high quality concreting aggregates, drainage materials and aggregates for construction use. The output from the site is estimated to be about 125,000 tonnes per annum, giving a site life of about 3.5 years. This is considered a viable economic reserve within the Worcester aggregate market.</p> | <p>Farm.</p> <p>Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed</p> |



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| <p><b>Enviroarm Ltd</b></p>  | <p><b>D023-2398</b></p>   |
| <p><b>Site Location</b><br/>         The proposed Pinches 4 quarry, is situated off Wildmoor Lane, approximately 1km north of Upper Catshill centre, 3/4km west of Lydiate Ash centre at National Grid Reference SO 396729 275393, with the centre of the site located at SO 396780 275582. The site location is shown on Drawings MPAP4.0 and the application boundary is presented on Drawing MPAP4.1.</p> | <p>Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, submitting a site for consideration at Pinches.</p> <p>Your comments and the sites you have submitted will be considered by the Council</p> |



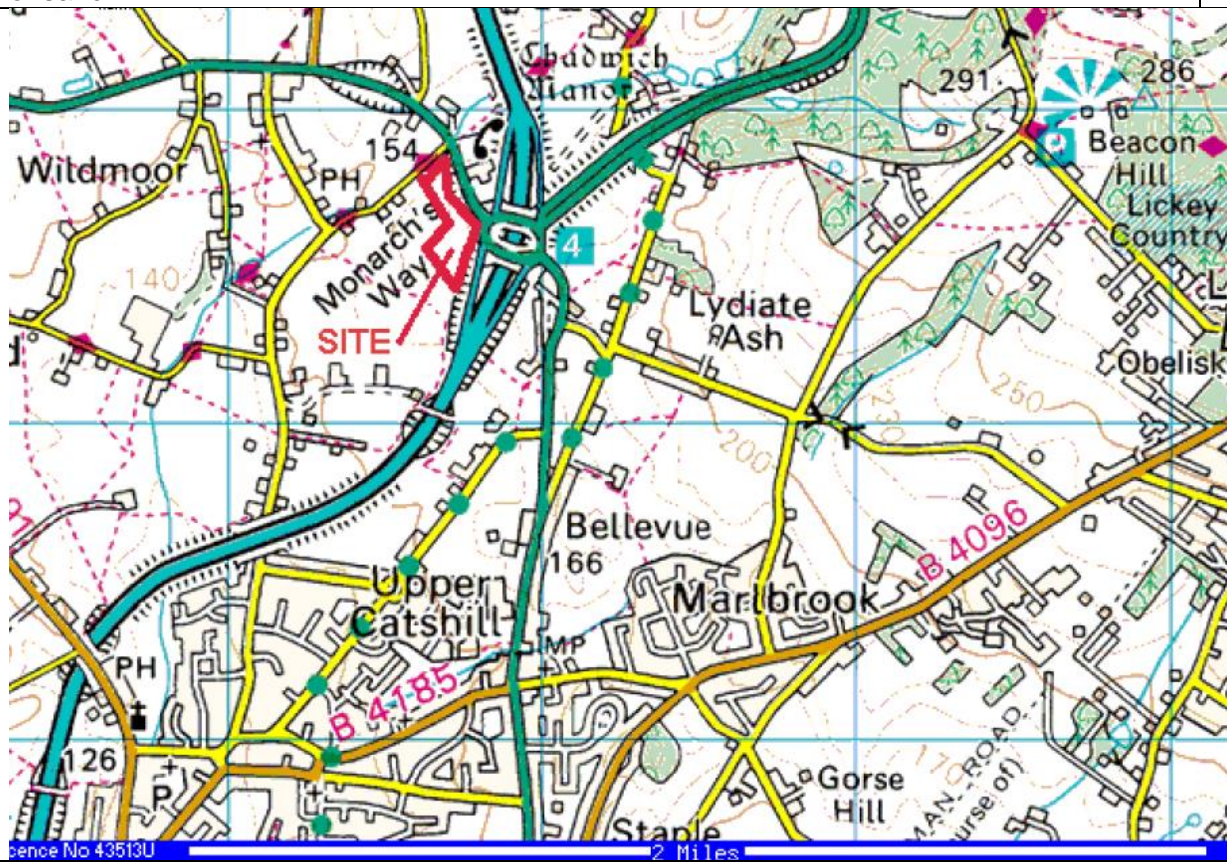
Enviroarm Ltd

D023-2398

Estimate of Reserve

A plan showing the surface contours is presented on Drawing MPAP4.2. This drawing also shows some of the groundwater monitoring points for Pinches 2 and Pinches 3. The boreholes for Pinches 3 were drilled in 2008 and the drill logs are presented at Appendix A. Based on groundwater information undertaken and a safety standoff of between 5 and 10 metres and subject to more detailed slope stability assessment the reserves are between 822,020m<sup>3</sup> and 1,000,000m<sup>3</sup> which equates to some 1.64 and 2.0 million tonnes of sand.

during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed

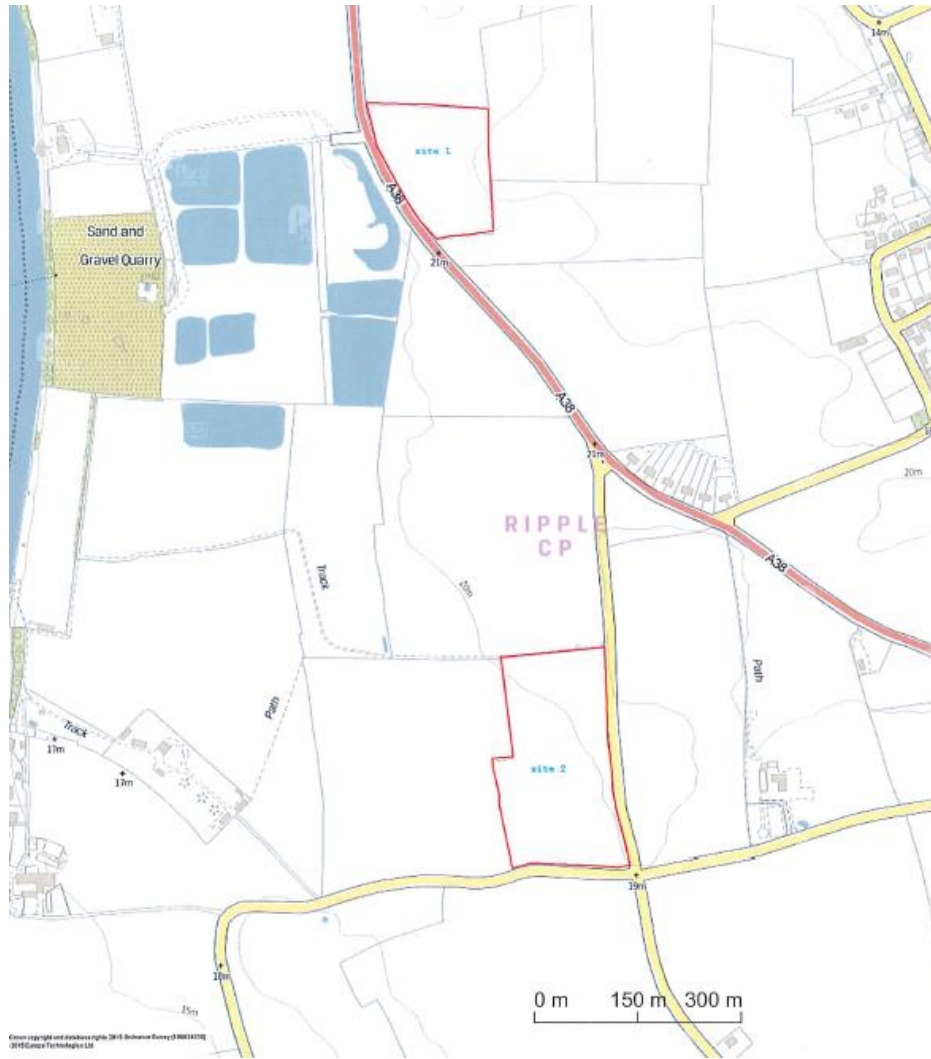


Place Partnership Ltd

D025-2444

| Place Partnership Ltd  | D025-2444  |
|--|--|
| <p>Site 1</p> <p>See plan A attached, with site marked as site 1.</p> <p>See plan B attached, which shows the site lies within the area marked as sand and gravel with more than 2 million tonnes. This site has not yet been individually assessed.</p> <p>None yet known, but this site is immediately opposite an existing quarry currently being worked.</p> <p>The landowner is Worcestershire County Council who fully support mineral working of this site.</p> <p>The landowner is flexible in their view on the restoration of the site. The preference would be agricultural but if an alternative is proposed, the landowner would be prepared to consider all options.</p> <p>The site is located adjacent to the A38, so access can be gained directly from the main road.</p> <p>The site is immediately opposite a quarry currently being worked and where the sand/gravel are taken off site by water. This site could initially extract across the main road and join the arrangements currently being used by the existing quarry.</p> <p>The site is located directly opposite an existing quarry currently being worked, so it is anticipated material could be transported across the A38 directly to the processing plant on the existing quarry. It can then be transported away by water.</p> <p>Site 2</p> <p>See plan A attached with site marked as site 2.</p> <p>See plan B attached, which shows the site lies within the area marked as sand and gravel with more than 2 million tonnes. This site has not yet been individually assessed.</p> <p>The operator of the quarry currently being worked to the north west of this site has made an initial expression of interest to the landowner of this site. The landowner has confirmed interest but no further details have yet been forwarded.</p> <p>The landowner is Worcestershire County Council who fully support mineral working of this site.</p> <p>The landowner is flexible in their view on the restoration of the site. The preference would be agricultural but if an alternative is proposed, the landowner would be prepared to consider all options.</p> <p>The site is located adjacent to a minor road running north which feeds onto the A38. Access to the site can be gained from the minor road. The site could also be accessed</p> | <p>Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, submitting sites for consideration which we have called Land Opposite Ryall Quarry Entrance, and Land at School lane</p> <p>Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed</p> |

|   |           |
|---|-----------|
| Place Partnership Ltd   | D025-2444 |
| <p>from a second minor road running west that links to a private road adjacent to the existing quarry being worked, so access can be gained without going on to the A38 if required, but across the existing quarry, subject to agreement. The site could possibly extract into the arrangements currently being used by the existing quarry, by water.</p> <p>The site is located very close to an existing quarry currently being worked, so it is anticipated material could be transported via the minor road to the existing quarry where it can be processed. Subject to agreement, it may be possible for material to be conveyed across the land between this site and the existing processing plant.</p> |           |



| Pleydell Smithyman Ltd   | D026-2397   |
|--|---|
| <p>I refer to the above together with your telephone call with Robin. Please find attached a plan illustrating 2N° sites we wish to put forward for consideration for future mineral extraction.</p> <p>The sites are located to the north of Kidderminster near Wolverley. The mineral is sand and gravel, and sandstone.</p> <p>Site A is location north of Wolverley Road (B4189) between Wolverhampton Road and Brown Westhead Park Road.</p> <p>Site B is located to the south of Wolverley Road to the south west of Site A and adjoining the Staffordshire and Worcestershire Canal.</p> <p>We are in the process of compiling drilling results which we will be able to forward in the near future.</p> <p>I hope the attached plan provides sufficient information for you at this stage.</p> <p>Grateful for confirmation of this email.</p> | <p>Thank you for your response to our recent "Call for Sites" for the Worcestershire Minerals Local Plan on behalf of the Diocese of Worcester, submitting sites for consideration at Land North of Wolverley Road, and Land South of Wolverley Road.</p> <p>Your comments and the sites you have submitted will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage. We will contact you directly if we require any further information to assist in assessing the sites you have proposed</p> |

Land at Wolverley, Kidderminster



|                                     |            |
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| DRAWING STATUS                      |            |
| <b>FINAL</b>                        |            |
| TITLE                               |            |
| Land at Wolverley,<br>Kidderminster |            |
| DATE                                | SCALE      |
| Nov 2015                            | 1:5,000@A3 |
| DRAWN                               | CHECKED    |
| RGD                                 | RJS        |
| DRAW NO.                            | REVISION   |
| psc1b(III).435                      |            |

PleydellSmithyman

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PLEYDELL SMITHYMAN LIMITED  
26A THE WHARF AGE, BORNBRIDGE  
SHROPSHIRE TF4 7JH  
T: 01952 433211 F: 01952 433323  
E: psc@pleydellsmithyman.co.uk  
www.pleydellsmithyman.co.uk

# General Responses

| Summary of comments   | Initial officer response   |
|---|--|
| <p data-bbox="188 419 371 443">National Grid</p> <p data-bbox="188 459 1319 592">Hi,<br/><br/>IS this a request for gas plans or a particular planning application? Or is this just for our information? Many thanks</p>  | <p data-bbox="1388 419 1547 443">C001-2373</p> <p data-bbox="1388 459 2020 628">This is a request for developers or landowners to put forward sites for inclusion in the Worcestershire Minerals Local Plan. They may result in planning applications at a later stage.</p> <p data-bbox="1388 667 1984 802">We sent this request to everyone registered on our consultation database for Minerals Planning matters. At this stage it is for information for you.</p>  |
| <p data-bbox="188 815 622 839">Gloucestershire County Council</p> <p data-bbox="188 847 1346 1182">Our site options are undergoing consultation as you know but we would stress that at this stage no decisions have been taken as to what we might formally allocate within the draft MLP. In particular we need to consider carefully what might come out of the consultation and whether we need to carry out any further work on any of the site options before confirm the inclusion of any of them in a formal draft of the MLP. In that regards we would we welcome any views that WCC might have on the site options that are close to the Worcestershire border. As part of that process it would be useful if WCC were in a position to clarify their thoughts on whether the Bow Farm site would likely form a consultation site at some stage and whether any preliminary views have been formed upon it.</p> | <p data-bbox="1388 815 1529 839">C002-695</p> <p data-bbox="1388 847 2020 1300">We too would stress that at this stage no decisions have been taken as to what we might formally allocate within the draft MLP and we will be carrying out further work on the site options before we confirm the inclusion of any of them in a formal draft of the MLP. At this stage no decisions have been made and formal deliverability assessments will be undertaken at a later stage<sup>1</sup>. Your comments and the sites which have been submitted will be considered by the Council during the coming months. We will assess all the site information we receive and</p> |

<sup>1</sup> Cross-boundary discussions were undertaken early in 2015 following this response.

| Summary of comments  | Initial officer response   |
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|  | sites will either be included in the Third Stage consultation or reasons given for not taking sites forward at that stage.   |
| Cabinet Office   | C003-1294  |
| <p>Thank you for submitting your draft consultation paper into the Efficiency Reform Group within Cabinet Office.</p> <p>The guidance which previously advised that we require sight of such documentation is no longer extant so there is now no need to submit these to us.</p>  | Noted.   |
| Central Bedfordshire Council   | C004-2142  |
| <p>Thank you for contacting the Minerals and Waste Planning Shared Service. I am not in a position to put forward additional sites for you to consider. However, on behalf of Central Bedfordshire Council I would like to make you aware that a site in Central Bedfordshire- Kensworth quarry, currently exports significant quantities of Chalk via pipeline to Rugby. Planning permission for this site runs until 2037. This may have implications for your Plan.</p>                             | Noted.   |
| Coal Authority   | C005-1939  |
| <p>Thank you for consulting The Coal Authority on the above document.</p> <p>Having reviewed the document, I confirm that we have no specific comments to make at this stage. It is for the minerals industry and their representative bodies to seek the identification of specific sites, preferred areas or areas of search.</p> <p>Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).</p> | Noted.   |
| Cemex  | C006-1793  |
| <p>I think I've supplied this information already for Ryall North, could you confirm, or let me know what else you'd like?</p>   | Your comments will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Draft Plan consultation or reasons will be given for not taking sites forward at that stage. |



| Summary of comments  | Initial officer response  |
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|  | <p>With regard to whether the requested information has already been supplied for Ryall North, we can confirm that your response to the Second Stage consultation on the Minerals Local Plan (reference B057-1793) contained the majority of the information we require. We also received confirmation of support from the major landowner, Croome Estate, through their Agent, Carter Jonas, (reference B043-126). We note that other landowners have confirmed their support in response to the second call for sites (references D009-2296) along with your subsequent submission (reference D020-1793).</p> <p>The one point which was not addressed in detail in your previous submission was "details of any landowner or community aspirations for the site which might influence restoration and after-use options". We are aware that restoration options were discussed as part of your pre-application discussions with officers at Worcestershire County Council and during the course of consideration of application 15/000013/CM which relates to this site.</p> |
| Severn Trent Water   | C007-1731   |
| Thank you for sending the mail below with regard to the Call For Sites. It is not likely at this stage that Severn Trent Water has any sites that we wish to put forward, however we are keen to engage with you on the implications of the sites that have been identified. | Thank you for your response to the above. We have updated our records as requested.   |

| Summary of comments   | Initial officer response   |
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| <p>As I am due to leave Severn Trent Water after this week, could you please make sure that any future mails are sent to my department's mailbox:-<br/> growth.development@severntrent.co.uk and to my colleague Dawn Williams:-<br/> dawn.williams@severntrent.co.uk</p>   |  |
| <p><b>Brecon Beacons National Park Authority</b></p>  | <p>C008-2265</p>   |
| <p>Thank you for your letter dated 14<sup>th</sup> July 2014 received at this office on 17<sup>th</sup> July 2014. I can confirm that your letter has been passed to Mr Ryan Greaney who will be in contact, if required.</p>   | <p>Noted.</p>  |
| <p><b>Worcestershire Regulatory Services</b></p>  | <p>C009-689</p>  |
| <p>Thank you for your consultation. WRS are unable to provide information of potential sites for mineral extraction and anticipate this information will be provided by the Local Planning Authorities. However note WRS should be consulted on any sites that are proposed by other parties in respect of environmental concerns such as Contaminated Land, Air Quality and Dust, Noise or Light emissions.</p> <p>I trust this fulfils your enquiries but please do not hesitate to contact wrsenquiries on the contact details below quoting the above number if we can be of any further assistance.</p>              | <p>Noted. We will contact you in due course with regard to individual site submissions.</p>                    |
| <p><b>Lead Local Flood Authority</b></p>  | <p>C010-1976</p>   |
| <p>Please find attached spreadsheet with the LLFA assessment of surface water risk for the proposed sites. This has been informed using the emerging surface water management plan.</p> <p>For clarity an ordinary watercourse is defined as:</p> <p>a "watercourse" that does not form part of a "main river" Flood and Water Management Act 2010</p> <p>watercourse - includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows. Land Drainage Act 1991.</p> | <p>Thank you. We will consider this information during the coming months as we assess the submitted sites.</p> |

| Summary of comments   | Initial officer response |
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| <p>Any proposals for new, or alterations to existing, structures such as culverts on watercourses will require an application to SWLDP for consent under s.23; Land Drainage Act 1991.</p> <p>Flood Zone 1 - Some watercourses have not been modelled on EA Flood Zone Maps, which primarily show flooding from main rivers, not ordinary watercourses with a catchment of less than 3km<sup>2</sup>.</p> |                          |
| Homes and Communities Agency  | C012-2192                |
| I write to confirm that the HCA has no comment to make/information to provide in relation to the Worcestershire Minerals Local Plan: Call for Sites.  | Noted.                   |
| The Shelsleys Parish Council  | C013-663                 |
| The Parish Council is not aware of any sites.   | Noted.                   |

| Summary of comments   | Initial officer response  |
|---|---|
| <p data-bbox="188 236 510 268">Worcester Reclamation</p> <p data-bbox="188 272 1357 341">(THIS RESPONSE HAS BEEN REDACTED DUE TO INAPPROPRIATE LANGUAGE. THE ORIGINAL CAN BE VIEWED ON REQUEST)</p> <p data-bbox="188 379 1290 443">In response to your request for information on the location of minerals around our area:</p> <p data-bbox="188 485 1364 549">Unfortunately we are new to Worcestershire but since receiving your letter last year we have undertaken extensive research via our local customers.</p> <p data-bbox="188 590 1357 762">One elderly gentleman remembered his grandfather telling him of the famous Woodbury Lane gold rush in 1843 when people came from as far away as Littleworth with shovels and picks to dig for gold. After considerable excavations and many years, no gold had been found but, a valuable mud was discovered and this was the start of Worcester porcelain.</p> <p data-bbox="188 804 1364 1050">Another local historian had records of a coal mine being near here, in fact the entrance was through the bar of the old "retreat pub" which was situated in fields behind the existing "Retreat pub". Allegedly the mine was three miles deep and ten miles long and produce enough coal to power the orient express which used to stop at Norton Station on route to Constantinople. Apparently the station also had a [REDACTED] which was frequented by the miners. A nice touch which maybe could be included in the new Parkway development.</p> <p data-bbox="188 1054 1364 1158">[REDACTED]</p> <p data-bbox="188 1163 1357 1299">I think the most interesting story was from a farmer from Pershore in his late 80's who remembered his father telling him of trains stopping here at "Norton Sidings" to collect coal which had been dug from the mine, this valuable trade continued until the farmers grandad was digging a hole for a gate post and struck oil.</p> <p data-bbox="188 1337 1234 1367">We originally came from the black country which has a history of coal mining,</p> | <p data-bbox="1388 236 1547 268">C014-2375</p> <p data-bbox="1388 272 2013 480">I acknowledge receipt of your response to the above, received 1st August. Your representation has been issued a unique number (CO14-2375). Please use this number in any subsequent correspondence about the Minerals Local Plan Call for Sites.</p> <p data-bbox="1388 521 2007 799">I can see the joke but we are duty bound to consider all the letters we receive and your comments will be considered by the Council during the coming months. We will assess all the site information we receive and sites will either be included in the Draft Plan consultation or reasons given for not taking sites forward at that stage.</p> <p data-bbox="1388 841 2018 1192">For your information you were included in the consultation because recycling sites can contribute to minerals supply, notably through recycling construction and demolition waste, something you, or your successors, may have an interest in and because we do not know what land you own or may have an interest in now or in future and we wanted to give you the opportunity to contribute to the plan and, possibly, advance your own interests.</p> <p data-bbox="1388 1233 2018 1337">I imagine that you would not have been happy if you had had any minerals interests or other land holdings and we had not contacted you.</p> |

| Summary of comments   | Initial officer response   |
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| <p>[REDACTED]</p> <p>Anyway you can see we have taken your request seriously and, done our best to find minerals lying on top of the ground on our property. We are still a little baffled as to how we are expected to know where minerals are located. Apart from the local knowledge which may or may not be the absolute truth.</p>   | <p>Please contact me if you need further information about the process.</p>  |
| <p>English Heritage</p> <p>Many thanks for inviting English Heritage to respond to this current consultation.</p> <p>At this stage we have a number of general comments to raise:</p> <ul style="list-style-type: none"> <li>• We request that consideration is given to identifying minerals sites that contain traditional building stone and roofing material that support the vernacular in the area. The English Heritage Stone Study could provide additional information on this.</li> <li>• We also encourage you to work with local conservation and archaeology staff in your area to consider the impacts to the historic environment through allocating minerals sites and to consider any opportunities for conservation and enhancement of the historic environment.</li> <li>• English Heritage has produced some guidance documents on Minerals Planning and the Historic Environment and I attach the link, for your information. This includes information on minerals planning and archaeology which is an important consideration.</li> </ul> | <p>C016-716</p> <p>Thank you. We will consider this information during the coming months as we assess the submitted sites.</p> |

| Summary of comments  | Initial officer response  |
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| <p><a href="https://www.english-heritage.org.uk/publications/mineral-extraction-and-historic-environment/">https://www.english-heritage.org.uk/publications/mineral-extraction-and-historic-environment/</a></p> <p><a href="https://www.english-heritage.org.uk/publications/mineral-extraction-and-archaeology/">https://www.english-heritage.org.uk/publications/mineral-extraction-and-archaeology/</a></p>  |   |
| Natural England  | C017-717  |
| <p>Thank you for your consultation dated 14th July 2014 which we received via email.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England does not have available staff resources to provide bespoke advice on Minerals Plan: Call for Sites. In line with the National Planning Policy Framework, we offer the following generic advice on key natural environment considerations, which we hope is of use.</p> <p><b>1. Avoiding harm to the international, national and locally designated sites of importance for biodiversity.</b></p> <p>International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites<sup>1</sup>. National sites include biological Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites are Local Wildlife Sites (a variety of other terms are also in use).</p> <p>Worcestershire contains a number of SACs, Ramsar sites and SSSIs and their interest features include transition mires and quaking bogs, which are extremely sensitive to changes in water quality/quantity and surface and/or groundwater contamination. Any allocations for mineral development would therefore need to take account of possible impacts on the interest features of these sites by way of water pathways.</p> <p>European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations').</p> | <p>Thank you. We will consider this information during the coming months as we assess the submitted sites and develop the policy framework.</p> |

| Summary of comments   | Initial officer response |
|---|--------------------------|
| <p>In considering European sites of interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have. The Conservation objectives for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.</p> <p>Indirect impacts may be experienced several kilometres distant from Mineral development. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.</p> <p>The Nature on the Map website is a useful source of information on the location and qualifying features of the international and national designations. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.</p> <p>The Plan should give consideration to the mitigation hierarchy of Avoid; Mitigate and then Compensate as a last resort as well as consideration to irreplaceable habitats as per para 118 of NPPF.</p> <p><b>2. Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites).</b></p> <p>The Nature on the Map website referred to above is a useful source of information on the location and qualifying features of geological SSSIs. Local Environmental Records Centres should</p> |                          |

| Summary of comments   | Initial officer response |
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| <p>also be of assistance and often hold information on Local Geological Sites.</p> <p>Mineral development may present opportunities for the enhancement of geological sites. Further information on geological conservation is available on the Natural England website here Geodiversity.</p> <p><b>3. Soil, Agricultural Land Quality and Reclamation</b></p> <p>The Minerals Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our well-being and prosperity. Decisions about minerals development and restoration should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:</p> <p>1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011) emphasises the importance of natural resource protection, including the conservation and sustainable management of soils.</p> |                          |



| Summary of comments   | Initial officer response |
|---|--------------------------|
| <p>2. The conservation and sustainable management of soils also is reflected in the National Planning Policy Framework (NPPF), particularly in paragraphs 109, 112 and 143. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example by:</p> <ul style="list-style-type: none"> <li>o Safeguarding the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future (After 1976 Grade 3 was subdivided into Sub-grade 3a and 3b with the best and most versatile land being defined as Grades 1,2 and 3a).</li> <li>o Not identifying new sites or extensions to existing sites for peat extraction.</li> <li>o Avoiding development that would disturb or damage other soils of high environmental value (eg wetland and other specific soils contributing to ecological connectivity), ensuring soil resources are conserved and managed in a sustainable way.</li> </ul> <p>3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 143 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the <a href="http://www.magic.gov.uk">www.magic.gov.uk</a></p> |                          |

| Summary of comments   | Initial officer response |
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| <p>website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey for any sites they wished to put forward for consideration in the Local Plan.</p> <p>4. In line with the Technical Guidance to the National Planning Policy Framework we advise that a soil and ALC assessment should be carried out as part of the site selection process. It should be noted that some of the potential sites may already have had such surveys carried out, for example by MAFF (see point 3 above), or by potential developers. These surveys can then be used to inform any subsequent soil moving and site restoration plans. Further information can be found in the Defra Guidance for Successful Reclamation of Mineral and Waste sites and Good Practice Guide for Handling Soils.</p> <p>5. General mapped information on soil types, including peaty soils, is available as 'Soilscapes' on the <a href="http://www.magic.gov.uk">www.magic.gov.uk</a> and also from the LandIS website <a href="http://www.landis.org.uk/index.cfm">http://www.landis.org.uk/index.cfm</a> which contains more information about obtaining soil data.</p> <p>6. Where minerals underlie the best and most versatile agricultural land (Grades 1, 2 and 3a in the Defra ALC system) it is particularly important that restoration and aftercare preserve the long-term potential of the land as a national, high quality resource. Where alternative afteruses (such as forestry and some forms of amenity, including nature conservation) are proposed on the best and most versatile agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term capability, thus remaining a high quality resource for the future.</p> <p>7. Reclamation to non-agricultural uses does not mean that there can be any reduced commitment to high standards in the reclamation. Such reclamations require equal commitment by mineral operators, mineral planning authorities and any other parties involved to achieve high standards of implementation.</p> <p><b>4. Avoiding harm to the character of nationally protected landscapes – National Parks and locally valued landscapes.</b></p> |                          |

| Summary of comments   | Initial officer response |
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| <p>Impacts from Mineral development upon landscape may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects with other development.</p> <p>The assessment of potential Mineral sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. These update the national framework of Joint Character Areas and Countryside Character Areas that are used to inform LCAs. Further information is available at NCAs. The NCAs which fall within the plan area include;</p> <ul style="list-style-type: none"> <li>• Shropshire, Cheshire and Staffordshire Plain</li> <li>• South West Peak</li> </ul> <p>Landscape Character Assessments (LCAs) identify the different landscape elements which give a place its unique character and can help inform the location and design of new development. Further information on LCAs is at Landscape Character Assessment.</p> <p>More detailed study (e.g. Landscape and Visual Impact Assessment) of the sensitivity of the landscape and capacity to accommodate change may be necessary to determine the suitability of potential mineral extraction, particularly those within or near protected landscapes.</p> <p>The site selection methodology should account for the importance of avoiding harm to the character of nationally protected landscapes, such as the Peak District National Park and locally valued landscapes.</p> <p><b>5. Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations.</b></p> <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here UK BAP priority species and habitats.</p> <p>Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible</p> |                          |

| Summary of comments   | Initial officer response |
|---|--------------------------|
| <p>habitats for protected species.</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.</p> <p>Priority habitats can be found on the Nature on the Map website referred to above. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these.</p> <p>It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species. More information is available here <a href="#">Phase 1 Habitat Survey</a>.</p> <p><b>6. Seeking opportunities to contribute to landscape restoration and enhancement.</b><br/> The NCAs profiles identify potential opportunities for positive environmental change. LCAs also identify opportunities for landscape restoration and enhancement. These can help identify potential opportunities for aftercare and restoration in terms of landscape enhancement in an area<br/> Where Nature Improvement Areas (NIAs) are identified they can provide a focal point for creating more and better-connected habitats. Where mineral sites are proposed in the environs of NIAs the potential to contribute to habitat enhancement should be considered. Further information on NIAs is available here <a href="#">NIAs</a>.</p> <p>The Meres and Mosses NIA falls within the Borough of Cheshire East, the objectives for this NIA are attached as an Appendix.</p> <p>Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Further information through the UK BAP link below.</p> |                          |

| Summary of comments   | Initial officer response |
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| <p>It is also important to recognise that restoration offers the potential for the creation of <b>Green Infrastructure</b> in addition to Priority Habitat. Restoration will depend on the geological soil and hydrological conditions and the proximity of the site to existing habitats and GI.</p> <p>Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health &amp; well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Green infrastructure maintains critical ecological links between town and country. Please also refer to <b>Nature After Minerals</b> for further guidance in aftercare and restoration.</p> <p>The site selection process should consider the availability of GI and opportunities to enhance GI networks when considering sites for Mineral extraction.</p> <p>The NPPG discusses restoration and aftercare in further detail – see link. Para 037 states that The most appropriate form of site restoration to facilitate different potential after uses should be addressed in both local minerals plans, which should include policies to ensure worked land is reclaimed at the earliest opportunity and that high quality restoration and aftercare of Mineral sites takes place, and on a site-by-site basis following discussions between the minerals operator and the mineral planning authority.</p> <p>Natural England also believe that the following principles should be applied with regards to restoration and aftercare;</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Be based on a specific, up to date evidence base, including a biological and geological baseline, current trends and conditions.</li> <li><input type="checkbox"/> Seek to secure adequately funded long term management programmes for aftercare</li> </ul> |                          |

| Summary of comments  | Initial officer response |
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| <p>and site management, which should be set out from the earliest stages of planning.</p> <p><input type="checkbox"/> Deliver locally tailored phased restoration and management proposals and consider strategic projects to deliver restoration at a wider scale.</p> <p><b>7. Seeking opportunities to contribute to the restoration and re-creation of habitats , the recovery of priority species populations and biodiversity enhancement.</b></p> <p>Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Further information through the UK BAP link above.</p> <p><b>8. Seeking opportunities to enhance public rights of way and accessible natural green space.</b></p> <p>Mineral Development allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails. More information is available here National Trails.</p> <p>Accessible natural greenspace should be provided as an integral part of development. Further information is set out in . Our Accessible Natural Greenspace Standard (ANGSt) which describes the amount, quality and level of visitor services we recommend for all areas. More information here Accessible Natural Greenspace Standard.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Jamie Melvin on 2497. For any new consultations, or to provide further information on this consultation please send your correspondences to</p> |                          |

| Summary of comments   | Initial officer response   |
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| <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>  |  |
| Stourport-on-Severn Town Council  | C018-667   |
| <p>Your letter of the 14<sup>th</sup> July 2014 received consideration at a Meeting of the Town Council on the 5<sup>th</sup> August last. I am sorry that this response is a few days beyond the date requested in your letter. However, the Council's response is brief in that there are no sites within three categories mentioned in your letter which the Council wishes to be considered for inclusion in the emerging Local Plan.</p> <p>Thank you for consulting with the Town Council.</p>  | Noted.   |
| dai*****@gmail.com  | D002-xxxx  |
| <p>On having read an article entitled 'Have your say on mineral extraction' in last Thursday 23rd July edition of the Evesham Journal, page 18, I wish to voice concern that this and your 'Minerals Local Plan' is outlining a tiptoe stepping stone plan towards FRACKING in our local area.</p> <p>Of course mentioning the word 'FRACKING' outright might stir some people into thinking its not a good idea and putting fracking under the heading of 'Minerals' of which, of course, oil is, quietly suggests this isn't about fracking. Now I understand we need resources to build, but fracking is a completely insane and environmentally devastating method to obtain oil reserves and is not negotiable. We should never frack anywhere. Not in the UK nor in any part of the world.</p> <p>Using a 'back door' method, to instigate the acceptance of programmes, schemes and laws that are not conducive to the long term stability of our environments and health of the people has long been the construct of governments. Using soft words and deceptive, easy sentences, covering up a far greater sinister project has become the norm. People are waking up to the tactics of government procedure moulding their evil way onto the people.</p> <p>As soon as I read this article red alarm bells were going off in my head 'FRACKING' an undercover plan. Fracking will not be allowed in our local area by the people and indeed throughout the UK. There will be violent resistance to it, be assured.</p> | <p>In response to the points you raise about "fracking"; as you rightly suggest, oil and gas are minerals and therefore need to be addressed in the Minerals Local Plan. However, all the available evidence to date suggests that there are no shale oil or gas resources in the county.</p> <p>Further information about the consultation on the Minerals Local Plan is available on our website at <a href="http://www.worcestershire.gov.uk/minerals">www.worcestershire.gov.uk/minerals</a>. We have also produced an extensive suite of background documents to inform the process, including a document specifically looking at Oil and Gas in Worcestershire. You can find this by following the links to "Background Documents", then "Minerals Found in Worcestershire and Why We Need Them", and the "Oil and Gas in Worcestershire" document is linked from that page.</p> |

| Summary of comments  | Initial officer response  |
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| <p>I hope my comments have been useful.</p> <p>A concerned resident.</p> | <p>The best evidence we have available is the British Geological Survey's document "Mineral Resource Information for Development Plans: Herefordshire and Worcestershire: Resources and Constraints." British Geological Survey 1999" (available to download from <a href="http://www.bgs.ac.uk/mineralsUK/planning/resource.html">http://www.bgs.ac.uk/mineralsUK/planning/resource.html</a>). This document does not address fracking specifically, but states that:</p> <ul style="list-style-type: none"> <li>- Conventional oil and gas - 3 exploration wells have been drilled, none of these discovered oil or gas: <ul style="list-style-type: none"> <li>o Absence of hydrocarbon source rocks within the Permo-Triassic sandstones of the Worcester Basin mean is it "not prospective"</li> <li>o Failure to discover hydrocarbons in the Lower Palaeozoic rocks to the west of the Worcester Basin reduces their potential</li> </ul> </li> <li>- Coalbed methane: <ul style="list-style-type: none"> <li>o The exposed coalfields of Wyre Forest and South Staffordshire are considered to have low methane potential.</li> <li>o No information is available on the methane potential of the concealed Coal Measures which lie between these two coalfields</li> </ul> </li> </ul> <p>To summarise, there is currently no evidence that there are commercially attractive oil or gas resources in the county. No companies have ever approached us with regard to this</p> |



| Summary of comments   | Initial officer response  |
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|   | type of development. However, we are required to develop the Minerals Local Plan to ensure that policies are in place which would enable any application for oil or gas exploitation (whether by conventional means, or by "fracking") to be appropriately assessed.  |
| Worcester Regulatory Services   | D003-1700   |
| I do not have any adverse comments to make with regard to this consultation.  | Noted. We will contact you in due course with regard to individual site submissions.  |
| St Peter the Great Parish Council   | D004-651  |
| <p>Whilst this consultation raises no concerns for the Parish of St Peters, we would wish to place on permanent record that we strongly object to any plans for 'fracking' in or below the Parish.</p> <p>I would be grateful if you could record this objection accordingly.</p> | We note your objection to "fracking". There is currently no evidence that there are commercially attractive oil or gas resources in the county. No companies have ever approached us with regard to this type of development. However, we are required to develop the Minerals Local Plan to ensure that policies are in place which would enable any application for oil or gas exploitation (whether by conventional means, or by "fracking") to be appropriately assessed. |
| Wythall Parish Council  | D005-678  |
| In relation to the above Consultation document email sent to us on 15th July, just inform you that this doesn't really affect Wythall.  | Thank you for your response. For your information, there are mineral resources in the Wythall area. Please have a look at our <a href="http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/">interactive webmap</a> at <a href="http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/">http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/</a> .   |
| Bewdley Town Council  | D006-528  |
| Bewdley Town Council's Planning Committee considered the County Council's request 'call for sites' for non-aggregate minerals and the further 'call for sites' for aggregate minerals at its meeting on 3 <sup>rd</sup> August.   | Noted.  |

| Summary of comments   | Initial officer response  |
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| <p>I can confirm that <b>no further sites have been identified</b> within the administrative area of Bewdley.</p>   |   |
| <p>Historic England</p>   | <p>D007-716</p>   |
| <p>Thank you for consulting Historic England on the above consultation document.</p> <p>We have no comments to raise at this 'call for sites' stage.</p> <p>We do, however wish to be fully engaged when sites have been assessed and are being proposed for minerals development. We are keen to ensure that all proposed sites have been fully assessed to ensure that the historic environment will be protected and conserved and we are committed to assisting Worcestershire County Council in achieving this.</p> <p>I attach a link to Historic England's website which contains information about minerals development and the historic environment.</p> <p><a href="https://historicengland.org.uk/advice/planning/mineral-extraction/">https://historicengland.org.uk/advice/planning/mineral-extraction/</a></p> <p>If you have any queries relating to policy wording for minerals development and the historic environment and/or the assessment process for proposed mineral sites, please contact us and we would be happy to assist.</p> | <p>Noted. We will contact you in due course with regard to individual site submissions.</p> |
| <p>Coal Authority</p>   | <p>D008-2484</p>  |
| <p>Thank you for consulting The Coal Authority on the above call for evidence.</p> <p>We have previously provided you with information relating to surface coal resources, there has been no change to the position regarding coal resources.</p> <p>We also informed you previously that no PEDL licences existed in Worcestershire. At that time we did draw attention to the need to review this position in case the 14th Licensing Round were to grant any PEDL licences in Worcestershire before the Local Plan is adopted. Following the Oil and Gas Authority announcement in August 2015, it</p>   | <p>Noted.</p>   |

| Summary of comments   | Initial officer response  |
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| <p>can be seen that no licence blocks in Worcestershire are currently being offered.</p> <p>I confirm therefore that we have no specific comments to make at this stage.</p> <p>Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).</p>   |   |
| <b>Redditch Borough Council</b>   | <b>D010-682</b>   |
| <p>Redditch Borough Council (RBC) welcomes the opportunity to make comments on the Worcester Minerals Local Plan Consultation – Summer 2015. Having looked at the documents, and with your key questions in mind, RBC has the following comments: Redditch Borough Council does not have any new additional resources or information to add to this Local Plan. All minerals have been highlighted previously in the interactive plan and those that could be of an asset are already safeguarded or compromised e.g. already built upon or under a river bed.</p>  | Noted.  |
| <b>Rowney Green Association</b>   | <b>D013-2297</b>  |
| <p>Thank you for sending us notification of the above consultation on Tuesday 14<sup>th</sup> July 2015.</p> <p>We wish to confirm the information that we sent to you, by email, on 7<sup>th</sup> January 2013 about the detrimental effect should sand and gravel be extracted from the hillsides around Newbourne Hill, Rowney Green.</p> <p>We attach copies of two letters which were sent to Hereford and Worcestershire County Council on 23<sup>rd</sup> August 1983 and 10<sup>th</sup> July 1992 from Worcestershire Nature Conservation Trust (now called Worcestershire Wildlife Trust).</p> <p><b>Text from the attached letters:</b><br/> <b>Letter 1</b><br/> Ref PJLF/JS</p> <p>The Planning Officer,<br/> Bromsgrove District Council</p> | <p>Thank you for your response. We will consider the points you raise as we continue to develop the plan.</p> <p>Worcestershire Wildlife Trust and Natural England are actively engaged in the development of the Minerals Local Plan and are also consulted on individual planning applications.</p> |

| Summary of comments   | Initial officer response |
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| <p>Dear Sir,</p> <p>Planning Application No.B11079</p> <p>We are particularly concerned to receive information about this Planning Application which we have since inspected at your office. The area in which it is proposed to extract gravel is part of a site known since Victorian times a “Rowney Green Bog” and is of considerable value for its wildlife.</p> <p>The Valley in which this site lies has many springs originating from the gravels capping the hills around. These have created wet flush sites which have developed layers of acid peat. Some parts of these have been colonised by alder trees making an unusual type of valleyside woodland. In addition several rare plants occur in the valley:-</p> <ul style="list-style-type: none"> <li>• Marsh Forget-me-not – <i>Myostis secunda</i> – only known in one other site in Worcs</li> <li>• Marsh Violet – <i>Viola palustris</i> – only known in a couple of sites in Worcs.</li> <li>• Meadow Lousewort – <i>Pedicularia sylvatica</i> – now rare as wet pastures have been destroyed</li> <li>• Wood Horsetail – <i>Equisetum sylvestris</i> – only known in a few places in NorthWorcs.</li> <li>• Bog Moss – <i>Sphagnum sub nitens</i> – only known form Wyre Forest apart from here</li> </ul> <p>It is also an important area for undisturbed wet and dry acid grassland and represents one of the most valuable sites of this type in the county. Apart from these plants listed above it has a wide variety of other less unusual species.</p> <p>Although this application only affects part of the site there is a strong possibility that other areas will be physically damaged during operations, damaged by water runoff and more likely damaged by changes in the water systems in the hills which could</p> |                          |

| Summary of comments   | Initial officer response |
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| <p>affect parts well away from the working area.</p> <p>We urge your Council most strongly to oppose this application. The proposal could irrevocably damage or destroy a most important area for wildlife. We do not consider the gains to the community of this proposal warrant such long term effects.</p> <p>Yours faithfully,<br/>For Worcestershire Nature Conservation Trust</p> <p>A.J.L. Fraser<br/>Conservation Officer</p> <p>Copy of letter sent to Bromsgrove District Council on 12th August 1983 and to Hereford and Worcester County Council on 23rd Aug 1983</p> <p><b>Letter 2</b><br/>The Worcestershire Nature Conservation Trust Ltd<br/>10th July 1992</p> <p>Your ref. P/407313 JJR/MAC</p> <p>FOR THE ATTENTION OF Miss J. J. READ</p> <p>County Engineer and Planning Officers<br/>Hereford and Worcester County Council<br/>County Hall<br/>Spetchley Road<br/>Worcester<br/>WR5 2NP</p> <p>Dear Sir</p> |                          |

| Summary of comments   | Initial officer response |
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| <p>Proposed Extraction of Sand and Gravel<br/>Land North of Storage Lane, Alvechurch</p> <p>Thank you for your letter of 3rd July concerning this proposal.</p> <p>As you will be aware, just to the north of the proposed sand and gravel extraction site is a valley which lies south of the village of Rowney Green. This valley supports a complex mosaic of habitats, including dry and wet acid woodland, dry acid grassland and valley bogs, a very uncommon habitat in Worcestershire. The valley bog in the bottom of the valley supports several species of plant which are uncommon or rare in the County. At least two of these, marsh violet <i>Viola palustris</i> and smooth-stalked sedge <i>Carex laevigata</i> occur in only one or two other sites in Worcestershire.</p> <p>To our knowledge this valley system with the bog around its perimeter is unique in Worcestershire. Because of this interest the valley system has been notified to your Council by the Trust as Special Wildlife Site No. SP 07/12. This SWS includes the acid grassland which lies on the application site, and the land to the north of it which is partially valley bog, but still within the ownership of the same person.</p> <p>The valley bog relies for its water supply on a series of springs which flow out from the valley sides. These form where the underlying Mercian Mudstone rocks are overlain by the gravels and sands in which the applicant is interested. Rain falling on the surface of these permeable gravels and sands flows through it until it reaches the underlying landscaped surface of the Mercian Mudstones, and then flows over this until it reaches the valley side where it appears as springs. The survival of the habitat and all of the wildlife it supports is totally dependent on the continuing supply of water formed by this system. If the water supply at any point is interrupted or changes its characteristics, e.g. becoming more basic, then the future of the bog and its wildlife is under threat.</p> |                          |
| Harriett Baldwin MP   | D014-911                 |
| You have contacted me in respect of a consultation you are carrying out ahead of developing the Minerals Local Plan.  |                          |

| Summary of comments  | Initial officer response   |
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| <p>As a matter of policy, I do not comment on specific planning applications but have engaged in correspondence on behalf of communities regarding extraction sites. I have no specific comments on sites to be included in the plan but note that it is essential to ensure full consultation with local communities when identifying appropriate sites and ensuring that this work is carried out sensitively to protect our highly-valued countryside spaces. I also feel that it is important that operators work harder to co-operate with their local communities and that these communities are not negatively impact during extraction operations.</p> <p>I have previously corresponded with the County Council regarding a specific local need to ensure that topsoil and other re-usable materials, including hardcore, be, where possible, reserved and used in the construction of flood defence structures protecting out villages and towns. Severn Stoke and Tenbury are both looking at building bunds to protect their communities and if possible, the re-use of materials extracted as part of your plan could be used to significantly reduce the cost of bund construction.</p> <p>I hope that you will bear this in mind when developing your plan.</p> | <p>We agree that full consultation with local communities is important. All parish councils are consulted at each stage of developing the plan, as well as any members of the public who have requested to be kept informed. We will seek to ensure that the level of consultation undertaken continues to be appropriate where any specific sites are being considered for allocation in the plan.</p> <p>Also, one of the draft objectives of the Minerals Local Plan focuses on ensuring opportunities for community inclusion in mineral development throughout the life of mineral sites.</p> <p>We agree that topsoil is an important resource which needs to be retained and reused. We will consider this during the coming months as develop the policy framework.</p> <p>The Waste Core Strategy (adopted 2012) encourages the re-use and recycling of waste materials such as hardcore.</p> |
| <p>Severn Trent Water</p>  | <p>D019-1688</p>   |
| <p>Thank you for giving Severn Trent Water the opportunity to comment on the above consultation I can now provide you with the following information.</p> <p>Currently we have no major concerns, however please keep us informed when the areas of development have been confirmed, because we will thoroughly need to risk</p>   | <p>Noted. We will contact you in due course with regard to individual site submissions.</p>  |

| Summary of comments  | Initial officer response |
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| asses the land within a Source Protection Zone before development can be considered. |                          |



# Responses to Background Document consultation

| Summary of comments   | Initial officer response   |
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| <p data-bbox="188 357 611 384"><b>Cotswolds Conservation Board</b></p> <p data-bbox="188 392 1346 459">The Cotswolds Conservation Board supports the references to the AONB designation and Management Plan 2013-18 within the background evidence.</p> <p data-bbox="188 499 1305 566">In addition to the Management Plan, reference could also be added to our adopted Position Statement on Minerals and Waste 2013 (see attached).</p> <p data-bbox="188 606 1352 810">We also recommend reference is added to Paragraph 115 of the NPPF that confirms the application of “great weight” in conserving landscape and scenic beauty in AONBs which have the highest status of protection. Accordingly Paragraph 116 of the NPPF confirms that planning permission should be refused for major developments in AONBs except in “exceptional circumstances and where it can be demonstrated they are in the public interest.”</p>  | <p data-bbox="1388 357 1525 384"><b>D001-740</b></p> <p data-bbox="1388 392 2018 496">Thank you for your response. We will consider the points you raise as we continue develop the plan.</p>  |
| <p data-bbox="188 820 443 847"><b>Highways England</b></p> <p data-bbox="188 855 1301 922">Thank you for forwarding me details of the consultation regarding the above Emerging Worcestershire Minerals Local Plan.</p> <p data-bbox="188 962 1357 1086">Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The SRN includes all major motorways and trunk roads. The SRN within Worcestershire includes the M5, M50 and M42 Motorways and the A46 Trunk Road.</p> <p data-bbox="188 1126 1346 1294">We have reviewed the relevant background documents and consider that additional sites, particularly those in close proximity to the SRN, could impose potential transport implications upon the SRN, notably with regard to traffic generation associated with employment and HGV movements associated with both the construction of sites and extraction of minerals.</p> <p data-bbox="188 1334 1361 1393">In consideration of the wide area of coverage of the Emerging Minerals Local Plan, Highways England’s concern is over the impact of proposed sites along on stretches of the</p> | <p data-bbox="1388 820 1543 847"><b>D011-2372</b></p> <p data-bbox="1388 855 2018 959">Thank you for your response. We will consider the points you raise as we continue develop the plan.</p> <p data-bbox="1388 999 2007 1066">We will contact you in due course with regard to individual site submissions.</p> |

| Summary of comments   | Initial officer response |
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| <p>SRN including:</p> <ul style="list-style-type: none"> <li>- M5 between Junctions 3 and 9,</li> <li>- M42 Junction 1 to 3</li> <li>- M50 Junction 1 to 2</li> <li>- A46 from Teddington Hands to the junction of the A44/A46 north of Evesham</li> </ul> <p>The potential traffic impacts of any additional proposed sites not previously identified within the adopted Minerals Plan should be assessed on an individual basis, and as appropriate, also a cumulative basis. This assessment should be undertaken through Transport Assessment and Environmental Impact Assessment processes and consider the need for mitigation of any potential for adverse effects on the SRN.</p> <p>We note that the potential for significant traffic flows arising from the allocation of additional minerals sites will have cumulative and interlinked transport impacts upon the SRN with that traffic, arising from development considered within the Local Plan process. In this regards both adopted and emerging Local Plans within Worcestershire districts are relevant.</p> <p>In particular we note the advance status of the submitted South Worcestershire Development Plan (SWDP), the Bromsgrove Local Plan and Redditch Local Plan are most relevant. The transport evidence and assumptions underpinning these emerging plans, as well as any further growth arising in the Wyre Forest District Local Plan, will be impacted by any new allocations.</p> <p>As you will be aware Highways England has worked with Highways Officers from Worcestershire County Council in the preparation of evidence and agreement of positions with regards the above submitted plans. The result of this work has identified a number of junctions along the SRN and Local Highway Networks where, due to traffic arising from development, highway improvements are required.</p> <p>In light of the above we would recommend that work is undertaken by the county, in conjunction with Highways England, to assess the cumulative impact of any newly proposed strategic minerals allocations or any cluster of smaller sites arising from the</p> |                          |

| Summary of comments   | Initial officer response   |
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| <p>Minerals Plan to enable the consideration of potential cumulative transport impacts upon the SRN.</p> <p>Any infrastructure needs arising from this assessment should be discussed and agreed with Highways England prior to adoption of the Minerals Local Plan.</p> <p>If you have any questions regarding our response please do not hesitate to contact me.</p>  |  |
| Woodland Trust  | D016-1967  |
| <p>“Safeguarding mineral resources and infrastructure”</p> <p>It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with emerging national policy as set out below.</p> <p>Details of the location of ancient woodland are available through the county Ancient Woodland Inventory (Natural England) and ancient trees can be identified by the Ancient Tree Hunt data (<a href="http://www.ancient-tree-hunt.org.uk/">http://www.ancient-tree-hunt.org.uk/</a>). We also draw your attention to Natural England and the Forestry Commission’s standing advice for Ancient woodland and veteran trees: protecting them from development - <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a></p> <p>With Worcestershire County Council showing an above average ancient woodland resource at 3.6% of land area compared to a UK average of 2.5%, it is critical that this valuable natural resource is absolutely protected in this Minerals Local Plan.</p> <p>It is also important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient</p> | <p>Thank you for your response. We agree that it is important to protect ancient semi-natural woodland and veteran trees. We are developing the Minerals Local Plan to be "Green Infrastructure" focused, meaning that minerals development should protect and enhance aspects of the natural environment such as ancient semi-natural woodland.</p> <p>We will consider the points you raise as we continue develop the plan.</p> |

| Summary of comments  | Initial officer response |
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| <p>trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees. The Ancient Tree Hunt (<a href="http://www.ancient-tree-hunt.org.uk/">http://www.ancient-tree-hunt.org.uk/</a>) is designed specifically for this purpose.</p> <p>Emerging national policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The Communities and Local Government (CLG) Select Committee published its report following its June 2014 inquiry into the 'Operation of the National Planning Policy Framework (NPPF)', in which it has specifically recognised the need for better protection for ancient woodland (Tues 16th Dec 2014). The CLG Select Committee report states: 'We agree that ancient woodland should be protected by the planning system. Woodland that is over 400 years old cannot be replaced and should be awarded the same level of protection as our built heritage. We recommend that the Government amend paragraph 118 of the NPPF to state that any loss of ancient woodland should be "wholly exceptional". We further recommend that the Government initiate work with Natural England and the Woodland Trust to establish whether more ancient woodland could be designated as sites of special scientific interest and to consider what the barriers to designation might be.'</p> <p><a href="http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf">http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf</a> .</p> <p>This shows a clear direction of travel, recognising that the NPPF does not currently provide sufficient protection for ancient woodland. Until the NPPF is amended there is a clear role for Local Plans and associated documents to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF.</p> <p>This recommendation should also be considered in conjunction with other - stronger - national policies on ancient woodland -</p> <ul style="list-style-type: none"> <li>• The Government's policy document 'Keepers of Time – A statement of Policy for England's Ancient &amp; Native Woodland' (Defra/Forestry Commission, 2005, p.10) states: 'The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland'.</li> <li>• The Government's Independent Panel on Forestry states: 'Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland</li> </ul> |                          |

| Summary of comments   | Initial officer response |
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| <p>Policy (Keepers of Time – A statement of policy for England’s ancient and native woodland).....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.’ (Defra, Final Report, July 2012). This has been endorsed by the response in the Government Forestry Policy Statement (Defra Jan 2013): ‘We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England’s ancient and native woodland’.</p> <ul style="list-style-type: none"> <li>• The Government’s Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: ‘The Government is committed to providing appropriate protection to ancient woodlands....’.</li> <li>• The Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England’s Wildlife &amp; Ecosystem Services, Defra 2011, see ‘Forestry’ para 2.16) states that – ‘We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site’.</li> </ul> <p>A useful example of good Local Authority minerals policy on ancient woodland is provided by Northamptonshire Minerals and Waste Local Plan (adopted October 2014). The Plan states -</p> <p>“6.17. Particular features that create a specific aspect of local distinctiveness or character should be protected from future loss; this includes such features as topography (e.g. hills and dales), habitats that are unique to an area (e.g. ironstone gulleys or quarries, acid grassland and ancient woodland), geology (e.g. unique formations and historic quarries) and historic landscapes (which may contain features such as ancient hedgerows, stone walls and survivals of former field systems such as ridge and furrow).”</p> <p>The Essex Minerals Local Plan adopted July 2014 also sets out that -</p> <p>“5.39 Mineral development in the countryside should pay particular regard to the local landscape and should aim to protect and enhance this, including through restoration and after-use. The Landscape Character Assessments undertaken by the local planning</p> |                          |

| Summary of comments   | Initial officer response  |
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| <p>authorities should be used by developers to inform the design and working programmes of their mineral proposals. Impacts on the landscape can be avoided, reduced or overcome by a variety of measures including:</p> <ul style="list-style-type: none"> <li>• Safeguarding local features (such as significant topography, woodland, veteran trees, hedgerows and viewpoints) to retain biodiversity networks and provide part of the framework for restoration,”</li> </ul> <p>We would therefore like to see this Local Plan contain a specific policy for absolute protection of ancient woodland and ancient trees. Suggested wording: “Development which would result in the loss of Ancient Woodland, Ancient trees or Veteran trees will not be permitted”.</p>  |   |
| <p><b>South Worcestershire Councils</b></p>   | <p>D017-681,1623,683</p>  |
| <p>Thank you for providing the opportunity to respond to the Summer 2015 consultation related to the development of the Worcestershire Minerals Local Plan.</p> <p>This response is on behalf of the South Worcestershire Councils (SWC’s) – Malvern Hills District Council, Worcester City Council and Wychavon District Council. The response has been prepared by officers and has not been considered or endorsed by Members.</p> <p><u>Call for Sites</u></p> <p>The SWC’s do not collate information on potential sites for minerals extraction, so are not proposing any new sites for consideration in the Minerals Local Plan.</p> <p><u>Safeguarding Mineral Resources</u></p> <p>NPPF (paragraph 143) requires local planning authorities to adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked.</p> <p>To safeguard known deposits of minerals from unnecessary sterilisation by non-mineral development, Policy SWDP 32 in the draft South Worcestershire Development Plan (SWDP) is proposing that developers assess the scope for minerals extraction before any development takes place in Minerals Consultation Areas. SWDP 32 is proposing that planning permission would not be granted for non-mineral development that would lead to</p> | <p>Thank you for your response.</p> <p>Noted, we welcome the inclusion of Policy SWDP 32 in the South Worcestershire Development Plan.</p> <p>We will contact you in due course with regard to individual site submissions and the development of the policy framework.</p> |

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| <p>the unnecessary sterilization of mineral resources within a Minerals Safeguarding Area (MSA) unless:</p> <ul style="list-style-type: none"> <li>a. The applicant can demonstrate that the mineral concerned is no longer of any value or potential value; or</li> <li>b. The mineral can be extracted satisfactorily prior to the development taking place; or</li> <li>c. The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed.</li> </ul> <p>The SWC's are intending to consult on Main Modifications to the SWDP, including policy SWDP 32, in October / November 2015. Worcestershire County Council will be formally consulted on the Main Modifications.</p> |                          |

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| <p><u>Safeguarding Infrastructure</u></p> <p>NPPF also requires that appropriate facilities which support minerals production and processing be safeguarded.</p> <p>The SWC's are aware that within south Worcestershire there are concrete batching plants (at Worcester, Upton upon Severn, Ryall, Pershore, Hanbury, Longdon and Evesham) and asphalt batching plants (at Pinvin and Upper Strensham). These may have the potential to be safeguarded if they do not have unacceptable effects on health, amenity, the environment or matters of acknowledged importance. There are also wharfage facilities onto the River Severn at Ryall House Farm Quarry (South of Upton-upon-Severn) and Ripple Quarry (South of the M50 motorway crossing).</p> <p>It is understood that there are currently no rail heads or rail links to quarries in south Worcestershire.</p> <p>We hope the above information is helpful in developing the Worcestershire Minerals Local Plan. If you require clarification on any issues raised in this response or wish to arrange a meeting with South Worcestershire officers to discuss the issues further, please contact David Clarke at Malvern Hills District Council on 01684 862370.</p> | <p>Thank you for highlighting the locations of these concrete batching and asphalt batching plants. We will ensure that our background document "Concrete Batching and Asphaltting Plants in Worcestershire" refers to all of these.</p> <p>We intend to develop and publish documents regarding water and rail transportation over the coming months.</p> |



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| Heaton Planning on behalf of Tarmac   | D018-1504   |
| <p>Thank you for consulting with us in respect of the above consultation. Our comments on behalf of our client, Tarmac (previously Lafarge Tarmac), are provided below. Please note we have previously made representations in respect of the Worcestershire Minerals Local Plan, the most recent of which were in response to the 'Minerals Local Plan Second Stage' consultation (on 28th January 2014) and the 'Statement of Community Involvement' (on 28th July 2014).</p> <p><u>Worcestershire Local Aggregates Assessment (December 2014)</u></p> <p>We note from the latest LAA that Worcestershire's sand and gravel landbank is currently 4.42 years. The Council acknowledge that this is below the minimum landbank as set out in the NPPF (i.e. 7 years) and that there is a shortage of supply in the County. It is stated (paragraph 1.12) that the Minerals Local Plan is being developed with 'a view to enabling the appropriate supply of aggregates in the County'. Obviously, the Plan cannot oblige operators to come forward with planning applications so that the landbank is maintained. The Plan can only identify appropriate reserves/ resources through the allocation of areas of search, preferred areas and/ or site allocations.</p> <p>Given the lack of a sufficient landbank of sand and gravel we believe that it is of paramount importance that the Plan be flexible enough to ensure that the required additional resources are able to be exploited during the Plan period. To achieve this, the Plan should be positively prepared to maximise opportunities for appropriate sites to come forward to contribute to aggregate supply. In our opinion, this would best be achieved through the identification of 'Preferred Areas' of working and, where possible, site specific allocations. This would give greater certainty to mineral operators and encourage the submission of proposals for mineral working in the future. Given the supply shortfall, sites outside of identified areas should also be allowed to come forward if the resource is proven and they can be developed appropriately.</p> | <p>Thank you for your comments on the Local Aggregates Assessment. This is published as an annex to our Annual Monitoring Report and is revised annually. As you note, we acknowledge that the County's landbank of permitted reserves for sand and gravel (and also crushed rock) is well below the minimum expected by national policy. We agree that the best way to address this is by developing and adopting the Minerals Local Plan to provide a policy framework which gives certainty to the Minerals Industry.</p> <p>Whilst our earlier consultation documents stated that we did not intend to allocate Specific Sites in the Minerals Local Plan, we have taken on board the comments we received which highlighted that allocating sites would give greater certainty to both Industry and local communities about where mineral development should take place and what it should seek to achieve, as well as being the best method to encourage sites to come forward to raise the level of permitted reserves in the county (the "landbank").</p> |

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| <p>Tarmac have previously promoted, and continue to promote, two potential extensions to Clifton Quarry for allocation in the Minerals Local Plan. These are a southern extension to the existing quarry and a larger eastern extension, east of the A38 (mineral from the eastern area would be transported by conveyor to the existing plant site). The two extension areas have a potential reserve of 2 million tonnes and are required to maintain a continuity of supply from Clifton Quarry during the Plan period. Restoration of the two areas would complement the existing restoration of Clifton Quarry (to a mix of agriculture and water bodies) and provide an opportunity to further enhance the biodiversity/ecological value of the site.</p> <p>We note that the Council's proposed annual apportionment figure post-2016 is based solely on the 10 year rolling sales average. The LAA makes clear that the Council has considered 'other relevant local information' (in accordance with NPPF), however, it has been concluded that this information does not justify a deviation from an apportionment figure based on the 10 year average. In our opinion, the 10 years sales average is heavily influenced by the steep decline in demand during the global economic recession. To rely solely on this information as the basis for the annual apportionment figure would not properly take into account the upward trend over the last two years (reflected in increased activity and outputs from Lafarge Tarmac sites Nationwide). It is perverse to be reducing the apportionment figure when all indications are for sustained economic growth through the provision of new housing and major infrastructure development during the Plan period. This is consistent with anecdotal evidence through economic forecasts and growth figures</p> | <p>However, we also recognise that further resources are likely to be required in addition to those allocated, and will therefore develop the policy framework to be flexible enough to allow other proposals to come forward where they meet the objectives of the plan as a whole.</p> <p>We have received a number of site proposals from landowners, minerals operators and agents in response to the Second Stage Consultation on the Minerals Local Plan and the two Calls for Sites, including the extension sites at Clifton proposed by Tarmac. We will consider all of the site proposals we have received and assess which sites should be designated as Specific Sites in the Plan. We are aiming to publish the results of that assessment later in 2016.</p> <p>Thank you for setting out your concerns about the reliance on the 10-year average so clearly. Whilst we have considered other relevant local information in previous versions of the Local Aggregates Assessment, the LAA needs to be updated annually. We will therefore give full consideration to the points you raise as we develop the next version. We will also take into account the views of the West Midlands Aggregate Working Party.</p> |

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| <p>produced by Government. Through discussions we have held with house builders (Barratt Homes / David Wilson Homes, Bovis, Radmore) and property developers (Hallam Land Management, Gallagher Estates, Harworth Estates, Waystone Development), house building and construction activity has increased rapidly over the last two years and is now back to pre-recession levels.</p> <p>In our opinion, the LAA, including the method for calculating the annual apportionment post-2016, does not take into account potential increased demand for aggregate resulting from the wider economic recovery. As such, it is not positively prepared and may result in an undersupply of aggregate materials over the Plan period.</p> <p><u>Analysis of Mineral Resources in Worcestershire Background Paper (May 2015)</u></p> <p>As stated in our previous representations, the overall approach to the identification of 'Resource Areas' is appropriate and logical. However, due to the inherent limitations of site sieving we have some concerns that workable resources outside of the identified 'Resource Areas' may exist. The policies within the Minerals Local Plan should allow mineral sites to come forward that are not included within 'Resource Areas' if the mineral resource is proven and it can be developed appropriately.</p> <p>We support the identification of 'Resource Area 20/4: South of Kempsey' as a 'Significant to Key' resource for inclusion in the Minerals Local Plan. The two promoted extensions to Clifton Quarry are included within this identified Resource Area and, as set out above, would contribute approximately 2 million tonnes to the County's landbank.</p> <p>As outlined in our comments on the LAA, it would be useful for the Council to go a step further in respect of their policies relating to the location of future mineral extraction i.e. in</p> | <p>We are pleased to note that you generally support the approach to identifying Resource Areas. We agree, and acknowledge in the Analysis of Mineral Resources document, that there are limitations in the data which may mean that other resources exist, or indeed that our resource estimates are not always as accurate as we would hope. We will develop the plan with this in mind, and intend to build in enough flexibility to allow other proposals to come forward where they meet the objectives of the plan as a whole. We look forward to your comments on our approach at the next full consultation stage.</p> <p>Noted.</p> <p>As outlined above, we now intend to allocate Specific Sites, as well as having a Spatial</p> |

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| <p>addition to identifying 'Resource Areas' it would be useful for the Council to identify 'Preferred Areas' for mineral extraction and, wherever possible, site specific allocations. This would provide a greater level of certainty to the Mineral Planning Authority, developers and local communities.</p> <p>It would appear (from the geological data available) that there are very few, if any, large sand and gravel deposits remaining in the County. The issue with smaller mineral deposits is that the available mineral resource is often insufficient to warrant investment in on-site processing plant. As such, we would welcome support in the Minerals Local Plan for the development of satellite quarries, where appropriate, utilising existing quarry processing plants. This would support the sustainable working of smaller deposits that may not be viable to be worked as stand-alone quarry sites.</p> <p>We note that a significant amount of work has been done in respect of the 'Analysis of Mineral Resources in Worcestershire Background Paper'. However, as a minor point, the Plans within the background document are at a very small scale which make them difficult to interpret.</p> <p><u>Concrete Batching and Asphaltting Plants in Worcestershire Background Paper (May 2015)</u></p> <p>We support the safeguarding of asphaltting plants in the Minerals Local Plan (including Tarmac's asphalt plant in Pershore) in accordance with national policy.</p> | <p>Strategy which will identify broader areas where mineral development should be directed. We will be developing this Spatial Strategy over the coming months and look forward to your comments on our approach at the next full consultation stage.</p> <p>Noted. We will consider how to incorporate this concept as we develop the policy framework over the coming months.</p> <p>We apologise that the scale of the plans was insufficient for easy interpretation. We recognised this problem during the Second Stage Consultation and have therefore developed an interactive web-map to assist with viewing the data we hold on mineral resources. This was published alongside the call for sites, resources and infrastructure and background document consultation in summer 2015. It can be viewed at <a href="http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/">http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/</a>.</p> <p>Thank you for providing comments on the Concrete Batching and Asphaltting Plants background document. We recognise the concerns you have raised and will consider these as we develop the policy framework of</p> |

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| <p>We have concerns that the health and environmental issues/ controls sections of the Background Paper (paragraphs 1.63 to 1.66 and 1.85 to 1.105) indicate the potential for fairly prescriptive and, perhaps, unduly onerous environmental policies in the Minerals Local Plan. Whilst we appreciate the need for the Minerals Local Plan to consider potential environmental impacts, including methods for their control, there appears to be potential duplication of other regulatory controls (for example in respect of health issues). This is unnecessary and would result in the Plan being unduly onerous.</p> <p>The proposed approach to mitigating potential environmental effects through policies in the Minerals Local Plan appears very prescriptive (promoting a 'one-size fits all' approach). For example paragraph 1.96, in respect of 'Noise Management', states that the Minerals Local Plan could include policies to lessen noise issues by:<br/> "Setting noise limits at sensitive properties, limiting hours of operation, limiting the number or frequency of night operations, prescribing certain kinds of reversing alarms."</p> <p>A policy incorporating these elements would be very inflexible and would not take into account the variety of mitigation measures available or the need to determine development proposals on a case by case basis. Policies should simply be worded to make clear that proposals must include mitigation measures, where necessary, to ensure that development does not result in unacceptable environmental impacts.</p> <p>The Background Paper acknowledges an increasing trend amongst asphaltting plant customers to require 'out of hours' deliveries and accordingly a need for plant to be operated at night (paragraph 1.76). We appreciate that there is potential for conflict between commercial demand and local amenity and, in principle, we would support a policy relating to this in the Minerals Plan as it would provide clarity on the issue. However, a policy relating to 'out of hours' operations should not be overly prescriptive (proposals should be considered on a case-to-case basis) or unduly onerous as this may prove to constrain and hinder operations.</p> <p>I trust that the points above are sufficiently clear. Should you require any further information or clarification please do not hesitate to contact me on the below details.</p> | <p>the Minerals Local Plan.</p> |
| <p>Environment Agency</p>   | <p>D021-719</p>                 |

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| <p>Thank you for referring the above consultation. We wish to make the following comments:</p> <p><u>Background Documents</u></p> <p>We welcome the comprehensive framework of background documents. These provide a very robust and useful context for the MLP. We would add the following comments with regards to the 'Minerals and Climate Change':</p> <p>We note that flood risk has been identified as a key issue and that a separate background document is being formulated. We would be happy to review/provide comment on iterative versions of this document moving forward. Flood risk and climate change are issues that are inextricably linked to one another. We raise further comment on flood risk issues below.</p> <p>The flood risk betterment examples are commendable but it should be remembered that opportunities should be informed by site constraints in combination with the hydraulic and ecologic setting. A uniform approach will not always be the most preferable. We note the paper acknowledges this.</p> <p>Whilst appraising the flood risks to and from potential sites, flood risk assessments should consider the impacts of climate change. Climate change allowances for fluvial flood risk are due to change this Autumn and the previous allowances will become out of date. This is important in the context of existing Strategic Flood Risk Assessment (SFRA) data and EA flood mapping and should be borne in mind moving forward.</p> <p>It is very likely that development proposals in areas at flood risk (at the site specific stage) will require detailed hydraulic modelling and this will include allowances for climate change. As such we would advocate that the MLP signposts this requirement and the updated climate change allowances. The allowances have not yet been published but I can advise that the pertinent allowances are as follows:</p> <p>These are presently in draft but would update the current NPPG referenced 'Table 2' September 2013 allowances (see link below). The table below is for 'peak river flows' within the Severn River Basin district, and for your information at this time in</p> | <p>Thank you for your response. We will contact you in due course with regard to individual site submissions, and the development of the water and flood risk background document.</p> |

| Summary of comments  | Initial officer response  |           |           |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
|--|---|-----------|-----------|-----------|---|--|--|--|-----------|-----|-----|-----|----------------|-----|-----|-----|---------|-----|-----|-----|-------------------------|-----------|-----------|----------------|-----|-----|--|
| <p>considering the impact upon (and of) proposed development and mitigation/resilience measures. ('Table 1' Rates of Sea level rise are not changed).</p> <table border="1" data-bbox="232 360 1034 663"> <thead> <tr> <th>Severn Peak River Flows:</th> <th>2015-39</th> <th>2040-2069</th> <th>2070-2115</th> </tr> </thead> <tbody> <tr> <td><b>Total potential change anticipated</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Upper end</td> <td>25%</td> <td>40%</td> <td>70%</td> </tr> <tr> <td>Higher central</td> <td>15%</td> <td>25%</td> <td>35%</td> </tr> <tr> <td>Central</td> <td>10%</td> <td>20%</td> <td>25%</td> </tr> </tbody> </table><br><table border="1" data-bbox="232 687 1043 788"> <thead> <tr> <th>Current NPPG allowances</th> <th>1990-2025</th> <th>2025-2115</th> </tr> </thead> <tbody> <tr> <td>September 2013</td> <td>10%</td> <td>20%</td> </tr> </tbody> </table>  | Severn Peak River Flows:  | 2015-39   | 2040-2069 | 2070-2115 | <b>Total potential change anticipated</b> |  |  |  | Upper end | 25% | 40% | 70% | Higher central | 15% | 25% | 35% | Central | 10% | 20% | 25% | Current NPPG allowances | 1990-2025 | 2025-2115 | September 2013 | 10% | 20% |  |
| Severn Peak River Flows:   | 2015-39   | 2040-2069 | 2070-2115 |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| <b>Total potential change anticipated</b>  |   |           |           |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| Upper end  | 25%   | 40%       | 70%       |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| Higher central   | 15%   | 25%       | 35%       |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| Central  | 10%   | 20%       | 25%       |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| Current NPPG allowances  | 1990-2025   | 2025-2115 |           |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| September 2013   | 10%   | 20%       |           |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| Mineral Products Association   | D024-1899   |           |           |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |
| <p>The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.</p> <p>Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 &amp; 144) we should like to direct your attention to 'Making the Link', a</p> | <p>Noted</p> <p>Thank you for directing us to the MPA's "Making the Link" document. We have already</p> |           |           |           |   |  |  |  |           |     |     |     |                |     |     |     |         |     |     |     |                         |           |           |                |     |     |  |

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| <p>document produced by the MPA to highlight the contribution that the sector makes to the economy.</p> <p><b>Ensuring adequate and steady supply of Industrial and Energy Minerals</b></p> <ul style="list-style-type: none"> <li>• We consider the classification of industrial minerals to include dimension, or building stone. The justification for this is that NPPF recognises only three categories of mineral; aggregates, industrial minerals and energy minerals. Dimension stone is a construction mineral but not an aggregate. In this respect, it is most like brickclay. Accordingly, it should fall under Para 146 of NPPF for national policy and should be included by mpas in Local Plans with other industrial minerals for local policy purposes. Mpas sometimes get concerned about the level of aggregates which can be produced at such sites as a by-product, but essentially such sites are no different than the silica sand sites mentioned in the document.</li> <li>• The MPA incorporates SAMSA, or the Silica and Moulding Sands Association. For silica sand we would advise you that there is indeed no recognised way of forecasting demand; indeed it is not necessary since for all industrial mineral minerals national policy assumes that it is based on the individual need of the operator for a minimum 10 year supply of material from each operating site. We would suggest therefore, that you need to canvass operators for their projected requirements during the plan period and allocate accordingly, and in the absence of a response adopt a policy of supplying the nationally advised minimum reserves at each site should applications be made.</li> </ul> <p><b>Analysis of Mineral Resources in Worcestershire</b></p> <ul style="list-style-type: none"> <li>• We remain extremely sceptical of the exercise to calculate resource quantities. In our experience whenever this has been carried out, it results in a gross over-estimate of resources that skews the assessment of what the area can realistically produce. We would be interested to know if the 21 sites said to have been put forward in the call for sites are located in the areas you have identified as having potential, whether the deposits have been proven, whether they are deliverable and what the quantities add up to. Previous</li> </ul> | <p>found that document extremely useful and have used some of the information it contains in the draft Spatial Portrait which will provide the introduction to the Minerals Local Plan.</p> <p>Thank you for these helpful comments on industrial and energy minerals. We will consider these as we develop the policy framework.</p> <p>We have developed an interactive web-map to assist with viewing the data we hold on mineral resources. It can be viewed at <a href="http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/">http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/</a>.</p> <p>We acknowledge in the Analysis of Mineral</p> |



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| <p>comments that our members are finding it difficult to find good sites which are commercially viable are still valid.</p> <ul style="list-style-type: none"> <li>• Nevertheless, there is value in the work undertaken to identify Key Resources and we see no reason why these should not form the basis of Areas of Search if a shortfall of material is identified.</li> </ul> | <p>Resources document that there are limitations in the data which may mean that other resources exist, or indeed that our resource estimates are not always as accurate as we would hope. However, we believe that the methodology is robust enough to allow the broad categorisation of resources into "key", "significant" and "not significant" which we believe is crucial for plan making in this county. We revised the Analysis to take into account comments on the method used and more detailed information about some of the resources which were received in response to the Second Stage Consultation.</p> <p>We will develop the plan with this inherent uncertainty in mind, and we intend to build in enough flexibility to allow proposals to come forward where they meet the objectives of the plan as a whole. We look forward to your comments on our approach at the next full consultation stage.</p> <p>The majority of the sites put forward are either within or in close proximity to what they Analysis considered to be either Key or Significant resources. We are undertaking a "Deliverability Assessment" to consider all of the site proposals we have received and assess which sites should be designated as Specific Sites in the Plan. We are aiming to publish the results of that assessment later in</p> |

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| <p><b>Building Stone in Worcestershire</b></p> <ul style="list-style-type: none"> <li>• We think the document is well researched and is a valuable background document but is overly reliant on an interpretation of dimension stone for the ‘heritage repair’ market. Thompson’s work is still relevant but there have been significant changes in the industry over the last 11 years that render some of his conclusions out of date. There has been much consolidation in the industry with smaller operators closing and larger companies emerging. Regulatory drivers (health and safety, quarry regs, EIA, etc) are making it impossible to sustain ‘one man and his dog’ hobby quarries, and the industry is professionalising fast. The larger operations are commercially branded and marketing is much more sophisticated. Many companies have a significant export market. One of the impacts of these changes is to concentrate working in fewer, larger operations. The majority of dimension stone operations will still be smaller than aggregate operations but the scale of difference will not be as acute in the future.</li> <li>• Although up to now there has been no interest in dimension stone operations this does not mean that they will not be made in the future. For the following reasons we would ask for a more flexible policy on this mineral.</li> <li>• The MPA’s approach to Dimension Stone can be summarised as follows, <ul style="list-style-type: none"> <li>o Minerals of all types are essential to support sustainable development</li> <li>o Policies should be included in plans for locally important minerals</li> <li>o Mpas should provide a steady and adequate supply of minerals by providing a stock of permitted reserves to support actual and proposed investment</li> <li>o Mpas should give great weight to the benefits of mineral extraction</li> <li>o There is no national policy justification for limiting new sites or extensions as long as they fulfill the requirements of NPPF</li> <li>o Need should not be required to be demonstrated for proposals, nor should new proposals be compared with existing sites – each proposal should be treated on its merits</li> <li>o Dimension stone should be treated as an industrial mineral and policy should be modelled in accordance with para 146 of NPPF on a site by site basis</li> <li>o Production of dimension stone in the UK is rising, particularly for limestone.</li> </ul> </li> </ul> | <p>2016.</p> <p>Thank you for these detailed and interesting comments on the Building Stone background document. We will consider them as we develop the policy framework.</p> |

| Summary of comments   | Initial officer response  |
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| <ul style="list-style-type: none"> <li>o Dimension stone is often site or regionally specific and products are branded</li> <li>o Customers require assurances of quality, colour and durability together with longevity of supply.</li> <li>o Dimension stone operations involve skilled workforces and are based on a different business model to aggregates.</li> <li>o Dimension stone operations differ widely in thier size but the most successful ones employ up to date professional working practices which can only be guaranteed by operations being of a significant size in production terms, because of the costs involved.</li> <li>o Aggregates must sometimes be sold by dimension stone operators to create working space in the quarry and to provide an accounting contribution to fixed costs.</li> <li>o Heritage uses usually only account for 10% of business for MPA members.</li> <li>o Limitations to small scale and local markets restrict access to markets and capital and hence threaten the long term viability of operations.</li> <li>o Reserves need to be assured for the long term.</li> </ul> <p>• I attach as Appendix 1 a new brochure produced by the MPA to alert mpas to the needs of the sector and I commend it to the local authority. I also attach an analysis of Mineral Yearbook data on Dimension Stone that shows production trends and relationship to imports (Appendix 2) to show that UK production is rising and imports are falling.</p> <p>We wish to emphasise two additional points;</p> <ul style="list-style-type: none"> <li>• First, the MPA believes that aggregate production does not need to be discouraged at dimension stone sites. A dimension stone operation will be markedly different from an aggregates operation in scale and in arrangement. That is not to say that an aggregates operation cannot produce dimension stone as a by-product. The nature of the operation should be apparent by observing the workforce, the equipment/plant used (eg. Sawing sheds) and the nature of the geology (material needs to be removed as overburden that then forms the byproduct). We do not believe that aggregates production should be 'discouraged' since to do so might threaten the viability of the operation in raising operating costs and removing income streams.</li> <li>• Second, the MPA believes that limitation to small scale operations is counter-productive and unjustified. This is the outcome of a prejudice against dimension stone and a</li> </ul> | <p>Thank you for highlighting this issue. We also consider that limiting the sale of aggregates would be against the principle of making the best use of our scarce resources. We will develop the policy framework to ensure an appropriate balance between this and appropriate environmental and amenity protection.</p> <p>Noted. We will consider this as we develop the policy framework.</p> |

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| <p>misinterpretation of national policy. NPPF does not say that all dimension stone operations must be small scale, just that consideration should be given to the supply of small scale operations from 'relic quarries' to supply the heritage market. Only about 10% of MPA members' output goes to the heritage and repair sector. And this part of para 144 of NPPF should not apply to them.</p> <ul style="list-style-type: none"> <li>• Therefore, we would wish to see a local policy that encouraged dimension stone operations of any description and for any market, and that is additionally not constrained by being small scale, or only for local markets, or only short term, or arbitrary limits set on the quantity of aggregates produced.</li> </ul> <p><b>Concrete Batching and Asphaltting Plants in Worcestershire</b></p> <p>We only have a few comments on this paper, which is well researched and is a valuable background document.</p> <ul style="list-style-type: none"> <li>• NPPF requires safeguarding of 'sites...for other concrete products...' However, there is no mention in the document of such sites such as concrete products plants, etc. we wondered if this could be rectified.</li> </ul> <ul style="list-style-type: none"> <li>• For safeguarding the paper speaks of adjacent land to mineral infrastructure sites, and we would like to see a formal buffer adopted in any spot safeguarding to deal with proximity issues.</li> </ul> | <p></p> <p>Thank you for highlighting this omission. We will consider this point and address it through the policy framework and/or through amendment to the background document as necessary.</p> <p>We would be grateful if you could pass on any information you have about such plants in Worcestershire.</p> <p>We intend to consider safeguarding of resources and essential infrastructure together to ensure a consistent approach, including the application of any safeguarding buffer. We will be developing our approach to safeguarding over the coming months and look forward to your comments on our approach at the next</p> |

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| <p>Your concern about the release of dust from concrete plants is misplaced. The document makes the point that a permit under the PPC regs must be considered to be doing its job. All emissions from concrete plants are covered under these regulations and a modern plant will not lead to the release of cement dust. Typically, all mixing and loading activities will be carried out under cover, or with adequate wind blow protection. Please adjust the text accordingly.</p> <ul style="list-style-type: none"> <li>• The same comments could also be made about your statements of potential for water contamination. Once again, this is regulated under the environmental permit and the planning system should assume that it is effective. Otherwise, you will only duplicate the environmental permitting system. We suggest that your concern should be directed towards whether the proposed use is suitable for that particular site. Details of emission control should not form part of that concern.</li> <li>• We also consider that you may over-emphasise the potential health issues arising around asphalt. Our members are continually aware of the health and safety issues of their operations to their employees and the wider public.</li> </ul> <p>Asphalt plants are regulated under the IPPC regime and we would not like the Plan to duplicate this arrangement in any way.</p> <ul style="list-style-type: none"> <li>• In terms of the future demand for asphalt products, the government white paper Action for Roads says that “by 2021, spending on road enhancements will have tripled from today’s (2013) levels, and we will have resurfaced 80% of the network. This is a genuinely transformational package, every bit the equal of the major investments we are making on rail and High Speed 2.” This includes investing more than £12 billion in maintaining the network, including over £6 billion to resurface over 3,000 miles of the strategic road network. Such activity will have a significant impact on the demand for aggregates and asphalt.</li> </ul> <p><b>Crushed Rock in Worcestershire</b></p> | <p>full consultation stage.</p> <p>Thank you for highlighting these points, and we acknowledge their validity. We will consider these and address them through the policy framework and/or through amendment to the background document as necessary.</p> <p>Thank you for highlighting points which would help to make the Crushed Rock background</p> |

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| <p>The paper needs some editing to bring it up to date.</p> <ul style="list-style-type: none"> <li>• In para 3.12 Tarmac are now owned by CRH and Lafarge merged with Holcim in July 2015 to form LafargeHolcim.</li> <li>• In paras 3.8 and 3.9 the UK Minerals Yearbook for 2014 states that the UK production of crushed rock in 2013 was 94.3 Million tonnes. Including contractors and drivers and direct employees, total employment in the Limestone and Igneous rock sectors was 13,558 in 2013.</li> <li>• In 2012 the Mineral Products Association (MPA) commissioned a study of the economic contribution of the mineral products industry to the national economy. This document is called The Foundation for a Strong Economy and was undertaken by Capital Economics. It may be downloaded at this website address:<br/> <a href="http://www.mineralproducts.org/documents/The_foundation_for_a_strong_economy.pdf">http://www.mineralproducts.org/documents/The_foundation_for_a_strong_economy.pdf</a></li> <li>• The Report's main findings are that; <ul style="list-style-type: none"> <li>• Mineral products are part of the unseen and unloved part of the economy, but which employs the bulk of the workforce and generates much of the country's prosperity. It isn't high profile or glamorous but nevertheless without it, much of what is high profile would simply not be possible.</li> <li>• The mineral products industry generates over £4 Billion of Gross Value Added (GVA) and employs between 33,000 and 39,000 people directly. A similar number is supported indirectly.</li> <li>• Using GVA per worker as a measure the sector's productivity employees are over 2½ times more productive than the average for the UK generating over £110,000 of GVA per worker each year.</li> <li>• The industry contributes similar levels of GVA to the economy as creative industries such as architecture, television or radio or some high-tech manufacturing activities. It is not significantly smaller than the motor vehicle manufacturing and</li> </ul> </li> </ul> | <p>document more robust and up to date, as well as providing some useful statistics which will be useful in informing the plan as a whole.</p> |

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| <p>aerospace industries.</p> <ul style="list-style-type: none"> <li>• The industry is also a major tax payer contributing over £1 Billion of taxes to the exchequer each year.</li> <li>• The industry spends over £5 Billion on suppliers each year which benefits many other sectors and unlike some of the more glamorous sectors it increases economic activity in every region of the UK.</li> <li>• The biggest customer of the industry is the construction sector, which is crucial to providing the infrastructure that the country will depend on to supply the economic growth that it needs to renew the economy. In total this sector comprises 6% of total economic output.</li> <li>• In total the construction sector spends over £6 Billion on mineral products (over 5% of construction turnover) which are vital to almost every type of building project.</li> <li>• Every £1 invested in construction delivers almost £3 of benefit to the total economy.</li> <li>• The total value of mineral products in construction is £6.4 Billion. Of this over £2 Billion of product flows into infrastructure products. Repair and maintenance and private commercial property construction accounts for another £2.2 Billion and non-infrastructure public work accounts for £800 Million.</li> <li>• The total turnover of the industries which are dependent on mineral products for their raw materials is over £400 Billion, and they provide jobs for 1.3 Million people.</li> <li>• About 250 Million tonnes of mineral products are extracted in the UK each year or just over 4 tonnes per person, or 1 Million tonnes every working day. This represents the largest materials movements in the economy although much of it is unseen by the public.</li> <li>• This record of importance is in line with the government's own assessment of the industry published in 2015. The construction sector is highly diverse with a range of</li> </ul> |                          |

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| <p>discrete sub-sectors. It delivered around £92 billion GVA to the UK economy in 2014 (2011 prices) employing around 2.1 million workers, and as such is a key contributor to UK growth. The government's Plan for Growth, published alongside the Budget in March 2011, set out how Coalition Government policy would aim to encourage growth in a number of industries, including construction. The document stressed the importance of investment in infrastructure projects and house building for the UK economy.</p> <ul style="list-style-type: none"> <li>• Construction is identified as an important component of the UK economy in the years ahead. With energy it is labelled an enabling industry which will have a major impact on other sectors, and whose growth is likely to be heavily influenced by societal challenges such as tighter environmental standards for low carbon construction. These sectors are heavily influenced by regulation. One other advantage of the construction sector is that growth will be felt across the entire country and not concentrated in specific locations.</li> <li>• Further more up to date information may be accessed from the MPA's latest edition of Mineral Products Today from this website address:<br/><a href="http://www.mineralproducts.org/documents/Mineral_Products_Today_12.pdf">http://www.mineralproducts.org/documents/Mineral_Products_Today_12.pdf</a></li> <li>• In para 4.6 the statement that England is relatively poorly represented by igneous rock production is contradicted by your statements in the next paragraph. The Leicestershire igneous quarries far surpass all the Scottish and Northern Ireland operations. There are also significant high PSV igneous operations in Wales.</li> <li>• In para 6.53 what makes restoring hard rock quarries back to original levels 'impossible' is not the size or nature of the void, but the unavailability of fill materials.</li> <li>• In para 6.73 you say, "There is currently some debate nationally about the viability of prior extraction policies." We are not aware of such a debate. Could you be more specific please?</li> </ul> <p><b>Minerals and Climate Change</b></p> <ul style="list-style-type: none"> <li>• The information used in table 1 and the paragraphs preceding it, are somewhat out of</li> </ul> | <p>Thank you for providing such helpful and detailed comments which would help to make the Minerals and Climate Change background</p> |



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| <p>date. The current data (2013) for CO2 emissions are 3.7 kg/t and not 4.6 kg/t for crushed rock; 3.9kg/t and not 4/0kg/t for sand and gravel; 27.4 kg/t and not 34.9 kg/t for asphalt, and 1.0kg/t and not 0.95 kg/t for RMX. These figures may be found in the latest MPA publication ‘Sustainable Development Report 2014’ found here:<br/> <a href="http://www.mineralproducts.org/sustainability/pdfs/MPA_SD_Report_2014.pdf">http://www.mineralproducts.org/sustainability/pdfs/MPA_SD_Report_2014.pdf</a></p> <ul style="list-style-type: none"> <li>• In addition, the mineral products industry is a highly sustainable part of the national economy. Although it is acknowledged that it can have detrimental impacts on the local environment, mineral extraction is increasingly being seen as a partner in climate change adaption and biodiversity enhancements.</li> <li>• From an economic and social perspective mineral products contribute to sustainability by reference to the following</li> <li>• 28% of aggregates consumption is comprised of recycled materials (2013 figure), which is three times the average recycling rate in Europe.</li> <li>• The per capita production of aggregates is 3.0 tonnes, which is 59% of the European average (2012 figure).</li> <li>• 91% of aggregate sites have a certified EMS (2013 figure).</li> <li>• The CO2 emissions from sand and gravel production are 3.9 kg/tonne (GB figures, 2014). This totals 214,500 tonnes of carbon for the 55 Million tonnes of sand and gravel that were produced in Great Britain in 2013. For comparison, government figures show that the residential sector in Britain produces 77 Million tonnes of carbon per year.</li> <li>• The industry has created 5,189 ha of priority habitats to date with a further 6,706 ha planned. It has planted 48 km of hedgerows with a further 117 km planned.</li> <li>• 95% of aggregates, ready mixed concrete, asphalt and cement sales recorded were certified to the Responsible Sourcing Standard BES 6001.</li> <li>• Other important aspects are as follows,</li> </ul> | <p>document more robust and up to date, as well as providing some useful statistics which will be useful in informing the plan as a whole.</p> |

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| <ul style="list-style-type: none"> <li>• Government statistics estimate that England produced 77.4 M tonnes of CDE waste in 2010. Of this only a small fraction went to landfill and the vast majority of this component was excavation wastes or soils which have no other beneficial use. This makes the UK the most efficient construction sector in the European Union with 35% less material use and less waste per capita than the EU average.</li> <br/> <li>• Evidence shows that the industry manages or controls an area of land equivalent to a National Park. This includes at least two National Nature Reserves, 22 Local Nature Reserves, 15 field study and education centres and 13 nature trails, with more planned. The RSPB estimates that the industry could, on its own, deliver UK biodiversity targets for nine out of eleven priority habitats. In addition, restoration can recreate the missing habitat links in the countryside which have been progressively lost over the last century and significantly contribute to biodiversity targets locally.</li> <br/> <li>• The sector is also critical to the achievement of UK climate change targets. The UK has a comparative advantage in certain construction services, primarily engineering, architecture and activities associated with low-carbon built environment solutions. This advantage will be important in benefiting from opportunities driven by technological change, increasing environmental awareness and emerging economies. Construction is heavily influenced by direct and indirect levers from the public sector, which procures around 40% of the industry's output, and commitments to renew and expand national infrastructure are therefore significant to the sector.</li> <br/> <li>• The use of mineral products makes a major contribution to wider national targets for carbon reduction. For example, 90% of the energy and emissions related to buildings are due to the lifetime use or operation of the building. The use of well designed concrete construction can significantly reduce “in use” energy because the thermal mass effect of concrete creates more even temperatures within buildings, therefore reducing the need for additional heating and cooling. The use of mineral products is also essential for the construction and operation of lower carbon energy generation capacity, including electricity from nuclear and renewable plants (source: MPA Sustainable Development Report 2014).</li> </ul> |                          |

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| <ul style="list-style-type: none"> <li>• We agree that it will be difficult for the Local Plan to make effective policy for many climate change topics. We suggest the following treatment for various topics; <ul style="list-style-type: none"> <li>• Energy Efficiency -seek assurances that applicants are operating to industry best practice, such as the MPA guidelines. It is often difficult to use renewable energy on sites, which need more power to operate machinery than renewables can provide, or operations are too far from the grid and must rely on fuel oil. Solar and wind power depend for their viability on subsidies, which are being withdrawn. The other examples quoted are extremely unlikely to be viable. Mobile plant is continually being upgraded through EU regulations.</li> <li>• Carbon emissions – the most effective way of limiting carbon emissions is to minimise ‘mineral miles’ by preferring localised production as far as possible. The declining resources and environmental/landscape constraints in Worcestershire will however, make this increasingly difficult. Energy efficiency improvements will also be demonstrated in declining use of carbon per tonne as seen in the latest industry figures. You should note that the high energy consumption figures quoted are heavily affected by high energy refractory processes making cement, dolomite and lime, by brick making and to a lesser extent hot rolled asphalt. The majority of aggregates are produced with sparing energy use.</li> <li>• Transport modal shifts – encourage consideration of alternatives but not make them mandatory. You correctly say that the potential for significant modal shift is unlikely. For example, the barge operation mentioned is the only one operating that we know of, a much larger operation operating between Nottinghamshire and West Yorkshire having closed in the recession. Both rail and water transport schemes are heavy consumers of capital and are not viable without subsidy, which has been withdrawn. Also, the capacity of the rail network is operating at near maximum and potential to expand is limited.</li> <li>• Whole life issues – your analysis is correct and life cycle analysis of mineral products is not justified by the potential savings. By all means please specify more concrete in buildings!</li> </ul> </li> </ul> | <p>Thank you for these policy suggestions. We will consider how to incorporate these as we develop the policy framework.</p> |

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| <ul style="list-style-type: none"> <li>• Habitat creation – this is the most important contribution that mineral workings can make to climate change impacts and should be encouraged rigorously. However, formulaic approaches through generalised policies are not the way to go. Instead, the Local Plan should aim for a site by site approach that takes into account its circumstances and potential.</li> <li>• Flood alleviation – mineral workings have a great potential to contribute to climate change mitigation by increasing flood storage or by changing the dynamics of river systems to slow down the passage of water. We consider this could be encouraged in the Local Plan since it could also be part of a habitat creation scheme.</li> </ul>   | <p>We agree that habitat creation and flood alleviation are two areas where mineral development can have a significant positive impact, and we will encourage this as we develop the Green Infrastructure-led approach to the Minerals Local Plan. However, we acknowledge that this approach needs to allow for individual site circumstances, and we look forward to receiving your comments on our approach at the next full consultation stage.</p>   |
| <p><b>Biodiversity and Mineral Sites in Worcestershire</b></p> <ul style="list-style-type: none"> <li>• In paragraph 1.2.1 it is regrettable that you did not include the industry through the MPA in your formulation of guidance and priorities. We hope this can be rectified in an update of the paper. It is strange that the sector which will implement the guidance has not been represented in its genesis.</li> </ul>   | <p>We apologise for this oversight, and will seek to ensure full consultation with the MPA as and when this paper is updated.</p>   |
| <p><b>Sand and Gravel in Worcestershire</b><br/>The paper needs some editing to bring it up to date.</p> <ul style="list-style-type: none"> <li>• In para 3.12 Tarmac are now owned by CRH and Lafarge merged with Holcim in July 2015 to form LafargeHolcim.</li> <li>• In paras 3.10 and 3.11 the UK Minerals Yearbook for 2014 states that the UK production of sand and gravel in 2013 was 43.0 Million tonnes. The Yearbook estimates an increase in sand and gravel production of 7% over the previous year. Including contractors and drivers and direct employees, total employment in the sand and gravel sector was 10,664 in 2013.</li> <li>• In 2012 the Mineral Products Association (MPA) commissioned a study of the economic contribution of the mineral products industry to the national economy. This document is</li> </ul> | <p>Thank you for highlighting points which would help to make the Sand and Gravel background document more robust and up to date, as well as providing some useful statistics which will be useful in informing the plan as a whole.</p> <p>The resource issues you refer to are also relevant to the Local Aggregates Assessment and we will take these into account as we prepare the next LAA update. We will also take into account the advice of the West Midlands Aggregate Working Party, of which</p> |

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| <p>called The Foundation for a Strong Economy and was undertaken by Capital Economics. It may be downloaded at this website address:<br/> <a href="http://www.mineralproducts.org/documents/The_foundation_for_a_strong_economy.pdf">http://www.mineralproducts.org/documents/The_foundation_for_a_strong_economy.pdf</a></p> <ul style="list-style-type: none"> <li>• In para 4.9 it is unfortunate that the RAWP reports do not also note that there is a serious resource issue developing in the West Midlands, which was noted by the BGS Report, An evidence based approach to predicting the future supply of aggregate resources in England, which was published in 2011. This report identified potential resource issues in all parts of England. This mentioned Staffordshire's perception of environmental constraints which would affect supplies in future, and examined alternative supply options. It was recorded that Warwickshire, Worcestershire and other mpas in West Midlands could not make up any shortfall.</li> <li>• Our members inform us that they cannot find sites in Warwickshire, West Midlands County and Worcestershire due to resource issues and this places more pressure on alternative available sources such as Staffordshire. The AWP Minutes for its meeting of 24th June 2014 indicated that sand and gravel landbanks were down to 3 years in Worcestershire and only three small operations were left; Herefordshire and Warwickshire were reduced to one sand and gravel site each and although landbanks were adequate there had been a 27 Mt fall in sand and gravel reserves in Staffordshire over the last decade. Shropshire was the only other mpa with an adequate sand and gravel landbank but this was at a modest output. There were no details for West Midlands County but it is thought that sand and gravel production and reserves are declining rapidly with no new sites coming forward.</li> <li>• We therefore believe this paper needs to be amended substantially to bring it up to date and to record the resources issues in the county.</li> <li>• In para 6.9 you mention the water transport of sand and gravel, which we have referred to previously. As far as transport of sand and gravel by rail is concerned we can be fairly confident that this will never be viable in Worcestershire. The reserves required and the production volumes involved to make a viable rail scheme are simply not possible in the county. An operator would need reserves of at least 20 Million tonnes to even consider it.</li> </ul> | <p>the MPA is a member.</p> |

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| <p>• Paras 6.11 – 6.19 – dust. This is almost never a problem with fluvial or glaciofluvial sand and gravel because the material is mostly wet and produces next to no PM10s. We are not aware of any problems with members’ sites as long as good management practices are followed.</p> <p><b>Silica Sand in Worcestershire</b></p> <p>• Paras 1.39 – 1.40 – we do not see your apparent problems about obtaining sufficient information to plan for future silica sand production. Given that NPPF policy is site and operator specific and is based on maintaining supplies at each individual production site, and not as with aggregates, an amalgamation of all reserves and production in the administrative area, surely all you need to do is to ask each operator for information about when they will require new reserves. Then if this is within the plan period plus 10 years (in order to provide a sufficient stock of reserves throughout the plan period) they may be asked to put forward plan allocations. If more than 10 years is asked for, policies may be developed to require proof of investment justifying longer than the minimum time but only if a proposal is controversial and would affect interests of acknowledged importance. We suggest that you do not need to use national data broken down to local level or to generate complicated methods of monitoring. All that is needed is an indication of whether minimum national policy levels for reserves are being met by reference to what we have said above. In any event it appears the quantities required are unlikely to be significant from an environmental point of view.</p> <p>• In para 1.105 and Figure 3 we agree broadly with your approach to safeguarding of this mineral.</p> <p><b>Worcestershire Local Aggregates Assessment 2014</b></p> <p>• We are grateful for the consideration of comments on earlier versions of this document in the Appendix. However, we still feel that the methodology proposed is flawed and will result in a distorted picture. We recognise the inherent problems of the bottom-up system we are working with, and that what we are looking for is probably not possible at present, but we would like to see some acknowledgement that further improvements to methodology will be made and that appropriate data sources will be developed.</p> | <p>Thank you for your comments and suggestions on the Silica Sand background document and our approach to silica sand generally. We will consider these as we develop the policy framework.</p> <p>Silica sand operators have been contacted in both "calls for sites", and sites have been put forward in the area of the county where silica sand resources are found. However, we are still at the stage of assessing all the sites and it is currently unclear what proportion of any new or extended site might yield silica sand and what would be for aggregate purposes.</p> <p>During 2015 we have been working closely with members of the West Midlands Aggregates Working Party, as well as surrounding AWP's, to establish the best approach to crushed rock in Worcestershire given the significant constraints and apparent lack of interest in working the remaining</p> |

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| <ul style="list-style-type: none"> <li>• Figure 17 is useful and could have been incorporated in the body of the document rather than forming part of the Appendix. Your conclusions in para 9.13 about the continued correlation of the two methods is in our opinion not robust. The resource issues in the county will mean that production will keep falling (but not disappear entirely) but if the housing completions projections are robust, the construction industry will find other sources of supply and it is likely that imports will rise.</li> <br/> <li>• We would like to highlight that you have focused on demand for Worcestershire material, and not demand per se. This is significant given what we have just discussed, because consumption as measured by use of locally produced mineral plus imports represents the true level of demand in the county. Exports are on top of that, and with locally consumed material is the total call on Worcestershire's reserves. In future, the likelihood is that imports will rise considerably. Indeed, they may already have, and AM14 will tell us the more up-to-date position. Clearly, the prospect of increased imports is a potential DTC matter and therefore should receive adequate treatment in the LAA.</li> <br/> <li>• The AWP's endorsement of the 10 year average is qualified (at least as far as the MPA is concerned) by consideration that it is 'business as usual'. If there are factors that militate against that such as lack of resources, environmental constraints, indications that demand is going to be radically different in the future than the past4, then the 10 year average may not be appropriate on its own. We believe this applies to Worcestershire, and to much of the West Midlands, and it is regrettable that such factors receive relatively scant attention in LAAs.</li> <br/> <li>• You say that landbanks can only increase if the industry submits more applications. However, having a Local Plan that is almost 20 years old does not help. Moreover, if allocations from that Plan are still outstanding it suggests that they are undeliverable and should not be relied on. The industry can only submit applications for sites it can find, which reflects the resource base and planning constraints. The industry complain that they cannot find sand and gravel sites of sufficient size to work except as isolated satellite operations which are not long term solutions, whilst landscape constraints actively prevent the establishment of new crushed rock sites in the county. These factors should be recognised.</li> </ul> | <p>resources.</p> <p>In view of this and the detailed analysis of our LAA you have provided, we recognise that we need to fully revise our LAA in 2016.</p> |

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| <ul style="list-style-type: none"> <li>• You also rightly suggest that the LAA process is affected by confidentiality rules. You may be interested to know that the MPA has now advised its members that confidentially rules may now be relaxed at each company's discretion, which should make things easier.</li> <br/> <li>• In para 9.18 we suggest that both scenarios suggested will be true since the first alternative measures demand and second, supply. We would prefer to see in the LAA an indication that the current methodology will be developed over time to address the shortcomings we have identified.</li> <br/> <li>• It is also regrettable that data is only presented up to 2012, which is out of date compared to fast changing demand. The MPA's own market update produced for its members quarterly (attached as an extract in Appendix 3) shows that output in 2014 and 2015 has been growing significantly nationally compared to previous years. In 2014 growth in aggregates for GB was 9% over 2013 levels, and the first half of 2015 has seen further growth, with RMC, mortar and aggregates around 6-7% higher than in the first half of 2014, construction output is expected to grow by 5.5% this year. By 2017 using conservative assumptions aggregates sales will be 14% over 2014 levels. These figures are national and there is more growth in the South East than elsewhere but our members report that growth in the West Midlands market is in line with these figures. The MPA has carried out a member survey of sand and gravel outputs in 2014 and 2015 with projections for the rest of the year and into 2016. This shows strong growth in the market of 10% over 2013 levels by 2016. We consider it imperative that you try and obtain more up-to-date information, or failing that, that you adopt as flexible an approach to forward planning as possible to maintain supplies.</li> <br/> <li>• Whether this increase in demand will be reflected in increased local production will depend on our members being able to identify sites to work. We consider that should the call for sites not produce the required level of site specific allocations that you also include Areas of Search in the Plan with appropriately flexible strategic and DM policies that allow sites to come forward when they can be found.</li> </ul> | <p>We anticipate that further sites will be required beyond those put forward in response to the calls for sites. We will therefore develop the policy framework to be flexible enough to allow other proposals to come forward where they meet the objectives of the plan as a whole.</p> |



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| <p><i>Appendices attached to this response are too large to be copied out into this document.</i></p> <p><i>They consisted of:</i></p> <ul style="list-style-type: none"><li>- <i>Dimension Stone brochure</i></li><li>- <i>Dimension Stone UK Yearbook Figures 2004-2013</i></li></ul> <p><i>Extract of MPA member briefing</i></p> |                          |