

# Worcestershire Minerals Local Plan

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## Third Stage Consultation Response Document

September 2017

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## **Introduction**

The Worcestershire Minerals Local Plan Third Stage Consultation ran from 14<sup>th</sup> December 2016 to 8<sup>th</sup> March 2017.

The documents were available on the Council's website, in all Worcestershire public libraries and printed copies were available on request.

The consultation was publicised through public notices in the County's newspapers, press releases promoting the consultation and drop-in sessions, and direct mail to those people registered on the Minerals Local Plan Consultation database, including key stakeholders, members of the public who have registered an interest and all local authorities and parish councils in and adjoining the county.

Consultation on the Sustainability Appraisal and the Habitats Regulations Assessment for the Third Stage Consultation Minerals Local Plan ran alongside this. These were made generally available, as well as to the statutory consultees. The responses received on these documents have been passed to the officers preparing the Sustainability Appraisal and Habitats Regulations Assessment and have also been included in this document.

This document sets out the Council's initial officer response to all the comments received, these responses are intended to give the direction of current thinking but may change during discussion with statutory consultees and other stakeholders. There will be another opportunity to comment on proposals during the fourth stage consultation in winter 2018.

Many responses used the consultation questionnaire, but those which were written as general responses have been considered under the relevant questions. All responses received up to the close of the consultation on 8<sup>th</sup> March 2017 have been included as a matter of priority. A small number of comments were received after this closing date but have been included in the document and are denoted by the letter L at the end of the respondents' unique reference numbers.

Comments received on any of the background documents as part of the Third Stage Consultation are recorded in this document and background documents will be updated as appropriate.

## **Summary of responses**

The approach in the Third Stage Consultation was generally supported. The landscape-scale green infrastructure led approach was broadly welcomed; however it is clear that care needs to be taken to highlight and maximise the social and economic as well as environmental benefits of this approach throughout the plan.

A significant area of concern relates to the ability to supply adequate sand and gravel resources. This is primarily due to the small number of allocated sites and low level of industry interest. There was also some concern about the robustness of the site selection process. The Council will undertake a further call for sites targeted at industry and landowners and review site selection criteria to address these matters. Some issues with the sand and gravel sales and imports/exports data were highlighted; these have been investigated and the implications will be addressed in future Local Aggregates Assessments.

The approach to crushed rock and industrial minerals was supported, although some wording alterations were suggested with regard to the landbank requirements in national policy.

The spatial strategy, with priorities for each strategic corridor, was also well received although the potential to better integrate flood betterment and water quality enhancements was raised. Alterations are needed to strengthen the requirement for proposals to contribute positively towards the corridor priorities during both working and restoration phases and to clarify the need to balance comprehensive extraction of mineral resources with the need for landforms and restoration schemes which are appropriate within the landscape.

Concern was raised in relation to how the strategic corridors were identified and there was a misconception that they are entirely based on environmental considerations. Although the earlier second stage consultation document made reference to the influence of the assessment of mineral resources and consideration of demand for minerals and these considerations were carried through to the third stage consultation, it is clear that this needs to be made more explicit in the future. There was also some concern that some of the strategic corridors are too wide to provide certainty. The potential to update the corridor boundaries to remove urban areas or sterilised land and existing site allocations for non-minerals uses will be considered.

It was suggested that the natural and historic environment should be addressed through separate objectives and that the links between the objectives and the policy framework lacked clarity. Specific issues were raised in relation to most of the policies in the plan and these will be considered in detail. The main areas of concern relate to policies MLP 18 Biodiversity, MLP 22 Water Environment and MLP 23 Historic Environment, which need to be revised to bring them in line with national policy. However there was also support for the requirement of these policies to optimise gains.

Several consultees sought clarity in relation to green belt policy and did not consider it appropriate to rely on other areas of the development plan and national policy. There were also queries raised about the way in which Health Impact Assessments were addressed in the Third Stage Consultation Document.

Following the responses received to the consultation the Council will continue to work with other Local Planning Authorities to ensure that the response to safeguarding mineral resources is proportionate and practical.

## **Next Steps**

Alongside the publication of this document, the Council is launching a fourth call for sites targeted at industry and landowners to try to address the shortfall in site allocations in the plan.

All site proposals will then be reconsidered against revised site selection criteria.

The comments received on the Third Stage Consultation will be taken into account in revising the Minerals Local Plan, and a fourth stage consultation will be undertaken in winter 2018. A formal pre-submission consultation on the soundness and legal

compliance of the plan and submission to the Secretary of State for examination will then take place in 2019.<sup>1</sup>

## Consultation methods

A letter setting out details of the consultation and the variety of ways to view the consultation was sent on 14<sup>th</sup> December 2016 to 144 postal addresses and 586 email addresses (total 730) for organisations and individuals registered in our consultation database to receive information on minerals planning. Reminder letters and emails were sent on 1<sup>st</sup> March 2017.

Copies of the consultation document were posted out on request and were available to take away from the consultation open days. Documents were made available in the county's libraries and at County Hall reception, and on the Council's website.

Public notices were placed in all the newspapers in the county. Media releases were sent at the start of the consultation and again, tailored by news patch, before the drop-in events around the county. 3 articles appeared in the local media.

We received **8 questionnaire responses, 47 general responses by letter or email** that did not use the questionnaire format and **1 response which was recorded in discussion at the Droitwich drop-in session**, giving a **total of 56 responses**. This gives an overall response rate of 7.7%.

We held six drop-in sessions around the county. These sessions were designed for residents, parish councils and other interested parties to drop-in and ask us any questions about the consultation. Locations for the drop-in sessions were chosen in each of the proposed strategic corridors, as well as one centrally in Worcester city centre as these were considered to give good geographical coverage, concentrated where there were likely to be most queries. The events gave a balance between weekday afternoon and evenings, and weekend daytimes to try to give people the greatest opportunity to drop in at a time convenient to them.

A number of key pages from the consultation document were produced at poster scale, including all of the strategic corridor maps, and these were displayed at each event. The Deliverability Assessment, Sustainability Appraisal and Habitats Regulations Assessment documents and the interactive web map were also available for the public to peruse during the events. Digital copies of the documents were available online, with printed consultation documents and paper questionnaires available for the public to take away. A total of 69 people attended these events.

### Bromsgrove Library drop-in session

- 10.00am - 3.30pm, Saturday 14th January 2017
- 29 attendees (10 signed in)
- Attendees at this event included representatives of Wildmoor Residents Association, Belbroughton and Fairfield Parish Council and local residents.
- The main areas of interest at this event related to the existing solid sand workings in the area, how restoration approaches differ in the third stage consultation document in comparison to the adopted Minerals Local Plan

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<sup>1</sup> See the timetable for the preparation of the Worcestershire Minerals Local Plan set out in the Minerals and Waste Local Development Scheme (2017) at <http://www.worcestershire.gov.uk/lds>.



and what influences the new plan will have on monitoring and enforcement activities.

#### Upton Memorial Hall drop-in session

- 2.30pm - 8.00pm, Thursday 19th January, 2017
- 7 (6 signed in)
- Attendees at this event included representatives of Bushley Parish Council, a planning officer from Malvern Hills District Council, and members of the public.
- The main areas of interest at this event were the strategic green infrastructure approach of the plan and whether mineral working is likely in Bushley Parish.

#### Evesham Library drop-in session

- 10.00am - 3.30pm, Saturday 21st January 2017
- 4 (3 signed in)
- Attendees at this event included representatives of Wick Parish Council and local farmers.
- The main areas of interest at this event were whether mineral working is likely in Wick Parish and the potential impact on farmland.

#### Droitwich Library drop-in session

- 10.00am - 3.30pm, Saturday 4th February, 2017
- 16 (6 signed in)
- Attendees at this event included representatives of Droitwich Spa Town Council, Holt Heath Parish Council, Himbleton Parish Council, and members of the public.
- The main areas of interest at this event were the history of salt and brine in Droitwich and whether this could be resumed on a small scale for tourism purposes.

#### Kidderminster Library drop-in session

- 2.30pm - 8.00pm, Tuesday 7th February 2017
- 9 (7 signed in)
- Attendees at this event included officers from Wyre Forest District Council and North Worcestershire Water Management, representatives of Chaddesley Corbett Parish Council, and local residents.
- The main areas of interest at this event were the strategic corridors and their green infrastructure priorities.

#### The Hive Worcester drop-in session

- 2.30pm - 8.00pm, Monday 13th February, 2017
- 4 (3 signed in)
- Attendees at this event included local residents.
- The main area of interest at this event was the potential for fracking, which is unlikely in the county.

The number of attendees in itself does not indicate the success of these open days as many in-depth conversations were held about detailed aspects of the plan. People were primarily interested in learning about proposals in their areas. A number of attendees took printed consultation documents and questionnaires away with them. There were also a lot of general questions asked about the consultation and the Minerals Local Plan.

We also proposed to hold two workshops during the consultation period:

- A workshop for members of the minerals industry, stakeholders and statutory consultees to explore the minerals industry and consultee perspective on the proposals and in the plan, and to focus on technical issues and deliverability. Mineral companies and associations, mineral planning authorities, all aggregate working parties, statutory consultees and members of the Worcestershire Green Infrastructure Partnership minerals working group.

The industry and stakeholder workshop did not go ahead as planned as only members of the Worcestershire Green Infrastructure Partnership minerals working group had registered to attend, they had already been involved throughout the development of the Minerals Local Plan and it was considered that without other attendees the session would be of limited value to them. An offer to meet individually to discuss any specific issues was offered instead. A meeting was held with two mineral operators who expressed interest after the event had been cancelled.

- A parish and town council briefing workshop which aimed to outline the plan and give parish and town councils an opportunity to ask questions. All the parish and town councils in and adjoining Worcestershire were invited to this in their consultation letter or email, and were asked to book places. A reminder letter/email was also sent on 12<sup>th</sup> January 2017.

The event was due to be held on Monday 23<sup>rd</sup> January. By Tuesday 17<sup>th</sup> January representatives from only one Parish and one Town Council had booked places

- Barnt Green Parish Council
- Droitwich Spa Town Council

We therefore decided to cancel the full briefing session, but wrote to these councils offering to meet on that date on a more informal basis to discuss any specific issues and questions, and to remind them of the remaining drop in sessions if they wished to attend those instead. Barnt Green Parish Council did not respond and did not attend any of the events. A councillor from Droitwich Spa Town Council requested to meet at 10am at the Droitwich drop in event, but did not attend on the day, although other members of Droitwich Spa Town Council did attend.

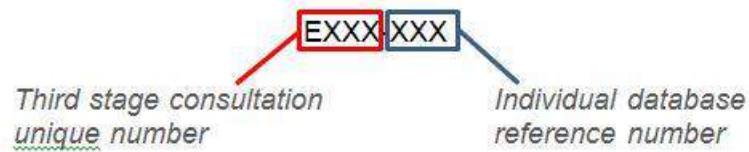
Following the cancellation, members of Wick Parish Council requested to book places, but decided to attend the Evesham drop in session instead, and a Belbroughton and Fairfield Parish Councillor requested to book and did attend on 23<sup>rd</sup> January.

## **Notes on how the responses section is organised**

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

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

- Each response was allocated an individual response reference number in the format EXXX-XXX.



- Where respondents submitted only general comments, their responses have been split and recorded against the most appropriate "best fit" question from the questionnaire.
- As so few responses were submitted using the questionnaire format and answering the yes/no questions, it was not possible to produce graphs or figures to quantify the support or lack of support for each issue. As such, tables are presented in the document showing who responded to each question for information purposes only and should not be considered reliable results for decision making.

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

If you would like any further details please contact:

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## Chapter 1: Introduction

### Q1.1 Are there any wording changes which you would suggest to Chapter 1 to improve clarity or any other issues which you think should be considered?

Yes: 2	No: 5	Written responses (see below)
<p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p>	<p>E007-2452: Mr N Dean</p> <p>E014-634: Pershore Town Council</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	<p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p>

### Comments on Chapter 1: Introduction

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>Reference 1.9: Whilst we accept the need for mineral sand extraction in northern Worcestershire, quarries in the Wildmoor area have in our opinion been exploited consistently over many years and in the case of Wildmoor quarry which never had any planning permission originally and whilst there is a restoration plan deposited with the County Council, it is not anticipated that this will ever come to fruition. We have similar concerns with regard to the Western Quarry owned by Veolia. In addition, Pinches quarry phases one and two are recorded as being restored, however in the last two years large quantities of sand tipping has been carried out which can be easily seen from junction 4. So the landscape condition here is a mess. Overall then, our concerns are that proper restoration needs more focus and attention within this minerals plan.</p>	<p>Objective 1 as drafted in the Third Stage consultation is to "Deliver development in accordance with the priorities of the spatial strategy". The spatial strategy outlines the priorities for development in each strategic corridor and "The priorities should guide how sites are designed, worked and restored so that mineral development across the corridor over the life of the plan is coordinated to deliver the priorities" (paragraph 5.31)</p> <p>Changes will be considered to enhance these principles in the vision, objectives and policy text.</p>
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
<p>It reads clearly and is concise. The written style becomes more technical after page 14, but not to the detriment of the chapter because you have provided a glossary to cover the technical terms therein.</p>	<p>Noted.</p>

Consultee comments	Initial Officer response
<b>E013-802: Malvern Hills AONB Unit</b>	
2.20 We think this paragraph misses the point, or at least part of the point. It is not just about commercial attractiveness but about the environmental harm which would be likely to be done to nationally and internationally important landscapes and habitats.	Paragraph 2.20 is in Chapter 2, therefore this comment is addressed under question 2.2 below.

## Chapter 2: Portrait of Worcestershire

### Q2.1 Does the Portrait of Worcestershire identify the locally relevant key issues for the Minerals Local Plan?

Yes: 8	No: 1	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean	E019-2459: Wildmoor Residents' Association	E014-634: Pershore Town Council	E019-2459: Wildmoor Residents' Association
E013-802: Malvern Hills AONB Unit			E030-1939: The Coal Authority
E026-813: Worcestershire Wildlife Trust			E034-1970: Worcestershire County Council, Landscape Advisor
E030-1939: The Coal Authority			E050-1971L Wyre Forest District Council
E034-1970: Worcestershire County Council, Landscape Advisor			E056-1782L: RSPB
E041-717: Natural England			
E047-716: Historic England			
E056-1782L: RSPB			

### Q2.2 Are there any wording changes which you would suggest to Chapter 2 to improve clarity or any other issues which you think should be considered?

Yes: 4	No: 3	Written responses (see below)
E013-802: Malvern Hills AONB Unit	E007-2452: Mr N Dean	E005-817 CPRE Worcestershire

Yes: 4	No: 3	Written responses (see below)
<p>E019-2459: Wildmoor Residents' Association</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	<p>E014-634: Pershore Town Council</p> <p>E026-813: Worcestershire Wildlife Trust</p>	<p>E013-802: Malvern Hills AONB Unit</p> <p>E017-507 Directorate of Public Health, Worcestershire County Council</p> <p>E019-2459: Wildmoor Residents' Association</p> <p>E020-2460 Mineral Products Association</p> <p>E025-1793 CEMEX</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p> <p>E043-2185L: Gloucestershire County Council</p> <p>E047-716: Historic England</p>

Comments on Chapter 2: Portrait of Worcestershire

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>2.128 The statement about the Droitwich canal is inaccurate, or rather incomplete. A major part of its role must have been to carry coal up to Droitwich to fuel salt-boiling there. Very substantial quantities of coal were used to boil salt, and these were previously brought by road from the Severn at Worcester. The state of the road between Worcester and Droitwich (due to such traffic) was similarly the reason why that road was turnpiked in 1714, only the 25th road in England for this to be done to. Coal was the most important cargo on almost every inland waterway, and was a major motive for improving the river Avon in the 1630s.</p>	<p>Paragraph 2.128 states that "The Droitwich Barge Canal and Droitwich Junction Canal were built to carry salt but were abandoned in 1939. They were restored and reopened in 2010 and 2011 respectively and are now used for leisure craft." This information is included to give an overview of the historical context and current use of the waterways. It is based on Information from the Canal and River Trust.</p> <p>A reference to the relevant webpage will be added. This page provides for further information on the Droitwich Canals.  <a href="https://canalrivertrust.org.uk/enjoy-the-">https://canalrivertrust.org.uk/enjoy-the-</a></p>

Consultee comments	Initial Officer response
	<a href="#">waterways/canal-and-river-network/droitwich-canal</a> s
2.117 The use of an area to describe footpaths and other essentially linear features is inappropriate. The paragraph should specify an area of country parks and other access land. It should additionally specify <i>areas</i> frequently accessible though payment of a modest fee, for car parking or otherwise. This would include National Trust properties (like Hanbury Hall and Croome Park), where parks and gardens are open to members or those paying admissions fees. Similarly, Lord Cobham has plans to open Hagley Park. Linear features should be specified by <i>length</i> , care being taken not to double-count public footpaths, used as part of long distance trails.	Noted. The paragraph will be amended to distinguish between areas and linear features. Areas that include an access fee have not been included as they do not form part of the Natural England "Access to Green Space Standards" and as such don't form part of the evidence base for the Minerals Local Plan as set out in the <i>Worcestershire Green Infrastructure Framework Document 3: Access and Recreation</i> (May 2013). For more information see <a href="http://www.worcestershire.gov.uk/gi">www.worcestershire.gov.uk/gi</a>
<b>E013-802 Malvern Hills AONB Unit</b>	
2.20 We think this paragraph misses the point, or at least part of the point. It is not just about commercial attractiveness but about the environmental harm which would be likely to be done to nationally and internationally important landscapes and habitats.	Noted. Changes will be made to make this clearer.
2.91 It would be useful to make reference to the AONB Management Plans as being core documents for the protected areas, aimed at conserving and enhancing the natural beauty of the landscape.	Noted and agreed. Change to be made.
<b>E017-507 Directorate of Public Health, Worcestershire County Council</b>	
Para 2.114 – this paragraph references the Health and Wellbeing Strategy 2013-16 – please note that this Strategy has been now superseded with the Health and Wellbeing Strategy 2016-21.	Noted. The new strategy will be reviewed and changes will be made to update the reference and reflect the content of the strategy.
<b>E019-2459 Wildmoor Residents' Association</b>	
2.15, 2.106 - 2.109: The Wildmoor sand deposits are located across zones 2 and 3 of the water protection zone which supplies the Wildmoor aquifer. We have grave concerns about the depth of extraction and possible impact on the water supply for Bromsgrove residents. The Wildmoor quarry site is less than 1000 metres from the Wildmoor pumping station.	The impact of individual proposals on the water environment must be assessed as part of the determination of any planning application. Policy MLP 22 Water Environment and reasoned justification are intended to address these issues.
There seems to be a contradiction in what is being referred to between 2.37 and 2.38 regarding silica sands.	Noted. Changes will be made to clarify the situation in relation to Worcestershire's silica sand.
<b>E020-2460 Mineral Products Association</b>	
Para 2.20; Not sure that you can make the conclusion that working crushed rock in not commercially viable in Worcestershire. It would	It is stated in paragraph 2.20 that the constraints on Worcestershire's crushed rock resources "in themselves are not an absolute bar on

Consultee comments	Initial Officer response
<p>be useful to reference the NPPF para. 116 (<i>'the major development test'</i>) or make the statement that National Policy does not preclude mineral working in designations subject to certain conditions being fulfilled. As rock resources become further under pressure in surrounding counties it is not inconceivable that Worcestershire could see renewed interest (see comments on MLP 9).</p>	<p>development". To this end, we included policy provision in the Third Stage Consultation to enable crushed rock development to come forward (including Policy MLP 1 and Policy MLP 9). However, it is considered that these constraints are significant and, although they may not always mean that crushed working is not viable in Worcestershire, we should be extremely cautious about our ability to deliver crushed rock development over the lifetime of the plan.</p> <p>This has been discussed with the Aggregate Working Parties (AWPs) of the West Midlands, East Midlands, South West, and South Wales. The actions and discussions undertaken in regard to the issue of crushed rock in Worcestershire are set out in the background document "<i>Strategic cross boundary issue: Crushed rock supply in Worcestershire - Summary of action undertaken under the duty to cooperate</i>" (September 2016), and all correspondence is included as appendices to that document. This can be viewed on the Minerals Local Plan webpages at <a href="http://www.worcestershire.gov.uk/mineralsbackground">www.worcestershire.gov.uk/mineralsbackground</a>.</p> <p>However this issue will be considered further in developing the Minerals Local Plan to ensure that the approach is both enabling and deliverable.</p>
<p><b>Para 2.23;</b>NPPF does not <i>advocate</i> a 7 year land bank it requires at least 7 year land bank. The word <i>advocate</i> should be replaced by <i>required</i> because as currently drafted it implies that the 7 year landbank is voluntary.</p>	<p>Noted and agreed. Change to be made.</p>
<p><b>Para 2.24;</b> The words <i>at least</i> should be inserted between <i>maintain</i> and <i>a</i>.</p>	<p>Noted and agreed. Change to be made.</p>
<p><b>E025-1793 CEMEX</b></p>	
<p><b>Para 2.23 -</b> NPPF does not <i>advocate</i> a 7 year land bank it requires at least 7 year land bank. This paragraph should be redrafted to reflect NPPF guidance.</p>	<p>Noted and agreed. Change to be made.</p>
<p><b>Para 2.24 -</b> The words <i>at least</i> should be inserted between <i>maintain</i> and <i>a</i>.</p>	<p>Noted and agreed. Change to be made.</p>
<p><b>E026-813 Worcestershire Wildlife Trust</b></p>	
<p>The Portrait appears to cover the main issues and is appropriately focussed on the local matters in Worcestershire.</p>	<p>Support noted.</p>
<p><b>E030-1939 The Coal Authority</b></p>	
<p>We support the inclusion of Para 2.5, which identifies that coal deposits within</p>	<p>Support noted.</p>



Consultee comments	Initial Officer response
<p>Worcestershire are not significant and are not identified as being a surface coal resource by the Coal Authority. It is also noted that this part of the Plan acknowledges that there are no known oil, gas or hydrocarbon resources in the county.</p> <p>The Coal Authority are pleased to see in Para 2.68 identification that former coal workings may have left a legacy of mining features which are locally significant and may cause issues of land instability.</p>	
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p><b>Para 2.23:</b> NPPF does not advocate a 7 year land bank it requires at least a 7 year land bank. NPPF para 145 states 'Mineral planning authorities should plan for a steady and adequate supply of aggregates by: making provision for the maintenance of at least 7 years for sand and gravel and at least 10 years for crushed rock.' The word advocate should be replaced by required because as currently drafted it implies that the 7 year landbank is voluntary.</p>	Noted and agreed. Change to be made.
<p><b>Para 2.24:</b> The words at least should be inserted between maintain and a.</p>	Noted and agreed. Change to be made.
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
<p>[Does the Portrait of Worcestershire identify the locally relevant key issues for the Minerals Local Plan?] Yes, however here are some suggested edits and additions:</p> <p>Landscape: add, perhaps in 2.88 or a new paragraph, Worcestershire has two distinctive settlement patterns. The majority of the county is associated with dispersed and wayside settlement, often associated with a sinuous network of hedgerow-bound lanes in rural areas. This has resulted in an intimate landscape character. The south east of Worcestershire east of the Severn has a dominant pattern of nucleated villages in a more open landscape setting.</p>	Noted and agreed. Changes to be made to reflect this issue.
<p>Landscape: paragraph 2.90 refers to the potential loss of beech hangers as a result of climate change. However, a much more profound change, of great risk is the future impact of Chalara on the Ash population. Worcestershire has a significant proportion of Ash woodland and Ash veterans. Any substantial loss will impose a significant impact on landscape character in those areas where Ash forms a large part of the woodland</p>	Noted and agreed. Changes to be made to reflect this issue.

Consultee comments	Initial Officer response
assemblage and also where Ash trees are a component of hedgerows.	
Landscape: add that while there is a high impact to existing landscape character from mineral workings, restoration, where lakes and ponds are not the sole solution, offers opportunities to enhance landscape character and connectivity through (for example) the replanting of hedgerows previously lost as a result of agricultural intensification, with clear benefits to GI and biodiversity. Restoration can also contribute towards enhancing the wider setting and views associated with landscapes and their key receptors. The Worcestershire Landscape Character Supplementary Guidance, Worcestershire Historic Landscape Character Report and Trees and Woodlands in Worcestershire: Biodiversity and Landscape Guidelines for their Planting and Management should all inform mineral restoration plans.	Chapter 3: Vision and Objectives and Policy MLP 19: Landscape are intended to address these issues. The reports are also referenced in the text.  We will consider whether the current document structure is appropriate.
<b>E041-717 Natural England</b>	
In paragraph 2.92, it states that there are 114 biological Sites of Special Scientific Interest (SSSI) in the country. Paragraph 2.97 states that there are 13 geological SSSIs. This is incorrect. There are a total of 113 SSSIs in Worcestershire, of these 99 are solely biological, 10 are solely geological and four are both biological and geological. Covering an area of 5304.68 ha.	Noted. Changes to be made.
<b>E043-2185L Gloucestershire County Council</b>	
Figure 2.7 – we note that this is based on the 2009 imports and exports due to availability of data at time of writing. However, the 2014 national survey data has now been published and we would expect that this would inform the next stage. For Gloucestershire there has been quite a dramatic shift in the supply pattern between 2009 and 2014. It would be beneficial to update this data for the next consultation stage.	Noted and agreed. Changes to be made.
<b>E047-716 Historic England</b>	
We support the varied references within Chapter 2, the Portrait of Worcestershire, about the history of the mining industry and how the local minerals have been used historically in local buildings. We have stated previously that it is important to have a supply of locally sourced materials that make up the historic fabric of buildings for future renovation and development purposes.	Support noted.

Consultee comments	Initial Officer response
<p>We support the specific reference to this issue in paragraph 2.64.</p>	
<p>The introductory paragraphs relating to 'Worcestershire's environment' are positive, yet we consider that they could be improved if there was reference to the need to protect, conserve and where possible, enhance the historic environment of Worcestershire, through the Minerals Local Plan.</p>	<p>Chapter 3: vision and objectives and Policy MLP 23: Historic Environment are intended to address these issues.</p> <p>We will consider whether the current document structure is appropriate.</p>
<p>We are supportive of a section within the introduction about the historic environment and what is special about Worcestershire. We consider that paragraph 2.103 could be further developed to highlight the potential concerns with minerals development and the need to protect, conserve and where possible, enhance the historic environment. This would set a positive introduction for the later policy concerning minerals development and the historic environment.</p>	<p>Chapter 3: vision and objectives and Policy MLP 23: Historic Environment are intended to address these issues.</p> <p>We will consider whether the current document structure is appropriate.</p>
<b>E050-1971L Wyre Forest District Council</b>	
<p>Page 19 – Map depicting primary aggregate minerals: Note the extent of sand and gravel resources and solid sand within the Wyre Forest Area and their identification as key resources. However, the current colour coding on the map and key as shown makes it difficult to distinguish between the two different resources.</p>	<p>Noted. An interactive minerals mapping tool was published alongside the consultation to enable readers to further interrogate the published data. This is available at <a href="http://www.worcestershire.gov.uk/minerals">www.worcestershire.gov.uk/minerals</a>.</p> <p>Changes to be made to address clarity within the document itself.</p>
<b>E056-1782L: RSPB</b>	
<p>The RSPB believes that the Portrait of Worcestershire does identify the locally relevant key issues for the Minerals Local Plan. In particular, the Portrait provides a good level of detail relating to the county's biodiversity (paragraphs 2.92 to 2.96), covering historical losses, the current status of biodiversity, the focus areas for enhancing biodiversity (i.e. the Biodiversity Opportunity Areas) and the potential opportunities provided by mineral development and mineral site restoration. This reflects the recommendations made by the RSPB in response to the Second Stage consultation.</p>	<p>Support noted.</p>

## Chapter 3: Vision and Objectives

### Vision

#### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 1	Don't know: 0	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E013-802: Malvern Hills AONB Unit</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	<p>E019-2459: Wildmoor Residents' Association</p>	<p>None</p>	<p>E019-2459: Wildmoor Residents' Association</p> <p>E020-2460 Mineral Products Association</p> <p>E025-1793 CEMEX</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E050-1971L Wyre Forest District Council</p> <p>E056-1782L: RSPB</p>

#### Comments on the Vision

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>Concerning Wildmoor the statement regarding the balancing of need with restoration and final landforms has not been carried out in practice. How will Worcestershire ensure this is carried out in the future?</p>	<p>The existing quarries in the Wildmoor area have existed for some time and the relevant planning applications were considered against the planning regime and Development Plan at the time.</p> <p>The statement in the vision that the winning, working and lasting legacy of minerals development in Worcestershire will balance the need for mineral with the need to achieve final landforms and restoration that delivers multifunctional benefits is a direct result of lessons learnt from both good and bad practice in Worcestershire and beyond in the past.</p>

Consultee comments	Initial Officer response
	However, it is noted that you have concerns over whether the objectives and policy framework set out in the Third Stage Consultation will be able to achieve the aim stated in the vision. Changes will be made to ensure this key concept is strengthened.
<b>E020-2460 Mineral Products Association and E025-1793 CEMEX</b>	
<p><b>Vision;</b> It is suggested that paragraph 3 of the vision should be moved to be the first paragraph of the vision and reworded, reflecting MLP8, as follows;</p> <p><i>At least a seven year landbank of permitted sand and gravel reserves will be reached as soon possible, and in any event by 2025. At least a seven year landbank will be maintained thereafter to ensure a steady and adequate supply of minerals.</i></p>	Noted. The changes suggested will be considered.
<b>E026-813 Worcestershire Wildlife Trust</b>	
We are pleased to support the vision as written and in particular the commentary pertaining to biodiversity enhancement, the use of strategic corridors and the wording around green infrastructure.	Support noted.
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>It is suggested that additional wording to paragraph 3 of the vision is provided so that, in accordance with NPPF, the second sentence reads as follows;</p> <p><i>At least 7 years for sand and gravel and at least 10 years for crushed rock will be maintained thereafter.</i></p>	Noted. The changes suggested will be considered.
<b>E050-1971L Wyre Forest District Council</b>	
<b>Page 57</b> – General support for the vision for minerals development in Worcestershire to 2035.	Support noted.
<b>E056-1782L: RSPB</b>	
<p>The RSPB is concerned that the Plan still does not promote the biodiversity-led restoration of mineral sites as an over-arching priority. As indicated in our previous consultation responses, we believe that this approach is essential given the vital and unique role that mineral site restoration can play in the creation of priority habitat and in helping to halt and reverse ongoing declines in biodiversity. Other Minerals Local Plans (MLPs), such as the Nottinghamshire MLP, have advocated this biodiversity-led approach. Unfortunately, the current Vision appears to be weaker in some respects compared to the draft Vision in the Second Stage Consultation. For example, the</p>	<p>Following the second stage consultation there was concern that delivery of benefits was focused on the restoration phases of the site when there are also significant opportunities to deliver benefit during the working phases of development. Changes were made to the vision to address this; it was not the intention to weaken the vision.</p> <p>The wording changes suggested will be considered.</p>

Consultee comments	Initial Officer response
<p>Vision no longer states that:</p> <ul style="list-style-type: none"> <li>Mineral workings will be restored to maximise social, environmental and economic gains, through coordinated restoration that delivers networks of green infrastructure in an integrated way.</li> </ul> <p>Also, it no longer:</p> <ul style="list-style-type: none"> <li>Drives development to the locations where the working of viable mineral resource will ... enable the delivery of the strategic restoration objectives.</li> </ul> <p>This emphasis on maximising social, environmental and economic gains, delivering strategic restoration objectives and taking a coordinated approach was one of the greatest strengths of the previous iteration of the Vision as it really highlighted the importance of the long-term legacy of the mineral sites. These themes are evidently still an important component of the Plan, as they still feature strongly in Chapter 5 (Spatial Strategy: location of mineral development). For example, paragraph 5.4 excludes some mineral resources 'because they do not have the potential to contribute to the delivery of coordinated benefits ... and therefore unable to contribute to a cohesive and coordinated approach at a landscape scale'. As such, it is not clear why they have been excluded from the Vision. It is the Vision which really sets the tone for the whole of the MLP, including the objectives, policies and supporting text, so it is vitally important that these strategic aspirations are addressed at this strategic level. Including these aspirations in the Vision would also provide instant clarity as to why minerals development is being focussed in the five strategic corridors.</p> <p>The RSPB and Nature After Minerals (NAM) have demonstrated that there is strong support for a strategic, coordinated and landscape-scale approach to minerals development and mineral site restoration. For example, we have worked in partnership with mineral operators, mineral planning authorities (MPAs) and other stakeholders to develop such an approach in the Trent and Tame River Valleys. This approach is set out in two advocacy documents: 'Bigger and Better: how Minerals Local Plans can help give nature a home on a landscape scale in the Trent and Tame River Valleys' and 'The Newark to South Clifton Concept Plan'.</p>	

Consultee comments	Initial Officer response
<p>Tarmac has been so supportive of this work that they have submitted it for an award in the Mineral Products Association Biodiversity Awards 2017. This submission has been endorsed by all of the main mineral operators working in the Trent and Tame River Valleys, including CEMEX.</p> <p>We strongly encourage the Mineral Planning Authority (MPA) to re-integrate these strategic, coordinated and landscape-scale aspirations into the Vision. The most suitable section of the Vision to do this would be the section on 'strategic corridors'. We provide suggested amended wording for the Vision [in response to Q3.4, below.]</p> <p>[For the reasons outlined in response to Q3.1, above,] we suggest that the paragraph of the Vision relating to strategic corridors is amended as follows (the text in bold is suggested new text):</p> <ul style="list-style-type: none"> <li>Minerals development will have been <del>delivered through multiple sites over the life of the plan,</del> focussed in five strategic corridors <b>in order to deliver strategic restoration objectives and to maximise social, economic and environmental gains. A coordinated and landscape-scale approach to mineral site restoration will have ensured that</b> mineral sites <del>will</del> form an integrated part of Worcestershire's green infrastructure network. <b>Within this strategic context,</b> the design, working and restoration of mineral sites will reflect the locally distinctive character of the strategic corridors, the site specific context and effective community engagement.</li> </ul> <p>This approach should maintain the necessary strategic thrust of the Vision whilst still providing greater certainty at a site level (which was identified as an issue in consultation responses to the Second Stage consultation, as indicated on page 60 of the current consultation).</p>	

## Objective 1: Deliver development in accordance with the priorities of the spatial strategy

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E013-802: Malvern Hills AONB Unit  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 1	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E019-2459: Wildmoor Residents' Association	None	E019-2459: Wildmoor Residents' Association

### *Comments on Objective 1*

Consultee comments	Initial Officer response
<b>E019-2459: Wildmoor Residents' Association</b>	
Here we would refer you to our comments in Q3.1	It is noted that the Wildmoor Residents' Association did not comment on Q3.1 in relation to Objective 1, but comments on the Vision and



Consultee comments	Initial Officer response
	Objectives 6, 11 and 13 are addressed under the relevant objectives.

## Objective 2: Maximise the contribution of substitute, secondary and recycled materials and minerals waste to overall mineral supply

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E013-802: Malvern Hills AONB Unit  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

### Objective 3: Maintain the steady and adequate supply of sand and gravel and address shortfalls in the landbank of permitted reserves

#### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

#### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	E020-2460 Mineral Products Association  E025-1793 CEMEX

#### Comments on Objective 3

Consultee comments	Initial Officer response
<b>E020-2460 Mineral Products Association</b>	
<b>Objective;</b> Objective 3 should have the words <i>as soon as possible</i> added to the end of the sentence reflecting policy MLP8.	Noted and agreed. Change to be made.
The order of objective 2 and 3 should be	Paragraph 143 of the NPPF states that " In

Consultee comments	Initial Officer response
swapped.	preparing Local Plans, local planning authorities should...so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials..." The current order of the objectives supports this policy principle and as such Worcestershire County Council does not propose to re-order these objectives.
<b>E025-1793 CEMEX</b>	
Objective 3 should have the words <i>as soon as possible</i> added to the end of the sentence reflecting policy MLP8.	Noted and agreed. Change to be made.

## Objective 4: Maintain the county's role in the steady and adequate supply of brick clay, bricks and brick products

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970:	None	E019-2459: Wildmoor Residents' Association	None

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
Worcestershire County Council, Landscape Advisor  E041-717: Natural England			

### Objective 5: Foster an adequate and diverse supply of building stone

#### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E013-802: Malvern Hills AONB Unit  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

#### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural	None	E019-2459: Wildmoor Residents' Association	None

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
England			

**Objective 6: Enable the sustainable supply of other locally and nationally important mineral resources found in the county, including crushed rock and silica sand**

**Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?**

<b>Yes: 4</b>	<b>No: 1</b>	<b>Don't know: 0</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E019-2459: Wildmoor Residents' Association	None	E019-2459: Wildmoor Residents' Association

**Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?**

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	None

## Comments on Objective 6

Consultee comments	Initial Officer response
<b>E019-2459: Wildmoor Residents' Association</b>	
Is low grade silica sand needed to be extracted in Wildmoor.	The National Planning Policy Framework requires Mineral Planning Authorities to plan for locally and nationally important mineral resources, including silica sand.

## Objective 7. Safeguard locally and nationally important minerals and supporting infrastructure from being needlessly sterilised

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association  E013-802: Malvern Hills AONB Unit	E005-817 CPRE Worcestershire

### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	E005-817: CPRE Worcestershire

## Comments on Objective 7

Consultee comments	Initial Officer response
<b>E005-817: CPRE Worcestershire</b>	
Objective 7 should be limited to scarce resources ones. If there were coal or oil, it might apply to them; but there are not, except coal unlikely to be worked.	The National Planning Policy Framework requires "mineral resources of local and national importance" to be safeguarded. Paragraph 8.6 of the Third Stage Consultation Document defines the materials that are considered to be locally and nationally important in relation to this objective in line with national policy.  Changes will be considered to make this clearer.

## **Objective 8. Promote community inclusion in mineral development from inception to after-use so that local issues are understood and addressed**

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England  E013-802: Malvern Hills AONB Unit	None	E019-2459: Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E034-1970 Worcestershire County Council, Landscape Advisor

### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife	None	E019-2459: Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E034-1970 Worcestershire County

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England			Council, Landscape Advisor

### Comments on Objective 8

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
The remaining objectives merely repeat matters set out in specific policies or are too vague to have any useful effect.	The objectives are intended to outline the high-level priorities for realising the vision and guide the development of the policy framework (see Paragraphs 3.1, 3.9 and table 3.1 of the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i> ).
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
Yes, however community inclusion will raise landscape issues, which should link with MLP19 as a consideration.	Noted.  The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.

## **Objective 9. Ensure that mineral development contributes to the mitigation of and adaptation to climate change and makes prudent use of natural resources**

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452 Mr N Dean  E013-802: Malvern Hills AONB Unit  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County	None	E019-2459: Wildmoor Residents' Association	E005-817: CPRE Worcestershire  E034-1970: Worcestershire County Council, Landscape Advisor  E032-1504 Heaton Planning on behalf of Tarmac



Yes: 5	No: 0	Don't know: 1	Written responses (see below)
Council, Landscape Advisor  E041-717: Natural England			

**Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?**

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	E005-817: CPRE Worcestershire  E032-1504: Heaton Planning on behalf of Tarmac  E034-1970: Worcestershire County Council, Landscape Advisor

**Comments on Objective 9**

Consultee comments	Initial Officer response
<b>E005-817: CPRE Worcestershire</b>	
The remaining objectives merely repeat matters set out in specific policies or are too vague to have any useful effect.	The objectives are intended to outline the high-level priorities for realising the vision and guide the development of the policy framework (see Paragraphs 3.1, 3.9 and table 3.1 of the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i> ).
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
Clarity is sought over how the Council are expecting the Objective 9 to 13 will be delivered.	Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.
<b>E034-1970: Worcestershire County Council, Landscape Advisor</b>	
Climate change resilience is a wider landscape issue that mineral development, and particularly restoration, should address.	Noted and agreed. This is intended to be addressed through policy MLP19. Changes to Table 3.1 will be considered to reflect this issue.

Consultee comments	Initial Officer response
Can the restoration help to mitigate the effects of climate change in associated landscapes either within the setting of the development or further afield – e.g. mitigation of flooding related erosion. MLP19 is therefore material.	

**Objective 10. Ensure that mineral development protects and enhances the health, well-being, safety and amenity of people and communities in and around Worcestershire**

**Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?**

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E034-1970: Worcestershire County Council, Landscape Advisor

**Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?**

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E019-2459: Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E017-507 Directorate of Public Health, Worcestershire County Council  E032-1504 Heaton Planning on behalf of Tarmac  E034-1970 Worcestershire County Council, Landscape Advisor

## Comments on Objective 10

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>The remaining objectives merely repeat matters set out in specific policies or are too vague to have any useful effect.</p>	<p>The objectives are intended to outline the high-level priorities for realising the vision and guide the development of the policy framework (see Paragraphs 3.1, 3.9 and table 3.1 of the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>).</p>
<b>E017-507 Directorate of Public Health, Worcestershire County Council</b>	
<p>We welcome that the Local Plan will be supported with the Health Impact Assessment (HIA) of the Local Plan which is currently being prepared in cooperation between the Minerals Local Plan team and Directorate of Public Health. Some of the initial findings of this HIA have informed our comments expressed in this response.</p>	<p>Support noted.</p>
<p>We welcome that health and wellbeing is considered and embedded within the Local Plan. In particular, we welcome:</p> <ul style="list-style-type: none"> <li>• Objective 10: Ensure that mineral development protects and enhances the health, well-being, safety and amenity of people and communities in and around Worcestershire.</li> <li>• Policy MLP 16: Health and Quality of Life</li> <li>• Para 7.92 stating that "The Mineral Planning Authority will expect health impacts to be considered through a health impact assessment that is proportionate to the development proposed".</li> </ul> <p>The importance of planning for health and the use of HIAs in planning is promoted through the national planning policy and guidance. The National Planning Policy Framework, 2012 (NPPF) recognises the need to understand and "take account of the health status and needs of the local population including expected future changes, and any information about relevant barriers to improving health and well-being." Additionally, the national Planning Practice Guidance (PPG) recognises that, in relation to planning applications, HIA is a useful tool to identify where significant impacts on the health of local people are expected.</p> <p>Health Impact Assessments undertaken on the mineral development proposals will help to</p>	<p>Support noted. Reference to data and good practice guidance will be strengthened.</p>

Consultee comments	Initial Officer response
<p>predict the health implications on a population from that development, both during the operation and after-use periods. A HIA will help to draw on the potential positive aspects of a proposal whilst avoiding or minimising any negative impacts. A HIA normally seeks both quantitative and qualitative assessment of how the site meets the health and wellbeing needs of both the current local population and future residents and whether there are any vulnerable population groups (such as the elderly) that would benefit from specific consideration or whether the site design encourages healthy lifestyles and reduces the prevalence of obesity etc.</p> <p>The size and time spent on the HIA is usually related to the size of the proposal, however, it is not expected to be either costly or a lengthy exercise. The evidence suggests that only major national scale projects would require a full HIA with most of minerals developments in Worcestershire expected to fall within the rapid or intermediate HIA type. This would mean a maximum couple of hours to a couple of days of work respectively. The data to inform this analysis is readily available on the Joint Strategic Needs Assessments and Public Health England webpages. The good practice guidance regarding HIAs is available in the HIAs for Planning Toolkit <a href="http://www.worcestershire.gov.uk/downloads/file/6948/health_impact_assessment_in_planning_toolkit">http://www.worcestershire.gov.uk/downloads/file/6948/health_impact_assessment_in_planning_toolkit</a>. The Directorate of Public Health can also assist in development of HIAs if required.</p>	
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>Clarity is sought over how the Council are expecting the Objective 9 to 13 will be delivered.</p>	<p>Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.</p>
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
<p>Health, wellbeing, amenity and community are rooted in attractive, well designed and socially accessible landscapes. MLP19 should link to this Objective.</p>	<p>The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.</p>

**Objective 11. Ensure that mineral development protects and enhances the natural and historic environment and distinctive local character**

**Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?**

<b>Yes: 5</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E013-802: Malvern Hills AONB Unit</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	None	E019-2459: Wildmoor Residents' Association	<p>E005-817 CPRE Worcestershire</p> <p>E019-2459: Wildmoor Residents' Association</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E056-1782L RSPB</p>

**Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?**

<b>Yes: 4</b>	<b>No: 1</b>	<b>Don't know: 0</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	E019-2459: Wildmoor Residents' Association	None	<p>E019-2459: Wildmoor Residents' Association</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p>

## Comments on Objective 11

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>The remaining objectives merely repeat matters set out in specific policies or are too vague to have any useful effect.</p>	<p>The objectives are intended to outline the high-level priorities for realising the vision and guide the development of the policy framework (see Paragraphs 3.1, 3.9 and table 3.1 of the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>).</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>We look forward to that objective being achieved!</p>	<p>Noted.</p>
<b>E026-813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support this important objective and the weight given to protection and enhancement of the natural environment.</p> <p>It will be essential for minerals development to deliver biodiversity protection and enhancement as set out in this objective if the overall plan vision is to be achieved.</p>	<p>Support noted.</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>Clarity is sought over how the Council are expecting the Objective 9 to 13 will be delivered.</p>	<p>Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.</p>
<b>E056-1782L RSPB</b>	
<p>Whilst we support the requirement for mineral development to protect and enhance the natural environment, we believe that Objective 11 should also require all mineral sites to deliver a net-gain in biodiversity.</p> <p>As outlined in our response to the Second Stage consultation, the National Planning Policy Framework (paragraph 6) identifies achieving net-gains in biodiversity as one of the overarching objectives of pursuing sustainable development (as outlined in paragraph six of the National Planning Policy Framework). Also, as outlined in response to Q3.1 above, mineral sites play a vital and unique role in helping to halt and reverse declines in biodiversity through the creation of priority habitat.</p> <p>Explicitly requiring all mineral development to deliver net-gains in biodiversity, in Objective 11,</p>	<p>We will consider the wording changes suggested alongside those raised by consultees (see question 3.4) in relation to the historic environment and water environment to ensure that each of these important issues are addressed sufficiently and appropriately in the plan's objectives.</p>

Consultee comments	Initial Officer response
<p>would help to address these issues. If the issues of biodiversity is not going to be explicitly addressed in the Vision (as discussed above), it is even more vital that it is explicitly addressed in the Objectives.</p> <p>We provide suggested amended wording for Objective 11 [in response to Q3.4, below.]</p> <p>[For the reasons outlined in response to Question 3.1, above,] we suggest that Objective 11 is amended as follows (the text in bold is suggested new text):</p> <ul style="list-style-type: none"> <li>Ensure that mineral development protects and enhances the natural and historic environment and distinctive local character. <b>In particular, ensure that all mineral development delivers net-gains in biodiversity.</b></li> </ul>	

## Objective 12. Ensure that mineral development protects and enhances the vitality of the local economy

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	None	<p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p>	E005-817 CPRE Worcestershire

### Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459: Wildmoor Residents' Association	E032-1504 Heaton Planning on behalf of Tarmac

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E026-813 Worcestershire Wildlife Trust			
E034-1970: Worcestershire County Council, Landscape Advisor			
E041-717: Natural England			

### Comments on Objective 12

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
The remaining objectives merely repeat matters set out in specific policies or are too vague to have any useful effect.	The objectives are intended to outline the high-level priorities for realising the vision and guide the development of the policy framework (see Paragraphs 3.1, 3.9 and table 3.1 of the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i> ).
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
Clarity is sought over how the Council are expecting the Objective 9 to 13 will be delivered.	Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.

## **Objective 13. Optimise opportunities to integrate economic, social and environmental benefits through the delivery of high-quality multifunctional green infrastructure throughout the life of the mineral development**

### Q3.1 Do the vision and objectives set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Yes: 5	No: 1	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean	E019-2459: Wildmoor Residents' Association	None	E005-817 CPRE Worcestershire
E013-802: Malvern Hills AONB Unit			E019-2459: Wildmoor Residents' Association
E026-813			E026-813



Yes: 5	No: 1	Don't know: 0	Written responses (see below)
<p>Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>			<p>Worcestershire Wildlife Trust</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E056-1782L RSPB</p>

**Q3.2 Do the objectives set the appropriate priorities to ensure that the vision will be achieved?**

Yes: 4	No: 1	Don't know: 0	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	<p>E019-2459: Wildmoor Residents' Association</p>	<p>None</p>	<p>E005-817 CPRE Worcestershire</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E026-813 Worcestershire Wildlife Trust</p>

**Comments on Objective 13**

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>The remaining objectives merely repeat matters set out in specific policies or are too vague to have any useful effect.</p>	<p>The objectives are intended to outline the high-level priorities for realising the vision and guide the development of the policy framework (see Paragraphs 3.1, 3.9 and table 3.1 of the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>).</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>Green infrastructure has been ignored in Wildmoor. Chadwich quarry was overfilled by 6 metres in depth, and then only restored because other permissions were being sought.</p>	<p>The existing quarries in the Wildmoor area have existed for some time and the relevant planning applications were considered against the planning regime and Development Plan at the time. Green infrastructure is a relatively new concept, with the Worcestershire Green Infrastructure Strategy only having been adopted in 2013, but it aims to bring together consideration of many economic, social and</p>

Consultee comments	Initial Officer response
	<p>environmental considerations in a holistic way.</p> <p>Objective 13 and the supporting policy framework seek to deliver high-quality multifunctional green infrastructure throughout the life of mineral development to ensure that opportunities to integrate economic, social and environmental benefits are optimised.</p>
<b>E026-813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support this objective and the commentary regarding green infrastructure.</p> <p>Taking the green infrastructure approach set out in this objective will be critical to delivering the plan vision.</p>	<p>Support noted.</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>Clarity is sought over how the Council are expecting the Objective 9 to 13 will be delivered.</p>	<p>Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.</p>
<b>E056-1782L RSPB</b>	
<p>Whilst we support the aspirations of Objective 13 for mineral development to deliver high quality, multi-functional green infrastructure, we recommend that the objective should be amended to reflect our suggested amendments to the Vision. In particular, Objective 13 should reflect the importance of taking a coordinated and landscape-scale approach to mineral site restoration in order to deliver the desired green infrastructure outcomes.</p> <p>We provide suggested amended wording for Objective 13 [in response to Q3.4, below.]</p> <p>[For the reasons outlined in response to Question 3.1, above,] we suggest that Objective 13 is amended as follows:</p> <ul style="list-style-type: none"> <li>Optimise opportunities to integrate economic, social and environmental benefits <del>through</del> <b>by taking a coordinated and landscape-scale approach to</b> the delivery of high-quality multifunctional green infrastructure <del>throughout the life of the mineral development.</del></li> </ul> <p>The last part of the sentence should be removed</p>	<p>The wording changes suggested will be considered.</p>

Consultee comments	Initial Officer response
as it focuses on the life of the mineral development, whereas many of the desired benefits (including green infrastructure) should continue to be maintained and enhanced in the longer term, not just during the life of the mineral development.	

### Q3.3 Do the vision and objectives together address the principles of the National Planning Policy Framework by:

#### a) Contributing to the achievement of sustainable development

Yes: 4	No: 1	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E019-2459: Wildmoor Residents' Association	E014-634: Pershore Town Council	E019-2459: Wildmoor Residents' Association  E011-2456 Upton Rowing Club

#### Comments

Consultee comments	Initial Officer response
<b>E011-2456 Upton Rowing Club</b>	
It appears to us that the document does not give enough weight to social and economic benefits when it discusses the evaluation of sustainable development. For example, policy MLP 3 focuses on environmental matters (which are of course important), but does not mention any social or economic benefits, even though these elements are also essential features of sustainable development. This is perhaps understandable, because many mineral extraction sites may not lend themselves to such uses. But the site at Ryall North is an unusual one, perhaps even unique: its size and layout permit the creation of a Water Sports Centre which would be of regional or even national	Economic and social factors have been considered in the development of the Minerals Local Plan, particularly through consideration of green infrastructure as a means of integrating social, environmental and economic benefits from high-quality green space. Differences in the rural economy such as different types of agricultural practices or forestry have been drawn upon in defining the priorities for each of the strategic corridors. Changes will be considered to draw out economic and social benefits of minerals development and green infrastructure, however most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council.

Consultee comments	Initial Officer response
<p>importance; and not only is it very close to a town centre, but it is also readily accessible from the motorway network.</p> <p>We therefore do not believe that the document deals adequately with these matters, and it is presently unbalanced in this regard. The discussion of sustainable development should be extended to recognise the importance of economic and social gains as well as environmental ones, while recognising that such benefits may not be attainable in all cases. We do not think that environmental benefits are necessarily incompatible with economic and social ones, and the site at Ryall North will seek to combine all three. However, it should be accepted that different weightings can properly be given to these different elements according to the merits of the particular application, and we ask that the document should also make this clear.</p>	<p>As you suggest in your response, the situation at Ryall North is unique and such situations are more appropriately considered on a site-by-site basis. This is reflected in the requirements set out in policies MLP 2 to MLP 6 for evidence to be provided to "demonstrate how the landscape-scale priorities for the corridor and any site-specific considerations have informed the development proposals" and in MLP 15 for proposals to "take account of local context".</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>The NPPF document places emphasis on the quality of life and protection of the green belt, with provisos for certain specified types of development. However in practice and from our experience, developers run ruffshod over their required stipulations for operation and restoration.</p>	<p>The National Planning Policy Framework states that certain forms of development, including mineral extraction, are "not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt" (paragraph 90). It would therefore be inappropriate for the Minerals Local Plan to seek to prevent minerals extraction within the Green Belt. Paragraph 5.32 of the Third Stage Consultation document stated that "any proposals would need to be assessed against relevant national and local Green Belt policy". Changes will be considered to strengthen this.</p> <p>Three of the Strategic Corridors are partially within the Green Belt and the priorities identified for them seek the delivery and enhancement of green infrastructure networks that will contribute towards the quality, character and distinctiveness of those corridors, including by providing public access and retaining and enhancing landscapes, visual amenity and biodiversity.</p> <p>However the inclusion of a policy specifically addressing greenbelt will be considered.</p>

b) Seeking opportunities to achieve each of the economic, social, environmental dimensions of sustainable development, delivering net gains across all three dimensions:

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E014-634: Pershore Town Council  E019-2459: Wildmoor Residents' Association	None

c) Setting out the strategic priorities for the area:

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E014-634: Pershore Town Council  E019-2459: Wildmoor Residents' Association	None

d) Containing a clear strategy for enhancing the natural, built and historic environment?

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County	None	E014-634: Pershore Town Council  E019-2459: Wildmoor Residents' Association	E026-813 Worcestershire Wildlife Trust

Yes: 4	No: 0	Don't know: 2	Written responses (see below)
Council, Landscape Advisor E041-717: Natural England			

*Comments*

Consultee comments	Initial Officer response
<b>E026-813 Worcestershire Wildlife Trust</b>	
Yes, although further detail given elsewhere in the plan is important in providing clarity on the strategy. The vision and objectives necessarily only set the tone and basic principles.	Noted and agreed.

e) Reflecting the vision and aspirations of local communities:

Yes: 4	No: 2	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E014-634: Pershore Town Council  E019-2459: Wildmoor Residents' Association	None	E014-634: Pershore Town Council  E019-2459: Wildmoor Residents' Association  E034-1970: Worcestershire County Council, Landscape Advisor

*Comments*

Consultee comments	Initial Officer response
<b>E014-634 Pershore Town Council</b>	
The strategic corridors do not seem to take account of other pressures such as the impact on communities, road traffic routing etc. A more balanced approach should be taken to ensure that future mineral development takes account of all criteria.	Landscape types were the predominant factor in defining the boundaries of the Strategic Corridors, Appendix 3 of the Third Stage Consultation set out in detail how the precise definitions of the Strategic Corridors were influenced by the components of green infrastructure. Consideration will be given to incorporating Appendix 3 in to the main body of the Plan to make this clearer.

Consultee comments	Initial Officer response
	<p>The Second Stage consultation assessed projected housing growth and infrastructure needs and determined that much of the county (and all of the strategic corridors identified in the third stage consultation) were well suited to serve this demand for mineral resources. Changes to the wording will be considered to ensure that the alternatives considered and factors taken into account in the second stage consultation are explicitly referenced in future documents.</p> <p>Areas assessed as "urban" in the Landscape Character Assessment were excluded from the strategic corridors. Consideration will be given to whether there is more appropriate data available to update these boundaries, such as defined settlement boundaries, and whether local plan allocations could be incorporated into this approach.</p> <p>Whilst it is appreciated that narrower corridors could provide greater certainty, the approach in the Third Stage Consultation included wide corridors to capture as much resource as necessary to bring the plan forward in line with national policy.</p> <p>Transport considerations are intended to be addressed through Policies MLP 24 and MLP 25.</p>
<b>E019-2459: Wildmoor Residents' Association</b>	
<p>Lack of sufficient enforcement means that the aspirations of local communities are insufficiently considered. The objectives need to ensure that the vision is achieved and not just words!</p>	<p>Policy MLP 15 c) is intended to ensure that proposals take account of the local context, with the reasoned justification stating that "Early consultation will enhance quality throughout the life of the site. It is expected that developers will consult with local communities and other stakeholders on proposals for mineral development before the planning application is submitted and demonstrate how they have taken account of the views of the community, including businesses, in a Consultation Statement."</p> <p>Once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which are able to be enforced. We agree that this is a key part of the effective operation of the planning system, and we are engaged in discussion with our colleagues in Development Management</p>

Consultee comments	Initial Officer response
	and Planning Enforcement to ensure that the policies can be applied and enforced as intended.
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
With adjustment, yes	Noted.

f) Taking an approach which is aspirational but realistic

Yes: 4	No: 1	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E019-2459: Wildmoor Residents' Association	E014-634: Pershore Town Council	E019-2459: Wildmoor Residents' Association  E026-813 Worcestershire Wildlife Trust

*Comments*

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
Lack of sufficient enforcement means that the aspirations of local communities are insufficiently considered. The objectives need to ensure that the vision is achieved and not just words!	<p>Policy MLP 15 c) is intended to ensure that proposals take account of the local context, with the reasoned justification stating that "Early consultation will enhance quality throughout the life of the site. It is expected that developers will consult with local communities and other stakeholders on proposals for mineral development before the planning application is submitted and demonstrate how they have taken account of the views of the community, including businesses, in a Consultation Statement."</p> <p>Once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which are able to be enforced. We agree that this is a key part of the effective operation of the planning system, and we are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the</p>



Consultee comments	Initial Officer response
	policies can be applied and enforced as intended.
<b>E026-813 Worcestershire Wildlife Trust</b>	
We are particularly pleased to support the use of strategic corridors as a mechanism to target restoration priorities over the lifetime of the plan. Whilst such an approach is novel and aspirational there is no reason to think that it won't result in more positive restoration and potentially significant enhancement of the natural environment. We therefore believe that the strategy chosen is realistic and achievable.	Support noted.

### Q3.4 Are there any wording changes which you would suggest to Chapter 3 to improve clarity or any other issues which you think should be considered?

Yes: 2	No: 5	Written responses (see below)
E019-2459: Wildmoor Residents' Association  E034-1970: Worcestershire County Council, Landscape Advisor	E007-2452: Mr N Dean  E014-634: Pershore Town Council  E026-813 Worcestershire Wildlife Trust  E041-717: Natural England	E017-507: Directorate of Public Health, Worcestershire County Council  E019-2459: Wildmoor Residents' Association  E034-1970: Worcestershire County Council, Landscape Advisor  E047-716: Historic England  E048-719: Environment Agency  E050-1971L: Wyre Forest District Council

### Comments

Consultee comments	Initial Officer response
<b>E017-507 Directorate of Public Health, Worcestershire County Council</b>	
Table 3.1 - Ensure that mineral development contributes to the mitigation of and adaptation to climate change and makes prudent use of natural resources. Mitigation and adaptation of climate change can also contribute towards health and wellbeing goals including reducing	Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or

<b>Consultee comments</b>	<b>Initial Officer response</b>
urban heat island effect, reduction of air quality issues impacting human health or impacts of flooding on the residents' general wellbeing.	should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.
<b>E019-2459 Wildmoor Residents' Association</b>	
Take the above issues into consideration.	Noted. These issues are addressed above.
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
Suggested rewording for 3.7 landscape: Worcestershire has a diverse landscape character represented by 22 character types. Landscape is the physical and visual manifestation of the inter-relationship between human activities and the environment.	Noted. Change to be made.
<b>E047-716 Historic England</b>	
We support paragraph 3.4, clause C.	Support noted.
We support the statement that minerals working and restoration can have a positive impact on the landscape and can enhance the historic significance of landscape e.g. through reinstating historic field boundaries. We are keen to ensure that the restoration principles applied to mineral working sites are sensitive to the needs of the historic environment and what would be appropriate within a historic landscape or the setting of heritage assets. We will make specific reference to this and the need for some improvements to the restoration principles text later in our response.	Noted.
We support the inclusion of the historic environment within the Vision on page 57 and the aspiration of the Local Authority and Local Plan to enhance the historic environment. We would recommend that there is a separate objective relating to the historic environment, as the needs of the natural and historic environment can differ and we want to ensure that the historic environment is protected, conserved and enhanced through the principles and policies within the Local Plan. We have raised this recommendation previously in our earlier responses. This will also enable more accurate linkages between the Plan's objectives and the policies, identified in Table 3.1.	Support for the Vision noted.  We will consider the changes suggested alongside those raised by consultees in relation to biodiversity and the water environment to ensure that each of these important issues are addressed sufficiently and appropriately in the plan's objectives.
It is unclear from Table 3.1 how the assessment has been undertaken and we have some concerns with the assumptions that have been cited. For examples, Policy MLP1 does not receive a tick for objective 11 yet the separate policies, MLP2 – MLP6, on strategic corridors do? For the most part these policies relate to the natural environment element of the objective and not the historic environment. We consider that in their current form there is still potential for	Table 3.1 was intended to show how the objectives would be delivered through the requirements of the policy framework. The interpretation of Table 3.1 has resulted in some confusion. Consideration will be given to whether this table fulfils a useful purpose or should be removed from the plan. The links between the objectives and policy drivers will also be reconsidered.

Consultee comments	Initial Officer response
negative effects for the historic environment.	
<b>E048-719 Environment Agency</b>	
We also support the objectives in the WMLP and the recognition for the need to mitigate and adapt to climate change (Objective 9) and the potential to use mineral working to deliver integrated environmental, community and economic benefits (Objective 13). However, we believe these plan objectives could be further strengthened through specific reference to flood risk betterment, water quality and quantity improvements, particularly given the emphasis placed on the water environment within the introductory context (para 2.104).	Support noted. We will consider the changes suggested alongside those raised by consultees in relation to biodiversity and the historic environment to ensure that each of these important issues are addressed sufficiently and appropriately in the plan's objectives.
<b>E050-1971L Wyre Forest District Council</b>	
<b>Page 58</b> – General support for objectives of the Worcestershire Minerals Local Plan.	Support noted.

## Chapter 4: Key Diagram

### Q4.1 Is the key diagram effective in indicating broad locations for strategic development?

Yes: 6	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	None	E014-634: Pershore Town Council	E056-1782L RSPB

**Q4.2 Are there any changes which you would suggest to the key diagram to improve clarity or any other issues which you think should be considered?**

<b>Yes: 1</b>	<b>No: 4</b>	<b>Written responses (see below)</b>
E041-717: Natural England	<p>E007-2452: Mr N Dean</p> <p>E013-802: Malvern Hills AONB Unit</p> <p>E014-634: Pershore Town Council</p> <p>E019-2459: Wildmoor Residents' Association</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	<p>E028-547: Chaddesley Corbett Parish Council</p> <p>E041-717: Natural England</p> <p>E019-2459: Wildmoor Residents' Association</p> <p>E050-1971L: Wyre Forest District Council</p>

**Q4.3 Are there any changes which you would suggest to the interactive minerals mapping tool to improve clarity or any other issues which you think should be considered?**

<b>Yes: 0</b>	<b>No: 5</b>	<b>Written responses (see below)</b>
None	<p>E007-2452: Mr N Dean</p> <p>E014-634: Pershore Town Council</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	<p>E028-547 Chaddesley Corbett Parish Council</p> <p>E050-1971L Wyre Forest District Council</p>

**Comments on the key diagram and interactive webmap**

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E019-2459 Wildmoor Residents' Association</b>	
[Is the key diagram effective in indicating broad locations for strategic development?] Provided it is accurate and kept up to date?	It is the Council's intention to update the interactive webmap when new planning permissions are granted, and to update the

Consultee comments	Initial Officer response
	status of sites through the Authority Monitoring Report process.
<b>E028-547 Chaddesley Corbett Parish Council</b>	
We found the interactive map to be very helpful, and we hope that this will be maintained and remain available on the County Council website, as it represents a very useful resource.	Support noted. It is the Council's intention to maintain the interactive webmap, updating it when new planning permissions are granted, and to update the status of sites through the Authority Monitoring Report process.
<b>E041-717 Natural England</b>	
Though it shows the broad strategic locations for development, it is not clear from the key that the strategic corridors identify where mineral development will go. This is explained in section 5, but it would be helpful to have a brief explanation in section 4 with reference to section 5 to clarify what the diagram is showing.	Concern noted. Changes to the format and structure of the document will be made to address this issue.
<b>E050-1971L Wyre Forest District Council</b>	
<b>Key Diagram</b> – note the extent of the North West Worcestershire Strategic Corridor within the Wyre Forest District. Are the white areas around the towns of Kidderminster and Stourport exempt from the strategic corridor?	Yes. Landscape character was the predominant factor used to identify the precise boundaries of the strategic corridors, with the North West Worcestershire Strategic Corridor encompassing the Sandstone Estatelands landscape type, the Riverside Meadows landscape type which runs through these areas, and the pockets of Unenclosed Commons landscape type within them. The urban areas of Kidderminster and Stourport do not therefore form part of the North West Worcestershire Strategic Corridor. Changes to be considered to make the interpretation of the diagram clearer.
<b>Page 64</b> – Note that WCC has prepared an interactive minerals mapping tool which provides interactive boundaries.	Noted.
<b>E056-1782L RSPB</b>	
Yes, the Key Diagram is effective in indicating broad locations for strategic development, at least in terms of the Strategic Corridors. However, the 'allocated sites' are much less clear, especially where they overlap with 'mineral sites' and where these 'mineral sites' are of the same colour as the 'allocated sites'.	Noted. Changes to be considered to improve clarity.
Yes. The 'allocated sites' should be made easier to distinguish from the 'mineral sites' with which they overlap, particularly where the same (or similar) colours are currently used for both categories. For example, different colour schemes should be used for the 'allocated sites', such that they do not overlap with 'mineral sites' of the same colour. Any text (e.g. Upton-upon-Severn) should not overlap with either 'allocated sites' or 'mineral sites'. In order to provide the required level of clarity, it might	Noted. Changes to be considered to improve clarity.

Consultee comments	Initial Officer response
be appropriate to include inset maps for the 'allocated sites'.	
Also, showing mineral sites in the surrounding countries distracts from focussing on mineral sites in Worcestershire. As such, the mineral sites in the surrounding counties should be removed.	These sites are shown due to the potential relationships with Worcestershire, both with regards to supply and restoration priorities. Consideration will be given to whether these remain useful in future versions.

## Chapter 5: Spatial Strategy

### Q5.1 Do you agree with the approach to defining the strategic corridors?

- a) Considering key and significant sand and gravel as identified in the resource assessment

Yes: 3	No: 2	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean	E014-634: Pershore Town Council	E013-802: Malvern Hills AONB Unit	E014-634: Pershore Town Council
E026-813: Worcestershire Wildlife Trust	E019-2459: Wildmoor Residents' Association		E019-2459: Wildmoor Residents' Association
E034-1970: Worcestershire County Council, Landscape Advisor			

#### Comments

Consultee comments	Initial Officer response
<b>E014-634 Pershore Town Council</b>	
We feel that the strategic corridors are too wide and should be defined along much more restricted lines.	The strategic corridors contain clusters of key and significant mineral resources within coherent landscapes. In order to identify strategic corridors where gains can be maximised, the distribution of mineral resources was considered alongside the potential for mineral development to positively impact on green infrastructure at a landscape scale. Development within the strategic corridors is more likely to contribute to meaningful delivery of green infrastructure than development outside the corridors as it will enable the

Consultee comments	Initial Officer response
	<p>achievement of benefits across multiple sites that are greater than could be achieved by considering each site in isolation.</p> <p>Whilst it is appreciated that narrower corridors could provide greater certainty, the approach in the Third Stage Consultation included wide corridors to capture as much resource as necessary to bring the plan forward in line with national policy.</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>The consultation says there is adequate supply levels for the life of the plan, it would therefore seem unnecessary to consider further development within the north east corridor itself. Especially as in the proposals put forward this means going to greater depths and further endangering water quality.</p>	<p>The supply of silica sand for industrial use is considered to be adequate, however the Local Aggregates Assessment 2016 established the baseline for the Minerals Local Plan and identified that the landbank for sand and gravel for aggregate use (as of 31<sup>st</sup> December 2015) was 1.41-1.48 years. This is well below the 7 year landbank which is required by national policy. It is estimated that a further 16.25-16.3 million tonnes of primary sand and gravel will need to be permitted over the plan period to meet anticipated annual supply levels and to achieve and maintain a 7 year landbank of permitted reserves (Portrait of Worcestershire: paragraphs 2.23-2.24).</p> <p>There are significant deposits of solid sands in the north east of the county which have led to the identification of the North East Worcestershire Strategic Corridor in the Third Stage Consultation. These solid sands can be used as aggregate sand and gravel, as well as containing some areas which are suitable for use as industrial silica sands.</p> <p>All proposed mineral development will need to apply for planning permission and meet the requirements of the policy framework, including proposed policy MLP 22 which sets out safeguards for the water environment.</p>

b) Considering Mercia Mudstone group clays

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E019-2459: Wildmoor Residents' Association</p>	None	E013-802: Malvern Hills AONB Unit	None

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
<p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p>			

c) Not identifying strategic corridors for crushed rock

<b>Yes: 5</b>	<b>No: 0</b>	<b>Don't know: 0</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p>	None	None	None

d) Not identifying strategic corridors specifically for any other minerals

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 2</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p>	None	<p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p>	None



e) Using landscape character as the primary indicator of landscape scale coherence

Yes: 5	No: 1	Don't know: 0	Written responses (see below)
E013-802: Malvern Hills AONB Unit  E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E019-2459: Wildmoor Residents' Association	None	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association  E033-683/1077/2279 South Worcestershire Councils  E039-2212 Bromsgrove District Council (informal response)  E050-1971L Wyre Forest District Council  E056-1782L: RSPB

*Comments*

Consultee comments	Initial Officer response
<b>E013-802 Malvern Hills AONB Unit</b>	
Whilst being generally supportive of this approach we would guard against a rigid application of LCTs if the result is that worthy areas just outside a Type are excluded. Landscape and ecological transitions between one area and another are not always clear cut on the ground and it might be a shame to exclude certain areas merely because they fall outside a line on a map.	The green infrastructure approach is intended to ensure that networks surrounding individual sites are taken into account to ensure opportunities for enhancement are optimised, such as creating stepping stones or buffers in ecological networks. Consideration will be given to strengthening this concept.  It is considered important that the Minerals Local Plan sets a strategy for where minerals should be worked. However, where landscape and ecological transitions are less distinct, this is capable of being a material consideration in the determination of planning applications.
<b>E019-2459 Wildmoor Residents' Association</b>	
The operational activity for sand extraction in the green belt area in northern Worcestershire largely ignores the quality and character of the landscape for the north east corridor. Again lack of adherence to conditions and lack of enforcement severely affects the landscape.	The existing quarries in the Wildmoor area have existed for some time and the relevant planning applications were considered against the planning regime and Development Plan at the time.  The policy framework which we proposed in the Third Stage Consultation on the Minerals Local

Consultee comments	Initial Officer response
	<p>Plan represents a step-change in mineral planning policy in Worcestershire, and seeks to draw out and build on the strengths of Worcestershire's high quality and diverse natural and historic environment. By using Landscape Character as the primary indicator of landscape scale coherence, we consider that the proposed policy framework should result in stronger consideration of local quality and character than has happened in the past, resulting in proposals for higher quality working and restoration which is more in keeping with the landscape and wider character of the locality.</p> <p>Paragraph 7.38 of the Third Stage Consultation states that "planning permission will not be granted for mineral working unless satisfactory proposals have been made for the restoration and after-use of the site". Consideration will be given to whether this concept can be strengthened within the plan.</p> <p>Paragraph 7.146 also states that "Planning applications that propose significant landscape change at either the local or landscape scale are unlikely to be considered acceptable. Achieving an appropriate restoration scheme may require specific working practices, and in some cases this may impact on the quantity of mineral which can be extracted sustainably. This may mean working resources in a different manner than has taken place historically, particularly as landfilling was traditionally used to return land to previous levels and is now discouraged in Worcestershire".</p> <p>This stronger policy framework will enable strong and clear conditions to be attached to any planning permissions which are able to be enforced. We agree that this is a key part of the effective operation of the planning system, and we are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the policies can be applied and enforced as intended.</p> <p>The National Planning Policy Framework states that certain forms of development, including mineral extraction, are "not inappropriate in Green Belt provided they preserve the</p>

Consultee comments	Initial Officer response
	<p>openness of the Green Belt and do not conflict with the purposes of including land in Green Belt" (paragraph 90). It would therefore be inappropriate for the Minerals Local Plan to seek to prevent minerals extraction within the Green Belt. Paragraph 5.32 of the Third Stage Consultation document stated that "any proposals would need to be assessed against relevant national and local Green Belt policy". Changes will be considered to strengthen this.</p>
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
<p>The South Worcestershire Councils note that the proposed strategic corridors have been determined by the location of mineral resources and landscape character types and do not take into account of physical and policy constraints. We consider that a sieve of the proposed sand and gravel strategic corridors against constraints such as existing built development, international / national / local planning designations, heritage assets, sites of biodiversity interest etc would help refine the strategic corridors, reduce uncertainty for local communities and provide greater certainty for the minerals industry.</p> <p>We reiterate previous concerns expressed in earlier consultation stages about the proposed approach of using landscape character areas and green infrastructure priorities to drive the identification of strategic corridors for mineral extraction. The South Worcestershire Councils consider the restoration of minerals sites to be vitally important. In this regard, the wildlife ponds at Grimley are considered to be a good example of high quality restoration. However, we consider that green infrastructure priorities should be a factor in identifying preferred sites for mineral extraction after other suitability criteria (eg, physical constraints, policy constraints and local impacts) have been satisfied. It is considered that the proposed approach of identifying green infrastructure priorities is premature given that it has not been determined whether some areas within the proposed strategic corridors are likely to meet development management policies and other constraints criteria.</p>	<p>Given the spatial distribution and extent of mineral resources in Worcestershire and the extent to which impacts of mineral working differs on a site-by-site basis it is not considered possible to undertake a robust sieving exercise to address all of the issues suggested at the strategic scale. However the following issues have been taken into account:</p> <ul style="list-style-type: none"> <li>• Built development: areas assessed as "urban" in the Landscape Character Assessment were excluded from the strategic corridors. Consideration will be given to whether there is more appropriate data available to update these boundaries, such as defined settlement boundaries, and whether local plan allocations could be incorporated into this approach.</li> <li>• Proximity to market: the Second Stage consultation assessed projected housing growth and infrastructure needs and determined that much of the county (and all of the strategic corridors identified in the third stage consultation) were well suited to serve this demand.</li> </ul> <p>Changes to the wording will be considered to ensure that the alternatives considered and factors taken into account in the second stage consultation are explicitly referenced in future documents.</p> <p>Consideration of green infrastructure assets (such as the historic environment, biodiversity, flooding, water quality, public access, geological assets) has been integral to the development of the plan in conjunction with specialist consultees through a Minerals and Green Infrastructure working group under the Worcestershire Green</p>

Consultee comments	Initial Officer response
	<p>Infrastructure Partnership. Our understanding from that ongoing dialogue is that setting a positive framework at the strategic level and addressing particular constraints through policy criteria for consideration on a site-by-site basis is an appropriate approach. However, consideration will be given to whether a greater degree of scrutiny with regard to physical and policy constraints can be applied to the potential site allocations and areas of search to provide greater certainty for local communities and the minerals industry.</p>
<b>E039-2212 Bromsgrove District Council (informal response)</b>	
<p>The Council finds the concept of strategic corridors an interesting and acceptable proposition. The strategic corridors are determined by the location of mineral resources and landscape character types and do not take into account constraints, such as heritage assets or existing built development or allocated sites.</p> <p>The Council believes further emphasis of minerals development within the Green Belt should be further emphasised to ensure that it is understood that minerals extraction itself is not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt.</p>	<p>Support for the concept of strategic corridors noted.</p> <p>With regard to Green Belt, the National Planning Policy Framework states that certain forms of development, including mineral extraction, are "not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt" (paragraph 90). It would therefore be inappropriate for the Minerals Local Plan to seek to prevent minerals extraction within the Green Belt. Paragraph 5.32 of the Third Stage Consultation document stated that "any proposals would need to be assessed against relevant national and local Green Belt policy". Changes will be considered to strengthen this.</p> <p>The inclusion of a policy specifically addressing greenbelt will also be considered.</p>
<b>E050-1971L Wyre Forest District Council</b>	
<p><b>Policy MLP.1 Strategic Location of Development</b> – Whilst the logic for identifying the strategic corridors around clusters of key and significant minerals resources within coherent landscapes is supported, there is concern about the Landscape Character Assessment Supplementary Guidance being used as the predominant factor to identify the precise boundaries of the strategic corridors. This needs to be carefully balanced against a number of other factors including, strategic infrastructure provision, Green Belt boundaries and allocated and emerging site allocations within Local Plans. As this currently stands does it represent a truly balanced approach to corridor selection?</p>	<p>Whilst landscape types were the predominant factor in defining the boundaries of the Strategic Corridors, Appendix 3 of the Third Stage Consultation set out in detail how the precise definitions of the Strategic Corridors were influenced by the components of green infrastructure. Consideration will be given to incorporating Appendix 3 in to the main body of the Plan to make this clearer.</p> <p>With regard to strategic infrastructure provision, the Second Stage consultation assessed projected housing growth and infrastructure needs and determined that much of the county (and all of the strategic corridors identified in the third stage consultation) were well suited to serve this demand for mineral resources. Changes to the wording will be considered to</p>

Consultee comments	Initial Officer response
	<p>ensure that the alternatives considered and factors taken into account in the second stage consultation are explicitly referenced in future documents.</p> <p>With regard to Green Belt, the National Planning Policy Framework states that certain forms of development, including mineral extraction, are "not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt" (paragraph 90). It would therefore be inappropriate for the Minerals Local Plan to seek to prevent minerals extraction within the Green Belt. Paragraph 5.32 of the Third Stage Consultation document stated that "any proposals would need to be assessed against relevant national and local Green Belt policy". Changes will be considered to strengthen this.</p> <p>Areas assessed as "urban" in the Landscape Character Assessment were excluded from the strategic corridors. Consideration will be given to whether there is more appropriate data available to update these boundaries, such as defined settlement boundaries, and whether local plan allocations could be incorporated into this approach.</p>
<b>E056-1782 L: RSPB</b>	
<p>The RSPB acknowledges that landscape character is an appropriate indicator of landscape scale coherence. This should include consideration of the boundaries identified in Natural England's Natural Character Areas. However, biodiversity (e.g. extent of – and potential for – priority habitats) should also be a key consideration, with Worcestershire's Biodiversity Delivery Areas (BDAs) being a key factor in this process.</p> <p>In the Strategic Corridors that are based on river corridors, floodplain boundaries (as identified on Environment Agency maps) and the extent of wetland habitat should also be a consideration. In this context, it is encouraging to see the various references to creating wetland habitat in the relevant policies.</p> <p>Similarly, in the North West Worcestershire Strategic Corridor, heathland potential should be a consideration. In this context, it is encouraging to see the reference to conserving, enhancing</p>	<p>Natural England's National Character Areas define areas of physiographic and cultural identity at a broad brush level of detail. These were built upon in the Worcestershire Landscape Character Assessment to provide a greater degree of detail. However, consideration will be given to strengthening reference in the Minerals Local Plan to the National Character Areas.</p> <p>Appendix 3 of the Third Stage Consultation set out in detail how the precise definitions of the Strategic Corridors were influenced by the components of green infrastructure, including the Biodiversity Delivery Areas, flood zones and the Worcestershire Habitat Inventory. Consideration will be given to incorporating Appendix 3 in to the main body of the Plan to make this clearer.</p> <p>Support for references to creating wetland and heathland habitats noted.</p>

Consultee comments	Initial Officer response
and creating heathland and acid grassland habitats for this Strategic Corridor in Policy MLP 5.	

**Q5.2 Do you agree with the specific boundaries for each strategic corridor?**

**Avon and Carrant Brook Strategic Corridor**

Yes: 4	No: 1	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E014-634 Pershore Town Council	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association	E014-634 Pershore Town Council  E051-2385L Defence Infrastructure Organisation

***Comments***

Consultee comments	Initial Officer response
<b>E014-634 Pershore Town Council</b>	
See response to Q. 5.1a	This comment is addressed above (Q5.1a).
<b>E051-2385L Defence Infrastructure Organisation</b>	
<p>If you recall, we briefly discussed extending the consultation period for the above to the 31st March as correspondence had gone astray. I have since discussed the Minerals Local Plan with colleagues and we would like you to consider including Tiddesley Wood Firing Range, under MOD ownership, within the plan. The current proposal boundary stops at the southern boundary to MOD land.</p> <p>Please do not hesitate to contact me should you require any additional information relating to MOD land at Tiddesley Wood Range.</p>	<p>A telephone conversation was held on 24<sup>th</sup> March 2017 between a Worcestershire County Council officer and the Defence Infrastructure Organisation to clarify the intention of the request to include Tiddesley Wood Firing Range within the plan. The discussion was recorded by Worcestershire County Council as follows and was confirmed as an accurate record by the Defence Infrastructure Organisation:</p> <p><i>"Further to our telephone conversation this morning, I am writing to confirm our discussions.</i></p> <p><i>I explained that we do not have the definitive boundary of the MOD land at Tiddesley Wood Firing Range, and that we would need you to provide a map of this if you would like us to consider including the site in the Minerals Local Plan. However, I asked you to clarify whether</i></p>

Consultee comments	Initial Officer response
	<p><i>you were proposing the site as a potential mineral working, and if so whether you had any evidence of the resource in that area as our evidence does not indicate that the Tiddesley Wood area is likely to contain viable mineral resources, or whether your concern was about any potential impacts on the firing range from mineral working.</i></p> <p><i>You explained that as the boundary of the Avon and Carrant Brook Strategic Corridor stopped at the edge of the MOD land, that the reasons for this were not clear and wondered whether the boundary could be changed to include the Tiddesley Wood Firing Range land in case it had potential for the future, but not as a site which you had geological information for to support its allocation as a "Specific Site" allocation in the Minerals Local Plan.</i></p> <p><i>I explained that the boundary of the Strategic Corridor is based on landscape character types (as set out in the introduction to Chapter 5 of the Third Stage Consultation document).</i></p> <p><i>As there is a basis for the boundary of the Strategic Corridor not to include the Tiddesley Wood Firing Range, as well as the fact that the likelihood of the presence of viable mineral resources is low, you did not wish to pursue this further and we concluded that it would probably not be prudent use of the MOD's resources to conduct geological investigation of the land at the Firing Range."</i></p>

### Lower Severn Strategic Corridor

Yes: 4	No: 1	Don't know: 2	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural</p>	<p>E014-634: Pershore Town Council</p>	<p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p>	<p>E014-634: Pershore Town Council</p> <p>E040-860: The Canal &amp; River Trust</p>

<b>Yes: 4</b>	<b>No: 1</b>	<b>Don't know: 2</b>	<b>Written responses (see below)</b>
England			

*Comments*

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E014-634 Pershore Town Council</b>	
As above	This comment is addressed above (Q5.1a).
<b>E040-860 The Canal &amp; River Trust</b>	
<p>We note that the Council is proposing, under policy MLP3 the creation of a Lower Severn Strategic Area.</p> <p>As previously advised, and noted in the supporting document Water Transport, we act as Navigation Authority on the River Severn and therefore our primary concern is in relation to the promotion of the river, which is a commercial waterway between Gloucester &amp; Stourport for freight purposes. This means that when commenting on the acceptability or otherwise of sites we are only considering their impact on navigational safety. This of course is only of concern if it is proposed to move materials by water. Other matters such as pollution, ecological and visual impact should be considered more properly by the Environment Agency.</p> <p>The Canal &amp; River Trust supports in principle the use of the River Severn to carry Freight. However we have to consider any proposal to do so against the needs of other users of the waterspace to ensure that the proposal does not have an adverse impact on their safety.</p> <p>We are pleased to note that this is recognised in the document on Water Transport and that you have used the Cemex as a Case study. As an update to the study the trials runs required before freight could be moved have now successfully been undertaken.</p> <p>Various other sites within the Lower Severn Strategic corridor have the potential to use the river to carry materials by water. Whilst in principle this may be acceptable each application would need to be considered on its own merits with regard to navigational safety and would be dependent on volume, frequency, location of loading and off loading facilities, and</p>	<p>Your support in principle for the use of the River Severn to carry freight is noted.</p> <p>Whilst the Lower Severn Strategic Corridor is identified in policy MLP 3, that policy does not include any presumption regarding transportation methods, as it is recognised that a variety of factors will influence whether water transport or other methods are most appropriate for an individual site within that corridor. Policies MLP 24 and MLP 25 address transport to, from and within mineral sites, seeking to optimise the use of sustainable modes of transport subject to safety and other considerations.</p>



Consultee comments	Initial Officer response
movements by other existing users, including other minerals operators, on the stretch of river involved.	

**North East Worcestershire Strategic Corridor**

Yes: 4	No: 1	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E014-634 Pershore Town Council	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association	E014-634 Pershore Town Council  E042-2321 Barton Willmore

*Comments*

Consultee comments	Initial Officer response
<b>E014-634 Pershore Town Council</b>	
As above	This comment is addressed above (Q5.1a).
<b>E042-2321 Barton Willmore</b>	
On behalf of our client, J J Gallagher Ltd, we submit representations to the Worcestershire Minerals Local Plan (WMLP) – Third Stage Consultation. These representations relate to our client's land interest at Norton Farm, Birmingham Road, Bromsgrove (the 'Site'). Outline planning permission was approved by Bromsgrove District Council in August 2012 for the construction of up to 316 dwellings at the Site (LPA Ref: 12/0709). An application for reserved matters was subsequently approved in February 2016 (LPA Ref: 15/0996). A copy of the approved site layout has been provided at <b>Appendix 1 [WCC reference E042-2321 in Appendix 1 of this document]</b> . The approved plans have since been subject to various applications for minor material amendments, however the principle of providing dwellings along the southern boundary with public open space to the north remains unchanged – a	Areas assessed as "urban" in the Landscape Character Assessment were excluded from the strategic corridors. Consideration will be given to whether there is more appropriate data available to update these boundaries, such as defined settlement boundaries, and whether local plan allocations could be incorporated into this approach.

Consultee comments	Initial Officer response
<p>requirement of the outline planning permission.</p> <p>In light of the above, it is requested that the following comments are taken into consideration as part of the WMLP.</p> <p>Figure 5.3 of the draft WMLP identifies the location of the designated 'North East Worcestershire Strategic Corridor', which wraps around the majority of Bromsgrove and extends northwards towards Stourbridge. On review of the supporting Interactive Map, it is noted that the Site falls within this draft designation – with the boundary extending up to the existing built-form of Bromsgrove.</p> <p>However, given that detailed planning permission has been approved for residential development, the Site is soon to form the new settlement edge to Bromsgrove. It is therefore considered that the Site should be removed from the draft designation with Figure 5.3 and the supporting Interactive Map updated accordingly.</p> <p>Indeed, paragraph 182 of the NPPF requires policies to be 'effective' so that a Local Plan is deliverable over its Plan period. However, the guidance contained within draft Policy MLP 4 in respect of mineral developments within the North East Worcestershire Strategic Corridor is no longer relevant due to the residential permission at the Site.</p>	

**North West Worcestershire Strategic Corridor**

Yes: 3	No: 1	Don't know: 2	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p>	<p>E014-634 Pershore Town Council</p>	<p>E013-802: Malvern Hills AONB Unit</p> <p>E019-2459: Wildmoor Residents' Association</p>	<p>E014-634 Pershore Town Council</p>

### Comments

Consultee comments	Initial Officer response
<b>E014-634 Pershore Town Council</b>	
As above	This comment is addressed above (Q5.1a).

### Salwarpe Tributaries Strategic Corridor

Yes: 4	No: 1	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	E014-634 Pershore Town Council	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association	E014-634 Pershore Town Council

### Comments

Consultee comments	Initial Officer response
<b>E014-634 Pershore Town Council</b>	
As above	This comment is addressed above (Q5.1a).

**Q5.3 Do you agree that corridors containing crushed rock resources (see Annex 1) should not be designated as Strategic Corridors?**

### Bredon Hill

Yes: 4	No: 1	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural	E014-634: Pershore Town Council	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association	E049-683/1077/2279: South Worcestershire Councils  E056-1782L: RSPB

<b>Yes: 4</b>	<b>No: 1</b>	<b>Don't know: 2</b>	<b>Written responses (see below)</b>
England			

### Comments

Consultee comments	Initial Officer response
<b>E049-1077 South Worcestershire Councils</b>	
The extraction of rock on the Bredon Hill, Cotswold and Malvern Hills Areas of Outstanding Natural Beauty, notwithstanding the lack of commercial interest, is not supportive for both biodiversity and landscape impact reasons.	Paragraph 2.20 of the Third Stage Consultation states that the constraints on Worcestershire's crushed rock resources "in themselves are not an absolute bar on development", in line with the National Planning Policy Framework. However, the constraints are significant and a cautious approach has therefore been taken in relation to the ability to deliver crushed rock development in Worcestershire over the lifetime of the plan. To this end, policy provision is made in the Third Stage Consultation to enable crushed rock development to come forward (including Policy MLP 1 and Policy MLP 9), but this would be subject to policy requirements elsewhere in the Plan for the protection and enhancement of biodiversity and landscape.
<b>E056-1782L RSPB</b>	
The RSPB agrees that the corridors containing crushed rock resources should not be designated as Strategic Corridors. In particular, Bredon Hill's status as a Special Area of Conservation (SAC) means that it would not be appropriate to designate it as a Strategic Corridor. Bredon Hill and the Malvern Hills also form prominent landmarks and viewpoints within the Cotswolds Area of Outstanding Natural Beauty (AONB) and the Malvern Hills AONB, respectively. As such, any mineral development in these locations is likely to have a significant impact on the natural beauty of the AONBs, the statutory definition of which includes 'flora, fauna, geological and physiographic features'. In addition, the Malvern Hills has several Acts of Parliament which specifically seek to control quarrying. On this basis, it is doubtful that mineral development in these locations would be an acceptable option.	Noted.

### Malvern Hills

<b>Yes: 5</b>	<b>No: 0</b>	<b>Don't know: 2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean		E019-2459: Wildmoor Residents' Association	E049-683/1077/2279 South Worcestershire Councils

Yes: 5	No: 0	Don't know: 2	Written responses (see below)
<p>E013-802: Malvern Hills AONB Unit</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>			E065-1782L: RSPB

*Comments*

Consultee comments	Initial Officer response
<b>E049-1077 South Worcestershire Councils</b>	
The extraction of rock on the Bredon Hill, Cotswold and Malvern Hills Areas of Outstanding Natural Beauty, notwithstanding the lack of commercial interest, is not supportive for both biodiversity and landscape impact reasons.	Paragraph 2.20 of the Third Stage Consultation states that the constraints on Worcestershire's crushed rock resources "in themselves are not an absolute bar on development", in line with the National Planning Policy Framework. However, the constraints are significant and a cautious approach has therefore been taken in relation to the ability to deliver crushed rock development in Worcestershire over the lifetime of the plan. To this end, policy provision is made in the Third Stage Consultation to enable crushed rock development to come forward (including Policy MLP 1 and Policy MLP 9), but this would be subject to policy requirements elsewhere in the Plan for the protection and enhancement of biodiversity and landscape.
<b>E056-1782L RSPB</b>	
The RSPB agrees that the corridors containing crushed rock resources should not be designated as Strategic Corridors. In particular, Bredon Hill's status as a Special Area of Conservation (SAC) means that it would not be appropriate to designate it as a Strategic Corridor. Bredon Hill and the Malvern Hills also form prominent landmarks and viewpoints within the Cotswolds Area of Outstanding Natural Beauty (AONB) and the Malvern Hills AONB, respectively. As such, any mineral development in these locations is likely to have a significant impact on the natural beauty of the AONBs, the statutory definition of which includes 'flora, fauna, geological and physiographic features'. In	Noted.

Consultee comments	Initial Officer response
addition, the Malvern Hills has several Acts of Parliament which specifically seek to control quarrying. On this basis, it is doubtful that mineral development in these locations would be an acceptable option.	

**Q5.4 Do you think that there are any other coherent corridors containing locally or nationally significant mineral resources which should be designated as strategic corridors?**

Yes: 0	No: 2	Don't know: 4	Written responses (see below)
None	E007-2452: Mr N Dean  E034-1970: Worcestershire County Council, Landscape Advisor	E013-802: Malvern Hills AONB Unit  E014-634 Pershore Town Council  E019-2459: Wildmoor Residents' Association  E026-813: Worcestershire Wildlife Trust	E026-813: Worcestershire Wildlife Trust

*Comments*

Consultee comments	Initial Officer response
<b>E026-813 Worcestershire Wildlife Trust</b>	
We do not believe so but this is outside our technical knowledge.	Noted.

**Q5.5 Do you agree with method used to identify specific sites and preferred areas (see Appendix 2 and the Deliverability Assessment for further details)?**

*Specific sites*

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E014-634 Pershore Town Council  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape	None	E019-2459: Wildmoor Residents' Association	E038-2359 Warwickshire County Council  E041-717 Natural England  E047-716 Historic England

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
Advisor			

*Preferred areas*

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E014-634 Pershore Town Council</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p>	None	E019-2459: Wildmoor Residents' Association	<p>E038-2359 Warwickshire County Council</p> <p>E041-717 Natural England</p> <p>E047-716 Historic England</p>

*Comments*

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E038-2359 Warwickshire County Council</b>	
<p>It is noted that Worcestershire County Council (Minerals Planning Authority) undertook a call for sites in 2015 and 2016. The Deliverability Assessment (Winter 2016) assessed 24 sand and gravel sites as part of the call for sites. The assessment discounted all but two sites. Two key criteria of the assessment looked at site capacity with a large portion of sites being discounted based on size with the threshold being below 600,000 tonnes or information being unavailable. This led to the sites receiving a low score or rejection (graded on a traffic light system).</p> <p>In relation to Warwickshire's Minerals Plan, there are sizes of sites below this threshold that are being promoted for allocation in the Plan. We have sought and obtained evidence to support viability and deliverability to extract sand and gravel by mobile operators interested in sites less than 600,000 tonnes. We would encourage Worcestershire County Council to go back to the promoters of sites for further information where this has not been forthcoming. We suggest you reconsider sites where low tonnage has been the main criteria for rejection.</p>	<p>Noted. Changes to site selection criteria to take account of this point will be considered.</p> <p>Worcestershire County Council has requested additional information from operators and landowners on a number of occasions, including as part of the Third Stage Consultation, however in many cases this information has not been provided.</p> <p>We agree that the greater certainty of site allocations is desirable and a further 4<sup>th</sup> call for sites will be undertaken in late 2017.</p> <p>The plan as drafted in the Third Stage Consultation is intended to enable minerals development to ensure steady and adequate supply is maintained, including for sand and gravel, and includes a positive stance towards windfall development proposals which meet the requirements of the Development Plan.</p>

Consultee comments	Initial Officer response
<p>Small sites cannot be ignored as they offer potential to make weighty contributions to the overall provision though the course of a plan period, especially during Phase 2 of the Plan when reliance is being made on windfall sites. Warwickshire County Council (Minerals Planning Authority) would welcome the inclusion of site allocations for sand and gravel that are not just limited to large sites. In doing so, this would relieve pressure on other neighbouring authorities to provide/maintain an adequate and steady supply of sand and gravel. We recognise that there are smaller operators looking for such sites and they could provide greater certainty to the Council, public and developers on where future workings will be located and this would help ensure the total plan requirements are delivered, particularly if sufficient windfall sites are not brought forward.</p>	
<b>E041-717 Natural England</b>	
<p>Specific sites and preferred areas that could impact on SSSI should ideally be ruled out. This would avoid issues arising at planning application stage which mean that permission cannot be granted, thereby giving the plan greater certainty. We are happy to discuss any concerns further.</p>	<p>Changes to site selection criteria will be considered to take account of the points you raise, such as excluding internationally or nationally designated areas from site allocations or giving additional information about any mitigation measures which are likely to be required.</p> <p>However, the green infrastructure approach in the plan seeks to support and extend areas of valued habitat through appropriate high quality restoration. For example, part f of Policy MLP 18 requires proposals to "optimise biodiversity gain by enhancing, linking and extending existing habitat networks".</p> <p>It is also difficult to accurately assess any likely impacts on SSSIs or other environmental assets without the detailed information about site working methods and proposals provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p>
<b>E047-716 Historic England</b>	
<p>Appendix 2 further sets out that the assessment will be undertaken in relation to Policy MLP23, however, we would not agree that it is acceptable to assess allocated sites at the planning application stage when the principle for</p>	<p>Changes to site selection criteria will be considered to take account of the points you raise, such as excluding internationally or nationally designated areas from site allocations or giving additional information about any</p>



Consultee comments	Initial Officer response
<p>development will already have been established through the Local Plan process. Additionally, Worcestershire Archive and Archaeology Service have made a number of detailed comments, which could assist in informing the assessment process and potential mitigation measures.</p>	<p>mitigation measures which are likely to be required.</p> <p>However, the green infrastructure approach in the plan seeks to optimise enhancement of the historic environment. Worcestershire County Council looks forward to working with Historic England and Worcestershire County Council's Archive and Archaeology Service to refine this approach.</p> <p>It is also difficult to accurately assess any likely impacts on environmental assets without the detailed information about site working methods and proposals provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p>

**Q5.6 Do you have any further information about ANY of the sites submitted which might alter their Deliverability Assessment outcome? Please use the site reference given in the Deliverability Assessment and provide appropriate evidence to support this.**

Yes: 1	No: 4	Written responses (see below)
<p>E019-2459: Wildmoor Residents' Association</p>	<p>E007-2452: Mr N Dean</p> <p>E014-634 Pershore Town Council</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p>	<p>E006-2453 Mr Else</p> <p>E011-2456 Upton Rowing Club</p> <p>E012-2457 RAGE</p> <p>E016-2422 Pam Page</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E021-2461 Worcester Rowing Club</p> <p>E022-2462 British Rowing Facilities</p> <p>E023-2285 Upton upon Severn Town Council</p> <p>E024-1967 Woodland Trust</p> <p>E025-1793 CEMEX</p>

Yes: 1	No: 4	Written responses (see below)
		<p>E029-2036 Croome Estate Office</p> <p>E033-683/1077/2279 South Worcestershire Councils</p> <p>E035-509 Worcestershire Archive &amp; Archaeology Service</p> <p>E037-1051 Mr P &amp; Mr O Surman</p> <p>E041-717 Natural England</p> <p>E043-2185L Gloucestershire County Council</p> <p>E045-2465 PleydellSmithyman Ltd</p> <p>E048-719 Environment Agency</p> <p>E050-1971L Wyre Forest District Council</p> <p>E052-1234L Twyning Parish Council</p>

*General Comments on site allocations and deliverability assessment*

Consultee comments	Initial Officer response
<b>E012-2457 RAGE</b>	
<p>We appreciate the fact that the site options really can only be those where the owner/operator has indicated that they wish a particular reserve to be included in the plan. However it seems odd that where there are current planning applications in process those sites are excluded - e.g. Strensham.</p> <p>The time period for the plan is up to 2035 with two stages - the first from 2016 to 2025 to get to a 7 year bank, and then from 2026 to 2035 to maintain it at that level.</p> <p>It would seem appropriate that sites currently going through the planning process ought to be included. The situation for new sites should reflect this and should only be considered in terms of additional planning applications when the other opportunities have been exhausted.</p>	<p>You raise an interesting point. The development of the new Minerals Local Plan has been approached as an entirely new plan, three "calls for sites" have been conducted so far, at which point any site in the county could have been proposed for inclusion in the plan.</p> <p>The operator that submitted the Strensham site which is the subject of a planning application (application reference 09/000085/CM) has been consulted and has commented on the various stages of the development of the Minerals Local Plan and has submitted other sites for consideration. However the site at Strensham has not been submitted and therefore has not been considered as part of the plan preparation.</p>
We also think there should be a screening	The deliverability assessment you refer to is

Consultee comments	Initial Officer response
<p>process - as WCC has done for the current 5 nominated sites - for all new proposals. The ones with proven reserves, the least impact on sensitive receptors and transport and only those with operators with exemplary history of managing their sites and restoration should be considered.</p>	<p>intended to identify which sites are anticipated to be deliverable over the life of the plan. It is not considered necessary to assess planning applications against these criteria as a full planning application would only take place where the operator is confident that there is a proven resource. Detailed geological information will be required at application stage to inform how the site is worked and restored.</p> <p>All proposals for mineral development, on specific sites, preferred areas and in other "windfall" locations, would need to be assessed against the policies in the Minerals Local Plan. These address issues including impacts on amenity and well-being, the natural and historic environment and transport. The policies set out in the Third Stage Consultation are intended to ensure that strong and clear conditions can be attached to any planning permissions to ensure that sites are well designed and well managed through working phases, restoration and after-care.</p>
<b>E035-509 Worcestershire Archive &amp; Archaeology Service</b>	
<p>With regard to the Call for Sites – Deliverability Assessment, the Worcestershire Archive &amp; Archaeology Service (WAAS), acting in its capacity as archaeological advisors to the County Council have previously provided outline comments on the historic environment for each of the 30 sites that have been submitted to date for consideration as Specific Sites.</p>	<p>Noted. This information is included in Appendix 2 of the Third Stage Consultation as "site informatives" for those sites proposed as Specific Site and Preferred Area allocations.</p>

*Comments on Bow Farm*

Consultee comments	Initial Officer response
<b>E006-2453 Mr Else</b>	
<p>As part of a local residents group I have been going through the documentation leading up to and including the latest version of the MLP for Worcestershire. We are aware that comments must be made by the 8th March 2017. In the Aggregate Assessment document issued in August 2016 there was a proposal from Moreton C Cullimore to have a site at Bow Farm included in the plan. From what I can see in the plan this site has not been included. However, on page 207 of the draft plan there is a reference to 6 sites being included in the plan to deliver the sand and gravel needs - but in Appendix 2 there are only 5 sites itemised and none of these is</p>	<p>An email reply was sent:  "Bow Farm was put forward by Moreton C Cullimore for consideration for inclusion in the Worcestershire Minerals Local Plan. This has been assessed alongside all other site proposals as part of our "Deliverability Assessment" (November 2016). This assessment concluded that there were concerns over the deliverability of the Bow Farm site based on the information received as the quantity of resource was not proven to us and there was no detail provided about how or where any extracted material would be processed (see pages 12 to 14 of the</p>

Consultee comments	Initial Officer response
<p>Bow Farm. The Annex 1 map of all the sites is too indistinct to show Bow Farm and there is no listing of sites proposed but not included or their relationship to included/preferred sites. So the question is whether Bow Farm is definitely NOT a preferred site and is NOT included in the plan and the five sites itemised in Appendix 2 are the only ones which are included.</p>	<p>Deliverability Assessment at <a href="http://www.worcestershire.gov.uk/downloads/file/7609/deliverability_assessment_november_2016">http://www.worcestershire.gov.uk/downloads/file/7609/deliverability_assessment_november_2016</a>).</p> <p>This means that Bow Farm is not a preferred site in the Third Stage Consultation draft of the plan and the five sites itemised in Appendix 2 are the only ones which are included. However, the current consultation does include a call for further information to be provided which might alter the conclusions of the assessment and lead to the site being proposed for allocation at the next stage. If you have any information about that site which you would like us to consider alongside any further information from Moreton C Cullimore, we would be pleased to receive it.</p> <p>The reference to six sites which you mention on page 207 refers to the number of existing operational sand and gravel sites as the baseline for monitoring the plan, rather than the number of sites which are proposed for allocation. We apologise for any confusion this caused and will endeavour to ensure this is worded more clearly in future iterations of the plan.</p> <p>I hope this has sufficiently answered your query, but if you have any further questions, please do not hesitate to contact me. We look forward to receiving any further comments you would like to submit by 8th March."</p>
<b>E012-2457 RAGE</b>	
<p>Which brings us to Bow Farm. We are very pleased that this is currently not a preferred site and should it be subsequently included in the Fourth Stage Consultation we sincerely hope we can make comments. The plan for the next stage indicates only comments relating to National Policy or Legislation will be able to be made which on the face of it would preclude a response to additional sites.</p> <p>Even though the site is not included in the plan at this stage we have made some comments in the next section.</p> <p>Bow Farm. We would split our comments on this site option into five main issues:</p>	<p>Your concern about being able to comment on any further site allocation proposals is noted and we agree that you should have the opportunity to do so. In response to the comments received on this consultation, a 4<sup>th</sup> call for sites will be undertaken in late 2017. Any additional site allocations proposed as a result of this will be subject to further consultation at which comments can be made prior to the "pre-submission consultation" which is restricted by legislation to whether the plan meets certain national requirements and legal tests.</p> <p>The specific information you have provided with regard to Bow Farm is also noted. Should the site be reconsidered for allocation we will take account of the information you have provided as</p>

Consultee comments	Initial Officer response
<p>1. The site as far as we are aware has no proven resources of a magnitude that would warrant its inclusion in the plan - in terms of tonnage and material analysis.</p> <p>2. The site suffers from ground conditions which will make it challenging - especially in terms of limiting the pollution potential into the River Severn. The site is very low lying and in periods of sustained rain it floods - and the adjacent road becomes flooded for weeks on end. You need to be very confident in the operator and his procedures that there will be no site run off into the local water courses and hence into the River. We understand that there is long term plan to greatly reduce pollution levels on that stretch of the river that includes the proposed site.</p> <p>3. The next issue concerns where material will be processed and removed from the site. We understand from what the operator has said in the Background Documentation he intends to use lorries or a conveyor system to take the material up to the A38 in Gloucestershire and then out by heavy goods vehicles after processing. This has two major issues. The first is that adjacent to the site are sensitive commercial enterprises - an hotel and golf course and a specialised horticultural enterprise. Both are very sensitive to dust pollution and the leisure complex to noise. There are also three private dwellings that face the proposed site and its machinery and we believe would suffer great loss of amenity. We don't believe that mitigation is possible to the extent that an acceptable compromise can be reached - especially if material were to be processed and transported by road on the A38. We applaud the initiative that WCC have implemented with the developer of a similar site just upstream from the Bow Farm proposal. Here material is taken out by barge from a wharf for remote processing. We would very strongly advise that a similar situation should be mandated if the Bow Farm site were ever to be the subject of being included in the plan or if a planning application were to be made by the applicant. The applicant has said there are</p>	<p>fully as possible. We have ongoing engagement with Gloucestershire County Council and Tewkesbury Borough Council. This has included a joint site meeting at Bow Farm in June 2014 (this is detailed in Annex 2 to the 2014/2015 AMR<sup>2</sup>), and we will ensure we continue to cooperate as the Worcestershire and Gloucestershire Minerals Local Plans are developed.</p>

<sup>2</sup> Available at [www.worcestershire.gov.uk/amr](http://www.worcestershire.gov.uk/amr).

Consultee comments	Initial Officer response
<p>reserves for a twenty year period so the comment that it would be too expensive to put in the infrastructure etc are not realistic or justified. We believe that a new site planning application by Cemex at Ryall, Upton on Severn also includes a temporary wharf and this application is only for 5 to 10 years of workings. We believe it is critical to maintain the local economy which is now primarily either leisure based or specialised horticulture. Any jobs lost here would be huge compared to comparatively small number of people associated with sand and gravel extraction.</p> <p>4. Site restoration - we know of two instances where historically the applicant's company has failed to apply the highest standards to their site restoration. The first concerns a site at Mathon in Herefordshire – at Warners Farm and Croft Orchard, where planning permission was granted with a number of conditions including the site restoration and aftercare. There were numerous issues with the company including a Stop Notice and the importation of unauthorised waste materials.</p> <p>There was also very poor site restoration against the objective of the land being restored back to its previous grade and the incorporation of a nature reserve amenity (as intended for the site). The root causes were insufficient draining of the site by the company and insufficient suitable infill materials being used. The result was the site was rendered unsuitable for agriculture. The second issue was the company deposited waste soils illegally at the Cotswold Water Park site in Gloucestershire in 2006 and 2007 and were fined £10,000. The company director was also given a 12 month conditional discharge. Moreton C Cullimore (Gravels) Limited and its company director Roger Neville Cullimore pleaded guilty to charges of depositing waste without a waste management licence or an exemption certificate. The company was also ordered to pay £5,500 prosecution costs to the Environment Agency. A large amount of waste including soil, bricks, ceramics and stone were dumped in and around a number of lakes. Mr Cullimore stated that he had agreed to the deposit and keeping of waste materials.</p> <p>5. The company has a decades old record in the</p>	

Consultee comments	Initial Officer response
<p>area of continually making planning applications for various tracts of land close to the Conservation Area of Church End. This area is just to the east of the A38 and where we believe Cullimore intends to bring material up into Gloucestershire for processing. Every time the applications have been refused either by the planning committee at Gloucestershire County Council or on Appeal. The latest version was rejected last month and was a virtual identical version to an earlier application. This company has blighted the local community for decades and has no apparent intention of looking at mitigation or inappropriate development proposals.</p> <p>We would advise WCC to proceed carefully and it is no surprise to us that the company have failed to deliver the information required to back up their site inclusion in the plan. We would advise you to talk to the Gloucestershire Minerals Planning department if you have not done so already. We conjecture that they failed to provide you with the required information for the plan as they were awaiting the latest planning decision which was rejected for a site at Pages Lane. This we believe is their intended location for a 20 year processing plant and distribution complex and it would be impossible to mitigate the effects on the local community and businesses.</p> <p>We believe Bow Farm should remain a non-preferred site for the variety of reasons noted above - and should it be included it should mandate any material being taken out by river.</p>	
<b>E016-2422 Pam Page</b>	
<p>I would like to object to any plans to incorporate Bow Farm, Ripple in the emerging plan for Worcestershire if the applicant should re-submit his proposal.</p> <p>As you are aware this property, although in Worcestershire is adjacent to the Gloucestershire border and it is in Gloucestershire that any proposed access to the property is situated.</p> <p>The access to the proposed Bow Farm Site is very controversial in that it is adjacent to the Hilton Puckrup Hall Golf Course which would be a no go area for members, and guests, and also</p>	<p>The specific information you have provided with regard to Bow Farm is noted. Should the site be reconsidered for allocation we will take account of the information you have provided as fully as possible.</p> <p>In response to the comments received on this consultation, a 4<sup>th</sup> call for sites will be undertaken in late 2017. Any additional site allocations proposed as a result of this will be subject to further consultation at which comments can be made prior to the "pre-submission consultation" which is restricted by legislation to whether the plan meets certain national requirements and legal tests.</p>

Consultee comments	Initial Officer response
<p>visitors to the Hilton Puckrup Hall Hotel lying within its grounds. This could result in the loss of some 100 jobs. The impact on the hotel would be devastating. On the other side of the access road area is a Raspberry Farm, this is a sophisticated and computer controlled environment and it is very obvious that any dust created would ruin this business and also the jobs of the 40 or so employees.</p> <p>The access on to the A-38 is extremely dangerous as the speed limit on this busy road is 50 m.p.h. and it is opposite a very busy junction to the village of Twyning and near to the conservation area of Churchend where there is in excess of 1500 traffic movements every day, including local services and school buses.</p> <p>If this land is permitted for future mineral working we feel that any aggregate should be taken out by river transport as favoured by your Council.</p>	
<b>E043-2185L Gloucestershire County Council</b>	
<p>As you previously advised in response to the Gloucestershire draft Minerals Local Plan (GdMLP) consultation last year, we note the Bow Farm site has not been included as a preferred area but is contained within the proposed Lower Severn Strategic Corridor. This is mainly due to lack of information from the operator. As you are aware this site has strategic connections with the proposed draft Redpools Farm allocation within the GdMLP. We are still in the process of reviewing all of the sites in response to comments raised at the consultation and anticipate that we may need to have further discussions with Worcestershire County Council surrounding this area particularly if the circumstances change again with regards to Bow Farm's allocation status within the Worcestershire MLP.</p>	<p>Noted. Continued cooperation with Gloucestershire County Council is welcomed.</p>
<b>E052-1234L Twyning Parish Council</b>	
<p>The nature of our response relates to the identification in previous versions of the plan for what was identified as preferred site 5S at Bow Farm.</p> <p>We note that this site is now NOT included in the third stage consultation, but the opportunity exists for owners to identify new sites. In the expectation that the correct technical</p>	<p>The specific information you have provided with regard to Bow Farm is noted. Should the site be reconsidered for allocation we will take account of the information you have provided as fully as possible.</p> <p>In response to the comments received on this consultation, a 4<sup>th</sup> call for sites will be undertaken in late 2017. Any additional site</p>



<b>Consultee comments</b>	<b>Initial Officer response</b>
<p>information concerning site 5S may eventually be forthcoming, we are anticipating its reappearance in future versions of the Plan upon which we would expect to be consulted. To that end we wish to make our position clear.</p> <p>The Company who own site 5S have also submitted a number of sites in Twyning for consideration of them being adopted as preferred sites in the Gloucestershire Minerals Plan. These Twyning sites run west from the A38 down to the river Severn. Site 5S is adjacent to these sites.</p> <p>The company offering up site 5S has made repeated applications over a number of years to extract sand and gravel from sites in Twyning. Each and every application has been rejected by Gloucester County Council, including one on Appeal. The latest application was refused in February 2017. The applicant has consistently refused to address mitigation concerns and inappropriate development issues, contrary to Para 143 of the NPPF.</p> <p>Should any of these sites make preferred status and be subsequently worked, it is not inconceivable that the sand and gravel washing, grading, stockpiling and sales from all these sites would be conducted in close proximity to the A38 and within Twyning Parish. It is our view that this could not be conducted without significant and sustained damage to sensitive receptors, the environment, local businesses and result in a loss of recreational amenity.</p> <p>Paragraph 33 of the NPPF states:</p> <p>Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.</p> <p>The use of heavy lorries is not compatible with Para 33. Should any of these sites be approved for exploitation, the availability of waterborne transport as an alternative means of movement should be recognised. There is an active wharf at an adjoining site to the west of the Bow Farm and there is no demonstrable reason as to why this mode of transport cannot be used.</p>	<p>allocations proposed as a result of this will be subject to further consultation at which comments can be made prior to the "pre-submission consultation" which is restricted by legislation to whether the plan meets certain national requirements and legal tests.</p>

Consultee comments	Initial Officer response
<p>We view with considerable alarm the prospect of the Bow Farm site being preferred in the Worcestershire Plan and the suggestion that under the 'duty to cooperate' the processing may well take place in Twyning.</p> <p>Given the quantity of minerals in all of these sites, the village faces the prospect of 20 years disruption to their way of life.</p> <p>We are pleased that the Bow Farm site is not in the current consultation document and hope this position continues.</p>	

*Comments on Clifton South and East*

Consultee comments	Initial Officer response
<b>E024-1967 Woodland Trust</b>	
<p>Table A2.10. Clifton South 11: Site informatives:</p> <ul style="list-style-type: none"> <li>We are pleased to see the reference to the Clifton South proposal affecting the 2.4 hectares of ancient woodland but would like to see inclusion of comment referenced to the Woodland Trust that a buffer zone of at least 50 metres of semi-natural vegetation is required to protect this ancient woodland from minerals development, in accordance with Natural England and the Forestry Commission's standing advice for Ancient woodland and veteran trees: protecting them from development.</li> </ul> <p>This standing advice from Natural England and the Forestry Commission - <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> - states (April 2014):  <i>"Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and the type of development. In a planning case in West Sussex the Secretary of State supported the arguments for a 15m buffer around the affected ancient woodland, but larger buffers may be required."</i></p> <p>We would recommend a buffer zone of at least</p>	<p>Changes to site selection criteria will be considered to take account of the points you raise, such as excluding internationally or nationally designated areas from site allocations or giving additional information about any mitigation measures which are likely to be required. Consideration will be given to how the role of semi-natural vegetation to protect high-value habitats could be further promoted through the plan.</p> <p>However, the green infrastructure approach in the plan seeks to support and extend areas of valued habitat through appropriate high quality restoration. For example, part f of Policy MLP 18 requires proposals to "optimise biodiversity gain by enhancing, linking and extending existing habitat networks".</p> <p>It is also difficult to accurately assess any likely impacts on ancient woodland or other environmental assets without the detailed information about site working methods and proposals provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p>

Consultee comments	Initial Officer response
<p>50 metres of semi-natural vegetation would be required to protect the woodland from the change in land use on the site for each allocation. This 50m should be included as part of the policy for each site. An example of a council which has included the 50m within their site allocation policies is <b>Kings Lynn and West Norfolk</b>. The policy for the <b>Site Allocation and Development Management Policies</b> (pre-submission document 2015, Policy E4.1 Knights Hill) specifically reads:  <i>“Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife. A 50 metre buffer around the Reffley Wood ancient woodland,”</i></p>	
<b>E041-717 Natural England</b>	
<p>Clifton East and South have gone through planning (Ref: 15/000006/CM) and were granted permission in July 2016. Natural England was able to withdraw our objection following information on hydrology and subject to conditions /section 106 agreement.</p>	<p>Noted. Site informatives will be updated to reflect this change to Natural England's stance towards the Clifton sites.</p> <p>The 2016 Local Aggregates Assessment, which uses data up to 31<sup>st</sup> December 2015, was used as the baseline to underpin the Third Stage Consultation and therefore this did not include the planning permission for the Clifton East and Clifton South areas which was granted in 2016. Consideration will be given to updating the baseline information if a complete dataset is available.</p>

*Comments on Ryall East*

Consultee comments	Initial Officer response
<b>E025-1793 CEMEX</b>	
<p>The Company supports the identification of Land at Ryall North as a Specific Site and Ryall East as a Preferred Area for mineral development by paragraph 5.10 of the Consultation Document.</p>	<p>Support noted.</p>

*Comments on Ryall North*

Consultee comments	Initial Officer response

Consultee comments	Initial Officer response
<b>E011-2456 Upton Rowing Club</b>	
<p>We set out below the comments of Upton Rowing Club on the above policy document. As you will know, the Club has an interest in creating a Water Sports Centre at Ryall North, which gives us a perspective on the principles set out in your policy document. For your convenience we are attaching a copy of a recently produced conceptual plan showing how we envisage such a centre could look <b>[WCC reference E011-2456 in Appendix 1 of this document]</b>. We hope you will find our comments useful.</p> <p>The proposals for Ryall North will go through the usual planning process in due course and their merits can be evaluated then, but we think it is worth briefly summarising their main features here because they illustrate how the principles in the policy document might benefit from some modification.</p> <p>The proposed Water Sports Centre will provide facilities for training and competition in several sports including rowing, canoeing, triathlon and open water swimming, as well as for recreation for the Upton community. It has the support of the governing bodies of all these sports, as well as of the landowners, the mineral processing applicant, Upton Town Council and several other interested parties.</p> <p>The restored site would include a six-lane 1000 metre competition lake for rowing and other sports. This would be one of only a very few such lakes in the whole country, and the only one in the region, and regattas and other events held there would attract participants and supporters from a wide area. In addition, we expect that the lake would be well-used for training purposes, not only by our own club but by many other visiting clubs and individuals. All of these visitors would bring significant economic benefits to the town and the surrounding area.</p> <p>As well as its use for competitive sport, the lake would be used for recreational purposes. Our club has taken a lead within British Rowing in promoting recreational rowing, catering for people of all ages who do not wish to race but simply to row for enjoyment and to improve their</p>	<p>Thank you for outlining the Upton Rowing Club's aspirations for a rowing lake as part of the restoration of the Ryall North site which was proposed in the Third Stage Consultation as a Specific Site allocation within the Lower Severn Strategic Corridor. Table A2.11 will be updated to reflect this information.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council. We recommend that pre-application discussions are held jointly with Worcestershire County Council and Malvern Hills District Council.</p> <p>The current planning permission for mineral extraction at Ryall North (granted in 2016) has an approved restoration scheme which will achieve significant benefits for biodiversity. Any alterations to the approved scheme would need to ensure net gain for biodiversity over the existing scheme to meet the requirements of the National Planning Policy Framework, and once the new Minerals Local Plan is adopted, any proposals will need to be developed to accord with the Strategic Corridor priorities and other policy requirements it contains.</p>

Consultee comments	Initial Officer response
<p>health and fitness. Also, in addition to the water-based facilities, the site will have surfaced tracks over flat terrain, which will provide opportunities for exercise by walking and jogging for all ages and abilities. These tracks will be well suited for access by push chairs and wheel chairs in a safe environment which would enable family units to exercise and picnic in open and varied countryside. There would therefore be considerable social benefits to the local community by providing new leisure opportunities and promoting a healthy lifestyle.</p> <p>Finally, a very specific point: in Table A2.11 of Appendix 2, the Ryall North site is mentioned and its afteruse is described as 'unknown'. Although the revised proposal of course depends on future planning decisions, we think it would be appropriate at this stage to say that a Water Sports Centre is envisaged.</p> <p>We hope that you find these comments helpful, and if you would like any further clarification of them please contact Peter Barker whose contact details are given above.</p>	
<b>E021-2461 Worcester Rowing Club</b>	
<p>I've discussed this with my chairman and we both agree this would be a fantastic addition to the region. Worcester Rowing Club run a club wide training camp every 2 years, but not every year due to cost, but this would allow us to do each every year. Our senior athletes and juniors would also find a huge benefit.</p> <p>If you need something official I can ask our secretary to draft something up but it has the full support of WRC.</p>	<p>Noted.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council.</p>
<b>E022-2462 British Rowing Facilities</b>	
<p>I have been asked to comment on the viability and potential demand for a 1000m Multi Lane Rowing Lake in your area and I am pleased to report as follows.</p> <p>A 2000m rowing course is the standard race course length for International and leading National Competition High Performance Rowing, but the majority of rowers are not high performance athletes and consequently there is a huge demand for shorter multi-lane rowing training and competition courses.</p>	<p>Noted.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council.</p>

Consultee comments	Initial Officer response
<p>The most prominent of these is at Peterborough some 3 hours away from Worcester when towing a boat trailer. This venue, hosted by Peterborough City Rowing Club, is usually fully booked for training and competitions. <a href="http://www.peterboroughcityrowing.co.uk/lake-hire/">http://www.peterboroughcityrowing.co.uk/lake-hire/</a>.</p> <p>In addition to the demand from the West Midlands Rowing Region, which has specifically asked for access to a multi-lane training course as a strategic objective, visiting crews from surrounding Rowing Regions, including the North West, Wiltshire, Avon Gloucester and Somerset, upper parts of the Thames Region and even Welsh Rowing Clubs, particularly those situated in the Hereford and Monmouth area, could make good use of this venue.</p> <p>Another advantage of this type of water is that it can be used when the adjacent rivers are in flood, making rowing more hazardous, due to fast currents and debris. Rowers would therefore welcome the opportunity of the relatively benign conditions of a rowing lakes during these periods.</p> <p>Multi-lane racing has become extremely popular in recent years and is preferred by many to traditional side by side racing. Also, competitions can provide more races per day, which means that competitors can race in different categories in the same day, making the travelling to each competition more worthwhile, with the guarantee of more than one race.</p> <p>Consequently, I am very confident in the 'take up' for this type of rowing water and would urge you to give the opportunity of establishing a multi-lane rowing course in your area your full support.</p>	
<b>E023-2285 Upton upon Severn Town Council</b>	
<p>The Council has been asked to lend support to the proposal from Upton Rowing Club for a 1000m rowing lake at Ryall North after the conclusion of the gravel extraction works.</p> <p>I would like to confirm the Council's great enthusiasm for the project. As a tourist town, Upton is well-placed to host visitors to the facility and it would greatly enhance the local economy. The site is in a effective location and</p>	<p>Noted.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning</p>

Consultee comments	Initial Officer response
<p>would provide a much needed facility for the whole region, enhancing local and regional participation in sport. The Council asks that you give the proposal your most forward-thinking consideration.</p>	<p>permission from the relevant city, borough or district council.</p>
<p><b>E024-1967 Woodland Trust</b></p>	
<p>Table A2.15. Land at Ryall North16: Site informatives</p> <ul style="list-style-type: none"> <li>We are pleased to see the reference to the Ryall North proposal affecting the 3.3 hectares of ancient woodland at Cliff Wood and also a further 1.8 hectares block of ancient woodland nearby but would like to see inclusion of comment referenced to the Woodland Trust that a buffer zone of at least 50 metres of semi-natural vegetation is required to protect this woodland from minerals development, in accordance with Natural England and the Forestry Commission's standing advice for Ancient woodland and veteran trees: protecting them from development.</li> </ul> <p>This standing advice from Natural England and the Forestry Commission - <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> - states (April 2014):  <i>"Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and the type of development. In a planning case in West Sussex the Secretary of State supported the arguments for a 15m buffer around the affected ancient woodland, but larger buffers may be required."</i></p> <p>We would recommend a buffer zone of at least 50 metres of semi-natural vegetation would be required to protect the woodland from the change in land use on the site for each allocation. This 50m should be included as part of the policy for each site. An example of a council which has included the 50m within their site allocation policies is <b>Kings Lynn and West</b></p>	<p>Changes to site selection criteria will be considered to take account of the points you raise, such as excluding internationally or nationally designated areas from site allocations or giving additional information about any mitigation measures which are likely to be required. Consideration will be given to how the role of semi-natural vegetation to protect high-value habitats could be further promoted through the plan.</p> <p>However, the green infrastructure approach in the plan seeks to support and extend areas of valued habitat through appropriate high quality restoration. For example, part f of Policy MLP 18 requires proposals to "optimise biodiversity gain by enhancing, linking and extending existing habitat networks".</p> <p>It is also difficult to accurately assess any likely impacts on ancient woodland or other environmental assets without the detailed information about site working methods and proposals provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p>

Consultee comments	Initial Officer response
<p><b>Norfolk.</b> The policy for the <b>Site Allocation and Development Management Policies</b> (pre-submission document 2015, Policy E4.1 Knights Hill) specifically reads:  <i>“Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife. A 50 metre buffer around the Reffley Wood ancient woodland,”</i></p>	
<b>E025-1793 CEMEX</b>	
<p>With regard to Table A2.11 the Company can confirm that the landowners’ aspiration for the afteruse of the Ryall North site is for a regional water sports centre. The scale and the location of the site offers an opportunity to establish a centre of excellence for rowing and other water based leisure and sporting activities that would be unique within both the West Midlands and South West regions.</p>	<p>Thank you for confirming the landowners’ aspiration for a regional water sports centre as part of the restoration of the Ryall North site which was proposed in the Third Stage Consultation as a Specific Site allocation within the Lower Severn Strategic Corridor. Table A2.11 will be updated to reflect this information.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council. We recommend that pre-application discussions are held jointly with Worcestershire County Council and Malvern Hills District Council.</p>
<b>E029-2036 Croome Estate Office</b>	
<p>Supports the inclusion in Appendix 2 of Land at Ryall North (Table A2.11 &amp;12) but aspires to the afteruse of the site being a site for a regional watersports centre. The scale and situation of the site makes it suitable for a centre of excellence for rowing and other water based leisure and sporting activities and would provide facilities for use by local communities and organisations together with county and regional use. If properly designed such a use could fulfil all three dimensions of MLP 3, namely economic, social and environmental.</p>	<p>Your support as one of the landowners for a regional water sports centre as part of the restoration of the Ryall North site which was proposed in the Third Stage Consultation as a Specific Site allocation is noted. Table A2.11 will be updated to reflect this information.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or</p>



Consultee comments	Initial Officer response
	district council. We recommend that pre-application discussions are held jointly with Worcestershire County Council and Malvern Hills District Council.
Plan at Figure A2.3: draws WCC's attention to an error in the key in that the horizontal blue hatching of Ryalls Court Farm should extend to the majority of site hatched purple rather than just the area shown hatched blue	The various areas shown on Figure A2.3 relate to the areas which were submitted at different times by the Croome Estate, Cemex and Mr Surman (references B043-126, B043-126, D020-1793, D009-2296). These four sites were assessed separately on their own merits in the Deliverability Assessment. However, the largest area (Land at Ryall North (submitted by the Croome Estate) encompasses all of the proposals and met the requirements for allocation as a specific site in the Third Stage Consultation. Future iterations of the Plan will seek to minimise any ambiguity by showing only the allocated area.
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
Based on an initial desktop assessment, Malvern Hills officer comments on the proposed Clifton East, Clifton South, land at Ryall North and Ryall East sites which were submitted at an earlier consultation in February 2015 are summarised in the Appendix to this response <b>[WCC reference E033-683/1077/2279 in Appendix 1 of this document]</b> . The South Worcestershire Councils also consider that any further mineral extraction works at Ryall and Clifton should not compromise the continuity of the Severn Way Public Right of Way.	Noted. The Malvern Hills officer comments previously provided were taken in to account and are included as "informatives" for the sites in Appendix 2 of the Third Stage Consultation document. Policy MLP 17 protects all public rights of way.
<b>E037-1051 Mr P &amp; Mr O Surman</b>	
<b>Chapter 5: Spatial Strategy: location of mineral development.</b> We support the identification of Land at Ryall North as a Specific Site. We further support the presumption in favour of granting planning permissions for Specific Sites and Preferred Areas. We support the extension of the consented Ryall North area southwards to include substantial proven deposits of mineral.	Your support as one of the landowners for a regional water sports centre as part of the restoration of the Ryall North site which was proposed in the Third Stage Consultation as a Specific Site allocation within the Lower Severn Strategic Corridor is noted. Table A2.11 will be updated to reflect this information.  Your support for allocating the wider Ryall North site area as a Specific Site is also noted.
<b>Appendix 2, Table A 2.11.</b> At the box entitled "Proposer's aspirations for after-use of the site? – answer, unknown", unknown should be changed to "a multi-disciplined water sports	Thank you for confirming your aspiration as landowner for a regional water sports centre as part of the restoration of the Ryall North site which was proposed in the Third Stage

Consultee comments	Initial Officer response
<p>facility to include a 1000m, six lane rowing facility”</p> <p><b>And at Table A 2.12</b> To the box entitled “Landowner support”, add “Surman Family”.</p>	<p>Consultation as a Specific Site allocation within the Lower Severn Strategic Corridor. Table A2.11 will be updated to reflect this information.</p> <p>Whilst economic and social factors have been considered in defining the priorities for each of the strategic corridors, and benefits are sought through the policy framework, it is beyond the remit of the Minerals Local Plan to plan for other types of significant economic development. Most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council. We recommend that pre-application discussions are held jointly with Worcestershire County Council and Malvern Hills District Council.</p>

*Comments on Chadwich Lane Deepening*

Consultee comments	Initial Officer response
<p><b>E019-2459 Wildmoor Residents' Association</b></p>	
<p>Chadwich Lane Deepening ref B053- 2397 nq and Chadwich Lane East B053-2397. The idea that these sites could be involved in deep extraction is contrary to 7.146 meaning that significant deep extraction will not permit deliverability assessment. Such proposals once carried out can only in future be filled with inert waste which inturn will take many years and affect the green infrastructure.</p>	<p>Paragraph 7.146 stated that "Planning applications that propose significant landscape change at either the local or landscape-scale are unlikely to be considered acceptable. Achieving an appropriate restoration scheme may require specific working practices, and in some cases this may impact on the quantity of mineral which can be extracted sustainably. This may mean working resources in a different manner than has taken place historically, particularly as landfilling was traditionally used to return land to previous levels and is now discouraged in Worcestershire."</p> <p>This requirement to balance the need for mineral with the need to achieve final landforms and restoration that delivers multifunctional benefits is a direct result of lessons learnt from both good and bad practice in Worcestershire and beyond in the past.</p> <p>Changes will be made to ensure this key concept is strengthened.</p>
<p><b>E045-2465 PleydellSmithyman Ltd</b></p>	
<p><b>Consultation Questions 5.5 and 5.6</b> Overall we consider that the reasoning for the exclusion of our client’s interests at Wildmoor Quarry and at Chadwich Lane should be re-assessed given the obvious merits that have</p>	<p>Thank you for providing additional information in relation to this site. The site will be reconsidered against site selection criteria taking this information into account.</p>

Consultee comments	Initial Officer response
<p>been overlooked and deal with each of the sites originally promoted below. This refers to questions 5.5 and 5.6 of the consultation.</p> <p><b>Chadwich Lane Deepening Proposal (submission reference B053-2397 nq)</b>  This Chadwich Lane deepening proposal was previously granted planning permission for a 10 hectare extension at appeal under reference APP/E1855/A/08/2069139 dated 11th June 2009 and again under WCC planning reference 12/000036/CM dated 21st December 2012. It is important to acknowledge that the previous planning process and associated technical assessments found the scheme and site to be environmentally acceptable. The successful planning history would be a material consideration to any subsequent planning application for a new permission at the site. It is considered that the colour-coded assessment criteria should be re-assessed as set out below:</p> <p>Viability:</p> <ul style="list-style-type: none"> <li>• The site has a proven mineral resource of approximately 1.3 million tonnes as addressed in planning application ref 12/000036/CM</li> <li>• The site would be operated by Salop Sand &amp; Gravel</li> <li>• The site has the full support of the landowner Mr Bryan Wood</li> <li>• The mineral resource will be processed at Wildmoor as set out in planning application ref 12/000036/CM</li> </ul> <p>Planning Terms:</p> <ul style="list-style-type: none"> <li>• The site is located within the North East Strategic Corridor</li> <li>• Highways England considered the site acceptable under planning application ref 12/000036/CM</li> <li>• Worcestershire County Council Highways considered the site acceptable under planning application ref 12/000036/CM</li> <li>• Canals &amp; Rivers Trust not applicable</li> <li>• Avon Navigation Trust not applicable</li> <li>• Office of Road and Rail no comments</li> </ul> <p>Overall this previously approved site should be considered to be green as highly deliverable and accordingly included in the draft mineral plan as a specific site to ensure a minimum of 7 years supply of sand and gravel is maintained</p>	<p>The planning history for this site is noted, and was referred to in the site information and context set out in the Deliverability Assessment. However, the site does not currently benefit from an extant planning permission. For the purposes of the development of the Minerals Local Plan, the proposed site has been and will be considered alongside all other site proposals on a fair and equitable basis using a consistent methodology for all sites submitted for consideration.</p> <p>Any planning application will be decided on the basis of the adopted Development Plan and any other material considerations. Once adopted, the new Minerals Local Plan will present a materially different basis for decision making than when the site was previously approved in 2009 and 2012, and any application may need to consider alterations to proposed site design and working methods to accord with the new policy framework.</p>

Consultee comments	Initial Officer response
<p>in Worcestershire.</p> <p>I can confirm that the attached agreement between Chadwich Lane Quarry Limited and Wildmoor Quarry Products Limited dated 2017 has been returned to our Solicitors for validation today.</p> <p>I hope this meets with your approval as proof that both of the above Limited Companies have been actively working together and will continue to do so on our existing site for many years to come.</p> <p>Please find attached additional evidence of an agreement between the landowner and our client Richard Parton who owns both Salop Sand &amp; Gravel and Wildmoor Quarry Products Limited <b>[WCC reference E045-2465 (Chadwich Lane Deepening) in Appendix 1 of this document]</b></p> <p>Mineral resource won at Chadwich Lane would be processed at Wildmoor Quarry our client considers that Wildmoor Quarry Products Limited would be the operator and apologise for any confusion.</p> <p>As our clients sets out it in the attached e-mail, Mark Bishop is aware a new planning application for Chadwich Lane is to be made by WYG post local elections in May further to liaison with Natural England.</p>	

*Comments on Wildmoor Quarry extension*

Consultee comments	Initial Officer response
<b>E045-2465 PleydellSmithyman Ltd</b>	
<p><b>Consultation Questions 5.5 and 5.6</b> Overall we consider that the reasoning for the exclusion of our client's interests at Wildmoor Quarry and at Chadwich Lane should be re-assessed given the obvious merits that have been overlooked and deal with each of the sites originally promoted below. This refers to questions 5.5 and 5.6 of the consultation.</p> <p><b>Wildmoor Quarry Extension (submission reference B052-2397 nq)</b> Wildmoor Quarry is an existing quarry with long established infrastructure, good highway access, processing plant with associated quarrying facilities. The site produces a mix of aggregates</p>	<p>Thank you for providing additional information in relation to this site. The site will be reconsidered against site selection criteria taking this information into account.</p>

Consultee comments	Initial Officer response
<p>and industrial sand. It also has on site mortar production, ancillary storage and bagging areas with a proposed extension area of 12 hectares (hatched blue) as shown on attached drawing reference M11.119(f).D.040 <b>[WCC reference E045-2465 (Wildmoor Quarry Extension) in Appendix 1 of this document]</b>.</p> <p>The colour-coded assessment criteria should be reassessed as set out below:</p> <p>Viability:</p> <ul style="list-style-type: none"> <li>• The site has approximately 1 million tonnes of unproven mineral resource</li> <li>• The site would be operated by Salop Sand &amp; Gravel</li> <li>• The site has landowner support as it is owned by the existing operator</li> <li>• The mineral resource will be processed on site</li> </ul> <p>Planning Terms:</p> <ul style="list-style-type: none"> <li>• The site is located within the North East Strategic Corridor</li> <li>• Highways England consider the site acceptable with supporting information</li> <li>• Worcestershire County Council (WCC) Highways consider this existing site has an established access and subject to details the proposal will be acceptable</li> <li>• Canals &amp; Rivers Trust not applicable</li> <li>• Avon Navigation Trust not applicable</li> <li>• Office of Road and Rail no comments</li> </ul> <p>Overall the proposed extension should be considered to be amber and given the mix of sand resource produced at the existing site should be supported as an area of search as a minimum to ensure a minimum of 7 years supply of sand and gravel is maintained in Worcestershire.</p> <p>Should the mineral resource be proven on the site, a hierarchy of site preference should promote the extension of existing sites compared to greenfield sites to reduce any new environmental effects in the green belt.</p>	<p>Giving preference to extending existing sites over developing new sites was considered in developing the policies set out in the Third Stage Consultation. It was considered that it is possible for a new site in a less sensitive location to be preferable to an extension to an existing site in a more sensitive location, and therefore all sites should be considered on their own merits without policy preference for extension or for new sites. Consideration will be given to whether this remains the most appropriate approach.</p>

*Comments on Wolverley Glebe*

Consultee comments	Initial Officer response
<b>E048-719 Environment Agency</b>	
<p><b>Groundwater Resource</b>                      We would firstly highlight an error on page 247 that could impact on the Wolverley Glebe proposed site and its viability moving forwards. The background information states that our comments were not received for this site which is incorrect. We commented on this site in our email dated 03 December 2015 and MLP site sift excel document of the same date (both attached for reference) <b>[WCC reference E048-719 in Appendix 1 of this document]</b>.</p> <p>We advised that the site was upon a Principal Aquifer and was also within Source Protection Zones (SPZs) 2 and 3. We advised that this site is located in a sensitive hydraulic setting and that whilst this does not necessarily preclude mineral workings, it is constraint that resultant HIAs will have to closely focus on.</p> <p>The commentary and analysis for this site should be adjusted accordingly.</p>	<p>Noted. Apologies for this error. Site informatives will be updated to reflect this information.</p>
<b>E050-1971L Wyre Forest District Council</b>	
<p><b>Page 69, Paragraph 5.10</b> – It is noted that a preferred area has been allocated on land North of Wolverley Road. It is considered that the preferred area is unlikely to cause strategic harm to biodiversity, but there will certainly be site specific issues to pick up. One area that could be affected is farmland birds – when combined with other potential losses to farmland habitat in the Lea Castle area, this could be a cause for concern without some mitigation measures in place.</p>	<p>Noted. Policy MLP 18 is intended to ensure biodiversity is protected and enhanced, and to address site specific issues.</p>

**Q5.7 THIRD CALL FOR SITES: Do you have any further sites for mineral working or supporting infrastructure to put forward for consideration against the *Deliverability Assessment*?**

Yes: 1	No: 7	Written responses (see below)
<p>E045-2465: PleydellSmithyman Ltd</p>	<p>E007-2452: Mr N Dean                       E013-802: Malvern Hills AONB Unit                       E014-634: Pershore Town Council</p>	<p>E045-2465: PleydellSmithyman Ltd</p>

Yes: 1	No: 7	Written responses (see below)
	E019-2459: Wildmoor Residents' Association  E026-813: Worcestershire Wildlife Trust  E030-1939: The Coal Authority  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717: Natural England	

*Comments*

Consultee comments	Initial Officer response
<b>E045-2465 Pleydell Smithyman Ltd</b>	
<p>An additional proposed extension area (edged red) as shown on attached drawing reference M11.119(f).D.040 <b>[WCC reference E045-2465 (Wildmoor Quarry Extension) in Appendix 1 of this document]</b> is also promoted at Wildmoor Quarry to ensure adequate supply of sand for the County and the sustainable restoration of the site. The colour-coded assessment criteria is addressed as set out below:</p> <p>Viability:</p> <ul style="list-style-type: none"> <li>• The site has an unproven mineral resource</li> <li>• The site would be operated by Salop Sand &amp; Gravel</li> <li>• The site does not yet have full landowner support</li> <li>• The mineral resource will be processed on site at Wildmoor Quarry</li> </ul> <p>Planning Terms:</p> <ul style="list-style-type: none"> <li>• The site is located within the North East Strategic Corridor</li> <li>• Highways England would consider the site acceptable with supporting information</li> <li>• Worcestershire County Council Highways would consider an extension to the existing site that has an established access as acceptable subject to details</li> <li>• Canals &amp; Rivers Trust not applicable</li> </ul>	<p>Thank you for submitting the additional site for consideration. As you acknowledge, from the information provided the site would be graded "red" and therefore not included as a site allocation against the Deliverability Assessment criteria which were used for the Third Stage Consultation. However, this site will be considered alongside all other site proposals on a fair and equitable basis using a consistent methodology for all sites submitted for consideration.</p> <p>Giving preference to extending existing sites over developing new sites was considered in developing the policies set out in the Third Stage Consultation. It was considered that it is possible for a new site in a less sensitive location to be preferable to an extension to an existing site in a more sensitive location, and therefore all sites should be considered on their own merits without policy preference for extension or for new sites. Consideration will be given to whether this remains the most appropriate approach.</p>

Consultee comments	Initial Officer response
<ul style="list-style-type: none"> <li>Avon Navigation Trust not applicable</li> <li>Office of Road and Rail no comments</li> </ul> <p>Overall the proposed extension should be considered to be red but given the mix of sand resource produced at the existing site should be supported as an area of search as a minimum to ensure a minimum of 7 years supply of sand and gravel is maintained in Worcestershire.</p> <p>Should the mineral resource be proven on the site, a hierarchy of site preference should promote the extension of existing sites compared to greenfield sites to reduce any new environmental effects in the green belt.</p>	

**Q5.8 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy and the character and distinctiveness of the strategic corridor?**

*MLP 1: Strategic Location of Development*

Yes: 4	No: 1	Don't know: 0	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	<p>E019-2459: Wildmoor Residents' Association</p>	<p>None</p>	<p>E005-817 CPRE Worcestershire</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E025-1793 CEMEX</p> <p>E029-2036 Croome Estate Office</p> <p>E056-1782L RSPB</p>

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>MLP1: <i>add</i> "b iii Small-scale exploitation in very special circumstances". There may well be circumstances where a very specific mineral resource is required for heritage or environmental reasons. I do not have in mind substantial commercial exploitation. The following local examples spring to mind:</p> <ul style="list-style-type: none"> <li>The stone of which St Saviours Church, Hagley is built (in the 1900s) was</li> </ul>	<p>We agree that there may be circumstances where a specific mineral resource is required for heritage or environmental reasons, and it was intended that such requirements could be addressed under part b i which allows for mineral development where it is demonstrated that the mineral resource has qualities which mean sustainable supply cannot be delivered within the strategic corridors.</p>



Consultee comments	Initial Officer response
<p>donated the then Lord Cobham and quarried within Hagley Park. If an extension were required for the church, such as a new vestry or toilets, it might be desirable to build it from the same materials, which would require a temporary (and brief) reopening of the quarry.</p> <ul style="list-style-type: none"> <li>• When National Trust needed to deposit stone on top of Clent Hill to replace the natural Clent Hills Breccia, they found it necessary to bring in stone of the right colour, but a completely different geology from a distant quarry. A better solution from the environmental point of view would have been to reopen the small quarry on the side of the hill, which was once used by a local highways board to obtain material for surfacing local roads.</li> <li>• A farmer digging a small amount of stone from his farm to surface his tracks or deal with muddy patches in gateways. Many farms have such quarries.</li> </ul>	<p>The contribution of building stone to the local vernacular and quality of the historic environment is recognised in paragraphs 2.60-2.66. This is supported by Policy MLP 12 which specifically addresses the need for an adequate and diverse supply of building stone.</p> <p>Consideration will be given to whether the policy as drafted is flexible enough to address the point you raise.</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>Lack of enforcement and agreed restoration lets these policies down.</p>	<p>Paragraph 7.38 of the Third Stage Consultation states that "planning permission will not be granted for mineral working unless satisfactory proposals have been made for the restoration and after-use of the site". We are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the policies can be applied and enforced as intended. Consideration will be given to whether this concept can be strengthened within the plan.</p>
<b>E029-2036 Croome Estate Office</b>	
<p>Supports the Council's inclusion of Specific Sites and the identification of Land at Ryall North as such a site. Support is also given for Policy MLP 1a which has a presumption in favour of granting planning permission for such Specific Sites.</p>	<p>Support for the inclusion of specific sites and Land at Ryall North is noted.</p> <p>There is a presumption in favour of sustainable development, and whilst policy MLP 1 sets a positive framework towards specific sites, preferred areas and windfall sites, this must be read in the context of the Development Plan as a whole. As stated in paragraph 5.7 "Proposals will need to be assessed against other policies in the development plan to determine whether they constitute sustainable development".</p>
<b>E025-1793 CEMEX</b>	
<p>The Company supports... Policy MLP 1a) with respect to the presumption in favour of granting</p>	<p>There is a presumption in favour of sustainable development, and whilst policy MLP 1 sets a</p>

<b>Consultee comments</b>	<b>Initial Officer response</b>
planning permissions for Specific Sites and Preferred Areas.	positive framework towards specific sites, preferred areas and windfall sites, this must be read in the context of the Development Plan as a whole. As stated in paragraph 5.7 "Proposals will need to be assessed against other policies in the development plan to determine whether they constitute sustainable development".
<b>E056-1782L RSPB</b>	
The RSPB agrees that the policies and the reasoned justification contribute to the stated aims. In particular, we are pleased to see the extensive reference to enhancing biodiversity in a way that is compatible with the character and distinctiveness of the strategic corridors (e.g. wetland habitat creation in the Strategic Corridors that are based on river corridors and heathland creation in the North West Worcestershire Strategic Corridor.	Support noted.

*MLP 2: Avon and Carrant Brook Strategic Corridor*

<b>Yes: 4</b>	<b>No: 1</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	E014-634: Pershore Town Council	E019-2459: Wildmoor Residents' Association	E014-634: Pershore Town Council  E026-813: Worcestershire Wildlife Trust

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E014-634 Pershore Town Council</b>	
Concerns that the policies to grant planning permission are too broad. In addition there is no mention of other criteria which must be taken into account. eg: impact on communities and traffic routing.	As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional and local policies", as such the Council does not consider it necessary to make additions to policy MLP2 to address this point.  As drafted Policy MLP 16 specifically addresses "impacts on the health or quality of life of residents, business, other sensitive receptors

<b>Consultee comments</b>	<b>Initial Officer response</b>
	and users of land, either individually or cumulatively with other existing or proposed development" and Policy MLP 24 addresses transport to and from site.
<b>E026-813 Worcestershire Wildlife Trust</b>	
We are pleased to support the policy wording (particularly in the 1 <sup>st</sup> and 3 <sup>rd</sup> – 6 <sup>th</sup> bullets) and the commentary in paras. 5.38 – 5.43 and 5.45 – 5.58 of the reasoned justification, which offer important guidance on delivery of biodiversity and wider benefits in line with the plan vision.	Support noted.

*MLP 3: Lower Severn Strategic Corridor*

<b>Yes: 5</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E013-802: Malvern Hills AONB Unit  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459: Wildmoor Residents' Association	E013-802: Malvern Hills AONB Unit  E026-813: Worcestershire Wildlife Trust

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E013-802 Malvern Hills AONB Unit</b>	
We support the potential development of a strategic recreation asset that could take pressure from the Malvern Hills. Recognition of the need to protect important views could be included in the text.	Support noted. Changes will be considered to strengthen reference to important views.
<b>E026-813 Worcestershire Wildlife Trust</b>	
We are pleased to support the policy wording (particularly in the 1 <sup>st</sup> , 2 <sup>nd</sup> , 5 <sup>th</sup> and 6 <sup>th</sup> bullets) and the commentary in paragraphs 5.65 – 5.75 and 5.82 – 5.86 of the reasoned justification, which offer important guidance on the delivery of biodiversity and wider benefits in this corridor in line with the plan vision.	Support noted.

*MLP 4: North East Worcestershire Strategic Corridor*

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459: Wildmoor Residents' Association	<p>E015-582 Mr P King</p> <p>E026-813: Worcestershire Wildlife Trust</p>

Consultee comments	Initial Officer response
<b>E015-582 Mr P King</b>	
I am not clear if the northeastern corridor quite extends into Hagley, and I am less familiar with the geology. If it did so extend, its impact on the Grade One Scheduled Hagley Park would need to be considered. However, again, the possibility of the resource being required seems remote.	The North East Worcestershire Strategic Corridor does not extend in to Hagley Parish, finishing at the parish boundary adjacent to Hagley Park. This is shown on the interactive webmapping tool available at <a href="http://www.worcestershire.gov.uk/minerals">www.worcestershire.gov.uk/minerals</a> Policy MLP 23 seeks to protect and enhance heritage assets, including registered Parks and Gardens.
<b>E026-813 Worcestershire Wildlife Trust</b>	
We are pleased to support the policy wording (particularly in the 1 <sup>st</sup> - 3 <sup>rd</sup> bullets) and the commentary in paragraphs 5.93 – 5.107 of the reasoned justification, which offer helpful guidance on delivery of biodiversity and wider benefits in line with the plan vision.	Support noted.

*MLP 5: North West Worcestershire Strategic Corridor*

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural</p>	None	E019-2459: Wildmoor Residents' Association	<p>E015-582 Mr P King</p> <p>E026-813: Worcestershire Wildlife Trust</p>

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
England			

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E015-582 Mr P King</b>	
<p>I am lead councillor for planning for Hagley Parish Council and can perhaps flesh out for you Hagley Parish Council's decision not to comment. I have already commented on behalf of CPRE. You may take this is a personal comment from me.</p> <p>The west of the Parish includes part of the Northwestern Strategic Corridor, but my understanding is that the minerals present are only sandstone, possibly also what used to have the descriptive name of Bunter Pebble Beds. You have classified the former as "solid sand", but it seems improbable this would be worked while the county had sand and gravel. It has been used as building stone, but is no longer so used.</p> <p>The development of a quarry in the western part of Hagley would have severe highways implications, as the sole public highway access to the part of the parish west of the railway is Station Road, which is severely congested at peak times, being the sole access to two High Schools and a couple of hundred houses.</p> <p>There are other means by which access could be obtained, using roads that are only public bridleways. However, the parish council took the view that the possibility of these resources being developed was too remote to require consideration. If there had been a preferred site in the parish, I am sure a different attitude would have been taken.</p>	<p>The geological information we have from the British Geological Survey identifies the resource in the western edge of Hagley parish as Wildmoor Sandstone Formation (formerly known as Upper Mottled Sandstone). The solid sands of the Wildmoor Formation is currently worked in Worcestershire in the Wildmoor area, providing sand for use as aggregate.</p> <p>Should any sites be proposed in the western part of Hagley over the life of the plan, they would need to meet the requirements of Policy MLP 24 for good connections to the strategic transport network.</p>
<b>E026-813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support the policy wording (particularly in the 3<sup>rd</sup> – 6<sup>th</sup> bullets) and the commentary in paragraphs 5.123 – 5.139 of the reasoned justification, which offer helpful guidance on delivering biodiversity and other benefits in line with the plan vision.</p>	<p>Support noted.</p>

MLP 6: Salwarpe Tributaries Strategic Corridor

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459: Wildmoor Residents' Association	E024-1967 Woodland Trust  E026-813: Worcestershire Wildlife Trust  E027-525 Bentley Pauncefoot Parish Council

Consultee comments	Initial Officer response
<b>E024-1967 Woodland Trust</b>	
<p>Whilst we are pleased to see the objective – ‘<i>Conserve, enhance and restore characteristic hedgerow patterns and optimise opportunities to protect, restore, link and buffer relic ancient woodlands</i>’ – we need to see specific guidance included about the ‘buffer’ in accordance with Natural England and the Forestry Commission’s standing advice for <b>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></b> - which states (April 2014): “<i>Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and the type of development. In a planning case in West Sussex the Secretary of State supported the arguments for a 15m buffer around the affected ancient woodland, but larger buffers may be required.</i>”</p> <p>We would recommend a buffer zone of at least 50 metres of semi-natural vegetation would be required to protect the woodland from the change in land use. This 50m should be included as part of the policy for each site. An</p>	<p>Changes to site selection criteria will be considered to take account of the points you raise, such as excluding internationally or nationally designated areas from site allocations or giving additional information about any mitigation measures which are likely to be required. Consideration will be given to how the role of semi-natural vegetation to protect high-value habitats could be further promoted through the plan.</p> <p>However, the green infrastructure approach in the plan seeks to support and extend areas of valued habitat through appropriate high quality restoration. For example, part f of Policy MLP 18 requires proposals to "optimise biodiversity gain by enhancing, linking and extending existing habitat networks".</p> <p>It is also difficult to accurately assess any likely impacts on ancient woodland or other environmental assets without the detailed information about site working methods and proposals provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p>

Consultee comments	Initial Officer response
<p>example of a council which has included the 50m within their site allocation policies is <b>Kings Lynn and West Norfolk</b>. The policy for the <b>Site Allocation and Development Management Policies</b> (pre-submission document 2015, Policy E4.1 Knights Hill) specifically reads:</p> <p><i>“Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife. A 50 metre buffer around the Reffley Wood ancient woodland.”</i></p> <p>This best practice will ensure that the ancient woodland is protected from changing external pressures caused by minerals development.</p> <ul style="list-style-type: none"> <li>• <b><u>We would therefore like to see Policy MLP6 specifically include a 50m buffer for ancient woodland.</u></b></li> </ul>	
<b>E026-813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support the policy wording (particularly in the 1<sup>st</sup> and 2<sup>nd</sup> bullet points) and the commentary in paragraphs 5.147 – 5.155 of the reasoned justification, which offer helpful guidance on delivering biodiversity and other benefits in line with the plan vision.</p>	<p>Support noted.</p>
<b>E027-525 Bentley Paucefoot Parish Council</b>	
<p>Bentley Paucefoot Parish Council has noted that you have identified two areas within our parish which have the potential to provide mineral resources.</p> <p>A. A belt of glacial sands and gravels in Upper Bentley which is classed as a safeguarded area so that any future access to the deposits is not compromised.</p> <p>B. Clays in the western part of the parish are included within the Salwarpe Tributaries Strategic corridor where, you indicate, that proposals for mineral development will be viewed favourably. No area here has, however, been identified as a preferred area or as a specified site.</p> <p>Should the need for the exploitation of these minerals be proposed, then, as part of the</p>	<p>Noted. Bentley Paucefoot Parish Council would be consulted on any mineral planning application in the parish as a matter of course in accordance with the council's adopted Statement of Community Involvement (available at <a href="http://www.worcestershire.gov.uk/sci">www.worcestershire.gov.uk/sci</a>).</p>

Consultee comments	Initial Officer response
normal planning process, Bentley Paucefoot Parish Council, on behalf of its parishioners, expects to be fully apprised of the proposals so that it can contribute its own local knowledge to the assessment of site suitability.	

**Q5.9 Are there any wording changes which you would suggest to Chapter 5 to improve clarity or any other issues which you think should be considered?**

Yes: 0	No: 4	Don't know: 0	Written responses (see below)
None	<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717: Natural England</p>	None	<p>E002-2447: CLH Pipeline System Ltd</p> <p>E003-1700: Worcestershire Regulatory Services</p> <p>E004-2372: Highways England</p> <p>E005-817: CPRE Worcestershire</p> <p>E008-1944: Network Rail</p> <p>E012-2457: RAGE</p> <p>E020-2460: Mineral Products Association</p> <p>E025-1793: CEMEX</p> <p>E029-2036: Croome Estate Office</p> <p>E032-1504: Heaton Planning on behalf of Tarmac</p> <p>E037-1051: Peter &amp; Oliver Surman</p> <p>E041-717: Natural England</p> <p>E045-2465: PleydellSmithyman Ltd</p> <p>E047-716: Historic England</p>



Yes: 0	No: 4	Don't know: 0	Written responses (see below)
			<p>E048-719: Environment Agency</p> <p>E049-683/1077/2279: South Worcestershire Councils</p> <p>E050-1971L: Wyre Forest District Council</p>

### Comments

Consultee comments	Initial Officer response
<b>E002-2447 CLH Pipeline System Ltd</b>	
<p>Thank you for your email to CLH Pipeline System Ltd dated 14 December 2016 regarding the above. Please find attached a plan of our clients apparatus <b>[WCC reference E002-2447 CLH Pipeline System Ltd in Appendix 1 of this document]</b>. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.linerearchbeforeudig.co.uk">www.linerearchbeforeudig.co.uk</a> our free online enquiry service.</p>	<p>Noted. This information will be considered and used to update the Deliverability Assessment and site appraisals as appropriate.</p>
<b>E003-1700 Worcestershire Regulatory Services</b>	
<p>I have reviewed each site in the third stage consultation on the Worcestershire Minerals Local Plan from a potential nuisance perspective and confirm that we do not have any adverse comments to make due to the following reasons : -</p> <ul style="list-style-type: none"> <li>• There is no proposed hard rock quarrying or significant aggregate works/rock crushing activity planned for the area.</li> <li>• No major residential conurbations are located within significant proximity to the proposed quarrying areas.</li> </ul> <p>It is therefore anticipated that any potential for nuisance will be addressed through the detailed planning application stage where specific site issues will be assessed for dust noise and light impact based on site specific characteristics and proposed work activities at each location once revealed.</p>	<p>Noted.</p>
<b>E004-2372 Highways England</b>	
<p>Thank you for forwarding me details regarding the above Emerging Worcestershire Minerals Local Plan.</p>	<p>Noted.</p> <p>Policy MLP24: <i>Transport To and From Site</i> as drafted in the Worcestershire Minerals Local</p>

Consultee comments	Initial Officer response
<p>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>We have reviewed the Third Stage Consultation document and relevant background evidence documents. A high level desktop analysis of the potential traffic generation has been undertaken for the Specific Sites and Preferred Areas included at this stage of consultation. Taking account of this preliminary analysis, we do not consider that any of the sites included in the consultation document will have a severe impact on the operation and functionality of the SRN.</p> <p>Nonetheless, Highways England recognises that there is likely to be a cumulative impact of traffic associated with developments considered within the Local Plan processes. In this regard both the current development plans and emerging Local Plans, including the South Worcestershire Development Plan, 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 the site allocations in the Worcestershire Minerals Local Plan.</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 regard to 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, the potential traffic impacts of the identified sites should be assessed on an individual, and, where appropriate, a cumulative basis. Assessments should be undertaken through the Transport Assessment and Environmental Impact Assessment processes and consider whether the need for mitigation of</p>	<p>Plan Third Stage Consultation is intended to address these issues. Paragraph 7.224 states that <i>"All development proposals that generate significant amounts of movement should be supported by either a Transport Assessment or a Transport Statement dependant on the scale of the development."</i> Policy MLP 15 part h also requires that mineral development will <i>"not result in an unacceptable cumulative impact from other concurrent mineral working or existing or proposed development"</i>.</p>

Consultee comments	Initial Officer response
<p>any adverse effects on the SRN may arise. In principle, Highways England does not object to any of the proposed sites. However detailed assessment will be necessary for new sites in order to provide a robust assessment of the impact of associated traffic generation on the SRN. Any infrastructure needs arising from these assessments should be discussed and agreed with Highways England prior to any grant of planning permission. We therefore recommend that the need for such assessments be identified within the Worcestershire Minerals Local Plan.</p> <p>Please do not hesitate to contact me if you require any more information or clarification.</p>	
<b>E005-817 CPRE Worcestershire</b>	
<p><b>Mineral preferred area at Wolverley</b> The description of the site as “land north of Wolverley Road” is (in strictness) accurate, but inadequate; indeed it is potentially misleading as there could be other Wolverley Roads. A more appropriate description might be at Lea Castle Farm, Wolverley.</p>	<p>For the avoidance of confusion, a map and grid reference have been provided in Appendix 2 and the location of the site can be viewed on the interactive minerals mapping tool at <a href="http://www.worcestershire.gov.uk/minerals">www.worcestershire.gov.uk/minerals</a>.</p>
<p><b>Green Belt</b> NPPF para 90 makes mineral developments an exception to the general prohibition on development in the Green Belt, this is subject to the qualification ‘<i>provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt</i>’. This means that the Green Belt status of the land cannot be just overridden as if it did not exist.</p> <p>The phrase ‘<i>purposes of including land in Green Belt</i>’ clearly refers back to the five purposes of the Green Belt in para 80. These include:</p> <ul style="list-style-type: none"> <li>• <i>to prevent neighbouring towns merging into one another</i></li> <li>• <i>to assist in safeguarding the countryside from encroachment</i></li> </ul> <p>In the present context, keeping towns apart should perhaps be extended to include significant settlements of all kinds. In this case, the settlements in question are Kidderminster and Cookley, which are about 1.4 km apart at their nearest points. This is a narrow gap and this site sits in the middle of it. Accordingly the development of the site for gravel quarrying will substantially erode the Green Wedge keeping these settlements apart.</p>	<p>Paragraph 5.32 of the <i>Third Stage Consultation</i> states that:</p> <p>"Mineral extraction is not inappropriate in the Green Belt provided the openness of the Green Belt is preserved and there is no conflict with the purposes of including land in the Green Belt. However associated buildings and infrastructure may be inappropriate. Any proposals would need to be assessed against relevant national and local Green Belt policy."</p> <p>Consideration will be given to whether other parts of the development plan adequately address the issues raised or whether Green Belt policy should be strengthened in the Minerals Local Plan.</p>

Consultee comments	Initial Officer response
<p>This relatively narrow wedge has already suffered encroachment by the establishment of the former Lea Castle Hospital, which was presumably permitted under the “very special circumstances” exception about 50 years ago, but is now under Wyre Forest’s Development Plan classified as a major developed site in the Green Belt, whose redevelopment is likely to be permitted. The result of any erosion of this Green Belt gap is likely substantially to endanger the viability of the rest of it.</p> <p>There are circumstances where exceptionally land needs to be taken out of the Green Belt and released for development, but NPPF paragraph 83 indicates that Green Belt boundaries should only be amended <i>in exceptional circumstances</i>. The need for sand and gravel, when there are substantial other resources available, clearly takes this out of anything exceptional.</p> <p>The presence of quarry machinery and processing plant will almost inevitably affect the openness of the area. The eastern end of site appeared to be in arable cultivation when recently I passed it. A449 runs in the bottom of a dry valley, so that the eastern end of the site is highly visible from A449 and B4189 westbound from Parkgate Inn to A449, so that extraction from the slope above A449 will have a considerable landscape impact.</p> <p>I am also concerned about a quarry in this location generating add-on development, as has happened at Wildmoor Quarry in Belbroughton, where the quarry has generated a truck repair business and perhaps a takeaway kiosk in a rural Green Belt location where that kind of thing ought never to be permitted. This is perhaps a sort of stealth development, where planning enforcement has failed and ancillary uses have been allowed to expand beyond being ancillary. It would be highly undesirable to have such development in a narrow Green Wedge.</p>	
<p><b>Local impact</b>  The [Land North of Wolverley Road] site is crossed by several well-used footpaths. Mineral development will have devastating effect on the settling of these.</p> <p>Immediately west of the site is a street called</p>	<p>Impacts of mineral development will vary depending on the details of the proposal, the nature of the site, methods used and mitigation measures put in place. Policies MLP 16: Health and Quality of Life and MLP 17: Access and Recreation as drafted in the <i>Third Stage Consultation</i> are intended to address these</p>

Consultee comments	Initial Officer response
<p>Brown-Westhead Park, which is separated from the development in places by a narrow belt of trees. There are also houses on and a school on the opposite side of Wolverley Road, as well as the lodges of Lea Castle Park (which are, we think, listed buildings). Mineral development of this kind inevitably involves machinery (and hence noise). Sand extraction is liable to involve dust. These should be unacceptable in immediate proximity to people's homes.</p>	<p>concerns when determining planning applications. The council considers that these policies provide a more sophisticated and robust approach to protection and enhancement than could be achieved through the application of a buffer or stand-off zone around sensitive receptors such as people's homes.</p>
<p><b>The resource</b></p> <p>I would further question the assessment of the geological resource that underlies the selection on the area [Land North of Wolverley Road]. Geological maps appear to show the summit of the hill at SO843790 as sand and gravel, but much of the rest of the area as Upper Mottled Sandstone (a soft rock, not sand). Parts of the plan appear to refer to this rock as "solid sand". The sandstone is certainly friable, but very considerable energy would be required to convert the rock into sand. At a time when we are seeking to reduce energy consumption, in the light of climate change, converting sandstone to sand should be a low priority option, to be pursued when easier ones are exhausted.</p> <p>The western portion of the preferred site (nearest Brown-Westhead Park) appears to be the Fourth River Terrace. I am aware of places in the area (some beyond the county boundary) where these sands and gravels have been worked, but I cannot think of any case of the river terraces being worked in this immediate area. However, lower Terraces have been worked near Stourport and Astley. Both the sands and gravels and the River Terraces occur elsewhere within the corridor, so that there is no dire necessity to select this site rather than other sites within the corridor.</p>	<p>The geological information we have from the British Geological Survey identifies the geology for the Land North of Wolverley Road site as Wildmoor Sandstone Formation (formerly known as Upper Mottled Sandstone), overlain by Kidderminster Station Member (4<sup>th</sup> terrace of the Severn Valley Formation) and a small area of glacial deposit.</p> <p>The British Geological Survey describes the Wildmoor Sandstone Formation as "uniform, very weakly cemented, fine-grained micaceous, red sandstone which is easily crushed to produce a sand" (see BGS DETR document "Mineral Resource Information for Development Plans – Herefordshire and Worcestershire: Resources and Constraints" at <a href="https://www.bgs.ac.uk/mineralsuk/planning/resource.html">https://www.bgs.ac.uk/mineralsuk/planning/resource.html</a>). Crushing this sandstone is likely to be comparable in energy consumption to screening and sorting river terrace sand and gravel, particularly as some sand and gravel plant include crushers to make use of oversize material. The solid sands of the Wildmoor Formation are currently worked in Worcestershire in the Wildmoor area, providing building sand.</p> <p>We agree that there may be other suitable locations for sand and gravel resources to be worked within the North West Worcestershire Strategic Corridor. However, only four sites were put forward for consideration by mineral operators, landowners or agents within the Strategic Corridor, and of these the site "Land North of Wolverley Road" was the only one which met the tests set out in the Deliverability Assessment for allocation as a preferred area. Should other sites be proposed over the life of the Minerals Local Plan, they would be assessed against the policy requirements it contains.</p>

Consultee comments	Initial Officer response
<p><b>Alternatives</b></p> <p>It is clearly the case that the whole of the North West Worcestershire mineral corridor is in the Green Belt, but that does not mean that all of it is an equally important part of it. The whole of the area between A449 and A451 was before inclosure Wolverley Heath, which also extended to some extent south and west of the latter. Unfortunately, the Worcestershire Landscape Study has misclassified this area as sandstone estatelands, rather than as inclosed common. However there should be plenty of space within that area (though north of Lea Castle Hospital) to find a site for a sand pit. This area has wide inclosure roads, some of which are potentially suitable for the HGV traffic that is likely to be associated with a quarry.</p> <p>The area west of the river Stour (within Cookley and Wolverley Parish) was the medieval open fields of Cookley, Caunsall and Blakeshall. These fields were the subject of inclosure by private agreement, probably in the early modern period. They generally have narrow roads, characteristic of old inclosed lands and are unsuitable for significant HGV traffic, making them unsuitable for sand to be worked.</p>	<p>As noted in paragraph 5.32 of the <i>Third Stage Consultation</i>: "Mineral extraction is not inappropriate in the Green Belt provided the openness of the Green Belt is preserved and there is no conflict with the purposes of including land in the Green Belt. However associated buildings and infrastructure may be inappropriate. Any proposals would need to be assessed against relevant national and local Green Belt policy." There is no policy support for differentiating between different parts of the Green Belt.</p>
<p>5.32 correctly sets out the position in terms of planning policy, but other parts of the Plan then proceed completely to ignore those principles. Since this is fundamental to the Plan in north Worcestershire, it would be better to set out the NPPF paragraph explicitly as a direct quotation.</p>	<p>Paragraph 5.32 of the <i>Minerals Local Plan Third Stage Consultation</i> states that:</p> <p>"Mineral extraction is not inappropriate in the Green Belt provided the openness of the Green Belt is preserved and there is no conflict with the purposes of including land in the Green Belt. However associated buildings and infrastructure may be inappropriate. Any proposals would need to be assessed against relevant national and local Green Belt policy."</p> <p>Consideration will be given to whether other parts of the development plan adequately address the issues raised or whether Green Belt policy should be strengthened in the Minerals Local Plan.</p>
<p>5.119 I would question the correctness of the final sentence: it may be correct with the qualification "county or sub-regional scale", but this seems to ignore Habberley Valley, Hartlebury Common, and Rifle Range Nature Reserve, all near but west of Kidderminster, not to mention West Midlands Safari Park. Most of the area is good agricultural land and should not</p>	<p>This paragraph and the recreation priority for the corridor is based on the evidence set out in the Worcestershire Green Infrastructure Framework Document 3: Access and Recreation (May 2013) which uses the Natural England "Access to Green Space Standards" to identify natural or semi-natural greenspace which is freely accessible. An analysis of the distribution and</p>

Consultee comments	Initial Officer response
<p>unnecessarily be taken out of production. The Plan shows a “recreational opportunity site”, but this is outside the Corridor, and its location is not clear. It is not east of Kidderminster, but northwest; and it is wholly <i>undeliverable</i> through the Plan.</p>	<p>capacity of county or sub-regional scale sites is then used in the framework document to identify "recreational opportunity sites" where existing recreation assets are at capacity or facing visitor pressures. Recreational opportunity sites are indicative rather than precise locations. Further information about this area of the evidence base is available at <a href="http://www.worcestershire.gov.uk/gi">www.worcestershire.gov.uk/gi</a>.</p>
<p>5.121 displays a danger inherent in the plan: a Mineral Plan <i>cannot</i> and should not seek to meet countryside aspirations. Rather than creating its own policies, the Minerals Plan should be referring back to and supporting each District’s Local Plan. I do not recall the objective of taking 100 ha from food production for leisure uses being part of the (now adopted) Bromsgrove District Plan. In fact another countryside site is likely to open in the next year or two, as Lord Cobham has planning permission for a visitor centre to enable him to re-open his (Grade 1 Registered) Hagley Park.</p>	<p>Worcestershire County Council has taken account of the adopted city, borough and district local planning documents in developing the Worcestershire Minerals Local Plan Third Stage Consultation.</p> <p>The majority of the North West Worcestershire Strategic Corridor (to which paragraph 5.121 relates) is within Wyre Forest District. Whilst the adopted Wyre Forest <i>Core Strategy and Site Allocations and Policies Local Plan</i> do not refer to the "recreational opportunity sites" identified in the Worcestershire Green Infrastructure Framework, they do recognise the pressures on the Wyre Forest and acknowledge the need to improve accessibility to greenspace.</p> <p>The vision for the Minerals Local Plan set out in the Third Stage Consultation document states that "The winning, working and lasting legacy of minerals development in Worcestershire will be part of a holistic approach to delivering sustainable economic growth, supporting quality of life, and enhancing the natural, built and historic environment, that together contribute to the diverse character of the county and surrounding area."</p> <p>Paragraph 5.31 states that "The priorities for each corridor are likely to be delivered through the development of multiple sites. Each development proposal will need to be assessed on a site-by-site basis. The priorities should guide how sites are designed, worked and restored so that mineral development across the corridor over the life of the plan is coordinated to deliver the priorities. The local context will influence how the priorities can best be integrated at each stage of a site’s life." In the North West Worcestershire Strategic Corridor the priorities include facilitating "arable and horticultural land use that optimises opportunities to restore primary hedgerows, integrate wide field margins and create</p>

Consultee comments	Initial Officer response
	heathland habitats", alongside other habitat and public access objectives.
5.143: Figure 5.5 fails to mark the active sites. While the brickworks may have sufficient resources for the Plan period, should those resources and adjacent areas of potentially suitable minerals not be subject to some kind of specific safeguarding to prevent incompatible development, rather blanket safeguarding being applied to the whole corridor?	<p>The active mineral sites are shown on figure 5.5 as indicated in the legend. They are also shown on the interactive minerals webmap which was published alongside the consultation document at <a href="http://www.worcestershire.gov.uk/minerals">www.worcestershire.gov.uk/minerals</a>. However it is noted that there are difficulties with viewing and interpreting this information within the document itself. This will be addressed prior to the next stage of consultation.</p> <p>Safeguarding policies are set out in <i>MLP 27: Safeguarding Locally and Nationally Important Minerals</i> and <i>MLP 28: Safeguarding Permitted Mineral Sites and Supporting Infrastructure</i>.</p>
<b>E008-1944 Network Rail</b>	
We have no comments to make on the new mineral plan, as the sites are distant to railway. Please keep us informed of any potential new mineral extraction operations adjacent to Network Rail property via <a href="mailto:NationalMiningEngineer@NetworkRail.co.uk">NationalMiningEngineer@NetworkRail.co.uk</a> .	Noted.
<b>E012-2457 RAGE</b>	
Site options need a policy to be implemented giving priority to certain areas so any adverse effects are limited geographically.	<p>As stated in paragraph 5.1 "In order to direct mineral development to appropriate locations and realise the potential for minerals development to address some of Worcestershire's important economic, environmental and social issues, five strategic corridors for where mineral development should be located are identified...". The policies in the plan then provide a framework for assessing adverse effects on a site by site basis. Consideration will be given to whether it would be appropriate to include individual policies for allocated Specific Sites and Preferred Areas.</p>
<b>E020-2460 Mineral Products Association</b>	
<p><b>Policies MLP2, MLP 3, MLP4, MLP5, MLP6;</b> Paragraph 14 of the NPPF established a presumption in favour of sustainable development. Paragraph 7 of the same establishes that sustainable development has three pillars, economic, social and environmental with no difference in the weight given to any individual pillar. The above policies clearly address the environmental dimension, but fails to acknowledge that mineral development can also make significant contributions to both the economic and social dimension as well, both whilst operational and in terms of afteruse. This omission makes the</p>	<p>Economic and social factors have been considered in the development of the Minerals Local Plan, particularly through consideration of green infrastructure as a means of integrating social, environmental and economic benefits from high-quality green space. Differences in the rural economy such as different types of agricultural practices or forestry have been drawn upon in defining the priorities for each of the strategic corridors. Changes will be considered to draw out economic and social benefits of minerals development and green infrastructure, however most forms of economic or built development are likely to require</p>



Consultee comments	Initial Officer response
<p>policy somewhat partial in reflecting NPPF guidance relating to sustainable development which is considered unsound. Additional bullet points should be added to the above policies which allows them to better reflect all three pillars of sustainable development, both during development and afteruse, and not solely the environmental.</p>	<p>separate planning permission from the relevant city, borough or district council.</p>
<b>E025-1793 CEMEX</b>	
<p>Paragraph 14 of the NPPF established a presumption in favour of sustainable development. Paragraph 7 of the same establishes that sustainable development has <i>three</i> dimensions, economic, social and environmental. Policy MLP 3 clearly addresses the environmental dimension, but fails to acknowledge that mineral development can also make significant contributions to both the economic and social dimension as well, both whilst operational and in terms of afteruse. This omission makes the policy somewhat partial in reflecting NPPF guidance relating to sustainable development which the Company feels is unsound. Additional bullet points should be added to Policy MLP 3 which allows this policy to better reflect all three dimensions of sustainable development, both during development and afteruse, and not solely the environmental.</p>	<p>Economic and social factors have been considered in the development of the Minerals Local Plan, particularly through consideration of green infrastructure as a means of integrating social, environmental and economic benefits from high-quality green space. Differences in the rural economy such as different types of agricultural practices or forestry have been drawn upon in defining the priorities for each of the strategic corridors. Changes will be considered to draw out economic and social benefits of minerals development and green infrastructure, however most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council.</p>
<b>E029-2036 Croome Estate Office</b>	
<p>Suggests that Policy MLP 3 be broadened to acknowledge that mineral development in the Lower Severn Strategic Corridor can make significant contributions to the economic and social dimensions of sustainable development as well as the environmental dimension, both during the operational and afteruse phases.</p>	<p>Economic and social factors have been considered in the development of the Minerals Local Plan, particularly through consideration of green infrastructure as a means of integrating social, environmental and economic benefits from high-quality green space. Differences in the rural economy such as different types of agricultural practices or forestry have been drawn upon in defining the priorities for each of the strategic corridors. Changes will be considered to draw out economic and social benefits of minerals development and green infrastructure, however most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council.</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>"The 'Strategic Corridors' seek to reflect a 'best fit' of where mineral development and green infrastructure enhancement overlap and can best work together. Some mineral resources in close proximity to the strategic corridors have</p>	<p>The NPPF (paragraph 154) states that "Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for</p>

Consultee comments	Initial Officer response
<p>been excluded because they do not have significant potential to contribute towards the delivery of co-ordinated benefits." This approach is flawed – it is identifying potential sites on the basis of the mineral resource which is correct but it is not the whole resource, and the primary focus appears to be on securing landscape improvements rather than the delivery of a steady and adequate supply of aggregates. This is further evidenced by the Sustainability Appraisal which at page 53, para 5.6.2, states 'The MLPs approach is driven primarily by environmental concerns, and it is possible that the economic and social benefits could be under optimised and overlooked, respectively.'</p> <p>Para 5.14 states: existing mineral sites, specific sites and preferred areas are not sufficient to meet the requirements for sand and gravel over the life of the plan ... windfall sites will therefore be required to meet the levels of supply required over the life of the Plan.</p> <p>Para 5.18 states: sand and gravel development outside of the Strategic Corridors will be wholly exceptional. If there is such an apparent shortfall it is questionable why the Council are embarking on such a rigid approach.</p>	<p>development and clear policies on what will or will not be permitted and where."</p> <p>The approach taken in the Worcestershire Minerals Local Plan Third Stage Consultation identifies 70% of the county's sand and gravel resources within strategic corridors, considering the economic, social and environmental implications of these allocations and providing greater certainty for communities and developers.</p> <p>There are large areas of resource within the strategic corridors which have not been put forward for consideration as specific sites or preferred areas. A further call for sites will be undertaken to try to address this concern.</p> <p>The Sustainability Appraisal highlights a weakness within the plan to explicitly express how economic and social considerations have been taken into account.</p> <p>Economic and social factors have been considered in the development of the Minerals Local Plan, particularly through consideration of green infrastructure as a means of integrating social, environmental and economic benefits from high-quality green space. Differences in the rural economy such as different types of agricultural practices or forestry have been drawn upon in defining the priorities for each of the strategic corridors. Changes will be considered to draw out economic and social benefits of minerals development and green infrastructure and ensure that the options considered are clear for assessment through the Sustainability Appraisal process., however most forms of economic or built development are likely to require separate planning permission from the relevant city, borough or district council.</p>
<p>Para 5.23 and 5.24 – the constraints around the crushed rock resources in Worcestershire mean that crushed rock working is unlikely to be deliverable over the life of the plan. As such, the Minerals Local Plan does not identify strategic corridors for crushed rock. Para 5.24 states there is demand for crushed rock in the county and, as there are no known crushed rock resources in the strategic corridors, this could</p>	<p>The approach taken in the Worcestershire Minerals Local Plan Third Stage Consultation identifies 70% of the county's sand and gravel resources within strategic corridors, and it is therefore considered that sand and gravel development should be deliverable within the identified corridors. Conversely, no crushed rock resource falls within the identified corridors. Annex 1 showed two possible corridors</p>

Consultee comments	Initial Officer response
<p>provide a strong justification for the development of windfall sites for crushed rock working outside of the strategic corridors. With such an acknowledged shortfall for both crushed rock and sand and gravel, why is it wholly exceptional for sand and gravel sites to be considered appropriate outside of the Strategic Corridors whereas it is not wholly exceptional for crushed rock?</p>	<p>containing crushed rock resources around the Malvern Hills and Bredon Hill, but explained that these were not proposed as Strategic Corridors due to the constraints meaning they would be unlikely to be deliverable.</p> <p>Changes to the policy wording and justification will be considered to make the rationale for this policy difference clearer.</p>
<p><b>E037-1051 Peter &amp; Oliver Surman</b></p>	
<p><u>Reference to Policies MLP 3 and 15.</u>  In the context of restoration and after use we note the repeated emphasis on ecology and the environment with little or no regard to the sustainability of the restored area. Sustainable development is not all about ecology but has three strands, environment, social and economic, but the latter two hardly get a mention. Future long term maintenance of a site requires money and that can only be provided by some sort of income stream. The planning process should allow for greater consideration of social, sporting and economic benefit. There should also be consideration of what else is happening in the locality. For example, if there are two or three restored sites close by that are devoted entirely to ecology, then a new site that lends itself to social, sporting and economic development for the benefit of the community, should be considered in this wider context, and not in isolation. We therefore argue for a policy that gives greater weight to, and embraces social, sporting and economic activity where appropriate.</p>	<p>The priorities in policy MLP 3 (and policies MLP 2-MLP 6) are based on NPPF paragraph 143 which requires planning authorities to "put in place policies to ensure... that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources), geodiversity, biodiversity, native woodland, the historic environment and recreation." Economic considerations have been also taken into account when identifying the priorities set out for each strategic corridor within the context of the local rural economy. From this agricultural and recreation priorities have been identified.</p> <p>The priorities in policies MLP 2 – MLP6 "are likely to be delivered through the combination of development of multiple sites...The corridor priorities can be integrated and delivered alongside each other. In some cases it may not be possible or desirable to deliver all priorities on a single site. The size of the site and other local factors should be taken into account to ensure the site design, and the priorities it contributes towards, are the most appropriate for that location." (MLP Third Stage consultation paragraph 5.63 and 5.64). In addition, Policy MLP 15 requires proposals to "take account of local context".</p> <p>Consideration will be given to how potential economic and community benefits can be made more explicit.</p>
<p><b>E041-717 Natural England</b></p>	
<p>We are supportive of the creation of recreation asset that will take pressure off the Wyre Forest and Malvern Hills, which are currently experiencing issues due to visitor pressure in some areas.</p>	<p>Support noted.</p>
<p><b>E045-2465 PleydellSmithyman Ltd</b></p>	

Consultee comments	Initial Officer response
<p>When specific or allocated sites are set against the duration of the mineral local plan over an 18 year period it is considered that Worcestershire will be unable to maintain an adequate supply of sand and gravel.</p> <p>Our clients extension areas to existing quarry sites offer an environmentally better supply option than development of greenfield sites. The use of existing infrastructure facilities is considered to be sustainable when compared to the alternative of new quarry sites. The processing of materials through satellite facilities such as mineral won at Chadwich Lane being processed at Wildmoor is environmentally preferable to the development of new sites and removes the requirement for additional facilities including plant and road access.</p> <p>It is considered our clients interests in the existing quarry at Chadwich Lane that has previously been promoted under submission reference B053-2397 nq should be included and promoted in the draft mineral local plan. The proposed extension has been subject to previous environmental assessment through planning appeal and the granting of planning permission under planning reference 12/000036/CM dated 21st December 2012.</p> <p>The proposed extension areas at Wildmoor are (subject to investigation) considered to be deliverable areas that could bring forward additional mineral resource in addition to enabling sustainable restoration of the site. Given that the draft mineral local plan identifies a shortfall in the adequate supply of minerals we consider that the additional resources available from our clients sites ought to carry significant weight and be included in the Worcestershire Minerals Local Plan forthwith.</p>	<p>The Third Stage Consultation noted in paragraph 6.21 that the Specific Sites and Preferred Areas could together provide 6.15 million tonnes of sand and gravel, but that at least a further 10.104-10.154 million tonnes of sand and gravel will be needed from windfall sites to meet anticipated requirements over the life of the plan. For this reason, policy MLP 1 takes an enabling approach to windfall sites within the Strategic Corridors. The Wildmoor and Chadwich Lane sites both fall within the North East Worcestershire Strategic Corridor.</p> <p>Giving preference to extending existing sites over developing new sites was considered in developing the policies set out in the Third Stage Consultation. It was considered that it is possible for a new site in a less sensitive location to be preferable to an extension to an existing site in a more sensitive location, and therefore all sites should be considered on their own merits without policy preference for extension or for new sites. Consideration will be given to whether this remains the most appropriate approach.</p> <p>The Wildmoor and Chadwich Lane sites were assessed in the Deliverability Assessment on the basis of the information which was provided. The additional information you have submitted in response to this consultation will be taken into account in the next stage of site assessment. An additional call for sites will be undertaken in 2017. If your client wishes to submit any further details, they should be submitted as part of this consultation.</p> <p>The Chadwich Lane site does not currently benefit from an extant planning permission, and for the purposes of the development of the Minerals Local Plan, the proposed site has been and will be considered alongside all other site proposals on a fair and equitable basis using the same methodology, as set out in the Deliverability Assessment. Any planning application will be decided on the basis of the adopted Development Plan and any other material considerations. Once adopted, the new Minerals Local Plan will present a materially different basis for decision making than when the site was previously approved in 2009 and 2012, and any application may need to consider</p>

Consultee comments	Initial Officer response
	alterations to proposed site design and working methods to accord with the new policy framework.
<b>E047-716 Historic England</b>	
<p><b>Strategic Locations and Safeguarding Strategic Corridors for Minerals Extraction</b></p> <p>In line with the NPPF, Local planning authorities should set out a positive strategy for the conservation of the historic environment (NPPF, paragraph 126). Paragraphs 128, 129 and 132 of the NPPF provide further information about the need to assess the significance of any heritage assets that may be affected by development and what issues to consider.</p> <p>The Worcestershire Minerals Plan identifies a number of specific sites to be allocated for minerals development, a number of general areas for minerals development and significant safeguarded corridors for minerals development. Historic England recognises that minerals exist where they are found and that not all areas are suitable for minerals development. Additionally, we recognise that there has been limited interest through a series of call for sites and that the Council cannot allocate enough sites for mineral development to meet their requirement.</p> <p>However, where sites and general areas are known, it is possible to undertake the appropriate level of historic impact assessment and to understand what impacts there may be for the significance of heritage assets, in order to justify their inclusion within the Local Plan and comply with national policy.</p> <p>Historic England has made a number of comments about the specific sites and general areas identified for development, many of those are set out within Appendix 2 of the Plan and consider that the justification for the inclusion of these sites and the potential harm to the historic environment has not been fully assessed or evidenced. If the assessment has been undertaken we would welcome to see a copy. If the assessment has not been undertaken then we would advise the Council to carry out a historic impact assessment at the earliest opportunity. We still have outstanding concerns</p>	<p>Your concerns regarding the consideration of potential impacts on the historic environment in relation to Specific Site and Preferred Area allocations are noted.</p> <p>Consideration will be given to whether a greater degree of scrutiny with regard to physical and policy constraints can be applied to the potential site allocations and areas of search to provide greater certainty for local communities and the minerals industry. Further discussion with Historic England on this matter would be welcomed.</p>

Consultee comments	Initial Officer response
<p>relating to these sites and would require further information before we could say that the Plan was sound or legally compliant. I attach our previous comments on the specific sites and areas for your perusal [<b>WCC reference E047-716 in Appendix 1 of this document</b>], which we hope you will take into account as part of this response.</p>	
<p><b>Policies MLP2 – MLP6 Strategic Corridors identified for minerals development.</b></p> <p>There are concerns with the approach taken in identifying strategic corridors for mineral development where the Plan then states that it is difficult to assess the implication for the historic environment at this scale and therefore, does not.</p> <p>Whilst we recognise that specific sites within the corridors are not being allocated, the safeguarded corridors do give priority to minerals development within these areas. However, the assessment process for the strategic corridors is specific to natural environment principles and landscape character. There are some references to historic landscape character which we support, yet we consider that there needs to be additional detail about what is significant about the historic environment within the strategic corridors, in order to be certain that the historic environment is protected and conserved.</p> <p>It states within the strategic corridor policies that this approach is positive for the historic environment, however because it is a joint objective with the natural environment, it often relates only to the natural environment. It would be positive to include a clause within each of the Strategic Corridor policies about the need to consider the impacts of the historic environment and specific expectations and that where harm occurs, planning applications will be refused. Additionally, the SEA/SA assessment does highlight a number of specific heritage assets that could be affected and we consider that appropriate mitigation should therefore be included within the Plan.</p> <p>The principle of creating wetland habitats are identified within a number of these policies yet this may be harmful to the historic environment</p>	<p>We note and recognise your concerns over the lack of emphasis for the historic environment in the Strategic Corridor priorities in policies MLP 2 to MLP 6. The priorities were developed in discussion with members of the Minerals and Green Infrastructure working group under the Worcestershire Green Infrastructure Partnership, which included Worcestershire County Council's Historic Environment and Historic Landscape officers. Serious consideration was given to the historic environment and heritage assets in developing the approach set out in the Third Stage Consultation.</p> <p>Appendix 3 states that "Defining the boundaries of the strategic corridors based on landscape character is... considered an appropriate mechanism for addressing the historic environment at a landscape scale. <i>Worcestershire's Historic Landscape Characterisation</i> has been used to verify the validity of this approach but has not directly informed the boundaries of the strategic corridors. Other data was considered in relation to the historic environment, including distribution of designated and non-designated assets. This was not considered meaningful at a landscape-scale due to the variation in type, age and importance of assets across wider areas and the fact that a lack of recorded assets in an area does not necessarily mean that assets are not present."</p> <p>The approach in the Third Stage Consultation was to set a positive framework of priorities at the strategic level and to address particular constraints through policy criteria for consideration on a site-by-site basis through the Development Management policies (including Policy MLP 23 on the Historic Environment).</p> <p>Further discussion with Historic England on this matter would be welcome to ensure the</p>

Consultee comments	Initial Officer response
<p>where wetland habitats would not have been a feature of the historic landscape.</p> <p>Table 5.1 further states that there could be positive contributions for the historic environment through all elements of the policy and yet there is minimal evidence to support this. Is there any evidence to state that the creation of wetland habitats would be a positive inclusion of the landscape? It is possible that the restoration of hedgerows, fruit trees etc. could be beneficial, if these were part of the historic landscape etc.</p> <p>The diagram on page 107 incorporates important elements of the historic environment which are key considerations for the strategic corridors. We support the recognition of these elements; however, in its current form it is not clear that the historic environment is a key consideration of the strategic corridors policies. The landscape character criterion is cited as the primary indicator, in its current form it is the only indicator.</p> <p>We are aware that the Local Authority has tried to fully integrate the historic environment into this approach and has worked with local archaeology officers to overcome the limitations of the Plan and we welcome this approach. We would be happy to work with the Local Authority to gain some improvements for the historic environment within the approach and specific text.</p>	<p>approach is robust.</p>
<b>E048-719 Environment Agency</b>	
<p>Policy MLP2 to MLP6 sets out the policy requirements that proposals in each 'strategic corridor' need to meet. This policy framework underpins the delivery of mineral sites within the WMLP and we are therefore pleased to see reference to the flood betterment and water quality improvements within the policy priorities. We consider that the policy guidance should be strengthened further by placing a requirement on developers to deliver and seek opportunities for flood risk betterment. Such flood risk management measures should be developed in conjunction with wider Risk Management Authorities, thereby ensuring the benefits can be fully explored and capitalised upon in a partnership approach.</p>	<p>Support noted. Policy MLP 22 includes requirements for all proposals to "avoid increasing flood risk to people and property" and to "optimise gains for the water environment". Changes will be considered to strengthen this concept within policy MLP 22 as well as within the Strategic Corridors as appropriate.</p> <p>Further discussion with the Environment Agency on this matter would be welcome to ensure the approach is robust.</p>
<b>Water Framework Directive (WFD)</b>	We note and recognise your concerns over the

Consultee comments	Initial Officer response
<p>The MLP does not adequately include or seek to align with the objectives of the WFD. We recommend greater inclusion of the WFD throughout the WLP and embed its objectives as a GI function, within MLP objectives and within Development Management policies. As we have raised in previous correspondence, it is important that the WFD and the Severn RBMP form part of the wider evidence base for the plan. For information, a more user friendly way of interpreting the data has been published on line: our 'Catchment Data Explorer' (CDE) tool. This is a web application designed to enable our customers to explore information about catchments and the water bodies in them. The data it uses is published as linked data, an open format designed for reuse by anyone. Users can view the data in the application, and download it in CSV format. CDE is produced by an external company on behalf of the Environment Agency. Most of the data is sourced from our Catchment Planning System and the text summaries and photos are extracts taken from Catchment Summaries. CDE can be accessed here:  <a href="http://environment.data.gov.uk/catchment-planning/">http://environment.data.gov.uk/catchment-planning/</a></p> <p>Local level actions and decision making can help secure improvements to the water environment. This is widely known as the 'catchment-based approach' and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:</p> <ul style="list-style-type: none"> <li>• deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and</li> <li>• to encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.</li> </ul> <p>The headline issues in each catchment should provide useful context for each strategic corridor and contribute to the wider spatial portrait. The WFD data/headline issues could be included for each allocation.</p>	<p>lack of emphasis for the objectives of the Water Framework Directive in the plan as a whole, and in the Strategic Corridor priorities in policies MLP 2 to MLP 6.</p> <p>The priorities were developed in discussion with members of the Minerals and Green Infrastructure working group under the Worcestershire Green Infrastructure Partnership. Unfortunately, the Environment Agency were not resourced to attend the meetings of this group during the development of the Third Stage Consultation. Serious consideration was given to the water environment in developing the approach set out in the Third Stage Consultation, although it is recognised that there may be scope for the approach to be strengthened.</p> <p>Consideration will be given to the information you reference in your response, but further discussion with the Environment Agency on this matter would be welcome to ensure the approach is robust.</p>
<b>E049-683/1077/2279 South Worcestershire Councils</b>	
<p>Clarification and confirmation that for any mineral development proposals in the so called Strategic Corridors would still have to broadly</p>	<p>As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional</p>



Consultee comments	Initial Officer response
satisfy the generic MLP policies and other material considerations including South Worcestershire Development Plan policies.	and local policies", as such the Council does not consider it necessary to make additions to policies MLP 1 to MLP 6 to address this point.
<b>E050-1971L Wyre Forest District Council</b>	
Policy MLP.5 – North West Worcestershire Strategic Corridor – whilst there is general support for this approach; WCC should take into account that planning applications for mineral development within these areas will also be subject to Green Belt policies.	<p>Paragraph 5.32 of the <i>Minerals Local Plan Third Stage Consultation</i> states that:</p> <p>"Mineral extraction is not inappropriate in the Green Belt provided the openness of the Green Belt is preserved and there is no conflict with the purposes of including land in the Green Belt. However associated buildings and infrastructure may be inappropriate. Any proposals would need to be assessed against relevant national and local Green Belt policy."</p> <p>Consideration will be given to whether other parts of the development plan adequately address the issues raised or whether Green Belt policy should be strengthened in the Minerals Local Plan.</p>

**Q5.10 Would you support the development of Supplementary Planning Documents that “masterplan” the green infrastructure components of specific sites and preferred areas?**

Please indicate whether you represent an organisation, are a minerals operator, or are a member of a local community who could assist with providing the level of information required.

Yes: 5	No: 0	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean	None	None	E007-2452: Mr N Dean
E026-813: Worcestershire Wildlife Trust			E026-813: Worcestershire Wildlife Trust
E034-1970: Worcestershire County Council, Landscape Advisor			E034-1970: Worcestershire County Council, Landscape Advisor
E041-717 Natural England			E041-717 Natural England
			E056-1782L: RSPB

## Comments

Consultee comments	Initial Officer response
<b>E007-2452 Mr N Dean</b>	
Private citizen, none of the above.	Noted.
<b>E026-813 Worcestershire Wildlife Trust</b>	
This response is submitted on behalf of Worcestershire Wildlife Trust. We would welcome the opportunity to assist in developing SPDs in the form of Green Infrastructure strategies for any of the sites or preferred areas brought forward through the mineral plan.	Support noted.
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
Through the Green Infrastructure Partnership and Task and Finish Working Group.	Support noted.
<b>E041-717 Natural England</b>	
We may be able to provide assistance on this depending on resources.	Support noted.
<b>E056-1782L: RSPB</b>	
<p>The RSPB would strongly support the development of 'masterplan' Supplementary Planning Documents (SPDs). As outlined in response to Q3.1, above, we have helped to develop a 'masterplan' approach for a cluster of sites in the Nottinghamshire section of the Trent Valley, culminating in the production of the 'Newark to South Clifton Concept Plan'. This approach has been endorsed by the relevant mineral operators, the Mineral Planning Authority (Nottinghamshire County Council) and other stakeholders, including regulatory bodies and conservation sector organisations.</p> <p>Where a 'masterplan' approach is applied to a cluster of (existing and / or allocated) mineral sites, it provides an opportunity for the cluster of sites to collectively deliver more than they would individually (i.e. the whole will be greater than the sum of its parts).</p> <p>There are a number of good examples from around the country of developing a 'masterplan' approach and / or identifying habitat creation opportunities including:</p> <ul style="list-style-type: none"> <li>• Block Fen / Langwood Fen Master Plan SPD (Cambridgeshire County Council, 2011)</li> <li>• Restoration of Allocated Sites in Northamptonshire: an assessment of the opportunities for habitat creation (Northamptonshire County Council, 2013)</li> <li>• Mineral Site Restoration for Biodiversity SPD (Essex County Council, 2016)</li> </ul>	Support noted. These examples will be considered if the Council decides to develop SPDs.

Consultee comments	Initial Officer response
These might be useful references when developing a 'masterplan' approach in Worcestershire.	

## Chapter 6: Steady and adequate supply of mineral resources

### Q6.1 Contribution of substitute, secondary and recycled materials and mineral wastes to overall minerals supply

- a) *Does Policy MLP 7 provide an appropriate and justified approach to the contribution of substitute, secondary and recycled materials and mineral wastes to overall minerals supply?*

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E013-802 Malvern Hills AONB Unit  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E013-802 Malvern Hills AONB Unit  E033-683/1077/2279 South Worcestershire Councils  E034-1970: Worcestershire County Council, Landscape Advisor  E049-683/1077/2279 South Worcestershire Councils

- b) *Does Policy MLP 7 and the reasoned justification contribute towards the achievement of the Vision, Objectives and Spatial Strategy?*

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E013-802 Malvern Hills AONB Unit  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor	None	E019-2459 Wildmoor Residents' Association	E013-802 Malvern Hills AONB Unit

Yes: 5	No: 0	Don't know: 1	Written responses (see below)
E041-717 Natural England			

c) *Does Policy MLP 7 and the reasoned justification provide sufficient clarity as to how the policy would be applied?*

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E033-683/1077/2279 South Worcestershire Councils  E049-683/1077/2279 South Worcestershire Councils

### *Comments on Policy MLP 7*

Consultee comments	Initial Officer response
<b>E013-802 Malvern Hills AONB Unit</b>	
The need for local stone to support heritage building repair and appropriate development in the area is recognised in the AONB Management Plan.	Noted.
We agree that MLP 7 should be regarded as an enabling policy rather than one linked to targets.	Support Noted.
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
Given the large contribution that substitute, secondary and recycled materials can make to reducing the need for primary minerals, it is suggested that a more proactive approach to identifying facilities to manage or process secondary and recycled materials would be helpful.  To reduce adverse impacts on the health or quality of life of residents and businesses it is suggested that Policy MLP7 encourage developers to recycle and re-use construction waste on-site and use substitute, secondary and recycled minerals within the development, as proposed in Policy SWDP32. Applying this	As stated in paragraph 2.33 "A significant amount of recycled aggregates are produced in Worcestershire from the management of construction and demolition waste (C&D waste). This could provide up to 420,000 tonnes of recycled aggregates per year." Consideration will be given to whether support for facilities to manage substitute, secondary and recycled materials can be strengthened. Proposals for additional capacity would need to be determined against policies in the Waste Core Strategy.  Consideration will be given to the relationship between Policy MLP 7 and SWDP32.

<b>Consultee comments</b>	<b>Initial Officer response</b>
principle more widely, it is suggested that the Minerals Local Plan encourage rock to be crushed at source rather than where it is to be utilised.	
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
6.6 I support the initiative to promote the re-use of materials through Neighbourhood Development Planning. However, there will need to be an appropriate and accessible level of support and, at least, guidance for NDP communities producing plans. The MLP should consider how this might be facilitated and, probably as a separate exercise, set out an outline framework to develop guidance.	Noted. Currently the County Council comments on the development of Neighbourhood Plans, and the Minerals and Waste Planning Policy team feed in to this process.
<b>E049-683/1077/2279 South Worcestershire Councils</b>	
That given the paucity of viable rock reserves in Worcestershire that greater use of recycled and secondary aggregates should be promoted.	As stated in paragraph 2.33 "A significant amount of recycled aggregates are produced in Worcestershire from the management of construction and demolition waste (C&D waste). This could provide up to 420,000 tonnes of recycled aggregates per year." Consideration will be given to whether support for facilities to manage substitute, secondary and recycled materials can be strengthened.

### Q6.2 Aggregate supply

a) *Do Policies MLP 8 and MLP 9 provide an appropriate and justified approach to the steady and adequate supply of aggregates?*

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know: 3</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E041-717 Natural England	None	E013-802 Malvern Hills AONB Unit  E019-2459 Wildmoor Residents' Association  E026-813: Worcestershire Wildlife Trust	E012-2457 RAGE  E013-802 Malvern Hills AONB Unit  E020-2460 Mineral Products Association  E025-1793 CEMEX  E026-813 Worcestershire Wildlife Trust  E032-1504 Heaton Planning on behalf of Tarmac  E036-2277

Yes: 2	No: 0	Don't know: 3	Written responses (see below)
			<p>Staffordshire County Council</p> <p>E038-2359 Warwickshire County Council</p> <p>E043-2185L Gloucestershire County Council</p> <p>E044-2464 South Gloucestershire Council</p> <p>E052-1234L Twynning Parish Council</p>

Consultee comments	Initial Officer response
<b>E012-2457 RAGE</b>	
<p><b>Analysis of current stocks of sand and gravel.</b></p> <p>There are several pieces of what appear to be conflicting information in the Background Documentation and the Third Stage Consultation regarding what stocks of material are currently available in Worcestershire. It is obviously important that this data is correct as it forms the initial starting point for the plan. In the Third Stage Consultation in section 6.19 on page 116 there is a quoted figure of 1.41 - 1.48 years stock at a usage rate of 0.637 million tonnes per year. This equates to reserves of between 0.726 and 0.943 million tonnes although the document actually quotes a different figure of 0.895 million tonnes for the lower value.</p> <p>These figures are derived from the 2016 Worcestershire Local Aggregates Assessment and are the situation in December 2015. The figures seem curiously low.</p> <p>If you go back a further two years to the 2013 Worcestershire Local Aggregates Assessment the situation is quite a contrast. In that document the reserves are quoted as follows: Currently - June 2013 - 4.49 years at a projected rate of 0.871 usage per year - equating to a reserve of 3.91 million tonnes.(Section 1.6 on page 3).</p>	<p>The information on Worcestershire's stocks of permitted sand and gravel reserves given on page 116 of the Third Stage Consultation Document is derived from the 2016 Local Aggregates Assessment which is based on data up to 31<sup>st</sup> December 2015. That document sets out the methods used to derive these figures and can be viewed at <a href="http://www.worcestershire.gov.uk/AMR">www.worcestershire.gov.uk/AMR</a>. The stock of permitted sand and gravel reserves at the end of 2015 was between 0.895-0.945 million tonnes.</p> <p>We are not clear how your figure of 0.726 million tonnes has been derived, but have checked the figures in the Third Stage Consultation and believe that 0.895-0.945 million tonnes of reserves at 0.637 million tonnes per year equates to the quoted 1.41-1.48 years landbank.</p> <p>The 2013 Local Aggregates Assessment (LAA) was based on permitted reserves data up to 2010, with Table 5.2 on page 22 showing a landbank of 4.49 years at 2010. The 2014 LAA included data up to 2011, with Figure 14 on page 23 showing a landbank of 4.42 years at 2011.</p> <p>This means that there is a period of 5 years between the data used in the 2013 LAA (2010</p>

Consultee comments	Initial Officer response
<p>So in a period of two and a half years the stocks have been depleted by at least 2.967 million tonnes. This seems impossible at the extraction rates noted elsewhere for the period in question. These are typically around an average of 0.572 million tonnes per year which equates to around 1.43 million tonnes. So it would appear that at the latest rate of supply around 3 years of supply bank has disappeared. Where has it gone? If the 2013 assessment is correct the 2016 version should state something like 4 years of supply currently in reserves.</p> <p>We think some further analysis is required by WCC to establish which figures are the correct ones and what is the cause of the apparent discrepancy. We can only presume that the missing reserves are those held in 'inactive sites' - but if that is the case they are still reserves that can be counted and exploited. Otherwise if all the current producers closed their businesses the plan would say there are no reserves at all which is a major distortion of reality. We also find it hard to follow exactly what reserves are being included in the plan. There are current planning applications at for instance Strensham but none of these reserves are identified.</p> <p>1. We think the current bank of sand and gravel needs to be investigated further - it appears to be underestimated.  2. The projected markets for the material appear not to be fully understood and the long term requirements have been set too high.</p>	<p>data) and that used in the 2016 LAA (2015 data). The landbank has decreased by approximately 3 years from the estimated 4.49 years to estimated 1.41-1.48 years over that time as the permitted reserves have been used more slowly than was anticipated in the 2013 LAA methodology (which assumed consumption at the former Regional Apportionment rate of 0.871 million tonnes per year).</p> <p>The 2016 LAA was a fully refreshed document (permitted reserves at 31<sup>st</sup> December 2015), using the most up to date data possible, and taking account of new guidance, consultation responses and regional discussions. It is hoped that the structure and information in the 2016 LAA is much clearer and easier to interpret, and that comparison with future iterations will be accomplished more easily.</p> <p>Permitted reserves in 'inactive sites' are counted within the permitted reserves stated in the 2016 LAA, and the document notes in paragraph 5.25 that "<i>permitted reserves contained within sites classed as "inactive" in 2015 account for approximately 22% of [the permitted] reserves</i>". The sites whose reserves have been taken into account are detailed in the 2016 LAA in Table 3 on page 17. Consideration will be given to whether this can be made clearer within the Minerals Local Plan itself. Potential reserves in pending planning applications are not taken into account, as they do not benefit from planning permission and would falsely inflate the landbank figures when it is possible that planning permission may not be granted.</p> <p>The balance of demand and supply factors is fully considered in the 2016 LAA in line with the latest national guidance. Long term requirements set out in the Third Stage Consultation are based on the Annual Production Guideline established in that document. However, the LAA will be updated with data up to the end of 2016 over the coming months, and this will take account of the planning permissions which were granted during 2016. Consideration will be given to updating the baseline year of the Minerals Local Plan to reflect this updated data.</p>
<b>E013-802 Malvern Hills AONB Unit</b>	
We have a concern that Policy 9, in isolation,	As set out in paragraph 1.17 "The Minerals

Consultee comments	Initial Officer response
<p>makes no reference to the importance of conserving nationally important environmental assets when considering the suitability of proposals for winning crushed rock.</p>	<p>Local Plan should be read as a whole and alongside relevant European, national, regional and local policies", as such the Council does not consider it necessary to make additions to policy MLP 9 to address this point.</p>
<b>E020-2460 Mineral Products Association</b>	
<p><b>Policy MLP8</b>; The two bullet points under a) need rewording as follows;</p> <ul style="list-style-type: none"> <li>• <b>Phase 1 (2016-2025):</b> <i>Increasing landbanks of permitted sand and gravel reserves as quickly as possible and subsequently maintain them at a <del>minimum of level of at least of</del> 7 years.</i></li> <li>• <b>Phase2 (2026-2035 and beyond):</b> <i>Maintaining landbanks of permitted sand and gravel reserves at a level of at <del>minimum of least</del> 7 years up to and beyond the Plan period.</i></li> </ul> <p>The change in wording properly reflects the requirements of NPPF in respect of landbanks. Furthermore the use of the word minimum implies that it is appropriate to plan for the minimum whereas National Policy /Guidance make it clear that there is no maximum when it comes to landbanks.</p>	<p>These changes will be considered in order to improve the clarity of the policy and consistency with the NPPF.</p>
<b>E025-1793 CEMEX</b>	
<p><b>Policy MLP8</b> ; The two bullet points under a) need rewording as follows;</p> <ul style="list-style-type: none"> <li>• <b>Phase 1 (2016-2025):</b> <i>Increasing landbanks of permitted sand and gravel reserves as quickly as possible and subsequently maintain them <del>minimum of level of at least of</del> 7 years.</i></li> <li>• <b>Phase2 (2026-2035 and beyond):</b> <i>Maintaining landbanks of permitted sand and gravel reserves at a level of at <del>minimum of least</del> 7 years up to and beyond the Plan period.</i></li> </ul> <p>The change in wording properly reflects the requirements of NPPF in respect of landbanks. Furthermore the use of the word minimum implies that it is appropriate to plan for the minimum whereas National Policy /Guidance make it clear that there is no maximum when it comes to landbanks.</p>	<p>These changes will be considered in order to improve the clarity of the policy and consistency with the NPPF.</p>
<b>E026-813 Worcestershire Wildlife Trust</b>	
<p>The wording of the policies appears sound but the subject is outside our area of expertise.</p>	<p>Noted.</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	



<b>Consultee comments</b>	<b>Initial Officer response</b>
<p>Policy MLP 8 highlights the lack of permitted reserves within Worcestershire. Para 6.19 states:            Permitted reserves = 1.41 to 1.48 years at 0.637mtpa            To reach a 7 yr landbank – 3.514 to 3.564mt            To maintain a 7yr landbank to 2035 and beyond – 16.254 to 16.304mt</p> <p>Para 6.21 states that the specific sites and preferred areas provide a potential of 6.15mt, therefore 10.104 to 10.154mt will be needed from windfall sites within Strategic Corridors. We question the soundness of the Plan with such a shortfall and a reliance on windfall sites. For a Plan to be sound it must be deliverable and there is no clear strategy for delivering the landbank throughout the Plan period. There will be a reliance on imports and there is no clear assessment of what impact this may have upon neighbouring mineral authorities.</p>	<p>Concerns noted. An additional fourth call for sites will be undertaken in 2017 to further address this issue. The Strategic Corridors have been identified as areas of search to try to enable windfall sites to be brought forward in a sustainable manner within Worcestershire. Consideration will be given to whether further assessment is needed with regard to potential impacts if this does not occur.</p>
<b>E036-2277 Staffordshire County Council</b>	
<p>Policy MLP 8 is consistent with national policy in that the draft Plan aims to provide a steady and adequate supply of sand and gravel by maintaining a minimum 7 year landbank. It is considered, however, that the policy should state the level of provision to be made over the plan period i.e. 0.637 million tonnes based on the 10 year (2006 – 2015) or 8 years (2006 – 2015 not including 2012 and 2013 figures) sales average as assessed in the LAA.</p> <p>The policy should also state how that provision is to be made over the 18 years of the Plan period based on permitted reserves, the allocated specific/ preferred sites and windfall sites within the strategic corridors.</p>	<p>Worcestershire County Council recognises that many Minerals Local Plans include an annual provision figure within policy, and considers that this was a sensible approach when plans were based on a set "annual apportionment" figure which the plan should seek to achieve. However, the latest national requirements and guidance are for a Local Aggregates Assessment (LAA) to be prepared and updated annually. As the LAA takes into account a rolling average of 10-years sales data, other relevant local information, an analysis of supply options, and an assessment of the balance between demand and supply, the resulting "Annual Production Guideline" will inevitably vary from year to year.</p> <p>The Council therefore considers that inclusion of an annual supply figure within the policy itself would become out of date almost immediately. In addition, the Minerals Local Plan is not able to control whether a particular amount of mineral is extracted and sold in any particular year, but it can ensure that a steady and adequate supply is enabled through site allocations and enabling planning permissions for a sufficient landbank of reserves to be maintained. It is considered that the policy will be more robust if it seeks to provide an adequate supply by achieving (and maintaining), at least a 7 year landbank rather</p>

Consultee comments	Initial Officer response
	<p>than seeking an annual provision figure. This would also enable annual supply to be increased if the adopted but out-dated Minerals Local Plan has been responsible for artificially suppressing supply, or if market demands increase.</p> <p>Although the Annual Production Guideline from the 2016 LAA has been used as the basis for the plan to estimate the likely level of sand and gravel resource Worcestershire is likely to need to provide, the Reasoned Justification in paragraph 6.18 notes that the annual guideline figure is likely to change as the LAA is updated. A monitoring mechanism has been included in Chapter 9 (monitoring indicator 5) to capture whether any fluctuations are significant enough to have implications for the plan and to enable action to be taken if required.</p> <p>Paragraph 5.6 states "The steady and adequate supply of minerals in Worcestershire will be delivered through:</p> <ul style="list-style-type: none"> <li>• the county's existing mineral sites with remaining permitted reserves,</li> <li>• the three specific sites and two preferred areas which are identified within the strategic corridors, and</li> <li>• windfall sites in the strategic corridors which may be brought forward over the life of the plan." <p>This will be implemented through Policy MLP 1. It is therefore not considered necessary to make changes to policy MLP 8 to refer to permitted sites, allocated sites and windfall sites.</p> </li></ul>
<b>E038-2359 Warwickshire County Council</b>	
<p>We recognise Worcestershire's position in relation to crushed rock and welcome Policy MLP9 that supports proposals of crushed rock working during the plan period.</p>	<p>Supported noted. Worcestershire County Council welcomes continued engagement with regard to this issue.</p>
<b>E043-2185L Gloucestershire County Council</b>	
<p>We note that there are no strategic corridor or preferred area allocations for crushed rock working in Worcestershire. We recognise that there has been no working of this resource for some years now or mineral operator interest within the county for crushed rock and that making provision based upon a 10 year sales average in accordance with the NPPF has resulted in a production figure of zero. This has been an ongoing issue for Worcestershire and Gloucestershire has been engaged with</p>	<p>Support noted. Worcestershire County Council welcomes continued engagement with regard to this issue.</p>

Consultee comments	Initial Officer response
<p>previous discussions involving the respective aggregates working parties for our two authorities. Consequently, we support emerging policy MLP9 for Steady and adequate supply of crushed rock that would allow for crushed rock working in Worcestershire to be re-activated in the future should the circumstances change.</p>	
<b>E044-2464 South Gloucestershire Council</b>	
<p>Thank you for consulting South Gloucestershire Council regarding Worcestershire’s Minerals Local Plan Third Stage consultation, which has been prepared as part of the process of replacing current minerals planning policy in the county.</p> <p>It is noted that the Plan is being prepared within the context of Government requirements for the planned provision of aggregates/ minerals, management of waste and environmental protection, and the Council is very much supportive of the long term vision for mineral development within the County to 2035 and beyond, and the focus on the mineral resources which are most prevalent in Worcestershire.</p> <p>South Gloucestershire recognises the issues regarding accessing crushed rock resources within Worcestershire – the majority of which are within either the Cotswolds AONB or the Malvern Hills AONB (99.5%), and 15 % is within 2.5km of the Bredon Hill SAC, which is afforded a the highest level of protection through European law. The Council also notes that, in addition to (and likely to be partly as a result of) these issues, there has been very limited market interest in crushed rock working in recent years within the County, and that no sites have been submitted through the ‘call for sites’ undertaken previously.</p> <p>With the above in mind, the Council is pleased to note that the Plan reflects the approach to crushed rock provision that was discussed between officers of our respective councils along with colleagues in Gloucestershire County Council. This approach, which was informed by constructive, active engagement between officers of our respective councils along with colleagues in Gloucestershire County Council, and is considered to be both sensible and pragmatic, reflecting that Worcestershire has no permitted reserves, no productive capacity and</p>	<p>Noted. Worcestershire County Council welcomes continued engagement with regard to this issue.</p>

Consultee comments	Initial Officer response
<p>no landbank for crushed rock.</p> <p>It is also noted that the engagement referred to is fully and accurately documented in the 'Crushed rock supply in Worcestershire DTC' paper (September 2016) presented as part of the evidence base in support of the Plan.</p> <p>I have no further comments to make at this stage but would welcome the opportunity to continue to engage with the County Council on an ongoing basis, as appropriate.</p>	
<b>E052-1234L Twynning Parish Council</b>	
<p>We fully appreciate the need to stock landbanks in order to meet future requirements, but the projected volume figures as given are clearly misleading.</p>	<p>The information on Worcestershire's stocks of permitted sand and gravel reserves given on page 116 of the Third Stage Consultation Document is derived from the 2016 Local Aggregates Assessment (LAA) which is based on data up to 31<sup>st</sup> December 2015. That document sets out the methods used to derive these figures and can be viewed at <a href="http://www.worcestershire.gov.uk/AMR">www.worcestershire.gov.uk/AMR</a>. The stock of permitted sand and gravel reserves at the end of 2015 was between 0.895-0.945 million tonnes.</p> <p>The 2016 LAA reflects the latest national requirements and guidance, taking into account a rolling average of 10-years sales data, other relevant local information, an analysis of supply options, and an assessment of the balance between demand and supply. This assessment led to an Annual Production Guideline set out in the 2016 LAA of 0.637 million tonnes per year. If the remaining permitted reserves are used at this rate, this equates to the quoted 1.41-1.48 years landbank.</p> <p>The 2016 LAA was a fully refreshed document (permitted reserves at 31<sup>st</sup> December 2015), using the most up to date data possible, and taking account of new guidance, consultation responses and regional discussions. It is hoped that the structure and information in the 2016 LAA is much clearer and easier to interpret than previous LAAs, and that comparison with future iterations will be accomplished more easily. The LAA will be updated with data up to the end of 2016 over the coming months, and this will take account of the planning permissions which were granted during 2016. Consideration will be given to updating the baseline year of the Minerals</p>

Consultee comments	Initial Officer response
	Local Plan to reflect this updated data.

*b) Do you agree with the proposed phasing for increasing and maintaining the sand and gravel landbank?*

Yes: 3	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E026-813: Worcestershire Wildlife Trust  E041-717 Natural England	None	E013-802 Malvern Hills AONB Unit  E019-2459 Wildmoor Residents' Association	E012-2457 RAGE  E036-2277 Staffordshire County Council  E038-2359 Warwickshire County Council

Consultee comments	Initial Officer response
<b>E012-2457 RAGE</b>	
<p><b>Projected volumes required of sand and gravel.</b></p> <p>There are three aspects to this requirement. Firstly it is our understanding that the 7 years figure is an aspiration not a target and we believe WCC have acknowledged this fact. We also thought it applied to the balance of supply and demand within the County. When you look at the figures in the various documentation there is a situation - as follows:</p> <p>There are statements that Worcestershire is a net exporter of sand and gravel. In the 2015 Background Document in section 4.19 on page 16 there is a note that in 2009 a figure of 58,000 tonnes of sand and gravel were exported from the County - this may be a net figure although it isn't stated as such. In table 3.5 on page 16 of the Local Aggregates Assessment 2013 the 58,000 tonnes is quoted as an import figure not an export figure. The exports are quoted as 104,000 tonnes. However in Table 3.3 there is a figure of total export sales of land won sand and gravel of 114,000 tonnes. All for 2009. The figures in the Third Stage Consultation shown in Figure 2.7 on page 24 show the 58,000/104,000 tonnes. The amount extracted from the ground in Worcestershire that year is about 520,000 tonnes from Figure 5 on page 16 of the 2015 Background Document.</p> <p>This is all very confusing as some of the figures</p>	<p>NPPF requires local planning authorities to make provision for the maintenance of landbanks of <u>at least</u> 7 years for sand and gravel and <u>at least</u> 10 years for crushed rock (paragraph 145). It should therefore be considered a minimum requirement, not a maximum target. Changes will be made to ensure this is stated more clearly.</p> <p>The data on imports and exports of aggregate minerals on page 24 of the Third Stage Consultation was based on the Department for Communities and Local Government report "Collation of the results of the 2009 aggregate minerals survey for England and Wales" (published 2011). An update to this report (2014 data) was published late in 2016, after the Third Stage Consultation document had been finalised for printing.</p> <p>To help clarify the import/export figures from that document, the "Collation of the results of the 2009 aggregate minerals survey for England and Wales" shows that in 2009:</p> <ul style="list-style-type: none"> <li>• 114,000 tonnes of sand and gravel produced in Worcestershire was also sold in Worcestershire (Table 9f)</li> <li>• 104,000 tonnes of sand and gravel produced in Worcestershire was exported to the West Midlands or elsewhere (Table 9f)</li> </ul>


Consultee comments	Initial Officer response
<p>must be wrong. It would seem that a net export of 46,000 tonnes is taking place and one could argue this shouldn't be included in the 7 year material bank plans for Worcestershire - it is close to 10% of the volume requirements.</p>	<ul style="list-style-type: none"> <li>• 58,000 tonnes of sand and gravel were imported into Worcestershire (consisting of land-won and marine sand and gravel) (Table 10)</li> <li>• This resulted in a net consumption of 172,000 tonnes of sand and gravel within Worcestershire (Table 11), and a net export of 46,000 tonnes of sand and gravel.</li> </ul> <p>However, 192,000 tonnes of crushed rock was also imported and consumed in Worcestershire (Table 11), and none was produced in the county (Table 9f). This means that overall, Worcestershire was a net-importer of 146,000 tonnes of aggregate (sand, gravel and crushed rock) in 2009.</p> <p>National policy requires the mineral planning authority to plan for a steady and adequate supply of aggregate minerals within the national "Managed Aggregate Supply System" (MASS). This system helps to handle the significant geographical imbalances in the occurrence of suitable natural aggregate resources, and the areas where they are most needed. It requires mineral planning authorities which have adequate resources of aggregates to make an appropriate contribution to national as well as local supply, while making due allowance for the need to control any environmental damage to an acceptable level. It would therefore not be appropriate to exclude the figures for exported sand and gravel when planning for future requirements, particularly when the county is reliant on imports to meet its demand for crushed rock due to the significant environmental constraints on its crushed rock resources.</p> <p>However, we have looked in to the inconsistencies you have highlighted between the figures given in the Third Stage Consultation and that shown in the Sand and Gravel in Worcestershire background document. This appears to be caused by inconsistencies in the source data between:</p> <ul style="list-style-type: none"> <li>• the Department for Communities and Local Government Collation of the</li> </ul>

Consultee comments	Initial Officer response
	<p>results of aggregate minerals survey for England and Wales 2009 and 2014,<sup>3</sup></p> <ul style="list-style-type: none"> <li>• the Department for Communities and Local Government reports "Minerals extraction in Great Britain" (sometimes known as the Annual Minerals Raised Inquiry)<sup>4</sup>, and</li> <li>• the West Midlands Aggregate Working Party's Annual Reports<sup>5</sup></li> </ul> <p>These inconsistencies have been investigated by Worcestershire County Council and the West Midlands Aggregates Working Party following your comments to ensure the data is accurate and correctly interpreted, and discussion with the authors of the <i>Collation of the results of aggregate minerals survey 2009 and 2014</i> has revealed that the information does not represent a complete dataset from all mineral operators. Following this investigation, the background document "Sand and Gravel in Worcestershire" will be updated to ensure it uses the most accurate and most up to date data possible. The next Local Aggregates Assessment will also take the issues with this data into account and significant caution will be applied in relying on the import/exports data and this will be reflected in the next version of the Minerals Local Plan. Thank you for highlighting these issues, and we apologise for the confusion caused.</p>
<p>The second point is that Nationally some 29% of the requirements for sand and gravel come from secondary or recycled material. The data for Worcestershire indicates this source of material at 0%. Is that a sustainable situation when the countryside is being exploited for a finite resource? Doesn't the County have any plans or aspirations to promote a more sustainable model? If such material were used the identified reserves would last much longer and less material would be mined each year.</p>	<p>Paragraph 2.33 of the Third Stage Consultation document states that "A significant amount of recycled aggregates are produced in Worcestershire from the management of construction and demolition waste (C&amp;D waste). This could provide up to 420,000 tonnes of recycled aggregates per year... The Waste Core Strategy sets targets for capacity at static plant, but due to data limitations it is not possible to monitor the role of mobile plant" and paragraph 6.8 states that "The Mineral Planning Authority is aware of the widespread use of mobile recycling plant for construction and demolition waste for highway maintenance and at building and development sites but there is no data available to indicate the level of contribution to sustainable mineral supply that</p>

<sup>3</sup> Available at <https://www.gov.uk/government/collections/minerals>

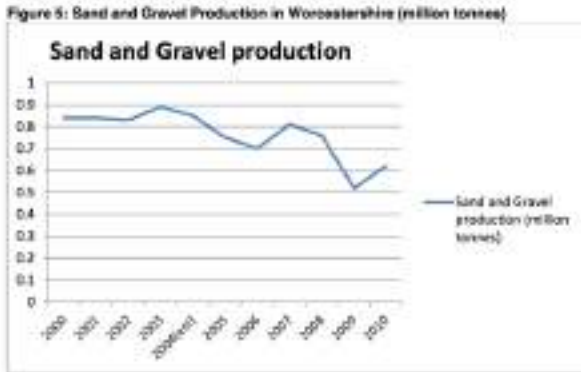
<sup>4</sup> Available at <https://www.gov.uk/government/collections/minerals>

<sup>5</sup> Available at <https://www.gov.uk/government/collections/aggregates-working-parties-annual-reports>

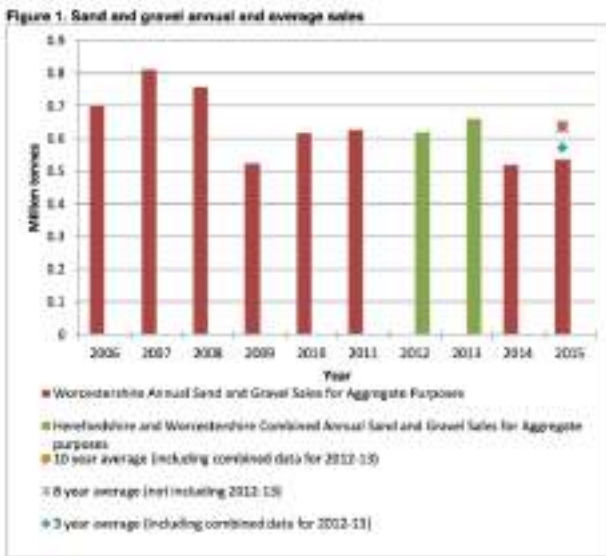
Consultee comments	Initial Officer response
	<p>these make."</p> <p>However, section 3 of the 2016 Local Aggregates Assessment considers the contribution of recycled and secondary materials in overall aggregate supply. It states that there is no evidence to indicate whether Worcestershire is likely to produce any more or any less secondary and recycled material than the national average. However, evidence from the minerals industry indicates that secondary and recycled materials are often much cheaper than primary materials and thus favoured where specifications can accommodate them. The contribution of substitute, secondary and recycled materials is therefore assumed to be accounted for in overall supply prior to considering the sales figures for primary aggregates. Consideration will be given to making this assumption clearer within the Minerals Local Plan itself.</p> <p>Policy MLP 7 is also intended to give support to increasing the contribution of substitute, secondary and recycled materials and mineral waste to overall minerals supply. Consideration will be given to whether this can be strengthened within the Minerals Local Plan.</p>
<p>Thirdly there is the subject of what the annual production figure should be for sand and gravel. There are various figures put forward and various scenarios that seek to justify them. In our opinion all of them are too high. It has been said that the major reason for the decline in the market for the materials was the economic problems around 2008/2009. That can't be the reason. Here are two charts from the 2015 Background document:</p> <p>Figure 4: Sand and gravel sales: Herefordshire and Worcestershire, 1973-2009 (million tonnes)</p>  <p>Source: West Midlands Regional Aggregate Working Party Annual Reports  * Figures derived from Office of National Statistics (2012) West Midlands Regional Aggregates Working Party  † Data includes estimates due to difficulties in data collection and noted in reports for later regional sales.  * Missing data (not available in RANP report)</p>	<p>The annual production guideline is established through the production of a Local Aggregate Assessment (LAA). The 2016 LAA was a fully refreshed document which took into account:</p> <ul style="list-style-type: none"> <li>• The requirements of the National Planning Policy Framework and National Planning Practice Guidance</li> <li>• Ongoing discussions with the West Midlands and other Aggregate Working Parties on Worcestershire's limited ability to supply crushed rock</li> <li>• Responses to a consultation held in 2015</li> <li>• Practice Guidance on the Production and Use of Local Aggregate Assessments (April 2015) produced by the Minerals Products Association and Planning Officers Society</li> <li>• Regional and national data updates which have been published recently.</li> </ul> <p>The production guideline it established was based on an average of the past 10 years sales</p>



**Consultee comments**



You can see that there is a year to year variability but the long term trend is downwards and has been since the mid-1990s. There is a further chart from the 2016 Background Document showing 2008 and 2009 were a reduction but there has been no significant longer term recovery. If you were to correct 2012 and 2013 in the chart to strip out Herefordshire sales there is still an ongoing downward trend in the figures.



Mention has been made regarding the link with house building and that the latest plans being put forward from Government will increase the market for sand and gravel. We don't believe there is a demonstrable link. The next chart from the 2016 Background Documentation shows this complete disconnect:

**Initial Officer response**

data and other relevant local information, an analysis of supply options, and an assessment of the balance between demand and supply. A draft of the LAA was consulted on with the West Midlands, East Midlands, South West and South Wales Aggregate Working Parties and their comments taken into account.

We note the apparent downward trend in sales, and it was acknowledged that there are a number of weaknesses in reliance on the 10 year average:

"5.8. The 10-year average has a number of weaknesses that make sole reliance on it undesirable:

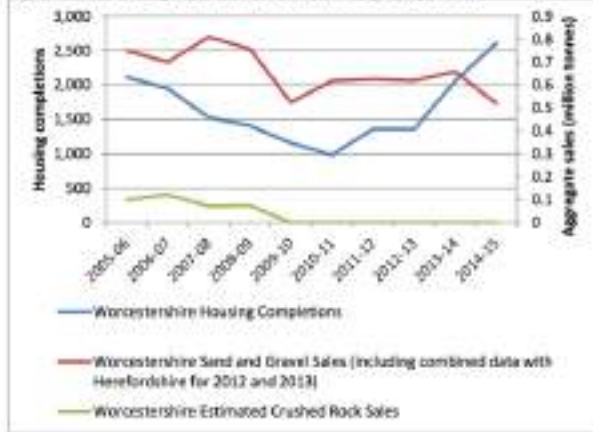
- sales will vary depending on both supply and demand factors in the market, and basing a production guideline on this alone could risk following historical trends rather than meeting future demand;
- it incorporates combined data with Herefordshire which could skew the average;
- it includes data from a period of significant economic downturn and therefore may not represent the demand likely to be experienced as the economy recovers; and
- the adopted Minerals Local Plan was beyond its expected implementation period, with a limited number of Preferred Areas and saved policies, which could have limited operator interest in bringing sites forward in Worcestershire during this time, thereby depressing the annual sales figure."

However, other local information was considered to determine whether the production guideline should be varied (either raised or reduced) from the 10 year average.

This included consideration of the relationship with housing completions and paragraph 5.17 concluded that there is not a direct correlation between housing completions and the level of sand and gravel sales. The estimate that house building may account for between 8% and 25% of aggregate sales is very much an estimate and is acknowledged as such within the LAA,

**Consultee comments**

Figure 2: Sand and gravel sales versus housing completions



This shows the continual long term downward trend - again the 2012 and 2013 figures need Herefordshire stripping out - but it also shows the major increase in housing completions has no effect on the sales of sand and gravel in the county. Indeed you could argue if it did then if house building were to return to 2010 type levels the market for sand and gravel would collapse. Elsewhere there are estimates of house building taking 8 - 25% of the extraction but these appear at best to be a wild guess and there is absolutely nothing to justify that in the figures.

**What seems clear is that the market for sand and gravel is not fully understood and over the period 2016 - 2025 an annual requirement of no more than 0.50 million tonnes per year - and probably less – should be used to calculate the reserves.**

Obviously all this means that current reserves will last much longer than forecast and those sites that have potential problems in terms of mitigation should not be included in the current plan.

**Initial Officer response**

stating in paragraph 5.19 that the estimate of consumption by a typical new house "is a generalisation which should be treated with a degree of caution". Although a significant amount of development is anticipated in Worcestershire, the evidence was not considered robust enough to warrant a deviation from the starting point of the average of the past 10 years sales figure.

The Local Aggregates Assessment has to be produced annually, and any additional evidence will be taken into account should it be available.

**E036-2277 Staffordshire County Council**

There is a current shortfall of reserves to sustain the proposed level of provision. Table 3 in the LAA lists the sand and gravel sites in Worcestershire which have been capable in combination of producing more than half a million tonnes but it is suggested that clarification is provided on how that capacity can be increased and maintained during the Plan period. This would assist in assessing how quickly a 7 year landbank can be achieved. The

Noted. Consideration will be given to this approach.

Consultee comments	Initial Officer response
aim should be to establish a 7 year landbank prior to 2025.	
<b>E038-2359 Warwickshire County Council</b>	
<p>Warwickshire County Council (Minerals Planning Authority) are concerned that Phase 2 with its reliance on windfall sites may not be capable of being delivered placing additional pressure on neighbouring authorities to meet any shortfall. It is not clear from the Plan and the Local Aggregates Assessment (2016) what evidence the Council is to rely upon to support the statement in paragraph 6.23 of the Worcestershire Minerals Plan '<i>Once adopted, it is anticipated that the plan will act as an impetus for development by providing greater certainty for developers, but proposals take time to be developed, submitted and determined.</i>' Phase 2 actually offers little in the way of certainty for both the Council and developers because it relies upon windfall sites to come forward in specific strategic corridors. Having had two call for sites and having rejected so many sites at this stage of the plan process suggests that windfalls are unlikely to come forward so further evidence is required to justify reliance on a Phase 2 based on windfalls.</p> <p>We welcome the provision of adequate landbanks for sand and gravel throughout the plan period.</p>	<p>Although the Vision seeks to achieve a 7 year landbank by 2025 at the latest, the plan does not seek to phase the delivery of resources from specific sites, preferred areas or windfall sites in to two phases.</p> <p>The Council has undertaken three calls for sites. Of the sites submitted for consideration in the plan preparation process prior to the third stage consultation, 3 were identified as specific sites and 2 as preferred areas in the Third Stage Consultation. Many were discounted as specific sites and preferred areas at this stage due to a lack of information (see Deliverability Assessment for further information). It was not considered appropriate to rely on these sites for delivery without evidence to indicate that they are deliverable. Given the shortfall in allocated sites a positive approach is taken to windfall sites to enable appropriate levels of development.</p> <p>One site was submitted in response to the third call for sites as part of the Third Stage Consultation and a further call for sites will be undertaken in Summer 2017.</p> <p>Further consideration will be given to this issue should it still not be possible to allocate sufficient sites.</p>

*c) Do Policies MLP 8 and MLP 9 and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?*

Yes: 2	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean	None	E013-802 Malvern Hills AONB Unit	E036-2277 Staffordshire County Council
E041-717 Natural England		E019-2459 Wildmoor Residents' Association	

Consultee comments	Initial Officer response
<b>E036-2277 Staffordshire County Council</b>	
The policy needs to be robust to ensure that an adequate and steady supply of sand and gravel is maintained over the Plan period. Policy MLP 8 needs to set an appropriate framework to achieve objective 3 and will be reliant on developing adequate resources as identified within the specific sites/ preferred areas or more broadly within the strategic corridors. It is important that the landbank is monitored annually (refer to chapter 9) and that there is a commitment to review the Plan if a 7 year landbank is not achieved/ maintained. This might also include a commitment to identify more specific sites/ preferred areas within the strategic corridors to secure provision over the Plan period.	This is the Council's intention. The landbank will be monitored annually through the Local Aggregates Assessment. Monitoring indicator 6 in chapter 9 seeks to monitor the landbank of permitted reserves for sand and gravel. Wording changes will be considered to make the commitment to further action as required more explicit.

*d) Do Policies MLP 8 and MLP 9 and the reasoned justification provide sufficient clarity as to how the policies would be applied?*

Yes: 2	No: 0	Don't know: 2	Written responses (see below)
E007-2452: Mr N Dean  E041-717: Natural England	None	E013-802: Malvern Hills AONB Unit  E019-2459: Wildmoor Residents' Association	E036-2277: Staffordshire County Council

Consultee comments	Initial Officer response
<b>E036-2277 Staffordshire County Council</b>	
The justification to the policy indicates that approximately 16 million tonnes is to be found from within the strategic corridors (6.15 million tonnes to be derived from specific sites/ preferred areas and 10 million from windfall sites) but clarification is sought on the amount of reserves required to meet the proposed level of provision given that permission was granted for 3.6 million tonnes in 2016 (refer to footnote 23 in the LAA 2016).	The Third Stage Consultation used the 2016 Local Aggregates Assessment as its baseline, this included data up to 31 <sup>st</sup> December 2015 and as such did not include the reserves permitted during 2016. The sites which gained planning permission were those which were proposed as Specific Site allocations at Clifton (South and East) and Ryall North. Therefore a further 2.55 million tonnes can still be anticipated from the preferred areas, and no change to the amount anticipated to be required from windfall sites.  The Local Aggregates Assessment will be updated to take account of this information and consideration will be given to whether the baseline for the Minerals Local Plan can also be updated to reflect the latest information.

### Q6.3 Industrial minerals supply

a) *Do Policies MLP 10, 11, 12 and 13 provide an appropriate and justified approach to the steady and adequate supply of industrial minerals?*

<b>Yes: 2</b>	<b>No: 1</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E041-717 Natural England	E019-2459 Wildmoor Residents' Association	E013-802 Malvern Hills AONB Unit	E005-817 CPRE Worcestershire  E009 Cllr Bob Brookes  E013-802 Malvern Hills AONB Unit  E019-2459 Wildmoor Residents' Association  E020-2460 Mineral Products Association  E031-800 Herefordshire & Worcestershire Earth Heritage Trust  E039-2212 Bromsgrove District Council (informal response)  E043-2185L Gloucestershire County Council  E047-716 Historic England

b) *Do Policies MLP 10, 11, 12 and 13 and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?*

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E009 Cllr Bob Brookes  E013-802 Malvern Hills AONB Unit  E019-2459 Wildmoor Residents' Association

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
			<p>E020-2460 Mineral Products Association</p> <p>E031-800 Herefordshire &amp; Worcestershire Earth Heritage Trust</p> <p>E039-2212 Bromsgrove District Council (informal response)</p> <p>E043-2185L Gloucestershire County Council</p> <p>E047-716 Historic England</p>

*c) Do Policies MLP 10, 11, 12 and 13 and the reasoned justification provide sufficient clarity as to how the policies would be applied?*

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E041-717 Natural England</p>	None	<p>E019-2459 Wildmoor Residents' Association</p> <p>E013-802 Malvern Hills AONB Unit</p>	<p>E005-817 CPRE Worcestershire</p> <p>E009 Cllr Bob Brookes</p> <p>E013-802 Malvern Hills AONB Unit</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E020-2460 Mineral Products Association</p> <p>E031-800 Herefordshire &amp; Worcestershire Earth Heritage Trust</p> <p>E039-2212 Bromsgrove District Council (informal response)</p> <p>E043-2185L</p>

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
			Gloucestershire County Council  E047-716 Historic England

*Comments on policies MLP 10, 11, 12 and 13*

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E005-817 CPRE Worcestershire</b>	
6.136: It is noted that there is a 75 year reserve in total, but do other policies adequately safeguard a sufficient resource?	<p>Paragraph 6.36 states that "Each of the clay workings in Worcestershire has stocks of permitted reserves that exceed 25 years and together these mean that Worcestershire has a stock of permitted reserves of brick clay of approximately 75 years. This is likely to be sufficient to supply Worcestershire's two existing brickworks over the life of the plan. As such, Policy <b>MLP 10</b> enables brick clay development to come forward but does not set supply targets or delivery milestones."</p> <p>Safeguarding issues are addressed in <i>Policy MLP 27: Safeguarding Locally and Nationally Important Mineral Resources</i> which safeguards an area of Mercia Mudstone Group brick clay close to the Hartlebury and Waresley brickworks. The Mercia Mudstone Group is extensive in Worcestershire and comments received on the Second Stage Consultation on the Minerals Local Plan indicated that it would not be appropriate to safeguard the whole of the formation.</p>
MLP11: The attached narrative makes it clear that the operators have no wish to make industrial use of silica sand on-site, but the policy says nothing of this and it might encourage the establishment of a foundry within a sand quarry on the basis that this was exploiting the resource. That would be wholly inappropriate for a Green Belt location. Sand is in fact a minor consumable of foundries, so that there would be no inherent economic reason for this (other than that the land might be cheap). The risk of the policy being abused could be resolved by making the reference to "industrial uses elsewhere".	The development of a foundry would require additional planning permission. It is a B2 use that would require planning permission from the relevant Borough, City or District Council.
MLP12: I find the thrust of this policy worrying. Stone is the required building material in Broadway and other villages in and near the	Policy MLP12 is intended to enable the working of building stone, as explained in paragraph 6.53 "Policy MLP 12 does not set supply targets

Consultee comments	Initial Officer response
Cotswolds. If the development needs of that part of the county are to be met, a source of suitable stone will be needed.	or delivery milestones but enables minerals development which would increase or maintain the diversity and quantity of Worcestershire's stock of permitted reserves for different types of building stones. This might include proposals to produce building stone alongside other types of mineral such as crushed rock aggregate, or proposals to supply a specific type of building stone to meet an identified local and national need for a specific material."
<b>E009 Cllr Bob Brookes</b>	
Make sure the plan could enable heritage salt production - not accidentally or purposefully prevent it.	Policy MLP 13 as drafted in the Third Stage Consultation document is intended to address this point.
<b>E013-802 Malvern Hills AONB Unit</b>	
We have a concern that Policy 9, in isolation, makes no reference to the importance of conserving nationally important environmental assets when considering the suitability of proposals for winning crushed rock.	As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional and local policies", as such the Council does not consider it necessary to make additions to policy MLP 9 to address this point.
The provision of a diverse supply of building stone is considered important. It may be helpful in the reasoned justification to make reference to the value of even small-scale sites.	Paragraph 6.54 states "Having a diverse stock of permitted reserves would enable industry to be responsive to the intermittent nature of demand for specific building stones. A relatively small stock of permitted reserves may be all that is required for the adequate supply of each type of material." Consideration will be given to whether this can be clarified further.
<b>E019-2459 Wildmoor Residents' Association</b>	
The absence of high grade silica sand in Worcestershire would seem to indicate the lack of need to increase or maintain Worcestershire's stock of permitted reserves of silica sands for industrial use.	National Policy requires Mineral Planning Authorities to "plan for a steady and adequate supply of industrial minerals" (NPPF Paragraph 146). This includes silica sand.
<b>E020-2460 Mineral Products Association</b>	
<p><b>Policy MLP9: Steady and Adequate Supply of Crushed Rock;</b></p> <p>While recognising the difficulties Worcestershire face on the matter of crushed rock there are resources within the county. The statement in para 6.32 that that the <i>Minerals Local Plan should not.....set a landbank requirement which it is not likely to meet for the foreseeable future</i> cannot be right. It is not for the mineral authority to determine whether it chooses to set the landbank figure. That requirement and obligation has been placed on it by NPPF at paragraph 145 and in respect of crushed rock is <i>at least 10 years</i>. Consequently reference to at least a 10 year landbank needs to be made within MLP 9 otherwise it is in danger of being</p>	Noted. The intention was not to frustrate sites which are put forward in future, but rather to produce a realistic and deliverable plan which acknowledged the constraints on Worcestershire's crushed rock resources but could still enable sites to come forward. However, it is acknowledged that as drafted policy MLP 9 could have unintended consequences as you suggest, and consideration will be given to addressing this issue in the next iteration of the plan.



Consultee comments	Initial Officer response
<p>unsound. The failure to reference the 10 year landbank could be used to frustrate any sites that are put forward in the future. It is suggested that Policy MLP 9 is reworded as follows;</p> <p>Proposed Changes (deletions in strikethrough; new text in <b>bold</b>)</p> <p><i>Planning permission will be granted for minerals development that will contribute to achieving a steady and adequate supply of crushed rock.</i></p> <p><i>Proposals will be required to demonstrate that the proposed development will contribute towards the security of crushed rock supply by:</i></p> <p><i>a) increasing or maintaining Worcestershire's landbank of permitted reserves <b>to achieve a landbank of crushed rock of at least 10 years;</b></i> <i>and/or</i></p> <p><i>b) enabling Worcestershire's productive capacity for crushed rock supply to be maintained or enhanced.</i></p>	
<p><b>Policy MLP10</b>; Needs rewording to properly reflect National Policy as follows;</p> <p>Proposed Changes (deletions in strikethrough; new text in <b>bold</b>)</p> <p><i>Planning permission will be granted for minerals development proposals that will contribute to achieving a steady and adequate supply of brick clay and clay products.</i></p> <p><i>Proposals will be required to demonstrate that the proposed development will contribute to the security of clay supply by:</i></p> <p><i>a) Increasing or maintaining Worcestershire's stock of permitted reserves <b>of at least 25 years</b> of brick clay; and/or</i></p> <p><i>b) Enabling Worcestershire's productive capacity for brick clay or clay products to be maintained or enhanced.</i></p>	<p>Changes will be considered to refer to the stock of permitted reserves at individuals sites as set out in the NPPF, however the Council's interpretation is that the 25 years landbank does not apply to Worcestershire's stock of permitted reserves as is the case with aggregate provision.</p>
<p><b>Policy MLP 11</b>; Needs rewording to properly reflect National Policy as follows;</p> <p>Proposed Changes (deletions in strikethrough; new text in <b>bold</b>)</p> <p><i>Planning permission will be granted for minerals</i></p>	<p>Changes will be considered to refer to the stock of permitted reserves at individuals sites as set out in the NPPF, however the Council's interpretation is that the 10 years landbank does not apply to Worcestershire's stock of permitted reserves as is the case with aggregate provision.</p>

Consultee comments	Initial Officer response
<p><i>development proposals that will contribute to achieving a steady and adequate supply of silica sand for industrial uses.</i></p> <p><i>Proposals will be required to demonstrate that the proposed development will contribute to the security of silica sand supply by:</i></p> <p><i>a) Increasing or maintaining Worcestershire's stock of permitted reserves of silica sand <b>of at least 10 years</b> for industrial uses; and/or</i></p> <p><i>b) Enabling Worcestershire's productive capacity for silica sand for industrial uses to be maintained or enhanced</i></p>	
<b>E031-800 Herefordshire &amp; Worcestershire Earth Heritage Trust</b>	
<p><a href="http://www.buildingstones.org.uk">www.buildingstones.org.uk</a> contains a searchable database of building stones quarries and stone built structures in Worcestershire. Bromsgrove, Droitwich, Ombersley, Hartlebury and the surrounding areas are noticeable for the use of large rectangular ashlar blocks of very locally sourced Triassic sandstone used to create boundary walls. These contribute significantly to the townscape of these areas but the structures are not listed (unless in the curtilage of a building listed in its own right) and the stone is no longer extracted. Ideally a means to allow small scale extraction for repairs and replacements should be possible as part of the minerals plan.</p> <p>Considerable stone resource remains in many smaller quarries that ceased working in the early twentieth century. We would welcome the opportunity for small scale extraction from such sites for conservation repairs and replacement of stone built structures.</p>	<p>Policy MLP12 is intended to enable the working of building stone, as explained in paragraph 6.53 "Policy MLP 12 does not set supply targets or delivery milestones but enables minerals development which would increase or maintain the diversity and quantity of Worcestershire's stock of permitted reserves for different types of building stones."</p>
<b>E039-2212 Bromsgrove District Council (informal response)</b>	
<p>The Council welcomes Policy MLP12: Adequate and Diverse Supply of Building Stone which allows for small local quarries to supply stone for the repair and maintenance of historic buildings. It encourages WCC to emphasise the importance of allowing small stone mining operations to open for relatively small amounts of local stone for use on historic buildings in the County.</p>	<p>Policy MLP12 is intended to enable the working of building stone, as explained in paragraph 6.53 "Policy MLP 12 does not set supply targets or delivery milestones but enables minerals development which would increase or maintain the diversity and quantity of Worcestershire's stock of permitted reserves for different types of building stones." Paragraph 6.54 states "Having a diverse stock of permitted reserves would enable industry to be responsive to the intermittent nature of demand for specific building stones. A relatively small stock of permitted reserves may be all that is required for</p>

Consultee comments	Initial Officer response
	the adequate supply of each type of material." Consideration will be given to whether this can be clarified further.
<b>E043-2185L Gloucestershire County Council</b>	
Given that building stone production has also dwindled to zero for similar reasons to crushed rock we also support emerging policy MLP 12 that makes provision for adequate and diverse supplies of building stone.	Support noted.
<b>E047-716 Historic England</b>	
We support Policy MLP12 and the reasoned justification in paragraph 6.51 about the need to provide locally sourced building stone for the repair and maintenance of historic buildings.	Support noted.

#### Q 6.4 Energy minerals supply

a) *Does Policy MLP 14 provide an appropriate and justified approach to the sustainable supply of energy minerals?*

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E030-1939 The Coal Authority  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E030-1939 The Coal Authority

b) *Does Policy MLP 14 and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?*

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E030-1939 The Coal Authority  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E030-1939 The Coal Authority

c) *Does Policy MLP 14 and the reasoned justification provide sufficient clarity as to how the policy would be applied?*

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire
E030-1939 The Coal Authority			E030-1939 The Coal Authority
E041-717 Natural England			

*Comments on policy MLP 14*

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP14 is a qualified negative. However, the phrase “contribute to the sustainable supply of energy minerals” drives a coach and horses through that negative. While it is the case that any use of energy minerals is fundamentally unsustainable and contributes to global warming, that is presumably not what is meant here by “sustainable”, meaning that the word must essentially be meaningless here. On the other hand, without it, any coal application would need to be granted. While the Coal Authority may not favour exploitation, the possibility cannot be ruled out that opencast coalmining may be desirable in the Wyre Forest coalfield, so that the pillars of coal left during deep mining can be removed, to make the ground stable enough to be built on: this has been done on a number of occasions in the Black Country. The thrust of the policy is that no mining should take place, but some more robust qualification is needed, so that the exception becomes a narrow one.	Noted. Consideration will be given to clarifying this policy to address these concerns whilst reflecting the requirements of national planning policy.
<b>E030-1939 The Coal Authority</b>	
Although The Coal Authority has no surface coal resource identified in Worcestershire County we are pleased to see that this policy sets out a clear steer for developers in respect of the requirements of information necessary to support any planning applications which may come forward for energy minerals.	Support noted.

**Q6.5 Are there any wording changes which you would suggest to Chapter 6 to improve clarity or any other issues which you think should be considered?**

Yes: 0	No: 4	Written responses (see below)
None	E007-2452 Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	E005-817 CPRE Worcestershire  E031-800 Herefordshire & Worcestershire Earth Heritage Trust

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>Policies MLP7-13 are all, on the face of them, wholly unqualified on questions as to the appropriateness of a particular site. Except where a particular mineral is so scarce that there is little alternative to working a particular resource, there needs to be a balance struck between the harm done by exploitation and the economic and other benefits flowing from it. Thus (to take a ludicrous example, beyond what the Plan intends), there might be an economic advantage to working the iron-rich Roman cinders that exist as an archaeological deposit under much of the centre of Worcester, but this could in practice only be done by demolishing the whole city centre, which would be unacceptable for a host of other reasons. All need some qualification, such as “Subject to other material considerations” or perhaps “Subject to Policy MLP16 and other the policies of this plan and other material considerations”.</p>	<p>As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional and local policies."</p> <p>National legislation makes it clear that decisions on planning applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).</p> <p>Therefore the Council does not consider it necessary to make this addition to the policies as drafted in the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>.</p>
<b>E031-800 Herefordshire &amp; Worcestershire Earth Heritage Trust</b>	
<p>Paragraph 6.6 states “There are examples of buildings across the county which have been constructed from local stone. This tends to be of poor quality, particularly sandstones found in the north west of the county and Cotswold limestone around Bredon Hill and Broadway, the exception is granite found in the Malvern area. Building stone is not currently worked in Worcestershire.”</p> <p>This statement needs updating in the light of the 1000 years of Building with stone project and I would suggest the following wording.</p>	<p>The changes suggested will be considered.</p>

Consultee comments	Initial Officer response
<p>“There are numerous examples of stone built structures in Worcestershire, over 2600 are recorded on the Buildingstones.org.uk database, this data set includes stone structure listed in Pevsner’s The Buildings of England – Worcestershire and structures from seven cluster study areas within Worcestershire so is not comprehensive.”</p> <p>Local building stones in Worcestershire are not all of poor quality – this is sweepingly inaccurate statement. Would be better to say “Whilst Worcestershire building stone sources were not widely exported for building construction in the way that stone sources such as Portland Limestone from Dorset or Grinshill Sandstone from Shropshire continue to be, good quality locally sourced stone was used for high status buildings such as churches, large houses and Worcester Cathedral from the middle ages and into the twentieth century. Locally sourced stone was widely used for construction of vernacular buildings.</p> <p>Paragraph 6.19 or 6.20 Suggest you insert “The 1000 Year of Building Stone project undertaken by Earth Heritage Trust from 2013 to 2017 identified 189 building stone quarries within the seven areas in Worcestershire studied in detail and 2661 stone built structures. Since the important building stone extraction around Ombersley, Hadley and Droitwich, was not covered in detail by a study area, this figure is likely to be an underestimate.</p>	

## Chapter 7: Development Management

### MLP 15: Sustainable Design Principles

#### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 5	No: 1	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean	E019-2459 Wildmoor Residents' Association	None	E005-817 CPRE Worcestershire
E013-802 Malvern Hills AONB Unit			E013-802 Malvern Hills AONB Unit

Yes: 5	No: 1	Don't know: 0	Written responses (see below)
<p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>			<p>E019-2459 Wildmoor Residents' Association</p> <p>E025-1793 CEMEX</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E029-2036 Croome Estate Office</p> <p>E037-1051 Peter &amp; Oliver Surman</p> <p>E048-719 Environment Agency</p> <p>E056-1782L RSPB</p>

**Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?**

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E026-813: Worcestershire Wildlife Trust</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459 Wildmoor Residents' Association	E045-2465 PleydellSmithyman Ltd

**Comments on MLP 15**

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP16: "Spatial Strategy" is used as if it is a term of art, but is not defined in the glossary. Its use raises the question of what strategy: is this that of the minerals plan (which – as indicated – strays far into areas that ought not to be within	This comment appears to refer to policy MLP15. The "Spatial Strategy" is the subject matter of "Chapter 5: Spatial strategy: location of mineral development."

Consultee comments	Initial Officer response
<p>its remit), or that of NPPF (in which case it should be named here), or the Development Plan as a whole, including in particular the relevant District Plan and any Neighbourhood Plan? We would suggest that it should be the latter. If Spatial Strategy refers to the Mineral Plan, it should say "this Plan".</p>	<p>Changes will be considered to improve clarity including greater referencing to the spatial strategy chapter in the reasoned justification and making reference to "Spatial Strategy" in the glossary.</p>
<p>To a very considerable degree, this policy lies at the heart of the strategy of the whole Plan. Policies MLP7-14 need explicitly to be subject to it, so that there is no room for clever lawyers to argue that MLP16 does not apply to those unqualified policies. For example, unlike most other development Green Belt is only a consideration in relation to mineral applications, unlike applications for new houses, where it is an overwhelming consideration. Minerals applications in the Green Belt can be permitted, as long as they meet certain criteria in NPPF, particularly para 90.</p>	<p>This comment appears to refer to policy MLP15.</p> <p>As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional and local policies."</p> <p>National legislation makes it clear that decisions on planning applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).</p> <p>Therefore the Council does not consider it necessary to make this addition to the policies as drafted in the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>.</p>
<p>7.29 defines the local context far too narrowly, as largely relating to the results of local consultation. However my experience of dealing with planning is that Planning Committees are not afraid to ride roughshod over the wishes of local communities when Plan Policies indicate that an application meets planning criteria. Local Context should include the designations of the land and policies for it in other plans (including the District and any Neighbourhood Plans).</p>	<p>As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional and local policies."</p> <p>National legislation makes it clear that decisions on planning applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).</p> <p>Consideration will be given to broadening the definition of local context to include designations of land, other local social and economic factors.</p>
<p>7.38-39 It is clearly important that there should be a plan as to what should happen to a quarry when it is worked out. However, it seems premature for its ultimate use to be finally determined before exploitation, when it may be worked over many years, leaving a large hole that will take a number of years to fill with waste. The lifecycle of a quarry may thus be 10-15</p>	<p>National policy (NPPF paragraph 143) requires policies to be put in place "to ensure worked land is reclaimed at the earliest opportunity... and that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources), geodiversity,</p>



<b>Consultee comments</b>	<b>Initial Officer response</b>
<p>years or even longer, so that its final use, whether for agriculture, as public open space, or otherwise, may be difficult to determine. It will almost inevitably be difficult to make definitive plans at such a great distance in time beforehand.</p>	<p>biodiversity, native woodland, the historic environment and recreation ".</p> <p>It is common practice for a restoration scheme for a mineral working to be submitted at the same time as a planning application so that the determination of the application and any environmental impact assessment take account of the potential impacts and opportunities throughout the life of the site.</p> <p>The restoration scheme will also influence the way in which a site is worked and phased. As stated in paragraph 7.146 " Achieving an appropriate restoration scheme may require specific working practices, and in some cases this may impact on the quantity of mineral which can be extracted sustainably. This may mean working resources in a different manner than has taken place historically, particularly as landfilling was traditionally used to return land to previous levels and is now discouraged in Worcestershire" (see Waste Core Strategy).</p> <p>However, planning applications can be made to vary conditions if circumstances change or unexpected issues are encountered over the life of the site. Any such applications would still be subject to consideration against the policies of the Development Plan and other material considerations. Minerals sites are also subject to a periodic review process as noted in paragraph 7.12.</p>
<b>E013-802 Malvern Hills AONB Unit</b>	
<p>It would be useful for the policy and/or reasoned justification to make reference to those documents and policies which are a material consideration in planning for minerals, for example AONB management plans in relation to local context/distinctiveness.</p>	<p>Paragraph 7.138 (Policy MLP19) makes reference to the AONB management plan. Changes to make reference to the AONB management plan in the reasoned justification for Policy MLP 15 will be considered.</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>The cumulative effects of quarrying in the Wildmoor area have exacerbated harm over many years. At Wildmoor quarry deep excavation and undercutting has undermined adjacent farm land. Good water management has not integrated safety and environmental objectives (7.44).</p>	<p>Policy MLP 15 part h states that mineral development proposals must demonstrate that they will "not result in an unacceptable cumulative impact from other concurrent mineral working or existing or proposed development."</p> <p>The existing quarries in the Wildmoor area have existed for some time and the relevant planning applications were considered against the planning regime and Development Plan at the time.</p>

Consultee comments	Initial Officer response
	Once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which are able to be enforced. We agree that this is a key part of the effective operation of the planning system, and we are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the policies can be applied and enforced as intended.
<b>E025-1793 CEMEX</b>	
It is noted that this policy explicitly referenced the three supporting principles of sustainable development, which is welcomed. The subsequent subparagraphs a to h make no specific reference to economic and social conditions however. The Company seeks the revision of these subparagraphs to refer to all three principles rather than solely the environment.	Noted. Whilst the Council considers that parts a to h are relevant to all three principles of sustainable development, consideration will be given to drawing out the links and issues more strongly in both the policy and the supporting reasoned justification.
<b>E026-813 Worcestershire Wildlife Trust</b>	
We are pleased to support the policy wording and in particular sub-sections a), b), d) and f).	Support noted.
<b>E029-2036 Croome Estate Office</b>	
Suggests that whilst Policy MLP 15 identifies the three principles of sustainable development the lettered bullet points therein could expand on the improvements to economic and social conditions which mineral development and afteruse can bring, rather than concentrating solely on the environmental aspects.	Noted. Whilst the Council considers that parts a to h are relevant to all three principles of sustainable development, consideration will be given to drawing out the links and issues more strongly in both the policy and the supporting reasoned justification.
<b>E037-1051 Peter &amp; Oliver Surman</b>	
Reference to Policies MLP 3 and 15. In the context of restoration and after use we note the repeated emphasis on ecology and the environment with little or no regard to the sustainability of the restored area. Sustainable development is not all about ecology but has three strands, environment, social and economic, but the latter two hardly get a mention. Future long term maintenance of a site requires money and that can only be provided by some sort of income stream. The planning process should allow for greater consideration of social, sporting and economic benefit. There should also be consideration of what else is happening in the locality. For example, if there are two or three restored sites close by that are devoted entirely to ecology, then a new site that lends itself to social, sporting and economic development for the benefit of the community,	Noted. Whilst the Council considers that parts a to h are relevant to all three principles of sustainable development, consideration will be given to drawing out the links and issues more strongly in both the policy and the supporting reasoned justification.

Consultee comments	Initial Officer response
<p>should be considered in this wider context, and not in isolation. We therefore argue for a policy that gives greater weight to, and embraces social, sporting and economic activity where appropriate.</p>	
<b>E045-2465 PleydellSmithyman Ltd</b>	
<p>The consultation document places a significant emphasis on landscape protection and enhancement. There requires to be acknowledgment that minerals development will by their nature very often bring about landscape change and the level of protection in the various policies require to be proportionate.</p> <p>Landfill restoration cannot be discounted for some sites in Worcestershire and paragraph 7.146 requires to be adjusted to acknowledge that some landfill restoration will be required at some sites if the wider green network, landscape improvement and access initiatives within the draft plan are to be secured. The Waste Core Strategy Local Plan acknowledges that there will be some instances where restoration of mineral sites incorporating landfill will be essential in order to secure a satisfactory restoration of mineral sites. This is particularly the case with restoration of old sites.</p>	<p>Paragraph 3.7 of the Third Stage Consultation document notes that "Landscape is a visual manifestation of the interrelationship between man's activities and the natural environment. These are dynamic forces, forever changing the character of the landscape" but "piecemeal change to these landscapes could weaken local distinctiveness and undermine the character of the landscape."</p> <p>There is therefore a requirement to balance the need for mineral with the need to achieve final landforms and restoration that delivers multifunctional benefits. Paragraph 7.38 of the Third Stage Consultation states that "planning permission will not be granted for mineral working unless satisfactory proposals have been made for the restoration and after-use of the site".</p> <p>The Council acknowledges that "fill" material is sometimes an appropriate option, and changes to paragraph 7.146 will be considered to ensure the Minerals Local Plan and Waste Core Strategy are compatible.</p>
<b>E048-719 Environment Agency</b>	
<p>Policy MLP15: Sustainable Design Principles It is recognised that mineral working can help to deliver substantial environmental and community benefits. In particular, high quality restoration should be encouraged to help secure the green infrastructure objectives within the WMLP which can make a positive contribution to meeting the requirements of the Water Framework Directive (see below) alongside flood management and biodiversity benefits. Bullet point (f) within Policy MLP15 should therefore be strengthened to ensure restoration and after use are not only delivered at the earliest opportunity but wherever possible help secure environmental and community benefits.</p>	<p>This is the Council's intention. Changes will be considered to make this point more explicit. Further discussion with the Environment Agency on this matter would be welcomed.</p>
<b>E056-1782L RSPB</b>	
<p>The RSPB agrees that the policies and the reasoned justification contribute towards the achievement of the Vision, Objectives and Spatial Strategy.</p>	<p>Support noted.</p>

## MLP 16: Health and Quality of Life

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459 Wildmoor Residents' Association	<p>E005-817 CPRE Worcestershire</p> <p>E017-507 Directorate of Public Health, Worcestershire County Council</p> <p>E020-2460 Mineral Products Association</p> <p>E025-1793 CEMEX</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E033-683/1077/2279 South Worcestershire Councils</p>

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459 Wildmoor Residents' Association	<p>E005-817 CPRE Worcestershire</p> <p>E017-507 Directorate of Public Health, Worcestershire County Council</p> <p>E020-2460 Mineral Products Association</p> <p>E025-1793 CEMEX</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E033-683/1077/2279 South Worcestershire Councils</p>

## Comments on policy MLP 16

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>MLP16 is much too positive. On the face of it this is a freestanding policy allowing anything that meets the conditions. That is clearly not the intention. Compliance with it is clearly intended to be a precondition. It should thus begin "Planning permission will <i>only</i> be granted ...". It may be necessary to add some qualification to this to allow through applications that have some impact on some of the criteria, but where it is expedient to proceed despite unmitigatable objections. Perhaps the wording should be "Planning permission will <i>normally only</i> be granted ..." or "Planning permission will <i>only</i> be granted (save in very special circumstances) ...". Similar drafting changes are needed to MLP17-25.</p>	<p>National Planning Policy makes it clear that "All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area." The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation reflects this.</p>
<b>E017-507 Directorate of Public Health, Worcestershire County Council</b>	
<p>Para 7.93 Some form of HIA checklist could be considered as part of the process. The checklist would provide greater clarity in relation to the relevant health and wellbeing considerations in relation to minerals developments.</p>	<p>Consideration will be given to whether a checklist could and should be included to support delivery of policy MLP 16, and whether this should be within the Minerals Local Plan itself or through other mechanisms such as the validation document.</p>
<p>Policy MLP 16: Health and Quality of Life seems to be focusing on adverse impacts on health and wellbeing. Could this policy refer to the enhancements as well as the protection of human health?</p>	<p>Wording changes will be considered to address this issue.</p>
<b>E020-2460 Mineral Products Association</b>	
<p><b>Air Quality;</b> Para 7.67 makes reference to PM10 particulates and quarry operations. In rural areas where quarries are most likely to be these are not an issue .The matter comes into play under Defra guidelines when considering AQMAs. The reference to PM10 particulates should be removed as the implication is that these should be measured as matter of course which is not the case.</p>	<p>There are 10 AQMA in Worcestershire. These areas could be impacted by the transport of minerals. Paragraph 7.67 refers to vehicle movements both on and off site, however changes will be considered to make this clearer. Worcestershire Regulatory Services will be consulted to inform any further changes to this paragraph.</p>
<p><b>Health and well-being;</b> Para 7.92 to 7.93 implies that the mineral planning authority expects health impact assessments to be carried out in respect of quarry/mineral developments. If this is the case this far exceeds any requirements in National Policy and /or guidance. Paragraph 04 Reference ID: 53-004-201400306 of the Planning Practice Guidance states that ; 5</p> <p><i>A health impact assessment may be a useful</i></p>	<p>Noted. Consideration will be given to this issue.</p>

Consultee comments	Initial Officer response
<p><i>tool to use where there are <b>expected to be significant impacts</b> (my emphasis).</i></p> <p>It is important to note also that the above is guidance only and not National Policy.</p> <p>Suggested that paragraphs 7.92 and 7.93 are deleted or reworded to reflect our above comments.</p>	
<b>E025-1793 CEMEX</b>	
<p><b>Air Quality;</b> Defra guidance indicates that the issue of PM10 emissions only become material when considering AQMAs. Almost by definition most minerals development takes place in rural areas, well away from AQMAs. Para 7.67 appears to be seeking to make PM10 particulates a material consideration in all proposals for mineral development. Given Defra guidelines it is considered that para. 7.67 is not sound and should be revised to clarify that consideration of PM10s is only material where a development is likely to impact upon an existing AQMA.</p>	<p>There are 10 AQMA in Worcestershire. These areas could be impacted by the transport of minerals. Paragraph 7.67 refers to vehicle movements both on and off site, however changes will be considered to make this clearer. Worcestershire Regulatory Services will be consulted to inform any further changes to this paragraph.</p>
<p><b>Health and well-being;</b> Paragraph 04 Reference ID: 53-004-201400306 of the Planning Practice Guidance states that; <i>“A health impact assessment may be a useful tool to use where there are expected to be significant impacts.”</i></p> <p>Para 7.92 to 7.93 of the Consultation Document implies that the mineral planning authority expects health impact assessments to be carried out in respect of all mineral developments. Such an approach has no basis in National Policy and /or guidance and is unsound. These references should therefore either be deleted or the Minerals Planning Authority provide an evidence base that justifies divergence from national policy in the case of Worcestershire.</p>	<p>Noted. Consideration will be given to this issue.</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>Health and well-being: Para 7.92 to 7.93 implies that the mineral planning authority expects health impact assessments to be carried out in respect of quarry / mineral developments. This far exceeds any requirements in National Policy and /or guidance. Paragraph 04 Reference ID: 53-004-201400306 of the Planning Practice Guidance states that:</p> <p>"A health impact assessment may be a useful</p>	<p>Noted. Consideration will be given to this issue.</p>

Consultee comments	Initial Officer response
<p>tool to use where there are expected to be significant impacts."</p> <p>It is important to note also that the above is guidance only and not National Policy. It is suggested that paragraphs 7.92 and 7.93 are deleted or reworded to reflect our above comments.</p>	
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
<p>Whilst Policy MLP16 requires a technical study to demonstrate that proposed development avoids or mitigates harm to "sensitive receptors" it does not indicate a minimum distance from dwellings. It is considered that an indication of a minimum distance from dwellings would be helpful and would help sieve and refine the strategic corridors. It is noted that water quality does not appear in the list provided in MLP16, but that it is covered elsewhere in the development plan, policy MLP22.</p>	<p>In the <i>Second Stage Consultation on the Minerals Local Plans</i> some concern was expressed about the intention not to apply a buffer around sensitive receptors. The Mineral Planning Authority has taken this into account when developing the policies proposed in the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>. National planning guidance states that separation distances/buffer zones may be appropriate in specific circumstances but that these should be established on a site-specific basis and should be effective, properly justified and reasonable (Planning Practice Guidance Paragraph: 018 Reference ID: 27-018-20140306). The Mineral Planning Authority considers that the policies set out in the Third Stage Consultation provide a more sophisticated and robust approach to protection and enhancement than could be achieved through the application of a standard buffering approach or minimum stand-off zone, enabling the issues to be considered on a site by site basis. The impacts will depend on several factors including the way a site is worked, site layout, topography and mitigation measures.</p> <p>Water quality is addressed through policy MLP22.</p>

## MLP 17: Access and recreation

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 3	No: 0	Don't know:1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970: Worcestershire County</p>	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire

Yes: 3	No: 0	Don't know:1	Written responses (see below)
Council, Landscape Advisor  E041-717 Natural England			

**Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?**

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire

**Comments on policy MLP 17**

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP17 is also too positive. Again the word "only" needs to be inserted. However, while improving the footpath network is desirable, those which have no more than a neutral (or no) effect on the network should also be permissible. The phrase "protecting and improving" should be used, rather than improving.	National Planning Policy makes it clear that "All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area." The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this. Whilst part a of MLP17 focuses on improving public access networks, part b of MLP 17 addresses protection of public rights of way. The Council will review this policy to ensure that this intention is clear.



## MLP 18 Biodiversity

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 5	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E013-802: Malvern Hills AONB Unit  E026-813: Worcestershire Wildlife Trust  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E020-2460 Mineral Products Association  E024-1967 Woodland Trust  E025-1793 CEMEX  E026-813 Worcestershire Wildlife Trust  E056-1782L: RSPB

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?

Yes: 3	No: 1	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970: Worcestershire County Council, Landscape Advisor  E041-717 Natural England	E026-813: Worcestershire Wildlife Trust	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E020-2460 Mineral Products Association  E024-1967 Woodland Trust  E025-1793 CEMEX  E026-813 Worcestershire Wildlife Trust

### Comments on policy MLP 18

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP18: Again the word "only" is needed. In the short term, during exploitation, environmental	National Planning Policy makes it clear that "All plans should be based upon and reflect the

Consultee comments	Initial Officer response
<p>harm is inevitable: surface flora will inevitably be destroyed. The question is whether the exploitation will always be able to enhance biodiversity, rather than be neutral to it or do as little short-term harm as possible. The NPPF phrase is "protect and enhance". The policy appears to require only enhancement. In principle we welcome that, but is that the intention? And is it achievable?</p>	<p>presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."</p> <p>The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this. Whilst part f of MLP18 focuses on improving public access networks, parts a-e of MLP 17 addresses protection biodiversity. The Council will review this policy to ensure that this intention is clear.</p>
<p><b>E020-2460 Mineral Products Association</b></p>	
<p>The policy as currently drafted does not properly reflect National Policy.</p> <p>NPPF at paragraph 113 makes it clear that;</p> <p><i>Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to the wider ecological networks.</i></p> <p>This policy gives equal weight to European sites, SSSI's and Local Wildlife Sites etc.</p> <p>The policy needs rewording to properly reflect NPPF.</p>	<p>It is the Council's intention for policy MLP 18 to reflect the hierarchy of designations in the NPPF. Changes to policy MLP18 will be considered to ensure that this is clear.</p>
<p><b>E024-1967 Woodland Trust</b></p>	
<p>Whilst we are pleased to see paragraph d) of this policy – '<i>A level of technical study appropriate to the biodiversity feature will be required to demonstrate that the proposed development.....will not result in the loss of populations of a priority species or areas of priority habitat, including ancient woodland or veteran trees, except where the need for and benefits of the development in that location clearly outweigh the loss</i>' – this wording needs to be amended to reflect current national planning policy.</p>	<p>Policy MLP 18 was drafted to reflect the NPPF. The additional evidence you reference will be taken into account in considering changes to the wording of policy MLP18.</p>

Consultee comments	Initial Officer response
<p>Emerging national policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The <b>Communities and Local Government (CLG) Select Committee</b> published its report following its June 2014 inquiry into the '<b>Operation of the National Planning Policy Framework (NPPF)</b>', in which it has specifically recognised the need for better protection for ancient woodland (Tues 16<sup>th</sup> Dec 2014). The <b>CLG Select Committee report</b> states: <i>'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.'</i></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>. Since then, the recent <b>Housing White Paper</b> (<i>Fixing our broken housing market</i>, Feb 2017, DCLG) has given notice of stronger protection for ancient woodland: <i>'As part of these changes the Government proposes to clarify which national policies it regards as providing a strong reason to restrict development when preparing plans.... Ancient Woodland and aged or veteran trees are irreplaceable habitats and we consider it important that national policy reflects the need to protect them'</i>.</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 is already being reflected in local plan policy – <b>Taunton Deane Site Allocations and Development Management Plan</b> (adopted Dec</p>	

Consultee comments	Initial Officer response
<p>2016) states:</p> <p><b>Policy ENV1: Protection of trees, woodland, orchards and hedgerows</b>  <i>“Development should seek to minimise impact on trees, woodlands, orchards, historic parklands and hedgerows of value to the areas landscape, character or wildlife and seek to provide net gain where possible. Where the loss is unavoidable, the works (or development) should be timed to avoid disturbance to species that are protected by law. Adequate provision must be made to compensate for this loss. Development which would result in the loss of Ancient Woodland, Aged or Veteran Trees will not be permitted. The proper management of this resource for nature conservation purposes will be sought”.</i></p> <p><b><u>We would therefore like to see paragraph d) of Policy MLP 18 amended to read (upper case amendments) – ‘will not result in the loss of populations of a priority species or areas of priority habitat, including ancient woodland or veteran trees, OTHER THAN IN WHOLLY EXCEPTIONAL CIRCUMSTANCES’.</u></b></p>	
<b>E025-1793 CEMEX</b>	
<p>The policy as currently drafted does not properly reflect National Policy.</p> <p>NPPF at paragraph 113 makes it clear that;</p> <p><i>Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to the wider ecological networks.</i></p> <p>This policy gives equal weight to European sites, SSSI’s and Local Wildlife Sites etc.</p> <p>The policy needs rewording to properly reflect NPPF.</p>	<p>It is the Council's intention for policy MLP 18 to reflect the hierarchy of designations in the NPPF. Changes to policy MLP18 will be considered to ensure that this is clear.</p>
<b>E026-813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support this important policy, subject to some small changes recommended under the following question. We welcome the</p>	<p>Support noted.</p>

<b>Consultee comments</b>	<b>Initial Officer response</b>
recognition given to species and habitats outside designated sites (as well as the designated sites themselves) and we are pleased to note the requirement to optimise biodiversity gain given in section f). We also support the commentary given in the reasoned justification. The policy and RJ provide valuable guidance that will be important in delivering the plan vision.	
While we are pleased to support the intent of this policy we believe that small amendments could be made to improve its clarity. We would therefore recommend that section e) be amended to read 'avoids harm or otherwise reduces it to an acceptable level through mitigation when the policy requirements of sections b), c) or d) have been met, with functional compensation accepted only as a last resort; and'	Support noted. Consideration will be given to the policy changes suggested.
<b>E056-1782L: RSPB</b>	
The RSPB agrees that the policies and the reasoned justification provide sufficient clarity. For example, MLP 18 (Biodiversity) provides an appropriate level of clarity in relation to: <ul style="list-style-type: none"> <li>• the requirement to deliver net-gains in biodiversity, including enhancing, linking and extending existing habitat networks;</li> <li>• the protection that will be given to the hierarchy of nature conservation designations, priority habitats and priority species; and</li> <li>• the mitigation hierarchy (i.e. prioritising the avoidance of harm and compensation only being used as a last resort).</li> </ul>	Support noted.

## MLP 19: Landscape

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know:1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E013-802 Malvern Hills AONB Unit	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E034-1970 Worcestershire County Council, Landscape Advisor

**Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?**

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know:1</b>	<b>Written responses (see below)</b>
<p>E007-2452: Mr N Dean</p> <p>E013-802 Malvern Hills AONB Unit</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459 Wildmoor Residents' Association	<p>E005-817 CPRE Worcestershire</p> <p>E013-802 Malvern Hills AONB Unit</p>

**Comments on Policy MLP 19**

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E005-817 CPRE Worcestershire</b>	
<p>MLP19: Again the word “only” is needed. Protection appears only to be afforded to AONBs. However certain former plans also designated a lower class of Landscape Protection Areas, including the Clent Hills, and the part of Wyre Forest District west of the Severn. CPRE was recently approached for advice as to the protection of the Teme valley, probably referring to the deep valley above Knighwick. Such areas may not need such strong protection as AONBs, but some enhanced protection is needed for selected areas of great (as opposed to outstanding) character. It is unfortunate that the County Landscape Characterisation is a tool for classifying landscape types, not one for identifying and protecting important ones.</p>	<p>National Planning Policy makes it clear that "All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."</p> <p>The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this. Paragraphs 115 and 144 of the NPPF make it clear that the protection of AONB should be given greater weight than other landscapes, however part c of Policy MLP 19 addresses the optimisation of landscape benefits in all areas. Consideration will be given to whether additional protection can be given to non-designated landscapes.</p>
<b>E013-802 Malvern Hills AONB Unit</b>	
<p>We welcome the focus on the Malvern Hills (and Cotswolds) AONBs in this section. We would prefer that reference to the need to comply with statutory AONB Management Plans is included</p>	<p>Support noted. Consideration will be given to the changes suggested.</p>

Consultee comments	Initial Officer response
in the policy wording rather than just in the reasoned justification.	
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
The policy should also link with Objectives 9, 9 and 10 (see comments in Q3.1).	The links between the objectives and policy drivers will be reconsidered.
7.142: Trees and Woodlands in Worcestershire: Biodiversity and Landscape Guidelines for their Planting and Management should also be flagged to inform restoration, particularly, but not exclusively, in already wooded landscapes.	Changes will be made to make reference to these guidelines.
7.144: Measures should also include the protection and enhancement of the setting of settlements appropriate to the spatial morphology of the settlement and inherited character of its setting and views.	Changes will be considered to incorporate these concepts into the Reasoned Justification for Policy MLP19.

## MLP 20: Agriculture and Soils

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 2	No: 0	Don't know:2	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	E005-817 CPRE Worcestershire  E026- 813 Worcestershire Wildlife Trust  E056-1782L: RSPB

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?

Yes: 4	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E056-1782L: RSPB

## Comments on MLP 20

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E005-817 CPRE Worcestershire</b>	
MLP20: Again the word “only” is needed. “Best and most versatile” (BMV) covers land down to grade 3A, but the barrier between 3A and 3B is indistinct and some classifications are according to a percentage chance of it being BMV land. The policy should not have sudden cut off at 3A, but require measures proportionate to the character of lower grades, probably meaning substantial measures for 3B and relatively little for grade 5. Grade 5 is often heaths and other land that is hardly cultivated and is likely to be subject to special considerations as a result of its flora. We have come across cases of landowners arguing that land is 3B, not 3A, where the problem is either bad husbandry or even a non-objective survey; this has happened in relation to at least one solar farm application.	Policy MLP 20 is considered to be in accordance with national policy with regard to the consideration of Best and Most Versatile Agricultural Land. It is noted that the classification of agricultural land is not always clear and may require the consideration of additional information as part of a planning application.
<b>E026- 813 Worcestershire Wildlife Trust</b>	
We are pleased to support the commentary in paragraph 7.161 and welcome the recognition it gives to the need to integrate future agriculture with wider GI needs.	Support noted.
<b>E056-1782L: RSPB</b>	
The RSPB agrees that the policies and the reasoned justification provide sufficient clarity. For Policy MLP 20 (Agriculture and Soils), we are pleased to see that the policy emphasises conserving and safeguarding the long term potential of Best and Most Versatile (BMV) agricultural land rather than requiring (or implying a preference for) restoration of BMV land to agriculture.	Support noted.

## **MLP 21: Geodiversity**

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E031-800 Herefordshire & Worcestershire Earth Heritage Trust



Yes: 3	No: 0	Don't know:1	Written responses (see below)
E041-717 Natural England			

**Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?**

Yes: 3	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E031-800 Herefordshire & Worcestershire Earth Heritage Trust

**Comments on Policy MLP 21**

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MPL21: Again the word "only" is needed. There will be cases where a geological exposure will be destroyed. In such cases, it may be possible to mitigate this with a replacement of equal or better quality in another part of a quarry. The statement on that principle in 7.170 is thus welcome.	National Planning Policy makes it clear that "All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area." The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this. Support for paragraph 7.170 is noted.
<b>E031-800 Herefordshire &amp; Worcestershire Earth Heritage Trust</b>	
In terms of future extraction of any mineral resources, Earth Heritage Trust feel that it would be helpful to oblige operators of working extraction sites to allow periodic access to log and record the extraction faces. These sites will provide opportunities to enable a better understanding of geology of the county and to inspect fresh exposures, largely lacking elsewhere. Where extraction is likely to yield	Part d of policy MLP 21 is intended to address this point stating that "A level of technical study appropriate to the feature will be required to demonstrate that the proposed development...will optimise opportunities to improve the legibility and understanding of geodiversity, integrating other green infrastructure components where appropriate."

<b>Consultee comments</b>	<b>Initial Officer response</b>
fossils, in particular vertebrate remains but also unusual invertebrate and plant fossils and other artefacts a watching brief should be in place.	In addition Paragraph 7.170 states that where there are impacts on designated geological assets "Mitigation will be expected to contribute to geological understanding. This might involve recording and publishing findings or exposing comparable features elsewhere." And paragraph 7.173 states "it is expected that opportunities to record significant features for scientific benefit are optimised and where features can be preserved this will be encouraged."

## MLP 22: Water Environment

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 0</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	None	E026- 813 Worcestershire Wildlife Trust  E048-719 Environment Agency

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know:1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E048-719 Environment Agency

## Comments on MLP22

Consultee comments	Initial Officer response
<b>E026- 813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support this policy and in particular sub-sections b), c) and d). We also welcome the commentary in paragraphs 7.187 – 7.194, which provide helpful guidance on delivering a better water environment in line with the plan vision.</p>	<p>Support noted.</p>
<b>E048-719 Environment Agency</b>	
<p>The major raw materials of the minerals industry often come from Principal and Secondary aquifers which can raise potential conflicts of interest. We have interest in the strategic location of the mineral quarry sites, the operational phase of the quarry sites to ensure pollution prevention/ water resource protection, and the final restoration phase of such sites.</p> <p>We would like to see more emphasis within the Worcestershire Minerals Local Plan placed on the protection of <i>water resources</i> including those resources within groundwater and rivers in the aquifers of Worcestershire. No reference is made to this aspect in any documents relating to the Plan.</p> <p>The County of Worcestershire contains several important Principal Aquifers which are used for strategic public drinking water supplies and these are also the same rocks which are sought for mineral/ rock extraction from quarrying. In river valleys, sand and gravel deposits are classified as Secondary Aquifers providing important base flows to watercourses which again are the same deposits used for quarrying. Therefore, we would expect to see acknowledgement to this aspect within the Worcestershire Minerals Local Plan considering the importance of protection of the water environment from the influence and potential impacts of quarry activities notably dewatering of groundwater and impact from pollution incidents on groundwater quality. We provide further detailed information on these aspects below.</p>	<p>Noted. Consideration will be given to addressing these issues in both Chapter 2 "Portrait of Worcestershire" and in relation to policy MLP 22.</p>
<p><b>Groundwater Protection Principles</b> We have developed aquifer classification maps to assist identifying aquifers which are important to protect from a water resource and environmental perspective. These aquifers are used for drinking water supply and to support</p>	<p>It was the Council's intention to address these issues, but it is recognised that this requires further work. The information you highlight will be considered and changes incorporated throughout the document.</p>

Consultee comments	Initial Officer response
<p>river flows and wetland ecosystems. Protection of aquifers from any quarrying activities which have the potential to impact upon them is therefore critical.</p> <p>We recognise that most hard rock quarry activities mainly from limestone/ sandstone rock take place within Principal Aquifer locations which contain high levels of groundwater storage and availability which support not only large more strategic abstractions utilised by water companies for public drinking water supply but also provide critical river base flows to watercourses.</p> <p>Deposits of more unconsolidated sand and gravels on the other hand, are often located within Secondary Aquifers close to watercourses within river terrace and low lying flood plain settings. Secondary Aquifers are capable of supporting water supplies at a local rather than strategic scale, and in some cases form an important source of base flow to local rivers. Quarrying within such site settings will more than likely encounter the local shallow groundwater table which will require some form of dewatering to recover the mineral. Therefore, the protection of the water environment from any influences of quarrying mainly from the impacts of quarry dewatering or contamination of water quality from onsite quarry activities is vitally important to water security for not only critical abstraction borehole users but also the protection of groundwater base flows feeding into rivers within the environment.</p> <p>The Environment Agency has a range of tools available to enable risks to groundwater to be quantified and assessed during the planning application process. Aquifer classification mapping is available identifying the importance of aquifers in a hierarchal approach from the highest classification of Principal aquifer through Secondary to the lowest designated as Un-productive strata.</p> <p>Also, other tools available for assessing groundwater protection include Source Protection Zone (SPZ) mapping which are zones of protection around important water supply boreholes mainly for water company</p>	

Consultee comments	Initial Officer response
<p>drinking water purposes and groundwater vulnerability mapping which also provides useful dataset on vulnerability of groundwater from quarry activities which could lead to pollution. We would like to see these tools embedded within the decision making process for quarry applications when defining groundwater risk and reference should be made within the Plan. Quarrying is an activity which physically removes the aquifer rock and the usable groundwater resources contained within those aquifers which may lead to severe impacts on the water environment if not managed effectively, especially if watercourses derive base flows from this same source of groundwater.</p> <p>We have more concerns where quarries are <i>worked sub water table</i> and thus dewatered by pumping to enable the rock/ deposit to be extracted as dewatering can lower the water table and impact surrounding water features using the same groundwater. Such water features at risk can include watercourses, ponds, boreholes wells and springs which rely on the same source of groundwater for their very existence.</p> <p>Particular attention should also be given to wetland features which are often designated as SSSIs or other designations such as SACs for example which rely on groundwater for their very existence.</p>	
<p><b>The role of Hydrogeological Impact Assessment (HIA)</b>  <b>Background</b>  There is a balance to be found between the extraction of rock and mineral aggregates versus the protection of the aquifer which is being removed and water resources potentially being lost to this extraction. Quarries physically disturb aquifers by removing the rock which makes up the aquifer where groundwater is stored. They can also lower groundwater levels, affect groundwater quality or impede or intercept groundwater flow. We would seek to achieve appropriate protection for water resources from quarry developments so that the aquifers can operate sustainably as a water resource.</p>	<p>As noted above, these issues will be considered and changes made as appropriate. Policy MLP 26 would enable planning obligations, such as Section 106 agreements, to be put in place if required.</p>

Consultee comments	Initial Officer response
<p>Mining and quarrying activities often involve dewatering, sometimes for substantial periods of time over the lifetime of the quarry. Such dewatering can lead to the loss of water supply from wells and boreholes, the removal of natural groundwater discharges to ponds and streams and drying or deterioration of wetland ecosystems. All of these may require protection or the loss to be mitigated. The groundwater table may in some cases be permanently lowered, leading to irretrievable reduction or loss of spring and stream flows.</p> <p>Quarrying in certain circumstances can cause problems by draining groundwater from an aquifer, diverting groundwater flows which support the water environment, or by interconnecting two separate aquifers. These types of issues can be subject to planning controls and where the effects of dewatering can be mitigated against, we may seek the use of agreements under Section 106 of the Town and Country Planning Act to put such measures into effect.</p> <p>The paramount concern is for water resources within groundwater Source Protection Zones which have been defined by us for groundwater abstractions, notably public drinking water supplies.</p>	
<p><b><i>Examining any impacts upon the water environment from quarrying activities</i></b></p> <p>It is the responsibility of the applicant through the planning process, to ensure that the development will also not adversely affect any existing legal water interests/ rights including abstraction licences in the proposal area nor any natural water features such as springs, watercourses and ponds which rely on groundwater for their existence. All licences have protected rights to abstract water and these are afforded a high degree of protection from activities which have the potential to cause derogation such as dewatering from quarrying where the effects are not always seen straight away but over a continued period of time.</p> <p>Therefore, we would expect quarry operators at the planning application stage to provide a detailed and robust assessment, through the environmental impact assessment (EIA) process where relevant, which should assess any potential impacts from dewatering including</p>	<p>These issues are addressed by part b of policy MLP 22 and supporting Reasoned Justification paragraphs 7.187-7.192. Consideration will be given to strengthening the concepts and including specific reference to the Environment Agency's guidance documents.</p>

Consultee comments	Initial Officer response
<p>the significance of those impacts. To achieve this, we would recommend that the operator provides a detailed quantitative hydrogeological impact assessment (HIA) in-line with the Environment Agency guidance documents provided below (see links). Attention will need to be given to carrying out a HIA to assess local impacts on the water environment and provide a site specific conceptual model for water resources in the proposed area. These controls are undertaken during the planning application stage.</p> <p>The role of the HIA is to identify any water features within a designated radius of the development site (via a water features survey) and then assess the full potential of any quantitative impacts and risks on the water environment which could take place from the activity of quarrying, notably from any dewatering pumping activities within excavations which has a zone of influence within the aquifer environment. We would recommend that an appropriately qualified hydrogeological consultant undertakes this specialist HIA assessment work which is provided in a lines of evidence approach to demonstrate any risks from the development proposal including the significance of the risk and whether it can be mitigated against to enable development.</p> <p>The Environment Agency's summary guidance on assessing the impact of dewatering on water resources (in this case from quarry dewatering) can be found at this link and we would expect to see this methodology used in any HIA assessment:  <a href="http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/scho0407bmaf-e-e.pdf">http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/scho0407bmaf-e-e.pdf</a>  Our main detailed report entitled: Hydrogeological impact appraisal for dewatering abstractions, PDF 204 pages, can be found at:  <a href="https://www.gov.uk/government/publications/hydrogeological-impact-appraisal-for-dewatering-abstractions">https://www.gov.uk/government/publications/hydrogeological-impact-appraisal-for-dewatering-abstractions</a></p>	
<p><b>Restoration Plans</b>  From a restoration perspective, the removal of rock and minerals from aquifers also leaves large void spaces which can have significant</p>	<p>The Council agrees that having due regard to final restoration at an early stage is essential. Consideration will be given to strengthening this concept in the plan as a whole.</p>

Consultee comments	Initial Officer response
<p>effects on reducing not only the quantity of groundwater available but also the quality of water resources. Quarry applications to Mineral Planning Authorities should have due regard to the final restoration of the site at a very early stage in the process as this aspect is often overlooked. Back filling of voids with waste materials can have a detrimental effect on the water environment and we would recommend planning control on such strategies. Restoration of the land post extraction should be done in a sympathetic way to provide protection to not only the visual landscape, but also due regard to water resources protection.</p> <p>We understand the principle that restoration of mineral sites is integral to the achievement of sustainable development. We would expect to see site restoration and aftercare plans provided detailing the strategy to be adopted at the planning application stage.</p>	<p>Paragraph 7.192 states that "applications should set out how the proposed development has been designed and will be monitored and managed at all stages of working, restoration and after-use".</p> <p>Consideration will be given to whether the strategic corridor priorities in policies MLP 2 to MLP 6 should be amended to strengthen links to or actions for water resources. The Council would welcome further discussion with the Environment Agency on this issue.</p>
<p>Where it is proposed to landfill and re-landscape post quarrying to restore sites back to another beneficial use, landfilling activities will more than likely require an Environmental Permit and will have to meet the criteria set within EPR/ Landfill Regulations. It is common to use site won materials and to import a proportion of inert waste materials for this purpose. We would recommend that site operators follow a twin tracking process with planning and permitting in tandem.</p> <p>In all cases, and certainly in more sensitive higher risk principal/ secondary aquifer environments, only clean inert materials should be considered for landfilling during the restoration phase. Operators should have regard to the Mining Waste Directive and discuss this further with our National Permitting team for any requirements in this respect. We would expect an EIA to include relevant information on the waste regulatory implications of the restoration proposals.</p> <p>For inert landfills under EPR/ landfill regulation we would require:</p> <ul style="list-style-type: none"> <li>• sites to have an appropriately constructed geological basal and side liner which is a requirement for the Landfill Regulations.</li> </ul>	<p>Any landfilling would be considered in conjunction with policy WCS 5 of the adopted Worcestershire Waste Core Strategy. Consideration will be given to strengthening references to the Waste Core Strategy and Environment Agency guidance on landfill and waste recovery.</p>



Consultee comments	Initial Officer response
<ul style="list-style-type: none"> <li>leachate and gas monitoring will be required where appropriate</li> <li>'Duty of care' should be applied to all materials before they are brought to site i.e. by chemical sampling at the production site to demonstrate that these materials meet the Waste Acceptance Criteria (WAC) for inert landfills.</li> </ul>	
<p>Furthermore, the HIA should include an assessment of impacts on groundwater quality and quantity as a result of back-filling extracted voids with inert materials. In particular this can have an impact on the groundwater flow regime, and it must be demonstrated that this will not increase flood risk as a result of the development, as well as risk of pollution to groundwater.</p>	<p>Wording changes will be considered to reflect these issues.</p>
<p>During the restoration phase, there is an opportunity to provide an enhanced environment which could include the construction of new wetland environments for the benefit of biodiversity. This is particularly applicable within riverine environments where sands and gravels have been extracted as the shallow groundwater table recovers post dewatering.</p>	<p>Noted and agreed. Policy MLP 22 part c seeks gains for the water environment, supported by Reasoned Justification paragraph 7.193 and the Strategic Corridor priorities in policies MLP 2 to MLP 6.</p>
<p><b>Policy MLP22: Water Environment</b>  Policy MLP22 is focused on protecting and enhancing the water environment. However, as reflected in earlier comments, it is felt that the WMLP does not go far enough in terms of embedding effective flood risk betterment. The WLP policy framework focuses on avoiding an increase in flood risk or damage to resources as a result of development rather than securing meaningful betterment.</p> <p>For example, bullet point (a) in Policy MLP22 states the WMLP "will avoid increasing flood risk to people and property, managing any residual risk through suitable adaptation and mitigation measures". Consequently, the policy does not encourage development proposals to deliver any betterment in areas at existing risk. Without a focus on reducing flood risk, the WMLP is unlikely to fulfil its more ambitious outcomes, reflected in paragraph 7.182, to assist in the delivery of interrelated plans and strategies such as the River Basin Management Plan, Local Flood Risk Management Strategy and Strategic Flood Risk Assessment. For example, the SFRA indicates that the</p>	<p>As you note, Policy MLP 22 part a seeks to avoid increasing flood risk. Part d, requiring proposals to "optimise gains for the water environment", was intended to apply to all aspects of the water environment including flood risk. Examples noted in paragraph 7.193 include "restoring or enhancing the naturalness of watercourses, including through creating braided stream beds or adding meanders, which benefit biodiversity and reinstate more natural fluvial-floodplain processes, provide additional channel conveyance or flood storage" and "alleviating flood risk by using quarry voids for water storage".</p> <p>However, consideration will be given to clarifying and strengthening requirements for flood risk betterment. The Council would welcome further discussion with the Environment Agency on this issue.</p>

Consultee comments	Initial Officer response
<p>WMLP will “include policies that require proposals to demonstrate that they will secure the betterment of the water environment and enable...flood mitigation and restoration...where appropriate”.</p> <p>However, this is not adequately replicated in the WMLP. A stronger policy stance is therefore required to ensure mineral developments demonstrate how flood mitigation and restoration solutions (amongst other flood betterment options) have been assessed; and where applicable, delivered.</p>	
<p><b>Climate Change</b>            Whilst appraising flood risks to and from potential sites, flood risk assessments should consider the impacts of climate change. Climate change allowances for fluvial flood risk have recently changed. We attach our Area climate change guidance note for reference <b>[WCC reference E048-719 in Appendix 1]</b> and inclusion in the plan where deemed necessary. Greater emphasis should be placed on the assessment of climate change within the plan, particularly with regards the assessment of flood risk.</p>	<p>Paragraph 7.184 requires "taking account of climate change over the longer term". Consideration will be given to whether this needs to be included within the policy itself.</p>

## MLP 23: Historic Environment

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 2	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970            Worcestershire County Council, Landscape Advisor</p>	<p>None</p>	<p>E019-2459 Wildmoor Residents' Association</p>	<p>E005-817 CPRE Worcestershire</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E033-683/1077/2279 South Worcestershire Councils</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E035-509 Worcestershire</p>

Yes: 2	No: 0	Don't know: 1	Written responses (see below)
			Archive & Archaeology Service  E039-2212 Bromsgrove District Council  E047-716 Historic England

**Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied?**

Yes: 4	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E032-1504 Heaton Planning on behalf of Tarmac  E033-683/1077/2279 South Worcestershire Councils  E035-509 Worcestershire Archive & Archaeology Service  E039-2212 Bromsgrove District Council  E047-716 Historic England

**Summary of responses to Policy MLP 23**

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP22: Again the word "only" is needed. I am not clear what has replaced PPG16, but the principle of "preserve or record" has not changed. However, this does not seem clearly to be incorporated into the policy. Two documents are cited, one only by way of example. The thrust of the policy, as set out, is for measures to be agreed, but the underlying	It is assumed that these comments refer to Policy MLP 23.  PPG 16 has been replaced by the National Planning Policy Framework which sets out guidelines to "conserve heritage assets in a manner appropriate to their significance." Policy MLP 23 addresses protecting and

Consultee comments	Initial Officer response
<p>principles for agreement are not. Mineral exploitation completely and irreversibly destroys archaeological remains on the surface. Historic buildings similarly cannot be re-created after destruction; the best that could be re-made is an ersatz reproduction of little historic value. PPG16 required preservation by record, where actual preservation was impossible; I believe the principle still applies and should be stated. The requirement should apply not only to areas to be quarried but to any land affected, including those used as temporary stores for overburden, during mineral working. Archaeology may consist in humps and bumps, which will almost inevitably be damaged in the course of earthmoving operations. It would require an archaeologist to identify precisely the original land surface and oversee its reinstatement, which is unrealistic. A recent example of this was a planning consent, involving the placing of overburden on a field with surviving ridge and furrow, probably of medieval origin, which is rare in Worcestershire. With the best will in the world, machine operators will be unable to reinstate that.</p>	<p>enhancing heritage assets and their settings from the impacts of all aspects of mineral development including working and processing of materials and storage of overburden. As such, the issues you raise in relation to archaeology and historic buildings are intended to be addressed through Policy MLP 23 as drafted in the Worcestershire Minerals Local Plan Third Stage Consultation.</p> <p>This is supported by paragraph 7.209 which states "Developers will be expected to provide for the recording, preserving and future management of important features in the historic environment."</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>We object to Policy MLP23 as it is too restrictive and not consistent with the NPPF. Policy MLP23 is contrary to the reasoned justification in paragraphs 7.197 to 7.211.</p>	<p>It is the Council's intention for policy MLP 23 to reflect the NPPF with regard to the historic environment. Changes to policy MLP23 will be made to address this issue.</p>
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
<p>It is considered that policy MLP23 is inconsistent with para 133 of the NPPF. The local minerals policy does not refer to <b>substantial</b> public benefits that outweigh the harm or loss; or the requirement for all of the bullet point criteria (as listed in para 133) being satisfied where substantial benefits cannot be demonstrated.</p>	<p>It is the Council's intention for policy MLP 23 to reflect the NPPF with regard to the historic environment. Changes to policy MLP23 will be made to address this issue.</p>
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
<p>Note: comments on HE will be supplied by Adrian Scruby, Historic Environment Advisor.</p>	<p>Comments below (E035-509).</p>
<b>E035-509 Worcestershire Archive &amp; Archaeology Service</b>	
<p>With regard to the <i>Worcestershire Minerals Local Plan - Third Stage Consultation</i> and <i>Policy MLP 23: Historic Environment</i>, paragraph 2.103 acknowledges that mineral working can affect large areas with the resultant loss of heritage assets of archaeological interest. It also notes that this can and does provide opportunities for archaeological investigation in advance of and during extraction, thereby securing the</p>	<p>It is the Council's intention for policy MLP 23 to reflect the NPPF with regard to the historic environment. Changes to policy MLP23 will be made to address this issue and the wording changes suggested will be considered.</p>

Consultee comments	Initial Officer response
<p>preservation by record of any threatened archaeological remains, but that opportunities for preservation in situ are often very limited or non-existent.</p> <p>On this basis we would note that <i>part a</i> of policy 23, which states <i>Planning permission will be granted where... will not cause unacceptable harm to or loss of significance of any heritage asset, or its setting, either directly or indirectly, unless there are public benefits that outweigh that harm or loss...</i> appears at odds with paragraph 2.103 and the recognition that the loss of undesignated heritage assets of archaeological interest of local to regional significance is a likely consequence of mineral extraction, the loss of which can typically be satisfactorily mitigated by conditions requiring a programme of archaeological works in advance of and/ or during extraction.</p> <p>Consequently, we would suggest that in accordance with local and national planning policy a more clear distinction should be made here between designated and undesignated heritage assets e.g.</p> <p><i>will not cause unacceptable harm to or loss of significance of any <b>designated</b> heritage asset, or its setting, either directly or indirectly, unless there are public benefits that outweigh that harm or loss...</i></p> <p>and with regard to undesignated heritage assets - <i>permission will be granted where satisfactory provision can be made to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.</i></p> <p>This would be more compliant with the NPPF (paragraph 141) and local plan policies such as SWDP 24d and also better address the issue that undesignated heritage assets of archaeological interest may be lost during mineral extraction and that this loss is likely to be considered both acceptable and mitigatable.</p>	
<p>7.200 We would note that significant potential exists for the discovery of as yet unknown archaeological remains that are not recorded on</p>	<p>Noted. Wording changes will be considered to address this point.</p>

Consultee comments	Initial Officer response
<p>the Historic Environment Record, particularly in key areas for early settlement such as the river valleys and terraces typified by the Severn, Avon, Salwarpe and Carrant Brook. A key aim of any field evaluation commissioned to support a planning application/ Environmental Impact Assessment would be to determine the presence or absence of any heritage assets of archaeological interest and any application/ EIA that does not robustly address this issue would be open to challenge on the grounds that the presence/ absence and significance of any heritage assets of archaeological interest has not been determined and therefore the impact of extraction cannot be properly understood (e.g. are previously unknown remains present – what degree of significance are they (local, regional or national), what is the level of impact and can this be acceptably mitigated with regard to local and national planning policy?).</p>	
<p>7.203 states: <i>The assessment will need to be sufficient to enable the significance of the asset and its setting to be understood.</i> Any application for mineral extraction will potentially involve multiple heritage assets and we would suggest that the wording here should be changed to reflect this e.g. <i>The assessment will need to be sufficient to enable the significance of any assets and their setting to be understood.</i> This comment also applies to the wording of Policy MLP 23 where the wording states <i>A level of technical study appropriate to the heritage asset and its setting will be required...</i> We would again suggest that the policy wording should be changed to reflect the likelihood that multiple assets are likely to be considered in any single application.</p>	<p>Noted. Wording changes will be considered to address this point.</p>
<p>7.204 we would note that in accordance with paragraph 132 of the NPPF Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be <b>wholly exceptional</b>. We would also suggest that this section dealing with the presumption against development resulting in substantial loss or harm to designated heritage assets should occur sooner in the supporting text to Policy MLP 23, reflecting upfront the strong presumption against any such proposed</p>	<p>It is the Council's intention for policy MLP 23 to reflect the NPPF with regard to the historic environment. Changes to policy MLP23 will be made to address this issue and the wording changes suggested will be considered.</p>

Consultee comments	Initial Officer response
<p>development.</p> <p>We would also note that paragraph 133 of the NPPF further states: <i>Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</i></p> <ul style="list-style-type: none"> <li>• <i>the nature of the heritage asset prevents all reasonable uses of the site; and</i></li> <li>• <i>viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</i></li> <li>• <i>conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</i></li> <li>• <i>the harm or loss is outweighed by the benefit of bringing the site back into use.</i></li> </ul> <p>This further reinforces the strong presumption against any development that would result in substantial harm to or total loss of significance of a designated heritage asset.</p>	
<p>7.206 states that: <i>In areas where remains are relatively abundant and well understood, a new find of a similar nature may or may not add significantly to overall knowledge; something unique or special to that particular environment could be of much greater value. An assessment of importance will need to be based on the merits of the particular site or landscape in question.</i> We would note that this paragraph appears to in part duplicate the aims/ objectives of the preceding paragraph (7.205). We would also note that archaeological remains are a finite and non-renewable resource and so we are unclear on the purpose of this paragraph and would suggest that 7.205 and 7.206 could better be combined as a single paragraph – e.g. <i>In weighing up applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the heritage asset. Any assessment of significance will need to be based on the merits of the particular site or landscape in question.</i></p>	<p>Noted. Wording changes will be considered to address this point.</p>
<p>7.113 Table 7.1. I appreciate that this is</p>	<p>Noted. Change to be made to use the term</p>

Consultee comments	Initial Officer response
<p>essentially semantics but the table should read Scheduled Monument and not Scheduled Ancient Monument, the latter being old terminology that has been replaced by Historic England as not all Scheduled Monuments are "ancient". The term is still used in some legacy reports etc but is not considered to be current terminology. See:</p> <p><a href="https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/">https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/</a></p>	<p>Scheduled Monument.</p>
<p><b>E039-2212 Bromsgrove District Council (informal response)</b></p>	
<p>Policy MLP23: Historic Environment explains that developments must have regard to the historic environment. However, the Council are concerned that the policy wording of part a) uses the phrase 'unacceptable harm'. This wording does not reflect the NPPF and the Council believes it should, as the NPPF wordings are established measures of the impact on heritage assets.</p> <p>Policy MLP23 could also provide a distinction between nationally designated heritage assets and locally designated heritage assets as to the level of harm a particular heritage asset or its setting may sustain before being detrimental.</p>	<p>It is the Council's intention for policy MLP 23 to reflect the NPPF with regard to the historic environment. Changes to policy MLP23 will be made to address this issue and the wording changes suggested will be considered.</p>
<p><b>E047-716 Historic England</b></p>	
<p>We are supportive of the inclusion of a specific policy for the historic environment, Policy MLP23 and consider that this is a key element in ensuring that the Local Plan has a positive strategy for the historic environment.</p>	<p>Support noted.</p>
<p>We have the following comments to raise:</p> <p>Planning permission will be granted where it is demonstrated that the proposed mineral development will protect, <u>conserve</u> and enhance the historic environment.</p> <p>A level of technical study* appropriate to the heritage asset and its setting will be required to demonstrate that the proposed development:</p> <p>*We would advise the inclusion of some additional text that states that developers should submit an appropriate level of desk based assessment, and where necessary a field evaluation, by a fully qualified and appropriate professional, in line with the NPPF.</p> <p>a) Will not cause unacceptable harm to or</p>	<p>It is the Council's intention for policy MLP 23 to reflect the requirements of the NPPF with regard to the historic environment. Changes to policy MLP23 will be made to address the issues raised and the wording changes suggested will be considered.</p>



Consultee comments	Initial Officer response
<p>loss of significance of any heritage asset, or its setting, either directly or indirectly, unless there are public benefits that outweigh that harm or loss; and</p> <p>b) Will optimise enhancement of the historic environment, integrating other green infrastructure components, where appropriate;</p> <p>c) <u>Includes appropriate restoration, informed by and sympathetic to the historic environment (including heritage assets and historic landscape character)*;</u></p> <p>d) Includes appropriate long term management of the restored mineral site.</p> <p>*Or similar wording.</p>	
<p>We would advise that where there is unavoidable loss to the significance of heritage assets, including to their setting, that there is a clause within the policy that states that the significance of the heritage asset will be recorded and added to the Historic Environment Record (HER).</p>	<p>Noted, consideration will be given to addressing this issue.</p>
<p>Reasoned Justification Comments</p> <p>7.198 Paragraph 128 of the NPPF requires local authorities to request desk based assessment and where necessary, field based evaluation, where a site has the potential to include heritage assets with archaeological interest. We recommend that heritage assessment is undertaken prior to the allocation of sites for minerals working and prior to the granting consent for planning permission, therefore we recommend amending:</p> <p><u>'..., particularly those with archaeological interest may not be apparent until <del>during the course of the development</del> the assessment process prior to development.</u></p> <p>We would further recommend that there is more detailed reference to what a heritage assessment should include, such as reference to the Historic Environment Record will also be required, as well as designated heritage assets.</p>	<p>Noted, changes will be considered to address these issues.</p>
<p>7.204 We recommend consideration of whether</p>	<p>Consideration will be given to whether these</p>

Consultee comments	Initial Officer response
any of this text should be in the policy or how this justification text relates to the policy wording.	concepts need to be incorporated within the policy itself.
We would advise including some text about appropriate restoration principles for the historic environment and the type of principles that developers could consider.	Paragraphs 7.208 – 7.210 were intended to address this. Consideration will be given to strengthening advice on restoration principles for the historic environment.
We would advise that where there is discussion of 'wet minerals working' an introductory sentence is added to explain what part of the policy this relates to/ is adding to. Is this the only mineral working that would require the inclusion of specific text?	Noted, changes will be considered to address these issues.
7.208 We support the inclusion of information about how minerals development can enhance the historic environment and welcome this. It would be beneficial to see more information on how the historic environment can be considered through the restoration principles embedded within the strategic corridor policies.	<p>Support for paragraph 7.208 noted.</p> <p>We also recognise your concerns over the lack of emphasis for the historic environment in the Strategic Corridor priorities in policies MLP 2 to MLP 6. The priorities were developed in discussion with members of the Minerals and Green Infrastructure working group under the Worcestershire Green Infrastructure Partnership, which included Worcestershire County Council's Historic Environment and Historic Landscape officers. Serious consideration was given to the historic environment and heritage assets in developing the approach set out in the Third Stage Consultation.</p> <p>Appendix 3 states that "Defining the boundaries of the strategic corridors based on landscape character is... considered an appropriate mechanism for addressing the historic environment at a landscape scale. <i>Worcestershire's Historic Landscape Characterisation</i> has been used to verify the validity of this approach but has not directly informed the boundaries of the strategic corridors. Other data was considered in relation to the historic environment, including distribution of designated and non-designated assets. This was not considered meaningful at a landscape-scale due to the variation in type, age and importance of assets across wider areas and the fact that a lack of recorded assets in an area does not necessarily mean that assets are not present."</p> <p>The approach in the Third Stage Consultation was to set a positive framework of priorities at the strategic level and to address particular</p>

Consultee comments	Initial Officer response
	<p>constraints through policy criteria for consideration on a site-by-site basis through the Development Management policies (including Policy MLP 23 on the Historic Environment).</p> <p>Further discussion with Historic England on this matter would be welcome to ensure the approach is robust.</p>

## MLP 24: Transport To and From Site

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 3	No: 1	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	<p>E014-634 Pershore Town Council</p>	<p>E019-2459 Wildmoor Residents' Association</p>	<p>E005-817 CPRE Worcestershire</p> <p>E014-634 Pershore Town Council</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E040-860 The Canal &amp; River Trust</p> <p>E047-716 Historic England</p>

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied

Yes: 3	No: 0	Don't know:1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	<p>None</p>	<p>E019-2459 Wildmoor Residents' Association</p>	<p>E005-817 CPRE Worcestershire</p> <p>E032-1504 Heaton Planning on behalf of Tarmac</p> <p>E040-860 The Canal &amp; River Trust</p> <p>E047-716 Historic England</p>

## Comments on MLP 24

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
<p>MLP24: Again the word “only” is needed, this time in both of the first two sentences. Also in MLP25.</p>	<p>National Planning Policy makes it clear that "All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area." The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this.</p>
<b>E014-634 Pershore Town Council</b>	
<p>There are concerns regarding traffic routing, “The Worcestershire advisory lorry route for the Vale of Evesham is recognised as a particular problem”. A policy that excludes extraneous heavy vehicles through the centre of towns such as Pershore should be included</p>	<p>The South Worcestershire Development Plan (SWDP) includes policy SWDP 11 “Vale of Evesham Heavy Goods Vehicles Control Zone”. The Minerals Local Plan will sit alongside the SWDP as part of the statutory Development Plan, and therefore this policy will be taken into account when considering applications for minerals development. It is therefore not necessary for this policy to be repeated within the Minerals Local Plan.</p> <p>However, policy MLP 24 of the Third Stage Consultation document requires proposals to demonstrate that sites will be well connected to the strategic transport network, will not have unacceptable impacts on safety or congestion, and will not have unacceptable adverse impacts on the environment or quality of life along proposed routes.</p>
<b>E032-1504 Heaton Planning on behalf of Tarmac</b>	
<p>Policy MLP24 states the site will be well connected to the strategic transport network. However, on reviewing the Strategic Corridors it is unclear how large areas of some of these corridors would be able to access the strategic transport network.</p> <p>This is further evidenced by the Sustainability Appraisal, at page 59 the summary of SA findings for the Strategic Corridors registers the impact upon Traffic and transport for all Strategic corridors as being unknown.</p>	<p>Noted. Consideration will be given to reviewing and clarifying strategic transport links for the Strategic Corridors.</p>

Consultee comments	Initial Officer response
<p>I trust that these comments are helpful. If you have any queries or would like to discuss any of the matters raised in more detail, please do not hesitate to contact me.</p>	
<b>E040-860 The Canal &amp; River Trust</b>	
<p><b>Canals</b>  The MLP and supporting document on Water Transport document correctly identifies the issues which may make it more difficult to promote freight by water on the canal network.</p> <p>The Trust would in principle support the use of canals to carry freight though this would largely depend on the extent required and maintenance implications for the waterway. The Trust should be contacted for further discussions if this is to be pursued as an option for any potential new sites. The particular working practises and frequency of movement would need to be considered in determining the overall suitability of any proposals for freight on the waterway. For sites not proposing to use water to carry freight, vehicle haulage routes will also need to be considered through the submission of a Transport Assessment and their impact on any routes adjacent or over the canal, in particular impact on bridges, would need to be fully considered as part of any submission.</p>	<p>Noted. Wording changes will be considered to address the points you have raised.</p>
<p><b>Policy MLP 24</b>  Paragraph 1.12 of the Water Transport Background document recommends that the MLP should include a positive policy framework to encourage and enable movement of freight by water and we are pleased to note the content of Policy MLP 24 attempts to do this. We would however suggest that the reasoned justification text of this policy includes mention of the need to engage with the owners &amp; operators of alternative strategic transport routes at the earliest possible stage in order to better understand opportunities, limitations and implications of the proposal to inform the transport assessment.</p>	<p>Noted. The changes suggested will be considered.</p>
<b>E047-716 Historic England</b>	
<p>Policy MLP24 states that it is positive for the historic environment as there should be no 'unacceptable adverse impact on the environment' yet there may be harm as set out in NPPF terminology which is not classified as 'unacceptable adverse impact'? There could also be harm to the historic environment through</p>	<p>Noted. The links between the objectives and policy drivers will be reconsidered.</p>

Consultee comments	Initial Officer response
<p>the support of options such as pipelines which could cause harm to buried archaeological remains, for example.</p> <p>We consider it would be beneficial to re-assess each of the policies using a single objective for the historic environment and then include any necessary amendments to the policy or reasoned justification text.</p>	

## MLP 25: Transport Within Mineral Sites

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied

Yes: 3	No: 0	Don't know:1	Written responses (see below)
<p>E007-2452: Mr N Dean</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire

### Comments on MLP 25

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP24: Again the word "only" is needed, this time in both of the first two sentences. Also in	National Planning Policy makes it clear that "All plans should be based upon and reflect the

Consultee comments	Initial Officer response
MLP25.	<p>presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."</p> <p>The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this.</p>

## MLP 26: Sustainable Development Delivery

### Q7.1 Do the policies and the reasoned justification contribute towards the achievement of the vision, objectives and spatial strategy?

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E026- 813 Worcestershire Wildlife Trust

### Q7.2 Do the policies and the reasoned justification provide sufficient clarity as to how the policy would be applied

Yes: 4	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970	None	E019-2459 Wildmoor Residents' Association	E026- 813 Worcestershire Wildlife Trust  E048-719 Environment Agency

Yes: 4	No: 0	Don't know:1	Written responses (see below)
Worcestershire County Council, Landscape Advisor  E041-717 Natural England			

**Comments on MLP 26**

Consultee comments	Initial Officer response
<b>E026- 813 Worcestershire Wildlife Trust</b>	
<p>We are pleased to support this policy and the commentary provided in paragraphs 7.243 and 7.244 of the reasoned justification, which provide important guidance on delivering required long term management for the future.</p> <p>We would however recommend that the final sentence of the first paragraph is altered to read ‘... a planning obligation MAY be required...’ as this better aligns with the commentary in the reasoned justification and elsewhere in the plan.</p>	<p>Supported noted. The changes suggested will be considered.</p>
<b>E048-719 Environment Agency</b>	
<p><b>Monitoring and Mitigation</b> Monitoring of the water environment can be secured through planning controls with a Section 106 monitoring agreement outlining monitoring locations, frequency of monitoring, trigger levels for actions and reporting requirements. It is vital to understanding that the risks and impacts are further managed to the water environment from any operational quarrying activities by an enhanced monitoring scheme, pre/ during and post development to demonstrate any derivations away from baseline monitoring conditions which will inform the mitigation strategy.</p> <p>Mitigation strategies should be provided within the EIA/ HIA approach outlining what measures will be taken should an adverse impact be realised during quarry operations. We note that some of the site allocations in the Plan are mainly extensions to existing quarry sites and a scheme of impact assessment (EIA/ HIA), monitoring, mitigation and restoration plans should have already been established at those sites.</p> <p>Extensions to such quarries will require the reconsideration of the HIA approach as outlined</p>	<p>Policy MLP 22 requires protection and enhancement of the water environment and for an appropriate level of technical study to be undertaken to demonstrate how impacts will be avoided or minimised, what mitigation and compensation measures might be required, what actions will be undertaken to optimise gains for the water environment, and incorporating long term management. Policy MLP 26 should be read alongside this, providing the policy basis for planning obligations such as Section 106 agreements to be secured.</p> <p>All future applications for mineral development, whether they are allocated sites, windfall sites, extensions to existing quarries or greenfield sites, will be decided on the basis of the adopted Development Plan and any other material considerations. Wording changes will be considered to address the points you raise.</p>



Consultee comments	Initial Officer response
above so that any impacts can be quantitatively assessed for the water environment from the extension proposal and any impact risks identified and addressed with appropriate mitigation.	

**Q7.3 Are there any wording changes which you would suggest to Chapter 7 to improve clarity or any other issues which you think should be considered?**

Yes:	No:	Written responses (see below)
<p>E013-802 Malvern Hills AONB Unit</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p>	<p>E007-2452: Mr N Dean</p> <p>E026- 813 Worcestershire Wildlife Trust</p> <p>E041-717 Natural England</p>	<p>E018-2458 Worcestershire Regulatory Services</p> <p>E013-802 Malvern Hills AONB Unit</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E033-683/1077/2279 South Worcestershire Councils</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p> <p>E048-719 Environment Agency</p>

Consultee comments	Initial Officer response
<b>E018-2458 Worcestershire Regulatory Services</b>	
I have reviewed the third stage consultation on the Worcestershire Minerals Local Plan from an air quality and contaminated land perspective and confirm that we do not have any adverse comments to make.	Noted.
<b>E013-802 Malvern Hills AONB Unit</b>	
Table 7.1 makes no reference to AONBs. Is this intentional?	The usefulness of table 7.1 will be reconsidered.
<b>E019-2459 Wildmoor Residents' Association</b>	
It is very hard to disagree with the stated aspirations, however putting these things in to practice requires considerable effort from developers which in many cases is sadly lacking.	<p>Planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.</p> <p>Once adopted, the new policy framework will enable strong and clear conditions to be</p>

Consultee comments	Initial Officer response
	attached to any planning permissions which are able to be enforced. We agree that this is a key part of the effective operation of the planning system, and we are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the policies can be applied and enforced as intended.
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
<p>It is considered that some of the development management policies lack sufficient clarity for them to be applied consistently and with confidence by decision makers.</p> <p>It is also noted that many of the emerging policies suggest that planning permission will be “granted” if particular conditions are demonstrated. It is suggested that the policies should be amended to say that proposals will be “supported” rather than “granted” because applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. It would be inappropriate to say that planning permission will be “granted” if other material considerations indicate otherwise.</p>	<p>We are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the policies can be applied and enforced as intended.</p> <p>National Planning Policy makes it clear that "All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." and that "Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."</p> <p>The positive policy wording in the Worcestershire Minerals Local Plan Third Stage Consultation is considered to reflect this and is compatible with the approach in the Waste Core Strategy which was found sound in 2012.</p>
Reference is made in paragraph 7.2 to the need to consider Local Plans, the Waste Strategy and adopted Neighbourhood Plans alongside the Minerals Local Plan when assessing site proposals. It is considered that this point need to be strengthened and could be given greater prominence in the Introduction of the Minerals Local Plan.	Noted. Changes to be considered to address this point.
It is suggested that the wording of the DM policies avoid the repetitive use of the word “and” between each criterion and instead use “and” between the penultimate and final bullet point only (MLP15, 16, 18, 19, 20, 21, 22, 23 and 24) as in the case of MLP17. In a similar vein, MLP26 should be amended to delete the repetitive use of the word “and” between the criteria and instead use “or” between the penultimate and final bullet point only.	Noted. Changes to be considered to address this point.

Consultee comments	Initial Officer response
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
See Q7.1	This is addressed under Q7.1 (Policy MLP 19, Landscape)
<b>E048-719 Environment Agency</b>	
<b>Flood Risk</b> Flood Risk policy in the Worcestershire Minerals Local Plan (WMLP) has been informed by the Worcestershire Minerals Local Plan Surface and Ground Water Protection Issues, including Flood Risk Assessment of Submitted Sites (consultation report June 2016). This evidence base was produced to identify flood risk constraints at a strategic level and to inform the WMLP with regards flood risk policy. We support this baseline evidence base and welcome its commission.	Support noted.

## Chapter 8: Safeguarding minerals and supporting infrastructure

### Q 8.1 Exempt Development

Paragraph 8.4 lists types of development as being exempt from safeguarding requirements of Policy MLP 27 and Policy MLP 28.

*a) Do you support the principle of certain types of development being exempt from the requirements of Policy MLP 27 and Policy MLP 28?*

Yes: 3	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	None
E026- 813 Worcestershire Wildlife Trust			
E041-717 Natural England			

*b) Do you agree that the types of development listed as being exempt from the requirements of Policy MLP 27 and Policy MLP 28 are appropriate?*

Yes: 3	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	None
E026- 813 Worcestershire Wildlife			

Yes: 3	No: 0	Don't know:1	Written responses (see below)
Trust E041-717 Natural England			

c) *Are there any other types of development which you think should be included in the list of exempt development?*

Yes: 0	No: 1	Don't know:2	Written responses (see below)
None	E007-2452: Mr N Dean	E019-2459 Wildmoor Residents' Association E041-717 Natural England	E039-2212 Bromsgrove District Council (informal response)

*Comments on exempt development*

Consultee comments	Initial Officer response
<b>E039-2212 Bromsgrove District Council (informal response)</b>	
<p>The National Planning Policy Framework (NPPF) requires that Minerals Planning Authorities adopt appropriate policies as well as define MSAs and MRCAs. Paragraph 8.4 of the MLP explains the types of development which are exempt from Policies MLP27 and MLP28. The exempt development includes allocated sites in Local Plans and Neighbourhood Plans, minor development within the curtilage of existing buildings, demolition of buildings, replacement dwellings Certificates of Lawfulness and Listed Building consent among others.</p> <p><i>"define Minerals Safeguarding Areas and 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; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas;" National Planning Policy Framework (2012) Paragraph 143</i></p> <p>The Council would suggest further exempt development from mineral safeguarding requirements to include rural exception sites and infill development of a small number of new</p>	<p>The suggested exemptions will be considered.</p>

Consultee comments	Initial Officer response
dwelling to ensure these types of development remain viable.	

**Q 8.2 Safeguarding process:**

National policy requires nationally and locally important mineral resources to be safeguarded through the identification of Mineral Safeguarding Areas and Mineral Consultation Areas. Policy MLP 27 and Policy MLP 28 set out the requirements developers will need to address in relation to these.

*Policy MLP 27 Safeguarding locally and nationally important mineral resources*

- a) *Is the 250m distance around the Mineral Resource Safeguarding Areas an appropriate and justified means of identifying the Mineral Resource Consultation Areas?*

Yes: 0	No: 1	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean	E019-2459 Wildmoor Residents' Association	None	E019-2459 Wildmoor Residents' Association  E033-683/1077/2279 South Worcestershire Councils  E039-2212 Bromsgrove District Council (informal response)

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
This depends on the surrounding area and its complexity.	Noted
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
The South Worcestershire Councils understand that the extent of the Minerals Safeguarding Areas (MSAs) are determined by the extent of minerals resources. However, the proposed Minerals Consultation Areas (MCAs) are defined by adding a 250m buffer from the boundary of the MSAs. We consider this to be a blunt tool which does not take account of other constraints and considerations.	Noted. Consideration will be given to whether there are any appropriate options for refining this on a consistent basis.
<b>E039-2212 Bromsgrove District Council (informal response)</b>	
The Council understands that the extents of the Mineral Safeguarding Areas (MSAs) are determined by the extent of mineral resources. The Mineral Resource Consultation Areas (MRCAs) are proposed to be determined through adding a 250m buffer from the	Noted. Consideration will be given to whether there are any appropriate options for refining this on a consistent basis.

Consultee comments	Initial Officer response
boundary of the MSAs which alone is a crude tool, as it does not take into account other constraints and considerations.	
There are a number of discrepancies which the Council will be happy to discuss with WCC to find a reasonable and mutually acceptable resolution. However, as drafted, the Council does not support the MSAs and MRCAs, especially with regards to some of the building stone MSAs and MRCAs and MRCAs for other types of minerals where they overlap with existing built development.	There are some inconsistencies in the way in which different minerals are considered. In analysing the information from British Geological Survey on aggregate resources in the county, the deposits which were already overlain by significant built development were classified as "compromised" and were therefore not included in the proposed Mineral Resource Safeguarding Areas. However, the information on potential building stone resources from the Herefordshire and Worcestershire Earth Heritage Trust was not subject to the same scrutiny, and therefore led to MrSAs and MrCAs being identified within existing built development. Consideration will be given to addressing this issue.

*b) Is the balance between safeguarding finite mineral resources and placing reasonable expectations on non-minerals development appropriate and justified?*

Yes: 1	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	E005-817 CPRE Worcestershire  E010-2455 Gladman Developments Ltd

Consultee comments	Initial Officer response
<b>E005-817 CPRE Worcestershire</b>	
MLP26 is onerously expansive in its implications. The Northwestern and Northeastern Corridors contain large areas of what the policy refers to as "solid sand", but are commonly called sandstone. This is inevitably a less useful resource than sand, since energy will be required to concert the relatively friable stone into sand. The rock formations probably exist to a considerable depth, probably hundreds of feet. It is most unreasonable for the Plan to seek to safeguard everything, when the resource ought to be sufficient for 1000s of years; sandstone is not a scarce resource. If anything the Plan understates the extent of the resource, because it does not seem to include areas where Keuper Sandstone is capped by	It is assumed that these comments refer to Policy MLP 27: Safeguarding Locally and Nationally Important Mineral Resources.  Solid sands and sandstone are currently used for aggregate in Worcestershire. Aggregate materials are defined as a national important material in National Policy and there is therefore a requirement to safeguard them so that they are not needlessly sterilised by non-mineral development.  Sandstone formations are of considerable depth, however there is a limit to the depth at which they are safe and viable to work with current technology.

Consultee comments	Initial Officer response
<p>Bunter Pebble Beds; I gather that this is obsolete terminology, but it is highly descriptive of the formation. While terrace and glacial sands and gravels are available it is unlikely there will be any need to grind up stone to replace it. The uneven distribution of resources may mean that it is desirable to safeguard some areas of sandstone, but safeguarding it all is excessive and exorbitant, so that this policy is fundamentally unsound.</p> <p>A similar approach should be taken to that for brick clay, which is also abundant and where the Plan has no safeguarded areas, because the operator happens to own large reserves.</p>	<p>The County Council will consider whether amendments to the introductory text or reasoned justification could make the rationale for this policy clearer and will continue to work with the six Borough, City and District Councils in Worcestershire and adjoining Planning Authorities to refine this approach, however Policy MLP 27 is broadly in line with National Policy and it is unlikely that significant changes will be appropriate.</p> <p>The Third Stage Consultation does include safeguarded areas for clay, as shown on the interactive minerals web map (<a href="http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/">http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/</a>). These are areas proposed for safeguarding by Wienerberger Ltd, as the geological information about the quality of the Mercia Mudstone in Worcestershire away from the current workings is not sufficient to suggest that it is all worthy of being safeguarded.</p>
<p>8.10 This is bureaucracy for the sake of it; a wholly unnecessary bureaucratic hurdle. In almost all cases, the report will acknowledge that part of the mineral resource will be sterilised, but that the rest of the resource is sufficiently abundant for that not to matter. What is the point of such a report? If a builder can work part of a mineral resource before building houses on it, it may be reasonable to require him to do so, but one can hardly build houses in the bottom of an unfilled sandpit. If this were dealing with scarce resources (such as rich metalliferous mineral deposits), different considerations would apply. The presence or absence of relatively abundant mineral resources should be a minor factor in determining whether development should take place.</p> <p>What is needed is a much more targeted approach to safeguarding relating to minerals. This should focus on those that are scarce, as opposed to ones with planning consent being scarce, and on those adjacent to existing quarries and brick kilns and likely to be worked in conjunction with them.</p>	<p>Aggregate materials are defined as a national important material in National Policy and there is therefore a requirement to safeguard them so that they are not needlessly sterilised by non-mineral development. The requirement for a Mineral Resource Assessment in paragraph 8.10 (and Policy MLP 27) is intended to ensure decisions are based on robust information about the likely impact on and economic value of the resource. It is acknowledged in paragraph 8.5 that "safeguarding mineral resources requires a balance to be struck between protecting finite resources as a source of supply for the future, and placing a realistic level of burden on both developers and local authorities. Developers should not be expected to spend time and money undertaking Mineral Resource Assessments unless there is a reasonable likelihood that the nearby mineral resources are of local or national importance".</p> <p>In conjunction with the exemptions set out in paragraph 8.4 and the fact that Mineral Resource Safeguarding Areas have only been identified for those resources of local or national importance in Worcestershire (paragraph 8.6), this is considered to be a proportionate approach.</p>

Consultee comments	Initial Officer response
<b>E010-2455 Gladman Developments Ltd</b>	
<p>Draft Policy MLP 27: Safeguarding Locally and Nationally Important Mineral Resources sets out criteria against which the Mineral Planning Authority will respond in relation to applications that are proposed within or partially within the identified Mineral Resource Consultation Areas that are identified in figure 8.1. It is vital that policies of this nature are suitably flexible to ensure that future decision making can be suitably balanced between the need to safeguard mineral resources and the need for the planning process to enable all of the development that the area requires to meet its future needs.</p> <p>In this regard, it is notable that Figure 8.1 identifies that a number of the county's larger settlements are adjacent to mineral resource safeguarding and consultation areas, for example in the vicinity of Kidderminster, Bewdley, Stourport-on-Severn and Pershore. It is highly likely that development sites within these locations will be required now and in the future by the local planning authorities in Worcestershire to meet objectively assessed development needs for housing and economic development in sustainable locations during the same plan period as the emerging Minerals Local Plan.</p> <p>Paragraph 143 of the National Planning Policy Framework states that in preparing local plans, local planning authorities should set out policies to encourage the prior extraction of minerals, where practicable and feasible, if it is necessary for non-mineral development to take place.</p> <p>Gladman acknowledges the need for some level of protection of mineral assets, but is of the view that the local policy framework that relates to this must clearly set out that competing development needs will be suitably balanced. A pragmatic approach should therefore be expressed through 'Policy MP27' and its supporting text to ensure that a positive approach can be taken by local planning authorities when making an assessment of the merits of competing development needs.</p>	<p>Policy MLP 27 is intended to contain enough flexibility to ensure that decision making can be balanced between the need to safeguard mineral resources and the need for development to meet an area's needs. This is set out in Part b) of the policy which sets out the different approaches which should be followed depending on whether the long term economic value of the mineral resource outweighs the merits of the non-exempt development, or vice versa. This is supported by the Reasoned Justification in paragraph 8.17 which states that "It will be a matter of planning judgement by the decision taker as to whether the long-term economic value of the mineral resource outweighs the merits of the proposed development".</p>
<p>It is noted at paragraph 8.17 of the Plan that the views of the Mineral Planning Authority will be</p>	<p>Noted. Consideration will be given to whether the wording of paragraph 8.17 is appropriate.</p>



Consultee comments	Initial Officer response
<p>expected to be given significant weight by the local planning authority in reaching a balanced judgement on whether the long term economic value of the minerals resource outweighs the merits of the proposed development. The level of weight to be attributed to the views expressed by consultees in the planning process is however a matter for the decision taker and would be based on the specific content of a response to an individual planning application.</p> <p>Furthermore, whilst Planning Practice Guidance (Planning Practice Guidance Reference ID: 27-005-20140306) is clear that local planning authorities should take the views of the relevant mineral planning authority on the risk of preventing mineral minerals extractions into account, it does not express the degree of weight that should be given to any such views.</p>	

*c) Does Policy MLP 27 provide sufficient clarity as to how the safeguarding process would be applied?*

Yes: 1	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	E031-800 Herefordshire & Worcestershire Earth Heritage Trust

Consultee comments	Initial Officer response
<b>E031-800 Herefordshire &amp; Worcestershire Earth Heritage Trust</b>	
<p>A considerable additional amount of data has been added to the Buidlingstones.org.uk database, since the earlier phases of the consultation when the quarry location data was extracted as part of the development of the minerals plan. We would be delighted to provide an up to date dataset before work on the minerals plan is completed. However, the study did not cover the entire county and in funding were available, further work in particular in the Ombersley/ Droitwich areas would make significant contribution to understanding stone use and stone sources.</p>	<p>The Council welcomes the opportunity to use this data to inform the plan and look forward to discussing this further with Herefordshire and Worcestershire Earth Heritage Trust.</p>

Policy MLP 28 Safeguarding permitted mineral sites and supporting infrastructure

d) *Is the 250m distance around the Mineral Infrastructure Safeguarding Areas an appropriate and justified means of identifying the Mineral Infrastructure Consultation Areas?*

Yes: 1	No: 1	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean	E019-2459 Wildmoor Residents' Association	None	None

e) *Is the balance between safeguarding mineral sites and supporting infrastructure and placing reasonable expectations on non-minerals development appropriate and justified?*

Yes: 1	No: 1	Don't know: 0	Written responses (see below)
E007-2452: Mr N Dean	E019-2459 Wildmoor Residents' Association	None	E019-2459 Wildmoor Residents' Association  E020-2460 Mineral Products Association

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
Dependent upon what sort of infrastructure is being considered.	Noted.
<b>E020-2460 Mineral Products Association</b>	
<b>Policy MLP28: Safeguarding Permitted Mineral Sites and Supporting Infrastructure</b> The MPA supports this policy but it believes that it could be more explicit with respect to <i>supporting infrastructure</i> . In order to assist non mineral developers it would be helpful to expand section iii) of the policy as follows;  <i>iii) the continued operation of supporting infrastructure e.g. mineral rail depots, mineral wharves, mineral recycling centres, bagging operations mineral processing plants, concrete batching and coated stone plants.</i>	Paragraphs 8.24-8.26 were intended to define the sites and infrastructure which would be safeguarded. Consideration will be given to including greater clarity within the policy itself.
<b>E025-1793 CEMEX</b>	
The Company supports this policy but it believes that it could be more explicit with respect to <i>supporting infrastructure</i> . In order to assist non mineral developers it would be helpful to expand section iii) of the policy as follows;  <i>iii) the continued operation of supporting infrastructure e.g. mineral rail depots, mineral wharves, mineral recycling centres, bagging</i>	Paragraphs 8.24-8.26 were intended to define the sites and infrastructure which would be safeguarded. Consideration will be given to including greater clarity within the policy itself.

Consultee comments	Initial Officer response
<i>operations mineral processing plants, concrete batching and coated stone plants.</i>	

f) *Does Policy MLP 28 provide sufficient clarity as to how the safeguarding process would be applied?*

Yes: 1	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	None

**Q 8.3 Are there any wording changes you would suggest to Chapter 8 to improve clarity or any other issues which you think should be considered?**

Yes: 1	No: 0	Written responses (see below)
E019-2459 Wildmoor Residents' Association	E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust	E019-2459 Wildmoor Residents' Association  E033-683/1077/2279 South Worcestershire Councils  E039-2212 Bromsgrove District Council  E042-2321 Barton Willmore  E050-1971L Wyre Forest District Council  E043-2185L Gloucestershire County Council

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
A majority of local neighbourhood plans are not yet in place as part of this consideration.	Noted. The Minerals Local Plan will take account of those that are in place and any that are adopted after the Minerals Local Plan will be taken into account at planning application stage. The Neighbourhood Plans should also accord with the Minerals Local plan and other adopted development plan policies.
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
The South Worcestershire Councils would welcome further discussion as to how future allocations may be located within MCAs and the steps and interactions that the County Council would wish to undertake to ensure that the MCAs do not blight land for future development.	This issue was discussed at a meeting between officers of Bromsgrove District Council and Worcestershire County Council in February 2017.  Existing allocated sites are listed as a potential exemption from the requirements of the

Consultee comments	Initial Officer response
	<p>safeguarding policies where safeguarding issues have been considered through the allocations process but it is noted that the Third Stage Consultation does not address how consideration of future non-mineral site allocations should be addressed.</p> <p>The following potential options were discussed and will be considered further in the development of the plan in conjunction with the city, borough and district councils in and around Worcestershire:</p> <ul style="list-style-type: none"> <li>• If minerals safeguarding could be considered alongside other factors in the site selection process (such as SHELAA), then the importance of and need for any sites which get to the stage of allocation could be considered to outweigh the need for full mineral safeguarding, and only incidental recovery would be required (such as from works taking place for footings, landscaping, drainage schemes etc).</li> <li>• The full force of the safeguarding policies should apply to windfall sites.</li> <li>• An approach will be required for rural exception sites.</li> <li>• WCC should be involved from the outset to help inform future site selection and green belt reviews.</li> <li>• It may be useful to develop a memorandum of understanding.</li> </ul>
<b>E039-2212 Bromsgrove District Council (informal response)</b>	
<p>The Council would welcome further information as to how proposed future allocations may be located within MRCAs, and the steps and interactions WCC would wish to undertake to ensure that the MRCAs do not blight land for future development.</p>	<p>This issue was discussed at a meeting between officers of Bromsgrove District Council and Worcestershire County Council in February 2017.</p> <p>Existing allocated sites are listed as a potential exemption from the requirements of the safeguarding policies where safeguarding issues have been considered through the allocations process but it is noted that the Third Stage Consultation does not address how consideration of future non-mineral site allocations should be addressed.</p> <p>The following potential options were discussed and will be considered further in the development of the plan in conjunction with the city, borough and district councils in and around Worcestershire:</p>

Consultee comments	Initial Officer response
	<ul style="list-style-type: none"> <li>• If minerals safeguarding could be considered alongside other factors in the site selection process (such as SHELAA), then the importance of and need for any sites which get to the stage of allocation could be considered to outweigh the need for full mineral safeguarding, and only incidental recovery would be required (such as from works taking place for footings, landscaping, drainage schemes etc).</li> <li>• The full force of the safeguarding policies should apply to windfall sites.</li> <li>• An approach will be required for rural exception sites.</li> <li>• WCC should be involved from the outset to help inform future site selection and green belt reviews.</li> <li>• It may be useful to develop a memorandum of understanding.</li> </ul>
<b>E042-2321 Barton Willmore</b>	
<p>On behalf of our client, J J Gallagher Ltd, we submit representations to the Worcestershire Minerals Local Plan (WMLP) – Third Stage Consultation. These representations relate to our client’s land interest at Norton Farm, Birmingham Road, Bromsgrove (the ‘Site’). Outline planning permission was approved by Bromsgrove District Council in August 2012 for the construction of up to 316 dwellings at the Site (LPA Ref: 12/0709). An application for reserved matters was subsequently approved in February 2016 (LPA Ref: 15/0996). A copy of the approved site layout has been provided at <b>Appendix 1 [WCC reference E042-2321 in Appendix 1 of this document]</b>. The approved plans have since been subject to various applications for minor material amendments, however the principle of providing dwellings along the southern boundary with public open space to the north remains unchanged – a requirement of the outline planning permission.</p> <p>In light of the above, it is requested that the following comments are taken into consideration as part of the WMLP.</p> <p>Draft Policy MLP 27 of the WMLP explains that a Mineral Resource Assessment will need to be submitted in support of a planning application for ‘non-exempt development’ within the identified Mineral Resource Consultation Areas.</p>	<p>Existing allocated sites are listed as a potential exemption from the requirements of the safeguarding policies where safeguarding issues have been considered through the allocations process but it is noted that the Third Stage Consultation does not address the difference between Outline and Reserved Matters applications. Consideration will be given to whether Reserved Matters applications could be exempt where minerals considerations have been taken into account at Outline stage.</p>

Consultee comments	Initial Officer response
<p>As identified within Figure 8.1 and the supporting Interactive Map, the Site is partially located within a defined Consultation Area.</p> <p>As <b>Appendix 1</b> demonstrates, the sections of the Site which fall within the defined Consultation Area are due to come forward as a residential development or public open space associated with the residential development. There is therefore no opportunity for the Site to be utilised for mineral extraction. For the avoidance of doubt, the outline permission includes no provision for mineral extraction to take place prior to the delivery of housing. As such, it is requested that the Site is excluded from the Mineral Resource Consultation Area and that Figure 8.1 and the Interactive Map are updated accordingly.</p> <p>We would be grateful if you could please give consideration to our comments and that we are kept informed of the next stages of the WMLP's preparation. In the meantime if you have any queries, then please do not hesitate to contact me.</p>	
<b>E050-1971L Wyre Forest District Council</b>	
<p>Policy MLP.27 – Safeguarding Locally and Nationally Important Minerals Resources: Note the extent of the minerals resource safeguarding consultation areas to North East Kidderminster. This is a cause for concern to the District Council as it approaches its preferred options consultation stage for the Local Plan Review which will identify specific areas for future development. It will be necessary to develop a statement of common ground with WCC around the application of this policy.</p>	<p>Worcestershire County Council is actively engaged in discussion with Wyre Forest District Council to inform the Local Plan Review with regard to Mineral Safeguarding issues. The Council would be happy to consider the production of a statement of common ground with Wyre Forest District Council on this matter to support the development of both the Minerals Local Plan and the Wyre Forest Local Plan Review.</p>
<p>Paragraph 8.10 – Note the requirement for a minerals resource assessment in the validation checklist. Paragraph 8.14 is particularly concerning with regard to the potential significant impacts on the design and timescales for the proposed development.</p>	<p>Concern about the potential impacts on design and timescales are noted, but are important considerations which need to be taken into account by developers. The proposed exemptions in paragraph 8.4 are intended to prevent mineral safeguarding requirements causing a barrier to types of development which are unlikely to cause needless sterilisation, as well as enabling sites allocated in adopted Local Plans and Neighbourhood Plans to come forward as safeguarding considerations should have informed site selection. Worcestershire County Council would welcome further discussion of this with the city, borough and district councils in Worcestershire.</p>

Consultee comments	Initial Officer response
<b>E043-2185L Gloucestershire County Council</b>	
As part of the revisions to the Gloucestershire MLP following consultation last year, consideration is being given to highlighting the existence of mineral safeguarding areas adjacent to or near to the county boundary. It may be beneficial to reciprocate this approach when preparing the next stage of the Worcestershire MLP.	The Third Stage Consultation showed Mineral Consultation Areas crossing the county boundary, but it is recognised that further work with the County and Local Planning Authorities adjoining the county is necessary to ensure this approach is appropriate. The option you suggest will be considered, and Worcestershire County Council welcomes the opportunity to discuss these issues further.

## Chapter 9: Implementation and Monitoring Framework

### Q9.1 Does the risk assessment in Chapter 9 adequately assess the issues that may impact on the delivery of the objectives of the Worcestershire Minerals Local Plan?

*Objective1: Deliver Development in accordance with priorities of the spatial strategy*

Yes: 3	No: 0	Don't know:2	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 2: Maximise the contribution of substitute, secondary and recycled materials and minerals waste to overall mineral supply*

Yes: 3	No: 0	Don't know:2	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 3. Maintain the steady and adequate supply of sand and gravel and address shortfalls in the landbank of permitted reserves*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 4. Maintain the county's role in the steady and adequate supply of brick clay, bricks and brick products*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 5. Foster an adequate and diverse supply of building stone*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 6. Enable the sustainable supply of other locally and nationally important mineral resources found in the county, including crushed rock and silica sand*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean	None	E019-2459 Wildmoor Residents' Association	None



<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England		E026- 813 Worcestershire Wildlife Trust	

*Objective 7. Safeguard locally and nationally important minerals and supporting infrastructure from being needlessly sterilised*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 8. Promote community inclusion in mineral development from inception to after-use so that local issues are understood and addressed*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:2</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 9. Ensure that mineral development contributes to the mitigation of and adaptation to climate change and makes prudent use of natural resources*

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust	None	E019-2459 Wildmoor Residents' Association	None

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England			

*Objective 10. Ensure that mineral development protects and enhances the health, well-being, safety and amenity of people and communities in and around Worcestershire*

Yes: 3	No: 0	Don't know:2	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 11. Ensure that mineral development protects and enhances the natural and historic environment and distinctive local character*

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E034-1970 Worcestershire County Council, Landscape Advisor

Consultee comments	Initial Officer response
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
While it is implicit to 'environment' I believe you should add 'landscape' into 9.44 to unite	This was the council's intention. Change to be made.

Consultee comments	Initial Officer response
the natural and historic environment references and maintain continuity with the rest of the document.	

*Objective 12. Ensure that mineral development protects and enhances the vitality of the local economy*

Yes: 3	No: 0	Don't know:2	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association  E026- 813 Worcestershire Wildlife Trust	None

*Objective 13. Optimise opportunities to integrate economic, social and environmental benefits through the delivery of high-quality multifunctional green infrastructure throughout the life of the mineral development*

Yes: 4	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E026- 813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	None

**Q9.2 Does Chapter 9 set out appropriate indicators to monitor the delivery of the objectives of the Worcestershire Minerals Local Plan?**

*Objective1: Deliver Development in accordance with priorities of the spatial strategy*

Yes: 3	No: 0	Don't know: 1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970	None	E019-2459 Wildmoor Residents' Association	None

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
Worcestershire County Council, Landscape Advisor  E041-717 Natural England			

*Objective 2: Maximise the contribution of substitute, secondary and recycled materials and minerals waste to overall mineral supply*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	None

*Objective 3. Maintain the steady and adequate supply of sand and gravel and address shortfalls in the landbank of permitted reserves*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	None

*Objective 4. Maintain the county's role in the steady and adequate supply of brick clay, bricks and brick products*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor	None	E019-2459 Wildmoor Residents' Association	None

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E041-717 Natural England			

*Objective 5. Foster an adequate and diverse supply of building stone*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	None

*Objective 6. Enable the sustainable supply of other locally and nationally important mineral resources found in the county, including crushed rock and silica sand*

<b>Yes: 2</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor	None	E019-2459 Wildmoor Residents' Association	None

*Objective 7. Safeguard locally and nationally important minerals and supporting infrastructure from being needlessly sterilised*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know: 1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	None

*Objective 8. Promote community inclusion in mineral development from inception to after-use so that local issues are understood and addressed*

<b>Yes: 3</b>	<b>No: 0</b>	<b>Don't know:1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E034-1970 Worcestershire County Council, Landscape Advisor

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
Add MLP19 as discussed above.	The links between the objectives and policy drivers will be reconsidered.

*Objective 9. Ensure that mineral development contributes to the mitigation of and adaptation to climate change and makes prudent use of natural resources*

<b>Yes: 4</b>	<b>No: 0</b>	<b>Don't know:1</b>	<b>Written responses (see below)</b>
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E034-1970 Worcestershire County Council, Landscape Advisor

<b>Consultee comments</b>	<b>Initial Officer response</b>
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
Add MLP19 as discussed above.	The links between the objectives and policy drivers will be reconsidered.

*Objective 10. Ensure that mineral development protects and enhances the health, well-being, safety and amenity of people and communities in and around Worcestershire*

Yes: 3	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E034-1970 Worcestershire County Council, Landscape Advisor

Consultee comments	Initial Officer response
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
Add MLP19 as discussed above.	The links between the objectives and policy drivers will be reconsidered.

*Objective 11. Ensure that mineral development protects and enhances the natural and historic environment and distinctive local character*

Yes: 4	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E026- 813 Worcestershire Wildlife Trust

Consultee comments	Initial Officer response
<b>E026- 813 Worcestershire Wildlife Trust</b>	
Measuring impacts on flooding, water quality, designated sites, and habitats and species appears sensible to us. We also welcome the use of specialist advice to define unacceptable impacts.	Support noted.

*Objective 12. Ensure that mineral development protects and enhances the vitality of the local economy*

Yes: 3	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	None

*Objective 13. Optimise opportunities to integrate economic, social and environmental benefits through the delivery of high-quality multifunctional green infrastructure throughout the life of the mineral development*

Yes: 4	No: 0	Don't know:1	Written responses (see below)
E007-2452: Mr N Dean  E026-813 Worcestershire Wildlife Trust  E034-1970 Worcestershire County Council, Landscape Advisor  E041-717 Natural England	None	E019-2459 Wildmoor Residents' Association	E026- 813 Worcestershire Wildlife Trust

Consultee comments	Initial Officer response
<b>E026- 813 Worcestershire Wildlife Trust</b>	
The measures chosen seem sensible to us and we welcome the use of specialist advice to define appropriate levels of contribution to GI.	Support noted.

Q9.3 Are there any wording changes which you would suggest to Chapter 9 to improve clarity or any other issues which you think should be considered?

Yes: 0	No: 3	Written responses (see below)
None	E007-2452: Mr N Dean  E026-813 Worcestershire	E019-2459 Wildmoor Residents' Association



Yes: 0	No: 3	Written responses (see below)
	Wildlife Trust E041-717 Natural England	E034-1970 Worcestershire County Council, Landscape Advisor

Consultee comments	Initial Officer response
<b>E019-2459 Wildmoor Residents' Association</b>	
The question is inappropriate given the size of chapter 9 and its coverage.	This question was intended to give consultees the opportunity to comment on issues not addressed by the specific questions on this chapter.
<b>E034-1970 Worcestershire County Council, Landscape Advisor</b>	
See Q9.1	This is addressed under Q9.1 (Objective 11) above.

## Any other comments on the Worcestershire Minerals Local Plan Third Stage Consultation

Consultee comments	Initial Officer response
<b>E033-683/1077/2279 South Worcestershire Councils</b>	
This response has been prepared by officers and has been considered by Malvern Hills members and the South Worcestershire Joint Advisory Panel. It will be considered by Members of Wychavon District Council in the coming weeks. We will advise you in due course if there are any amendments to this response. The South Worcestershire Authorities welcome the development of the Worcestershire Minerals Local Plan. The South Worcestershire Development Plan (SWDP) recognises the role of the County Council as the Minerals Planning Authority and recognises that the Minerals Local Plan forms part of the Development Plan. Minerals extraction is an important part of South Worcestershire's economy and an adequate supply of minerals is necessary to provide for new housing, built development and infrastructure.	Noted.
To make the Minerals Local Plan more readable and accessible, the South Worcestershire Councils strongly recommend that the next version of the Minerals Local Plan includes an Executive Summary.	It is unorthodox for a development plan document to include an executive summary and could cause some confusion.
<b>E010-2455 Gladman Developments Ltd</b>	
This letter provides the response of Gladman Developments Ltd. (hereafter referred to as "Gladman") to the Worcestershire (WCC) on the	Noted. The Minerals Local Plan is being prepared with due regard to the tests of soundness and the Council engages

Consultee comments	Initial Officer response
<p>Worcestershire Minerals Local Plan – Third Stage Consultation, which is being consulted upon from 14th December 2016 until 8th March 2017.</p> <p>Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the intention of the Minerals Local Plan is to set out a long term vision for mineral development in Worcestershire to 2035 and that a pre-submission version of the Plan will be the subject of consultation in due course.</p> <p>The National Planning Policy Framework (the Framework) sets out four tests that Local Plans must meet to be considered sound at Examination. The four tests that local plans must meet should be considered through each stage of the Plan’s preparation to help refine the policies that are being considered so that they are in accordance with national planning policy and guidance. The four tests of soundness are outlined as follows:</p> <ul style="list-style-type: none"> <li>- Positively prepared</li> <li>- Justified</li> <li>- Effective</li> <li>- Consistent with national policy</li> </ul> <p><b>Duty to Cooperate</b></p> <p>The Duty to Cooperate (DC) is a legal requirement established through Section 33(a) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This issue cannot be rectified through modification.</p> <p>Gladman recognise that the DtC is a process of ongoing engagement and collaboration (Planning Practice Guidance Reference ID: 9-011-2014036), as set out in the Planning Practice Guidance (PPG) it is clear that the DtC is intended to ensure that effective policies are produced on strategic matters. In two tier local planning authority areas,</p>	<p>constructively, actively and on an ongoing basis with other planning authorities and relevant bodies on cross-boundary strategic issues under the Duty to Cooperate.</p>

Consultee comments	Initial Officer response
<p>close cooperation between district local planning authorities and county councils will be critical to ensure that both tiers can take an effective approach when planning and taking decisions on inter-related strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with the Worcestershire districts and neighboring authorities, alongside any existing joint work arrangements, to satisfactorily address any local or cross boundary strategic planning matters. This is not simply an issue of consultation, but also a matter of effective cooperation to ensure that all relevant strategic requirements can be met.</p> <p>The Council should ensure that it is able to demonstrate what steps have been taken at each stage of plan preparation to ensure that it is the subject of ongoing and effective cooperation. This will require extensive and ongoing meaningful cooperation by both officers and members to ensure the Duty is fulfilled.</p>	
<b>E028-547 Chaddesley Corbett Parish Council</b>	
<p>Thank you for inviting Chaddesley Corbett Parish Council to respond to your consultation on the Emerging Minerals Local Plan. This is clearly a very thorough piece of work, with well thought-through plans and policies. We welcome and support the Plan's objectives for community inclusion and for ensuring that any mineral development should protect and enhance the natural and historic environment and distinctive local character.</p>	<p>Support noted.</p>
<b>E039-2212 Bromsgrove District Council (informal response)</b>	
<p>Worcestershire County Council (WCC) is the Minerals Planning Authority in Worcestershire and is required to produce an up to date Minerals Local Plan. The emerging Minerals Local Plan (MLP) is at its third stage consultation and will replace the existing county of Hereford and Worcester Minerals Local Plan 1997 (MLP 1997).</p> <p>Bromsgrove District Council (the Council) welcomes an updated Minerals Local Plan for the county, however, has some concerns with regards to the impact on existing and future development in the District.</p>	<p>Noted. The concerns raised in the consultation response have been addressed above. Worcestershire County Council welcomes the opportunity to discuss these issues further as necessary.</p>
<b>E040-860 The Canal &amp; River Trust</b>	
<p>The Canal &amp; River Trust (the Trust) is the successor body retaining the statutory responsibilities and functions of the British Waterways Board in England and Wales under the</p>	<p>Noted.</p>

Consultee comments	Initial Officer response
<p>provisions of the <i>British Waterways Board (Transfer of Functions) Order 2012</i> and to the property, assets and liabilities of BW in England and Wales under the terms of the <i>British Waterways Board Transfer Scheme 2012</i>.</p> <p>The Trust exists to protect, manage and improve the inland waterways for the public benefit in perpetuity and its' vision is for living waterways to transform places and enrich lives.</p> <p>The Trust has a range of charitable objects including:</p> <ul style="list-style-type: none"> <li>• To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;</li> <li>• To protect and conserve objects and buildings of heritage interest;</li> <li>• To further the conservation, protection and improvement of the natural environment of inland waterways; and</li> <li>• To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.</li> </ul> <p>Within Worcestershire we own and manage several canals but also act as Navigation Authority on stretches of the River Severn. Several sites have been identified as close to or adjacent to either the River Severn or the canals.</p>	
<p><b>Comment on Water Transport Background Document</b></p> <p>We are pleased to note the depth of investigation and wide ranging consultation which has taken place in the preparation of this supporting document. The Canal &amp; River Trust web pages and Freight document may be some assistance. to be any reference to the Canal &amp; River Trust Freight Policy. [sic]</p> <p>This can be found at;  <a href="https://canalrivertrust.org.uk/media/library/6213.pdf">https://canalrivertrust.org.uk/media/library/6213.pdf</a>  The document also uses the same diagram on types of waterway in several locations. Perhaps cross referencing may be preferable to repetition?</p>	<p>Support for the Water Transport Background Document noted. The information you highlight will be considered when the background document is reviewed.</p>
<b>E043-2185L Gloucestershire County Council</b>	
<p>Thank you for consulting Gloucestershire County Council on the third stage consultation Worcestershire Minerals Local Plan.</p> <p>Officers can confirm that ongoing duty to co-</p>	<p>Support noted.</p>

Consultee comments	Initial Officer response
<p>operate engagement occurs between the two authorities and this has meaningfully contributed to the preparation of respective mineral local plans.</p>	
<b>E046-1688L Severn Trent</b>	
<p>Firstly may I take this opportunity to apologise for the delay in responding to the third stage of the Worcestershire Minerals Local Plan consultation.</p> <p>I would just like to confirm that on this particular occasion we have no further comments to make.</p>	<p>Noted.</p>
<b>E047-716 Historic England</b>	
<p>Thank you for inviting Historic England to comment on the third stage consultation of the emerging Minerals Plan for Worcestershire. Our response builds on the initial responses we submitted to the first stage consultation in January 2013 and the second stage consultation in January 2014. We have also made additional comments regarding various site options in March and November 2015 as well as a series of emails and telephone calls over the preparation of the Plan.</p> <p>Please find attached Historic England's comments on the Worcestershire Minerals Plan, Third Stage Consultation.</p> <p>Additionally, we have included our previous comments on the specific sites and areas which details our concerns regarding specific heritage assets and historic landscapes.</p>	<p>Noted. The concerns raised in the consultation response have been addressed above. Worcestershire County Council welcomes the opportunity to discuss these issues further as necessary.</p>
<b>E048-719 Environment Agency</b>	
<p>Thank you for consulting us on the Third Stage Consultation of the Worcestershire Minerals Locals Plan. We welcome the progress made to date but consider the policy base could be made stronger, with greater emphasis on betterment and opportunities, specifically with regards to: flood risk, Water Framework Directive (WFD), groundwater and biodiversity. We wish to expand on these points further below:</p> <p><b>Crushed Rock/ Building Stone and groundwater aquifer sensitivity</b></p> <p>Historically we understand that quarrying has worked hard rocks within Principle and important Secondary aquifers for important crushed rock/ building stone resources. Areas such as the Malvern and Abberley Hills where worked historically for igneous and limestone rocks respectively for construction building materials for</p>	<p>Consideration will be given to ensuring that Source Protection Zones and aquifers throughout the county are afforded sufficient protection.</p> <p>Large scale quarrying is unlikely in the Malvern Hills in future, although it is not absolutely prohibited by the Malvern Hills Acts. The background document "Malvern Hills Acts" sets out the unique legislative protection the Acts provide and is available at <a href="http://www.worcestershire.gov.uk/mineralsbackground">www.worcestershire.gov.uk/mineralsbackground</a></p> <p>Broadway Quarry at Fish Hill has ceased operation and is undergoing restoration.</p>

Consultee comments	Initial Officer response
<p>motorway building in the Midlands. These old historic quarries are located within highly sensitive aquifer locations providing critical groundwater base flows to springs and watercourses from groundwater found within these same hard stone bedrocks.</p> <p>The Malvern Hills have been designated as a groundwater Source Protection Zone which is testament to their importance providing groundwater to many springs around the hills which is used for commercial bottling and local drinking water supplies. We would seek to prevent any further quarrying of this nature in such sensitive aquifer locations. Also, it is understood that quarrying is no longer an option within the Malvern Hills specifically due to several Acts of Parliament passed between 1884 and 1924 which prevent further quarrying which is administered through the Malvern Hills Conservators.</p> <p>Broadway Quarry in east Worcestershire on Fish Hill (part of the Cotswold Edge escarpment) is another crushed rock/ building stone quarry for the production of Cotswold Jurassic Limestone rock for construction and building materials. We understand that this quarry might have ceased trading (need to confirm this). The Jurassic Limestone's are Principal Aquifer supporting many groundwater features from springs to watercourses and also important drinking water abstractions. Several water company groundwater Source Protection Zone's exist within the Cotswold Jurassic Limestone aquifer, so groundwater protection is vital from the potential impacts of quarrying operations.</p>	
<p><b>Clay quarrying and groundwater aquifer sensitivity</b></p> <p>Clay is worked in Hartlebury for brick manufacture within the Mercia Mudstone Group (MMG) of rocks. Despite this area being mapped as MMG, it is extremely close to the Principle Aquifer of the Bromsgrove Sandstone which is extensively utilised for strategic drinking water supply by Severn Trent Water. Geologically, Hartlebury is within a geologic transition zone between these two bedrock formations with much faulting bringing these rocks close together in the subsurface environment. This means that groundwater can be readily encountered within deep excavations thus requiring dewatering operations to take place to allow operations to commence.</p> <p>This can put groundwater resources at risk and</p>	<p>Policy MLP 22 seeks to protect and enhance the water environment. Consideration will be given to ensuring that the policy contains sufficient safeguards for groundwater resources at all stages of mineral working, restoration and after-use.</p> <p>In accordance with the Council's adopted Statement of Community Involvement, the Environment Agency will be consulted on planning applications to the County Planning Authority relating to or affecting:</p> <ul style="list-style-type: none"> <li>• minerals and waste,</li> <li>• sewage,</li> <li>• flood zones 1, 2 and 3,</li> <li>• pollution risk,</li> <li>• watercourses,</li> </ul>

Consultee comments	Initial Officer response
<p>due consideration should be given to this aspect, especially when phased extensions are requested by quarry operators in the future. We would request that we are consulted on such applications and we would expect to see a detailed risk assessment through the HIA process concerning any impacts to the water environment from this activity. The restoration of such sites must also consider this sensitivity and importance of groundwater protection in this area. Landfilling of voids with polluting materials without appropriate management can impact critical water resources and appropriate permits through the EPR regulations must be sort from the Environment Agency.</p>	<ul style="list-style-type: none"> <li>• existing or former waste sites,</li> <li>• fish farming,</li> <li>• sites over 1ha.</li> </ul>
<p><b>Salt and water protection</b> Salt brine extraction from Droitwich and Stoke Prior was historically undertaken we understand until the 1970's. The salt deposits are located within the Secondary aquifer Mercia Mudstone Group formation at depth where salt brine solutions where brought to the surface by groundwater pumping and abstraction. Environmentally, watercourses in the general area have been affected by the brine industry historically and naturally today by the release of salt into the water environment. These waters are polluting and we seek to prevent the discharge into watercourses and protect water resources. Ground subsidence and stability issues can release polluting waters into the environment at the surface which is a feature within the area where we find salt in watercourses at higher concentrations than elsewhere where salt / brine is not present.</p>	<p>The history of brine extraction and subsequent subsidence in the county is discussed in paragraphs 2.55-2.57 of the Third Stage Consultation document. Policy MLP 15 part g seeks to ensure that mineral development does "not give rise to unacceptable hazards", with the Reasoned Justification in paragraphs 7.43-7.46 focusing on land instability. A background document on "Salt and Brine in Worcestershire" has been produced to inform the development of the Minerals Local Plan and is available at <a href="http://www.worcestershire.gov.uk/mineralsbackground">www.worcestershire.gov.uk/mineralsbackground</a>.</p>
<p><b>Coal mining and water protection</b> We understand that the last coal pit closed in 1972 in Northern Worcestershire. Coal Measures rocks are Secondary aquifers but have generally limited water resource potential for strategic supply. Groundwater is found however, within the more permeable sandstone and siltstone rocks which discharge baseflows to local watercourses, so pollutant pathways can exist from old mines to these sensitive receptors. Coal mine discharges can be highly polluting on river environments and need to be controlled to prevent pollution incidents. Locally, small private abstractions from wells and boreholes can be derived with limited groundwater yields from such rocks. We would seek to protect such resources from impact should coal mining be considered in the future in this</p>	<p>Coal resources are discussed in paragraphs 2.67-2.68 of the Third Stage Consultation document. The latest data from the Coal Authority indicates that none of the coal remaining in the county constitutes a "surface coal resource" that is likely to attract further interest. Should any applications arise, they would be considered against the policies of the Development Plan and other material considerations. Policy MLP 22 seeks to protect the water environment, including water quality. A background document on "Coal in Worcestershire" has been produced to inform the development of the Minerals Local Plan and is available at <a href="http://www.worcestershire.gov.uk/mineralsbackground">www.worcestershire.gov.uk/mineralsbackground</a>.</p>

Consultee comments	Initial Officer response
area.	
<p><b>Silica sand quarrying and groundwater protection</b></p> <p>These quarries found within North Worcestershire in the Wildmoor Area near Bromsgrove are located within Principal Aquifer. This area is extensively used for strategic public drinking water supply with several groundwater source protection zones present. Therefore, the local site setting is highly sensitive and the impact from quarrying activities needs to be considered from not only a water resources perspective, but also for water quality reasons. Any dewatering activities from pumping within the groundwater table must consider impacts upon the water environment. Site restoration is also key as landfilling with polluting materials can have a detrimental effect on groundwater quality and every effort should be made to protect these important strategic groundwater resources used for public drinking water by Severn Trent Water. We would expect to be consulted on any new applications for quarrying within this area of North Worcestershire in general within the important Principal Aquifer of the Sherwood Sandstone which includes the Bromsgrove, Wildmoor and Kidderminster sandstone formations.</p>	<p>Consideration will be given to ensuring that Source Protection Zones and aquifers throughout the county are afforded sufficient protection.</p> <p>In accordance with the Council's adopted Statement of Community Involvement, the Environment Agency will be consulted on planning applications to the County Planning Authority relating to or affecting:</p> <ul style="list-style-type: none"> <li>• minerals and waste,</li> <li>• sewage,</li> <li>• flood zones 1, 2 and 3,</li> <li>• pollution risk,</li> <li>• watercourses,</li> <li>• existing or former waste sites,</li> <li>• fish farming,</li> <li>• sites over 1ha.</li> </ul>
<b>E049-683/1077/2279 South Worcestershire Councils</b>	
<p>Further to the response made on 8 March 2017 I would be grateful if you could note the following. First the aforementioned response was endorsed by the Joint Advisory Panel on 28 February 2017. The response was also agreed by Malvern Hills District Council's Planning Committee on the same date and supported by Wychavon District Council's Executive Board Briefing. Subsequently the South Worcestershire Council response was considered by Wychavon District Council's Planning Committee and Executive Board on 9 &amp; 15 March 2017 respectively. Arising from these meetings a number of additional comments were agreed as follows:</p>	<p>Noted. The concerns raised in the consultation response have been addressed above. Worcestershire County Council welcomes the opportunity to discuss these issues further as necessary.</p>
<p>The initial wording on the majority of MLP policies implies that planning permission will be granted if the mineral development proposal satisfies it. Clearly such proposals will need to be supportive of MLP policies in general for planning permission to be granted.</p>	<p>As set out in paragraph 1.17 "The Minerals Local Plan should be read as a whole and alongside relevant European, national, regional and local policies."</p> <p>National legislation makes it clear that decisions on planning applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and</p>



Consultee comments	Initial Officer response
	<p>Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).</p> <p>Therefore the Council does not consider it necessary to make this addition to the policies as drafted in the <i>Worcestershire Minerals Local Plan Third Stage Consultation</i>.</p>
<b>E050-1971L Wyre Forest District Council</b>	
<p>Please find attached an officer level response from Wyre Forest on the third stage consultation. If you have any queries please do contact me. Our main concern is the approach to allocating the strategic corridors and the impact this could have on our emerging Preferred Options for the Local Plan Review,</p> <p>Please note that the responses set out below have been developed by Officers and have not received Member endorsement.</p>	<p>Noted. The concerns raised in the consultation response have been addressed above. Worcestershire County Council welcomes the opportunity to discuss these issues further as necessary.</p>
<b>E052-1234L Twynning Parish Council</b>	
<p>Twynning Parish Council welcomes the opportunity to comment on the draft plan and we will concentrate on those aspects that have a direct impact on the Parish.</p> <p>In submitting this comment, we wish to associate ourselves with the comprehensive report submitted by the local action group RAGE. We agree that some of the technical detail in the second and third stage plans need serious revision and fully endorse the reports conclusions.</p>	<p>Noted.</p>
<b>E053-694L Forest of Dean District Council</b>	
<p>Thank you for your continuing consultation re the above. Although we welcome the consultation we have no comments to make at present.</p>	<p>Noted.</p>
<b>E054-2190L Marine Management Organisation</b>	
<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p><b><u>Marine Licensing</u></b></p> <p>Activities taking place below the mean high water</p>	<p>Noted.</p>

Consultee comments	Initial Officer response
<p>mark may require a <a href="#">marine licence</a> in accordance with the <a href="#">Marine and Coastal Access Act (MCAA) 2009</a>. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p><b><u>Marine Planning</u></b></p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the <a href="#">East Inshore and Offshore marine plans</a> were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our <a href="#">Marine Information System</a>. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p>	

Consultee comments	Initial Officer response
<p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the <a href="#">Marine Policy Statement</a> for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the <a href="#">Marine and Coastal Access Act</a> and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our <a href="#">online guidance</a> and the <a href="#">Planning Advisory Service soundness self-assessment checklist</a>.</p>	
<p>Minerals and waste plans and local aggregate assessments</p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> <li>• The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.</li> <li>• The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.</li> <li>• The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.</li> <li>• The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.</li> </ul> <p>The NPPF informed MASS guidance requires local</p>	<p>The contribution of marine sand and gravel to the consumption of aggregates in Worcestershire is noted in paragraph 2.5 of the Third Stage Consultation, and the need to safeguard supporting infrastructure such as handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials, is addressed in chapter 8.</p> <p>Marine sand and gravel is considered explicitly in the 2016 Local Aggregates Assessment chapter 4 "Marine sand and gravel".</p>

Consultee comments	Initial Officer response
mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.	
<b>E055-2475L Worcestershire County Council Transport Strategy Team</b>	
<p>Thank you for the opportunity to comment on the emerging Minerals Local Plan.</p> <p>We (the Transport Strategy Team) have reviewed this and we have no further comments, other than to say that it's an excellent, innovative plan and we commend the authors on a job well done.</p>	Support noted.

## Sustainability Appraisal

### Q10.1 Do you have any comments on the Sustainability Appraisal Environment Report?

Yes: 0	No: 5	Written responses (see below)
None	<p>E007-2452: Mr N Dean</p> <p>E013-802 Malvern Hills AONB Unit</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p>	<p>E010-2455 Gladman Developments Ltd</p> <p>E047-716 Historic England</p>

Consultee comments	Initial Officer response
<b>E010-2455 Gladman Developments Ltd</b>	
<p><b>Sustainability Appraisal</b></p> <p>In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a</p>	<p>A Scoping Report was prepared and consulted on alongside the First Stage Consultation on the Minerals Local Plan. An Initial Sustainability Appraisal was prepared and consulted on</p>

Consultee comments	Initial Officer response
<p>Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations). The SA/SEA is a systematic process that should be undertaken at each stage of the Plans preparation, assessing the effects of the emerging Minerals Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify any policy choices. It should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for the chosen and rejected alternatives. The Council's decision making and scoring should be robust, justified and transparent.</p>	<p>alongside the Second Stage Consultation, and an Environmental Report was prepared and consulted on alongside the Third Stage Consultation on the Minerals Local Plan. Consideration will be given to ensuring that policy choices and alternatives are more clearly recorded with increased transparency through future iterations of the Sustainability Appraisal.</p>
<b>E047-716 Historic England</b>	
<p>We have made comments at previous stages of the Strategic Environmental Assessment (SEA). We welcome the inclusion of a separate objective for the historic environment on cultural heritage.</p> <p>We welcome recognition within paragraph 4.3.17 about the historic environment being a finite resource and that minerals development has the opportunity to physically damage or destroy it. Paragraph 4.3.20 looks at the role of mitigation measures where there are negative effects for the historic environment. Historic England considers that where mitigation measures are required or identified that these should be included within the Minerals Local Plan to form part of the positive strategy for the historic environment and the development plan.</p>	<p>Noted.</p>
<p>Paragraph 4.6.13 states that listed buildings and scheduled monuments have been assessed in the SA process. Have all designated assets been assessed as part of this process? There is also the potential for as yet unknown archaeology to be worthy of designation, which could be uncovered by minerals development.</p>	<p>The references in Paragraph 4.6.13 apply to the appraisal of specific sites and preferred areas. At this strategic level, it would be inappropriate to attempt to identify likely effects on specific historic environment receptors across entire corridors. The text will be amended to make this clearer.</p>
<p>We support paragraph 5.6.3 and the need for the restoration principles to better reflect the historic environment. We consider that the assessment needs to consider what is special about the historic environment within the</p>	<p>Noted.</p> <p>Future iterations of the SA will seek to further explore how the strategic corridors relate to</p>

Consultee comments	Initial Officer response
strategic corridors and then incorporate this information into the restoration principles and have specific requirements for the historic environment.	the historic environment and how far any modified policies and green infrastructure priorities achieve these aims.
<p>Page 59 Summary of SA findings for the Strategic Corridors – we are unclear why there is considered no impact for the historic environment for three strategic corridors? Has there been assessment to inform that there are no likely impacts for the historic environment in respect of heritage assets both designated and undesignated? There are considered negative effects for the historic environment from two of the strategic corridors, are there mitigation measures that could overcome these negative effects?</p>	<p>The Lower Severn strategic corridor has been rated as a minor negative/unknown, due to the fact that it contains specific sites and a preferred area, and concerns have been raised over the potential for historic environment harm at these locations. Similarly, the North West Worcestershire strategic corridor contains a preferred area which may have a heightened potential for certain historic environment issues to arise. The other three strategic corridors do not contain either preferred locations or specific sites for which historic environment concerns have been raised at this stage. However, consideration will be given to whether it would be appropriate to change many of the 'no effect' judgements to 'unknown effect' to better reflect these concerns.</p> <p>In terms of mitigation, the SA states at pages 119/120 that "The impacts of mineral development in any given location – inside or outside the corridors – will be mitigated through other policies in the MLP, including Policy MLP 23 Historic Environment".</p>
<p>Page 65/66 Summary of SA findings for the specific sites identifies a range of negative effects for the historic environment. Historic England has raised concerns about the allocation of these sites in previous consultation rounds and would require further assessment to be undertaken as well as specific restoration principles that will protect and conserve the historic environment after the minerals working has finished.</p>	<p>Noted.</p> <p>Section 4.7.2 of the SA Environmental Report notes that "SA cannot provide a full, site-level consideration of every impact of every policy. More localised assessments, such as those made through the planning application process, will be crucial in fully understanding the sustainability of any particular development".</p>
<p>We noted that the Council has looked at other reasonable alternatives and that during a number of 'call for sites', the interest has been low. We also recognise that the Council could have safeguarded larger strategic corridors or more in number so we are content that alternatives have been considered.</p>	<p>Noted.</p>
<p>Page 129, Appraisal of options, we are not convinced that Policy MLP23 in its current form will sufficiently mitigate against the effects of the development. We have requested some</p>	<p>We understand this comment relates to the 'Cultural heritage, architecture and archaeology' row on page 128, rather than page 129. We recognise that in order for</p>

<b>Consultee comments</b>	<b>Initial Officer response</b>
amendments to the Local Plan to overcome this.	mitigation to be effective, Policy MLP23 as currently drafted will require amendment.
Page 142 onwards, Appraisal of Strategic Corridors, we disagree with the assumption that because development boundaries are not yet known that this means there will not be an effect. The SA identifies a wide range of heritage assets that could be affected throughout the allocation of strategic corridors and it is important the Local Plan considers these effects and has a positive strategy for the historic environment and justifies the harm to heritage assets. Whilst we recognise this is difficult because development boundaries are not known, the Plan needs to ensure that there are measures in place to overcome this, if this strategy is to be employed. Additionally, the assessment notes that the restoration principles have not been especially guided by the historic environment, which we consider needs to be amended.	Noted.  Consideration will be given to whether it would be appropriate to change many of the 'no effect' judgements to 'unknown effect' to better reflect these concerns. As noted above, the approach to policy MLP23 will be reviewed in light of consultation feedback. A more robust policy MLP23 would help to ensure that these concerns are taken into account when development proposals come forward. The next iteration of the SA will appraise how far any modified policies and green infrastructure priorities achieve these aims.
Page 322 onwards, Appraisal of Specific Sites and Preferred Areas, this assessment identifies a number of concerns for the historic environment and details some appropriate mitigation measures that could potentially overcome some of these effects. We consider that before these sites/areas are allocated that more detailed assessment is undertaken. Additionally, we consider that the mitigation measures could be further developed as there are still comments within the assessment that state that 'the scale of any impacts arising from this is unclear at this stage' etc. We would request to see inclusion of appropriate mitigation measures in the Plan, as design principles, to guide developers when they submit planning applications. This will give greater certainty to Historic England and to the development industry about expectations for the historic environment.	Noted. It may be possible, through the next stage of the plan-making process, to identify potential sites with more certainty. This would allow for a more detailed appraisal of the potential effects on the historic environment and could lead to the identification of more specific mitigation measures. Otherwise, the MLP includes a full range of policies to manage and mitigate the negative effects of any development. The corridor priorities should help to inform proposals within the corridors, but any more specific design principles may require the production of site-specific development briefs. The next iteration of the SA will assess whether the Plan contains sufficient guidance or whether further guidance may be needed, for example in the form of SPDs.

### **Habitats Regulations Assessment**

#### Q11.1 Do you have any comments on the Habitats Regulations Assessment?

<b>Yes: 0</b>	<b>No: 5</b>	<b>Written responses (see below)</b>
None	E007-2452: Mr N Dean  E013-802 Malvern Hills AONB Unit	None

Yes: 0	No: 5	Written responses (see below)
	<p>E019-2459 Wildmoor Residents' Association</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E034-1970 Worcestershire County Council, Landscape Advisor</p>	

### Satisfaction with the consultation process

#### Q12.1 Are you satisfied with the consultation process for the Worcestershire Minerals Local Plan Third Stage Consultation?

Yes: 7	No: 1	Written responses (see below)
<p>E007-2452 N Dean</p> <p>E013-802 Malvern Hills AONB Unit</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E026-813 Worcestershire Wildlife Trust</p> <p>E030-1939 The Coal Authority</p> <p>E034-1970: Worcestershire County Council, Landscape Advisor</p> <p>E041-717 Natural England</p>	<p>E019-2459 Wildmoor Residents' Association</p>	<p>E001-1712 Mr P Bladon</p> <p>E019-2459 Wildmoor Residents' Association</p> <p>E024-1967 Woodland Trust</p> <p>E038-2359 Warwickshire County Council</p>

Consultee comments	Initial Officer response
<b>E001-1712 Mr P Bladon</b>	
<p>Your 'drop-in sessions around the county.</p> <p>Just a query that a few colleagues have asked ... Why not in other places like the Libraries in Malvern, Redditch, and Pershore?</p>	<p>We tried to choose locations for the drop-in sessions in each of the proposed Strategic Corridors, as well as one centrally in Worcester city centre. Although we recognise that this does not cover every urban area in the county, the locations were considered to give good geographical coverage, concentrated where there were likely to be most queries. We have also timed the events so that there is a balance between weekday afternoon and evenings and weekend daytimes to try to give people the</p>



Consultee comments	Initial Officer response
	<p>greatest opportunity to drop in at a time convenient to them.</p> <p>We considered that the drop-in sessions, alongside an event specifically for parish councillors, gave the best combination of opportunities for members of the public to engage with the consultation, whilst being mindful of appropriate use of the council's resources.</p>
<b>E019-2459 Wildmoor Residents' Association</b>	
<p>Please take our respective comments into account. The questions are admirable but the complexity produces issues which in practice are not considered. The onsite deliverability of mineral extraction is a major concern in terms of people and green infrastructure.</p>	<p>Each of your comments has been addressed above and will be taken into account alongside all the comments received in response to the Third Stage Consultation.</p> <p>Once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which are able to be enforced. We agree that this is a key part of the effective operation of the planning system, and we are engaged in discussion with our colleagues in Development Management and Planning Enforcement to ensure that the policies can be applied and enforced as intended.</p>
<b>E024-1967 Woodland Trust</b>	
<p>If you would like to discuss any of the issues raised here or would like further policy information from the <b>Woodland Trust</b>, please get in touch via this email address - <a href="mailto:governmentaffairs@woodlandtrust.org.uk">governmentaffairs@woodlandtrust.org.uk</a> or contact <a href="mailto:justinmilward@woodlandtrust.org.uk">justinmilward@woodlandtrust.org.uk</a></p>	<p>Noted.</p>
<b>E038-2359 Warwickshire County Council</b>	
<p>The County Council would like to continue to be kept up to date with the progress of your Minerals Plan and are keen to contribute where we can.</p> <p>Please do not hesitate to contact me should you wish to discuss this response in greater detail.</p>	<p>Noted.</p>

## **Appendix 1: Supplementary materials submitted with consultation responses**

**E002-2447 CLH Pipeline System Ltd**

- Location plan extract of pipeline

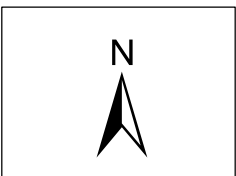
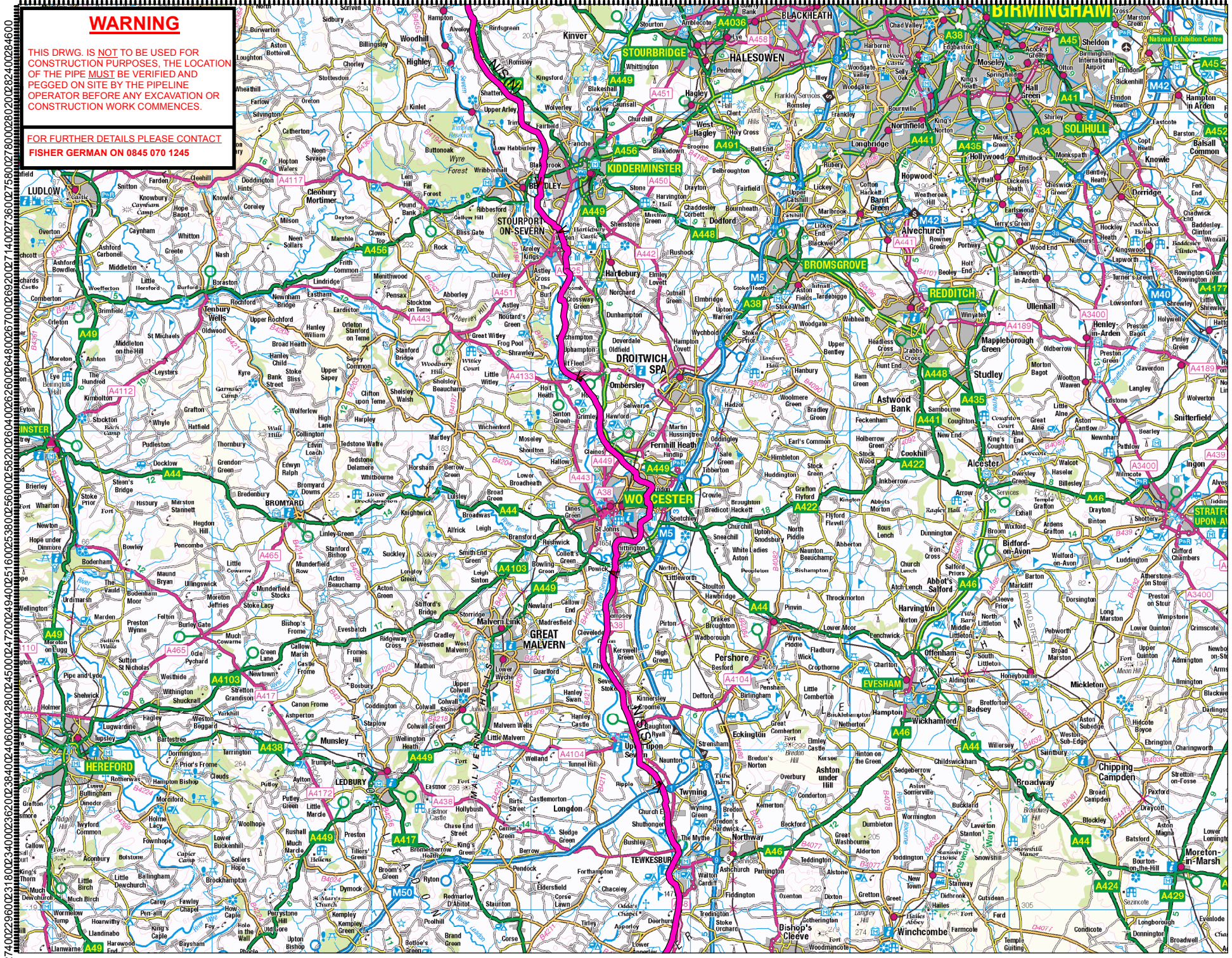


348000501035220354303564003585036060362703648036690369003711037320375303774037950381603837038580387903890039210394203963039840400504026040470406804089041100413104152041730419404215042360

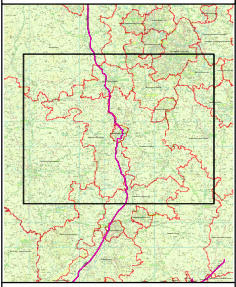
**WARNING**

THIS DRWG. IS NOT TO BE USED FOR CONSTRUCTION PURPOSES. THE LOCATION OF THE PIPE MUST BE VERIFIED AND PEGGED ON SITE BY THE PIPELINE OPERATOR BEFORE ANY EXCAVATION OR CONSTRUCTION WORK COMMENCES.

FOR FURTHER DETAILS PLEASE CONTACT FISHER GERMAN ON 0845 070 1245



OVERVIEW WINDOW



**Legend**

- CLH\_PS
- Cathodic Protection

Site centre coordinates:  
385,792 - 257,003

SCALE: 1:300,00@ A4  
DATE: 15/12/2016



TITLE:  
LOCATION PLAN EXTRACT  
OF PIPELINE N/S(S) & N/S(N)



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22740022960023180023400023620023840024060024280024450024720024940025160025380025600258200604002626002648002670026920071400273600275800278000280200282400284600



## **E011-2456 Upton Rowing Club**

- Upton Water Sports Centre Conceptual Masterplan



0 50 100 150 200  
SCALE 1:2500 (A1) METRES



**KEY**

- Approved Cemex planning application boundary
- Public Right of Way - Severn Way
- Existing track
- - - Existing track to be removed
- Proposed track
- Existing footpath
- Existing footpath route to be diverted
- Existing overhead electric power lines (to be re-routed)
- Indicative profile of lake based on gravel extraction footprint
- Footprint of the restored lake under the existing planning consent
- Area for festivals/regattas/triathlons
- Proposed camping and amenity areas
- ||||| Extra parking for festivals/regattas/triathlons

**To achieve the proposed rowing lake the following prerequisites are required;**

- That Cemex extend their application for gravel extraction further south with headlands from consented scheme amended
- That a 1 kilometer straight length lake can be achieved to competition standards
- That a vehicle access point can be achieved from the A4104



Redgrave Pinsent Rowing Lake



River and Rowing Museum, Henley on Thames



Eton Dorney Rowing Lake



Eton Dorney triathlon



Kingfisher habitat



Heron habitat



Floodplain habitats such as wetland meadow

**NOTE:**

**Total dimensions of racing area are as follows:**

<b>Total width</b>	<b>= 113.5m</b>
<b>Total length including marshalling area at the start and run-off area at the finish</b>	<b>= 1300 m</b>
<b>Minimum depth in racing lanes</b>	<b>= 3.5m</b>

REV	DESCRIPTION	DATE	BY
C	Design updates following comments received from PB	26/01/17	JC
B	Design updates following comments received from PB	20/01/17	JC
A	Design updates following comments received from ROC	15/07/16	RS
-	First issue	13/07/16	RS

DESIGNER  
One Creative Environments Ltd.  
5 The Triangle  
Wildwood Drive  
Worcester  
Tel: 01905 362 300  
Fax: 01905 363 333  
e: reception@onecd.com



CLIENT / CONTRACTOR / OPERATOR  
**Upton Rowing Club**

DRAWN BY :	POSITION	DATE :
RS	LA	12/07/2016
CHECKED BY :	POSITION	DATE :
Alison Osborne-Brown	Technical Director	26/01/2017
APPROVED FOR ISSUE BY :	POSITION	DATE :
Alison Osborne-Brown	Technical Director	26/01/2017

DRAWING TITLE  
**Upton Water Sports Centre  
Conceptual Masterplan**

DRAWING STATUS  
**DRAFT**

SCALE : 1:2500  
DRAWING SIZE: A1

DESIGNERS JOB NUMBER DRAWING NUMBER REVISION  
**P0557 DR-5-001 (C)**

Area of lake	22 ha	55 acres
Area of landscaping/camping	11 ha	27 acres
Area for festivals/regattas/triathlon	14 ha	35 yds
Area of additional parking for festivals	4 ha	10 acres
Length of existing track (excluding track to the Day House)	3.5 km	3850 yds
Length of existing track to be removed	0.7 km	780 yds
Length of proposed new track	7.5 km	8350 yds

Potential to use existing car park for overflow parking during the winter

*"A local community amenity area and water sports facility for all to enjoy"*

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**E033-683/1077/2279 South Worcestershire Councils**

- Initial Desktop Assessment of Potential Suitability of Submitted Minerals Sites in Malvern Hills District February 2015

## Appendix

### Minerals Local Plan Initial Desktop Assessment of Potential Suitability of Submitted Minerals Sites in Malvern Hills District February 2015

#### Site Assessment Matrix

Sites which do not satisfy criteria are shown in red, where criteria may be capable of being satisfied in amber and where criteria are satisfied in green.

Essential Criteria	Clifton East	Clifton South	Land at Ryall North	Ryall East (previously described as Ripple East)
<b>Flood Risk</b>	Site surrounded by Flood Zone 2	Flood Zone 3 and 2	Flood Zone 3 Ground water vulnerability	Groundwater vulnerability
<b>Contaminated Land</b>			Contaminated land 50m south of site	Site adjacent to contaminated land
<b>Safe &amp; Convenient Access + Impact on the Local Highway Network</b>	Site adjacent to A38 – subject to consideration by WCC	Potential access to A38 – subject to consideration by WCC	Potential access from A4104 – subject to consideration by WCC	Site adjacent to A38 and road from Ripple to A38 – subject to consideration by WCC
<b>International Designation</b>				
<b>National Designation</b>	East boundary of site adjacent to SSI. Listed building <50m from site	East corner of site is Ancient Woodland	Listed buildings 120m distance. Adjacent to Ancient Woodland	
<b>Local Designations</b>		Site adjacent to Special Wildlife Site / site of Regional / Local Importance. Also, 150m from another site of Regional / Local Importance.	Adjacent to Conservation Area. Adjacent to Special Wildlife Site (River Severn)	
<b>Local Plan Allocations</b>			350m from SWDP 58/1	
<b>Priority Species and Habitats</b>	Immediately adjacent to (to west of) Ashmoor Common SSSI. Records within site: Blysmus	Records within site: Motacilla flava (yellow wagtail) Mustela putorius (polecat) Immediately	None recorded or illustrated on Worcestershire Biological Records Centre GIS resource	None recorded or illustrated on Worcestershire Biological Records Centre GIS. Absence of records however

	compressus (vascular plant) Tyria jacobaeae (cinnabar moth) Motacilla flava (yellow wagtail) Nyctalus noctula (noctule bat) Plecotus auritus (brown long-eared bat)	adjacent to Clifton Arles Special Wildlife Site, valued for its grassland, marshland and swamp wet woodland.		does not necessarily indicate absence of protected species. Protected species may be present but unrecorded.
<b>Green Belt</b>				
<b>Significant Gap</b>				
<b>Residential Amenity / Neighbouring Land Uses</b>	Part of site is less than 50m from about 10 properties in Clifton	Site includes Sheepcote Farm	Adjacent to Ryall Court + Day House Cottages	60m from row of 12 Council Houses
<b>Capable of On-Site Services</b>	Probably if site is an expansion	Probably if site is an expansion	Likely due to proximity to Holly Green	Probably if site is an extension
<b>Desirable Criteria</b>	<b>6. Clifton East</b>	<b>21. Clifton South</b>	<b>2. Land at Ryall North</b>	<b>16. Ripple East</b>
<b>Expansion of an Existing Minerals Site</b>	Expansion	Extension	New	Extension
<b>Previously Developed Land</b>				
<b>Distance from Settled Community</b>	Site about 200m from Clifton		150m from Holly Green. 150m from Upton	60m from row of 12 Council Houses
<b>Local Green Network</b>				
<b>Transport by rail or water</b>	?	Site 330m from River Severn	Close proximity to River Severn	Site 550m from River Severn
<b>Restoration Opportunities</b>				
<b>Best and Most Versatile Agricultural Land</b>	>60% BMV	20 – 60% BMV		>60% BMV
<b>Cumulative environmental and Community Impact</b>	Existing and submitted sites at Clifton South (21) and Severn Stoke (Sandford & Madge Hill 14 & 15) in close proximity	Existing and submitted sites at Clifton East (6) and Severn Stoke (Sandford & Madge Hill 14 & 15) in close proximity		



**E042-2321 Barton Willmore**

- Approved site layout Norton Farm, Birmingham Road, Bromsgrove



- C Plots 07-08, 76-77, 88-89, 180-181 + 209-210 updated. 15/04/2015
- D General Revisions 27/05/2015
- E House types and mix amended to client mix 08/06/2015
- F Site layout modified to new Barratt and DWH land allocation plan; 08/07/2015
- G Working progress. Turning head near plot 69 flipped. 24/07/2015
- H Various layout changes; Draft Issue 29/07/2015
- I General amendments as per client DWH comments email 13/08/2015. General amendments as per client Barratt comments email 12/08/2015 and 17/08/2015. 26/08/2015

**ACCOMMODATION SCHEDULE**

Norton Farm, Bromsgrove 20/11/2015		
Housetype	Beds	Number
T14	2	51
T16	3	16
T18	4	5
T27	3	6
Apartments	1	18
DWB22	2	2
<b>TOTAL AFFORDABLE</b>		<b>98</b>
Newton	2	4
Alston	3	5
Morpeth	3	6
Faringdon 2	3	3
Barwick	3	16
Faversham	3	12
Chesham	4	12
Lincoln	4	12
Kennington	4	8
Thame	4	7
Cambridge	4	11

<b>TOTAL MARKET</b>		<b>96</b>
<b>TOTAL</b>		<b>194</b>

<b>TOTAL SITE UNITS</b>		<b>316</b>
-------------------------	--	------------

DWH Parcel		
Housetype	Beds	Number
SH27	2	9
SH35	3	4
SH39	3	10
SH48	4	1
DWB21	2	4
<b>TOTAL AFFORDABLE</b>		<b>28</b>
P341	3	2
H304	3	3
H331	3	7
T310	3	8
H406	4	9
H421	4	9
H431	4	11
H436	4	12
H452	4	5
H497	4	3
H455	4	2
H469	4	9
H470	4	4
H500	5	4
H585	5	6
<b>TOTAL MARKET</b>		<b>94</b>
<b>TOTAL</b>		<b>122</b>

- A Standard garage.
- B 6x3m internal garage.
- C Standard width garage with 6m internal length.
- EV charging points.
- Cycle storage - Secure Shed
- Cycle storage within garage.

- J Affordable provision amended to meet specific mix as per client instructions. Plots 002, 092, 094, 096, 101, 105, 118, 139, 149, 165, 174, 180, 181, 183, 184, 225, 228, 229, 231, 253, 301 handed to access meter boxes. General fence and path revision. 03/09/2015
- K Affordable provision plot subodd as per agreed distribution. 15/09/2015
- L Schedule amended. 16/09/2015
- M Plots swapped as per client request; affordable units roof colour modified; schedule updated. 07/10/2015
- N Highways amended as per client request; schedule updated. 26/10/2015
- O General amendments as per client request; Faversham and Woodbridge housetype introduced; H585, H470 and T310 introduced; schedule updated. 04/11/2015
- P Plots 118 and 277 garages amended as per client request. 04/11/2015
- Q Plot 244 modified to H436 and Plot 245 to H431; Plot 103 modified to a Cambridge; Proposed trees removed; Revised Sales Centre; General amendments as per client request; Schedule updated. 10/11/2015
- R Issue for clients internal signing off. 20/11/2015
- T General amendments as per meeting 16/11/2015. 20/11/2015
- U Path around dry basin C added; Green on ponds amended; Site boundary and blue land sale line amended. 23/11/2015
- V Highways amended to suit planning comments. 12/01/2016
- W Gates introduced to rear path gardens; Landscape updated. 18/01/2016



Architects · Project Managers · Quantity Surveyors  
 130 New Walk  
 Leicester, LE1 7JA  
 Tel: 0116 204 5800, Fax: 0116 204 5801  
 email: design@rg-p.co.uk, www.rg-p.co.uk

Project: A development at Norton Farm, Bromsgrove

Client: Barratt Homes West Mids / David Wilson Homes

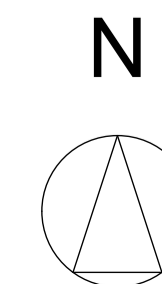
Sheet title: Site Layout

Ref: 40450/ 001 W

Scale: 1:1000 @ A1

Date: 20/03/15

Drawn: RG Checked: RW



All dimensions to be checked on site. Do not scale off drawing. This drawing is the copyright of the Architect, and not to be reproduced without their permission. Ordnance Survey map information reproduced with permission of HMSO Crown Copyright reserved. rgp Ltd. Trading as rgp.



**E045-2465 PleydellSmithyman Ltd (Chadwich Lane Deepening)**

- Evidence of agreement between landowner and client Richard Parton of Salop Sand & Gravel and Wildmoor Quarry Products Limited

## Joynes, Marianne

---

**From:** Richard Parton <[richard@gravel.co.uk](mailto:richard@gravel.co.uk)>  
**Sent:** 09 March 2017 20:47  
**To:** Rob Price  
**Subject:** Fwd: Sand Extraction and Waste Filling Agreement 2017

See below which hopefully satisfies them that we are all ok with the landowner .

Suggest you speak with mark bishop planning officer at Worcester as he encouraged us to delay the application for chadwich lane until the may elections were out of the way . Tell him we will be submitting then . We have sorted the last bit of the jigsaw - the sssi and are ready to go .

Richard

Sent from my iPhone

Begin forwarded message:

**From:** julie wood <[wood-julie@hotmail.co.uk](mailto:wood-julie@hotmail.co.uk)>  
**Date:** 9 March 2017 at 19:58:16 GMT  
**To:** "[richard@gravel.co.uk](mailto:richard@gravel.co.uk)" <[richard@gravel.co.uk](mailto:richard@gravel.co.uk)>  
**Subject:** Sand Extraction and Waste Filling Agreement 2017

To whom it may concern

I can confirm that the attached agreement between Chadwich Lane Quarry Limited and Wildmoor Quarry Products Limited dated 2017 has been returned to our Solicitors for validation today.

I hope this meets with your approval as proof that both of the above Limited Companies have been actively working together and will continue to do so on our existing site for many years to come.

Yours sincerely

Julie Wood  
For and on behalf of Chadwich Lane Quarry Limited

Sent from [Mail](#) for Windows 10

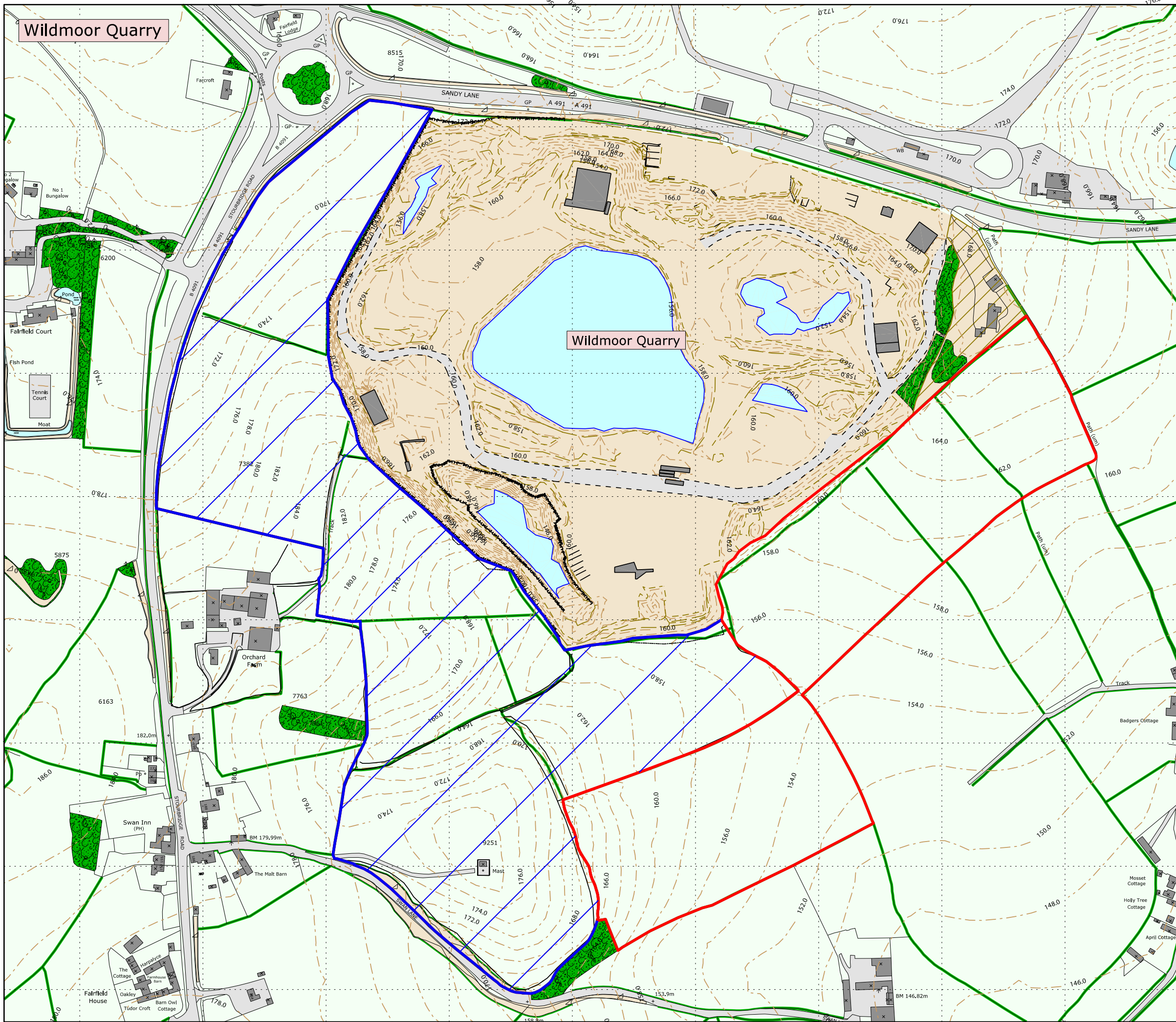
Dated

CHADWICH LANE QUARRY L  
WOOD, NICHOLAS BR

WILDMOOR C

**E045-2465 PleydeIISmithyman Ltd (Wildmoor Quarry Extension)**

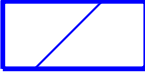

- Wildmoor quarry and proposed extension areas



Wildmoor Quarry

Wildmoor Quarry

**Legend**

-  Original Proposed Extension Area under reference B052-2397 nq
-  Additional Proposed Extension Area



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<b>DRAWING STATUS</b>	
<b>FINAL</b>	
<b>PROJECT</b>	
<b>Wildmoor Quarry</b>	
<b>CLIENT</b>	
<b>Salop Sand &amp; Gravel</b>	
<b>TITLE</b>	
<b>Proposed Extension Area</b>	
<b>DATE</b>	<b>SCALE</b>
<b>March 2017</b>	<b>1:3000 @A3</b>
<b>DRAWN</b>	<b>CHECKED</b>
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## **E047-716 Historic England**

- Historic England comments on specific sites March 2015
- Historic England comments on specific sites January 2016





# ENGLISH HERITAGE

WEST MIDLANDS

Worcestershire County Council  
Email Response

Our ref: 1309  
Telephone: 0121 625 6851  
Email: [kezia.taylorson@english-heritage.org.uk](mailto:kezia.taylorson@english-heritage.org.uk)

6 March 2015

Dear Sir/Madam,

## **Re: Minerals Sites for consideration within the Worcestershire Minerals Plan**

Many thanks for inviting English Heritage to a meeting at Worcestershire County Council on 12 February 2015 and for allowing us the opportunity to comment on the proposed mineral sites.

We have the following comments to make on the proposed mineral sites:

- We have significant concerns regarding minerals development at the Clifton Sites – specifically Severn Stoke, Madge Hill, Severn Stoke, Sandford, Clifton South and Clifton East due to the potential impacts on heritage assets, including a number of listed buildings, including Grade II\* and Grade II assets. We also have concerns about the impact on the Setting of the Registered Park and Garden at Croome Court, including the listed panorama tower as well as potential impacts to the Malvern Hills AONB. Any future allocations would need to be justified in terms of National Planning Policy which seeks to ensure that heritage assets are protected and conserved.
- We have significant concerns regarding mineral development at the Ryall sites, specifically Ryall North and Land at Ryall North due to the potential impacts on the Upton on Severn Conservation Area and the experience of the approach to the Conservation Area. We are also concerned about the impact on a number of listed buildings in Upton on Severn, in the area of Hanley Castle as well as within the wider area. Any future allocations would need to be justified in terms of National Planning Policy which seeks to ensure that heritage assets are protected and conserved.
- We would raise the issue of listed buildings within the wider Wolverley Glebe site area and the need to protect and conserve their significance, including their setting.
- Harvington West, Harvington North and Harvington Green Street Allocations would need to consider what impact development may have on a number of listed buildings in the area, as well as the Harvington Conservation Area. The allocations need to be justified in terms of National Planning Policy which seeks to ensure that heritage assets are protected and conserved.



English Heritage | The Axis | 10 Holliday Street | Birmingham | B1 1TG

Direct line: 0121 625 6851

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

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- Strong Farms site area is located in between three Grade II listed buildings, as well as within the wider setting of a listed church North West of the site. Any potential development would need to consider the impact on these heritage assets and ensure that their significance is protected and conserved.
- Ripple East site is located in between a number of Grade II listed buildings as well as South of the Upton on Severn Conservation Area and North of the Uckinghall Conservation Area. Any potential development would need to consider the impact on these heritage assets and ensure that their significance is protected and conserved.
- Ombersley Lineholt West and Ombersley Lineholt East are sited South East of a Grade II listed farmhouse. Due consideration would need to be given to the protection and conservation of this asset. Ombersley, West of Borelay Lane site has two Grade II listed cottages sited to the South East and South of the site, due consideration to the impact on these heritage assets is required to ensure that their significance is protected and conserved.
- We have concerns regarding the Bow Farm site and the proximity to the Towbury Hill Camp, Scheduled Ancient Monument as well as a number of Grade II listed buildings adjacent/within close proximity to the proposed mineral site. The allocation of this site would need to be justified in terms of National Planning Policy which seeks to ensure that heritage assets are protected and conserved.
- Wildmoor Quarry extension raises some concerns due to its proximity to the Moated Site at Fairfield Court, Scheduled Ancient Monument as well as a number of listed buildings in the wider area, one of which is adjacent to the site boundary. The allocation of this site would need to be justified in terms of National Planning Policy which seeks to ensure that heritage assets are protected and conserved. Chadwich Lane deepening site lies adjacent to a Grade II listed farmhouse and within the wider setting of this asset is the Chadwich Lane East site. Due consideration to the impact on these heritage assets is required to ensure that their significance is protected and conserved.

Please let us know if there are other sites that are being considered that we have not responded to at this time and we will endeavour to do so.

As well as concerns about the principle of development and the ongoing operational impacts including lighting, security, fencing, traffic and transport considerations etc. we are also keen to understand the longer term remediation opportunities for the proposed sites to ensure that any long term solution is appropriate for the historic environment. We are aware that for a number of the sites there are flooding issues and we would be keen to ensure that any future development does not exacerbate existing problems but rather looks for solutions that could offer enhancement opportunities for the historic environment. We welcome the approach of the Concept Plans as this offers English Heritage the opportunity to be involved in the wider process, prior to any development coming forward and to ensure that any impacts for the historic environment are fully assessed.

As mentioned at the meeting on 12 February we are keen to be involved in the Minerals Plan process, including in the preparation of the Concept Plans, as and when they are available for consultation. We are happy to offer advice on all of the forthcoming Concept Plans.



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We have also made a number of comments at earlier stages of the Minerals Plan process and ask that you consider these earlier comments alongside the comments made within this representation.

This response does not prejudice us from making comments at the planning application stage, when relevant.

If there any issues you wish to clarify or discuss please contact me. I would be happy to attend a future meeting to discuss the Minerals Plan in greater detail if you considered this useful.

Yours faithfully,

*Kezia Taylerson*

Kezia Taylerson  
Historic Environment Planning Adviser (West Midlands)



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Historic England

**By email only**

[Minerals@worcestershire.gov.uk](mailto:Minerals@worcestershire.gov.uk)  
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14 January 2016

Dear Mr Ward,

**RE: Worcestershire Draft Minerals Plan – additional sites consultation (3<sup>rd</sup> round)**

Thank you for your correspondence of 15 December 2015 including location information on a further four sites for consideration as part of the Draft Minerals Plan. It is understood that these further four sites would provide for the excavation of sand and gravel. I refer also to our earlier responses of 9 October 2015 and 26 November 2015. My response sets out some general comments relating to site allocations, and also some comments in respect of the four additional sites for consideration.

**General comments**

As stated with our previous comments, my assessment is based on the Government's expectation that such a Plan contributes to the delivery of sustainable development in accordance with the National Planning Policy Framework (NPPF)<sup>1</sup>; one of the core dimensions being the protection and enhancement of the historic environment<sup>2</sup>. My observations will also be mindful that future applications will need to comply with the Plan's historic environment policy and of the following national policy/legal matters in particular:-

- great weight should be given to an assets conservation and the more important the asset, the greater the weight to the assets conservation there should be (NPPF Paragraph 132);
- special regard must be given to desirability of preserving the setting of a listed building (S66, Planning (Listed Buildings and Conservation Areas) Act 1990);
- development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Paragraph 129).

I note that the *Archaeological Resource Assessment of the Aggregates Producing Areas of Worcestershire (WCC 2007)* was prepared to inform future Mineral planning within the County. [http://archaeologydataservice.ac.uk/archives/view/worcsagg\\_eh\\_2007/](http://archaeologydataservice.ac.uk/archives/view/worcsagg_eh_2007/)

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<sup>1</sup> NPPF paragraphs 151 and 182

<sup>2</sup> NPPF paragraph 7



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I note that your correspondence requests a response as to whether each of the sites is 'likely or unlikely' to be acceptable in planning terms. From the information available to me at this time I can advise that it is not possible to assess whether the sites should be taken forward as Specific Sites as part of the Minerals Plan. There is insufficient information available to assess the potential impact of the proposed minerals site allocations on environmental considerations such as the historic environment, including designated and non-designated heritage assets, and there is no reference to evidence base documents that are relevant to the historic environment.

Worcestershire County Council needs to be certain that the Plan complies with Section 12 of the NPPF. Such available evidence includes the Historic Environment Record, Conservation Area Appraisals and Management Plans, National Listing, Heritage at Risk Register, Local List, Historic Characterisation, Heritage Impact Assessment, SEA, and local conservation and archaeology officers/advisers in addition to the Worcestershire archaeological resource assessment mentioned above.

We would welcome receiving all of the information for the proposed allocations in due course in order to inform our understanding of how harm to the historic environment has been assessed. HE has provided advice on how sites can be assessed to ensure that they are NPPF compliant <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> The Site Selection Methodology on p.5 of the advice note may be of particular interest. I would also refer you to the various HE advice in relation mineral extraction and heritage assets which can be found via the following web page link: <https://historicengland.org.uk/advice/planning/mineral-extraction/> . Guidance on the preparation of setting assessments will also be of relevance: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> .

As stated in the November correspondence, a generic point of relevance to such sand and gravel allocations, is consideration of the potential impact of quarrying activity on groundwater flows and the chemistry of preserved organic and palaeo-environmental remains. Where groundwater levels are lowered as a result of excavation this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting could also be harmful.

### **Proposed additional sites comments**

Please note that elements of these comments for each site are repetitive and are set out in this way so that comprehensive text can be cut and pasted if you are forming a table of responses for sites.

#### ***D025-2444 - Land opposite Ryall Quarry entrance, Malvern Hills District***

It is likely that this site contributes to the significance of a number of heritage assets including listed buildings at Naunton and the River Severn historic landscape. Worcestershire County Council needs to be certain that any allocation of this site within the Minerals Local Plan complies with Section 12 of the NPPF. Such available evidence includes the Historic Environment Record, Conservation Area Appraisals and Management Plans, National Listing, Heritage at Risk Register, Local List, Historic Characterisation, Heritage Impact Assessment, SEA, and local conservation and archaeology officers/advisers in addition to the Worcestershire archaeological resource assessment mentioned above. At present HE is of the view that there is insufficient information available to demonstrate that the potential impact of the proposed minerals site allocations on environmental considerations such as the historic environment, including designated and non-designated heritage assets, has been considered in respect of taking the site forward as a Specific Site within the Minerals Local



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Plan. If the site is to be advanced you will need to demonstrate that great weight has been given to the conservation of the affected heritage assets and that all reasonable efforts have been made to safeguard their importance including any appropriate mitigation.

#### ***D025-2444 - Land at School Lane, Malvern Hills District***

It is likely that this site contributes to the significance of a number of heritage assets including Uckinghall Conservation Area, Ripple Conservation Area and various listed buildings within and around the two settlements, as well as the River Severn historic landscape. Worcestershire County Council needs to be certain that any allocation of this site within the Minerals Local Plan complies with Section 12 of the NPPF. Such available evidence includes the Historic Environment Record, Conservation Area Appraisals and Management Plans, National Listing, Heritage at Risk Register, Local List, Historic Characterisation, Heritage Impact Assessment, SEA, and local conservation and archaeology officers/advisers in addition to the Worcestershire archaeological resource assessment mentioned above. At present HE is of the view that there is insufficient information available to demonstrate that the potential impact of the proposed minerals site allocations on environmental considerations such as the historic environment, including designated and non-designated heritage assets, has been considered in respect of taking the site forward as a Specific Site within the Minerals Local Plan. If the site is to be advanced you will need to demonstrate that great weight has been given to the conservation of the affected heritage assets and that all reasonable efforts have been made to safeguard their importance including any appropriate mitigation.

#### ***D026-2397 – Land north of Wolverley Road, Wyre Forest District***

It is likely that this site contributes to the significance of adjacent heritage assets including the Grade II listed Lea Castle lodge and potentially the landscape park setting of the former castle as well as the River Severn historic landscape. Worcestershire County Council needs to be certain that any allocation of this site within the Minerals Local Plan complies with Section 12 of the NPPF. Such available evidence includes the Historic Environment Record, Conservation Area Appraisals and Management Plans, National Listing, Heritage at Risk Register, Local List, Historic Characterisation, Heritage Impact Assessment, SEA, and local conservation and archaeology officers/advisers in addition to the Worcestershire archaeological resource assessment mentioned above. At present HE is of the view that there is insufficient information available to demonstrate that the potential impact of the proposed minerals site allocations on environmental considerations such as the historic environment, including designated and non-designated heritage assets, has been considered in respect of taking the site forward as a Specific Site within the Minerals Local Plan. If the site is to be advanced you will need to demonstrate that great weight has been given to the conservation of the affected heritage assets and that all reasonable efforts have been made to safeguard their importance including any appropriate mitigation.

#### ***D026-2397 – Land south of Wolverley Road, Wyre Forest District***

It is likely that this site contributes to the significance of adjacent heritage assets including the listed buildings Wolverley Court and Sion Hill House, and would have the potential to impact on the canal as a heritage feature as well as the River Severn historic landscape. Worcestershire County Council needs to be certain that any allocation of this site within the Minerals Local Plan complies with Section 12 of the NPPF. Such available evidence includes the Historic Environment Record, Conservation Area Appraisals and Management Plans, National Listing, Heritage at Risk Register, Local List, Historic Characterisation, Heritage Impact Assessment, SEA, and local conservation and archaeology officers/advisers in addition to the Worcestershire archaeological resource assessment mentioned above. At



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present HE is of the view that there is insufficient information available to demonstrate that the potential impact of the proposed minerals site allocations on environmental considerations such as the historic environment, including designated and non-designated heritage assets, has been considered in respect of taking the site forward as a Specific Site within the Minerals Local Plan. If the site is to be advanced you will need to demonstrate that great weight has been given to the conservation of the affected heritage assets and that all reasonable efforts have been made to safeguard their importance including any appropriate mitigation.

## Conclusion

Further information is required on all proposed allocation sites to inform understanding of how harm to the historic environment has been assessed. This, in turn, will inform the principle and any appropriate contextual response.

We look forward to working with you again this year as the Mineral Local Plan progresses. Please do not hesitate to contact me if you wish to discuss any of the matters raised.

Yours sincerely

*Rosamund Worrall*

Rosamund Worrall  
Historic Environment Planning Adviser (West Midlands)

*Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.*



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## **E048-719 Environment Agency**

- Environment Agency comments on specific sites email December 2015
- Environment Agency email attachment - site sift spreadsheet
- Environment Agency email attachment – Bow Farm
- Environment Agency email attachment – Chadwich Lane
- Environment Agency email attachment – Clifton South and East
- Environment Agency email attachment – email response to Clifton application
- Environment Agency email attachment – Greenfields Farm
- Environment Agency email attachment – Harvington sites
- Environment Agency email attachment – Ombersley Lineholt sites
- Environment Agency email attachment – Ombersley West of Boreley Lane
- Environment Agency email attachment – Ripple East
- Environment Agency email attachment – Ryall North
- Environment Agency email attachment – email response to Ryall North application
- Environment Agency email attachment – Severn Stoke
- Environment Agency email attachment – Strong Farms
- Environment Agency email attachment – Wildmoor
- Environment Agency email attachment – Wolverley Glebe
- Environment Agency Flood Risk and Coastal Change, Climate Change allowances for planning (SHWG area) March 2016



**From:** Cording, Carl  
**Sent:** 03 December 2015 15:43  
**To:** 'mjoynes@worcestershire.gov.uk'  
**Subject:** MLP site sift

Dear Marianne,



MLP Site sift  
0.3.12.15.xlsx



Clifton South and  
East.pdf



Severn Stoke  
Sites.pdf



Bow Farm.pdf



Greenfields Farm,  
Upton Warren...



Harvington  
Sites.pdf



Ripple East.pdf



Wolverley  
Glebe.pdf



Ombersley West  
of Boresley Lan...



Ombersley  
Lineholt Sites.pdf



Ryall North.pdf



Strong Farms.pdf



Chadwich Lane.  
East and Deepen...



Wildmoor Quarry  
Extension.pdf



EA response to  
Clifton Quarry ...



EA response to  
LPA ref 15.0001...

This email intends to set out those issues we would expect to be considered in the appraisal of sites in the MLP. Given the number of sites for review, and potential sites in the future, I hope this provides a framework from which to work from moving forward. We have reviewed the sites and do not anticipate any showstoppers at this stage. Please find attached constraint mapping. We wish to make the following comments:

### **Flood Risk**

Our Flood Zone maps show flooding from 'ordinary watercourses' and 'main rivers' with a catchment less than 6km<sup>2</sup>. Whilst our Flood Zone maps use coarse modelling techniques, and should only be the starting point of the appraisal of flood risk, they set the scene with regards to fluvial flood risks. Flood risk from smaller watercourses will be unknown in the absence of modelling as will surface water (SW) flood risks. You will be aware that we no longer lead on SW flood risk this is the role of the LLFA, so you might want to discuss the sites with them in this regard. We do have surface water mapping. The LLFA is the custodian of this dataset. This is very coarse in its accuracy and care should be used in its use, but it is a valuable resource nonetheless and provides a SW overview for sites.

The key question is what level of assessment needs to be carried out at the strategic stage to inform the MLP? For other LPs we would expect SFRA to be produced, the key purpose is to ensure development sites are safe and the flood risks to and from allocations is acceptable. However, the other vital purpose is to demonstrate the application of the Sequential Test (ST). The NPPG sets out that MLPs should 'take account' of flood risk when allocating land having regard to available SFRA data. Given that mineral sites are classed as 'Water Compatible', and appropriate in areas at risk of flooding, the importance and need for a site specific SFRA is diminished. Indeed, there is not a requirement to apply the ST across the MLP. To accord with the general aims of the NPPF and NPPG I would envisage the WCC MLP should undertake an appraisal of the flood risk datasets that are available and summarise these for each site. This would comprise an in-house data gathering exercise most likely. The data that the MLP could pull on includes:

- EA Flood Map for Planning

- Updated Flood Map for Surface Water (UFMfSW)
- LLFA anecdotal evidence/SWMPs/SW hotspots
- Council SFRA work.....JCS, Wyre Forest etc.

Our FZ mapping is viewable here:

<http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=floodmap&layerGroups=default&lang=e&ep=map&scale=7&x=531500&y=181500>

Our UFMfSW is viewable here:

<http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?topic=ufmfsw#x=357683&y=355134&scale=2>

A key component in the NPPG concerns flood risk betterment. This should be strongly signposted in the MLP to embed this as a key principle.

### **Water Framework Directive**

It is important that the WFD and the Severn RBMP form part of the wider evidence base for the plan. For information, a more user friendly way of interpreting the data has been published on line: our 'Catchment Data Explorer' (CDE) tool. This is a web application designed to enable our customers to explore information about catchments and the water bodies in them. The data it uses is published as linked data, an open format designed for reuse by anyone. Users can view the data in the application, and download it in CSV format. CDE is produced by an external company on behalf of the Environment Agency. Most of the data is sourced from our Catchment Planning System and the text summaries and photos are extracts taken from Catchment Summaries. CDE can be accessed here:

<http://environment.data.gov.uk/catchment-planning/>

Local level actions and decision making can help secure improvements to the water environment. This is widely known as the 'catchment-based approach' and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- to encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

The headline issues in each catchment should provide useful context for each strategic corridor and contribute to the wider spatial portrait. The WFD data/headline issues could be included for each allocation.

My colleagues are working up a spatial portrait of projects and key actions in Worcestershire with regards WFD. I am due to sit down with them next week to see what progress they have made and understand how and if this work can splice with the MLP. Once this is undertaken the attached spreadsheet can be updated (see below) with a WFD context. I would not expect showstoppers with regards to WFD, but it is an important component with regards to betterment that needs action.

## **Groundwater Resource**

As previously advised, quarrying is an activity which physically removes the aquifer and the usable groundwater resources contained within aquifers which may lead to impacts on the water environment as groundwater flows can alter, especially if watercourses derive base flows from this same source of groundwater or wetlands rely on this water for their existence. The natural baseline conditions can change significantly from quarrying activities, so assessments (EIA, quantitative hydrogeological risk assessments (HIA)) will need to be robust and where appropriate mitigation applied to reduce any risks to the water environment to a minimum to allow the development to take place (at the site specific stage). Only until HIAs are undertaken will the risk and indeed the appropriateness of development be clear, this will also impact on the quantum of won material.

Alteration of groundwater flow and groundwater pathways must also be taken into account in addition to assessments of the reduction of aquifer storage. Impacts from these physical elements will affect other groundwater dependant environmental features (including surface water courses).

A few sites are located in sensitive hydraulic settings; being in Source Protection Zones (SPZs). This does not necessarily preclude mineral workings but it is constraint that resultant HIAs will have to closely focus on. Our Groundwater Protection: principles and Practice (GP3) policy provides guidance on the implications and limitations on SPZs:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297347/LIT\\_7660\\_9a3742.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297347/LIT_7660_9a3742.pdf)

For clarity the superficial aquifer is the upper strata whilst bedrock is self explanatory. The quality of the rock/strata as an aquifer is hierarchical for example:

- 1) Principal
- 2) Secondary A
- 3) Secondary B
- 4) Secondary (undifferentiated)
- 5) Unproductive

## **Submitted Sites**

The attached spreadsheet highlights the key constraints for the sites submitted to date and provided a summary to each. I have listed key betterment opportunities that the MLP should attempt to embed in the plan. Securing environmental betterment for proposals at the application stage is becoming increasingly more difficult so if there are solid hooks within the plan on which to 'hang' these asks that would be advantageous. These need not be prohibitively expensive or at the detriment of winnable material.

Some sites are currently in for planning. We are reviewing the submissions and have holding objections to each site (see letters attached).

## **Summary**

We do not anticipate showstoppers for the sites that have been selected to date. There are clearly constraints that will need to be fully assessed at the detailed application stage and until such work is carried out the appropriateness of the scale and form of development will be unknown. Work on HIAs

and FRAs are key examples in this respect. However, at this strategic stage we have no reason to consider any site would be unacceptable in planning terms.

I trust that the above is clear and of use but should you wish to discuss in further detail please do not hesitate to get in touch.

Best regards,

**Carl Cording**

Planning Specialist

Sustainable Places

Environment Agency - Shropshire, Herefordshire, Worcestershire and Gloucestershire



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Site	Watercourses	Flood Risk	WFD Setting	WFD Opportunities	Aquifer Setting	Source Protection Zone	Designations	Key Constraints	Betterment Opps.
B043-126 Ryall North (Carter Jonas for Croome Estate)	River Severn adjacent & a number of OWs transect.	FZ3b, FZ2, FZ2 &FZ1.			Secondary A Superficial, Secondary B Bedrock.	N/A	Nearby SSSIs	Flood Risk, WFD, Pollution Control	Flood Risk and WFD
B057-1793 nq Ryall North (Cemex)	As above	As above			Secondary A Superficial, Secondary B Bedrock.	As above	As above	As above	As above
B054-2398 nq Strong Farms	OW adjacent.	FZ1			Secondary A Aquifer Superficial, Principal Bedrock.	SPZ 3	N/A	SPZ3 and Principal Aquifer.	Biodiversity, WFD.
B053 – 2397 nq Chadwich Lane (deepen)	N/A	Ditches transect site. Known SW issues.			Secondary Undifferentiated Superficial, Pricpal Bedrock	SPZ3	SSSI	SSSI, SW flooding, SPZ3, Principal Aquifer	Flood Risk.
B053 – 2397 nq Chadwich Lane East	As above.	As above			As above.	SPZ3	SSSI	As above	As above
B052-2397 nq Wildmoor Quarry extension	N/A	FZ1			Undifferentiated Superficial, Principal Bedrock.	SPZ3	N/A	SPZ3, Principal Aquifer.	Biodiversity.
B050-1504 Clifton South	River Severn adjacent & a number of OWs transect.	FZ3, 2 and 1.			Secondary A Superficial, Secondary B Bedrock.	N/A	SSSI	SSSI, WFD and Flood Risk.	WFD and Flood Risk
B050-1504 Clifton East	As above	As above			As above	As above	As above	As above	As above
B023-1833 nq Bow Farm	River Severn adjacent & a number of OWs transect.	F3, 2 and 1			Secondary A Superficial, Secondary B Bedrock.	N/A	N/A	Flood Risk, WFD, Pollution Control	WFD and Flood Risk
C011-2411 Greenfields Farm, Upton Warren	Main River and Upton Warren Pools	FZ3, 2 and 1.			Secondary A Superficial, Secondary B Bedrock.	N/A	SSSI	SSSI, Flood Risk, WFD, Pollution Control.	WFD and Flood Risk
C015-1157 Harvington Green Street Allotments	N/A	FZ1			Secondary B Superficial, Secondary Undifferentiated Bedrock	N/A	N/A	Pollution Control	Biodiversity
C015-1157 Harvington North	N/A	FZ1			Secondary B Superficial, Secondary Undifferentiated Bedrock	N/A	N/A	Pollution Control	Biodiversity
C015-1157 Harvington West	N/A	FZ1			Secondary B Superficial, Secondary Undifferentiated Bedrock	N/A	N/A	Pollution Control	Biodiversity
C015-1157 Ripple East	River Severn adjacent & a number of OWs transect.	FZ3, 2 and 1.			Secondary A Superficial, Secondary A Bedrock.	N/A	SSSI	SSSI, Flood Risk, WFD, Pollution Control.	WFD and Flood Risk
C015-1157 Severn Stoke, Sandford	Nearby Severn and Ows.	FZ1.			Secondary A Superficial, Secondary A Bedrock.	N/A	N/A	WFD and Pollution Control.	Biodiversity.
C015-1157 Severn Stoke, Madge Hill	Nearby Severn and Ows.	FZ1.			Secondary A Superficial, Secondary A Bedrock.	N/A	N/A	WFD and Pollution Control.	Biodiversity.
C015-1157 Wolverley Glebe	OW adjacent.	FZ1.			Secondary A Superficial, Principal Bedrock.	SP22 and 3.	N/A	SP22 and 3, Principal Aquifer.	Biodiversity.
C015-1157 Ombersley, West of Boreley Lane	OW adjacent, nearby Severn.	FZ1 and 2.			Secondary A Superficial, Principal Bedrock.	N/A	N/A	Principal Aquifer, Pollution Control, WFD.	WFD and Biodiversity
C015-1157 Ombersley, Lineholt West	OW adjacent.	FZ1			Unproductive Superficial, Principal Bedrock.	N/A	N/A	Principal Aquifer, Pollution Control, WFD.	WFD and Biodiversity
C015-1157 Ombersley, Lineholt East	OW adjacent	FZ1			Unproductive Superficial, Principal Bedrock.	N/A	N/A	Principal Aquifer, Pollution Control, WFD.	WFD and Biodiversity
C015-1157 Ombersley, Lineholt North	OW adjacent	FZ1			Unproductive Superficial, Principal Bedrock.	N/A	N/A	Principal Aquifer, Pollution Control, WFD.	WFD and Biodiversity
D023-2398 Pinches 4	OW near.	FZ1			Secondary A Superficial, Principle Bedrock.	SPZ3	N/A	Principal Aquifer, Pollution Control.	WFD and Biodiversity.
D022-2441 Church Farm, Claines	N/A	FZ1			Secondary A Superficial, Secondary B Bedrock.	N/A	N/A	Pollution Control.	Biodiversity.
D020-1793 Land North East of Uckinghall lane	River Severn near.	FZ1			Secondary A Superficial, Secondary B Bedrock.	N/A	SSSI near.	SSSI, WFD, Pollution Control.	WFD and Biodiversity.
D020-1793 Land South of Ryall North	River Severn adjacent & a number of OWs transect.	FZ3b, FZ2, FZ2 &FZ1.			Secondary A Superficial, Secondary B Bedrock.	N/A	Nearby SSSIs	Flood Risk, WFD, Pollution Control	Flood Risk and WFD
D009-2296 Ryall Court Farm	River Severn adjacent & a number of OWs transect.	FZ3b, FZ2, FZ2 &FZ1.			Secondary A Superficial, Secondary B Bedrock.	N/A	Nearby SSSIs	Flood Risk, WFD, Pollution Control	Flood Risk and WFD

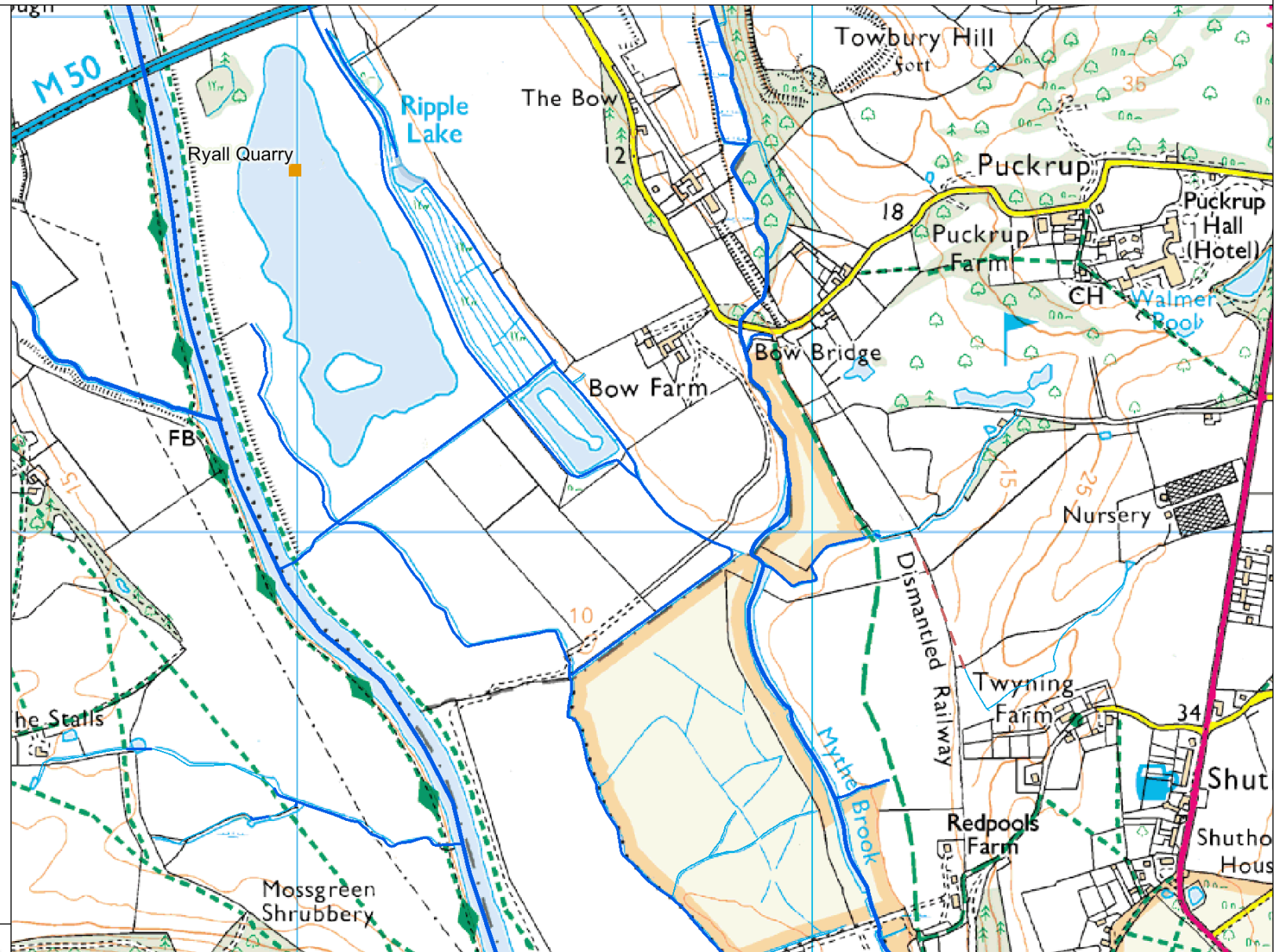


# Bow Farm



## Legend

- Detailed River Network**
- Primary River
  - Secondary River
  - Tertiary River
  - Lake / Reservoir
  - Canal
  - Culvert
  - Canal Tunnel
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  - Historic Landfill Sites
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- Special Protection Areas (SPA) England
- Special Protection Areas (SPA) Wales**
- Special Protection Areas (SPA) Wales



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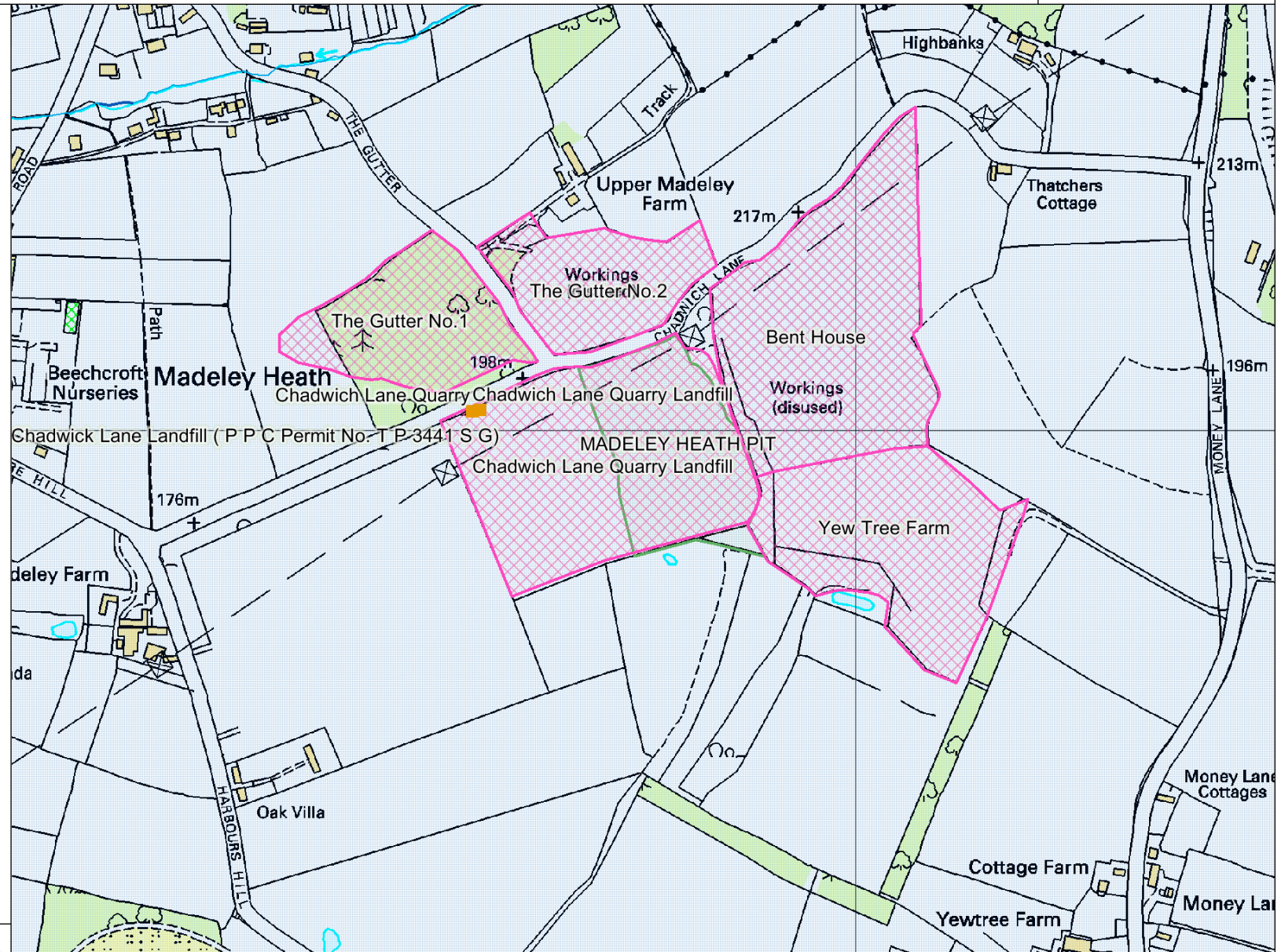


# Chadwich Lane



## Legend

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- Special Protection Areas (SPA) Wales



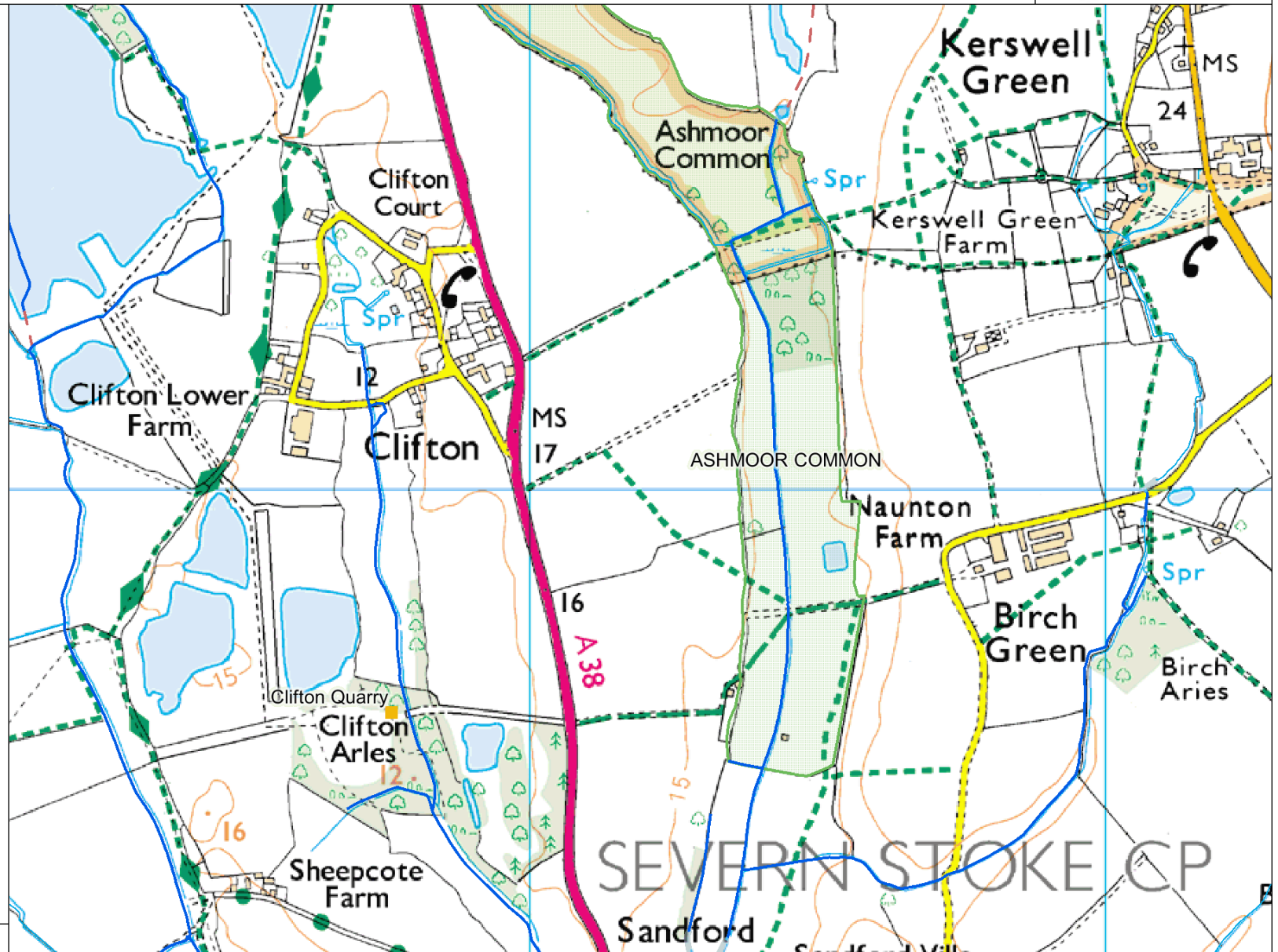


# Clifton South and East



## Legend

- Detailed River Network**
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  - Tertiary River
  - Lake / Reservoir
  - Canal
  - Culvert
  - Canal Tunnel
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- Special Protection Areas (SPA) England
- Special Protection Areas (SPA) Wales**
- Special Protection Areas (SPA) Wales



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Miss Emma Johnston  
Worcestershire County Council  
Development Control  
County Hall  
Spetchley Road  
Worcester  
Worcestershire  
WR5 2NP

**Our ref:** SV/2015/108339/01-L01  
**Your ref:** 15/000006/CM  
**Date:** 29 May 2015

Dear Miss Johnston

**PROPOSED PHASED EXTENSION TO EXISTING SAND AND GRAVEL QUARRY,  
CONSOLIDATION OF EXISTING SAND AND GRAVEL EXTRACTION AND  
RESTORATION TO AGRICULTURE, NATURE CONSERVATION USES AND LAKES  
CLIFTON QUARRY, CLIFTON ARLES WOOD, SEVERN STOKE, WORCESTER,  
WR8 9JE**

Thank you for referring the above application. We object to the proposals and request further information is submitted to address the below concerns:

**Ground Water Protection**

We recognise the economic importance of the minerals industry and the needs of Mineral Planning Authorities to provide sand and gravel extraction in quarries within their county boundary. We will support applications which do not have any adverse impact upon the water environment and will object to those sites which indicate more of a risk and detrimental impact on the water environment unless overriding mitigation proposals can be provided in support of the application.

Quarrying is an activity which physically removes the aquifer and the usable groundwater resources contained within aquifers which may lead to severe impacts on the water environment as groundwater flows can alter, especially if watercourses derive baseflows from this same source of groundwater or wetlands rely on this water for their existence. The natural baseline conditions can change significantly from quarrying activities, so assessments (EIA, quantitative hydrogeological risk assessments) will need to be robust and where appropriate mitigation applied to reduce any risks to the water environment to a minimum to allow the development to take place.

After review of the EIA (notably ES Chapter 9 on the Hydrology and Hydrogeology) we have some concerns regarding the effects dewatering may have upon the Ashmoor Common SSSI marshy grassland with only a 25m buffer zone proposed from the extension zones G and F. This assessment also presents a water features survey and

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Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

we note that there are also several licences, some located on Ashmoor Common watercourse or close by in ponds and boreholes which have protected rights to abstract water so protection of these features is vital from the effects of quarry dewatering.

The springs and seepages to the east of Ashmoor Common SSSI could also be at risk from dewatering along with the drainage ditches and watercourses notably close to Ashmoor Common SSSI. The Clifton Arles Wood is also a notable wet woodland and marsh complex supporting wetland flora.

The proposal is to remove an estimated 2.2 million tonnes of a Secondary A aquifer of sand and gravel which also provides groundwater to several key water features as discussed above. The mitigation measures applied to protect water features should be robust and protective of that feature to minimise any impacts to the water environment from the development. The ES presented is deficient in our opinion where the assessment of key features such as Ashmoor Common SSSI is concerned and we provide further detailed comments below regarding this application and ES.

With would have to query at this stage if this development is acceptable this close to such a critical feature as Ashmoor Common SSSI which is reliant on water for its very existence.

### **Ashmoor Common SSSI key protected site**

The Ashmoor Common SSSI flora/ key plant communities are highly sensitive to changes in the hydroecology/ hydrogeology underlying this site of special scientific interest. Changes in the groundwater level regime from dewatering (even by centimetres change within the capillary fringe zone) could affect this water/ ecological balance to the detriment of the SSSI status over the indicated 18 month working period per zone. Natural England ecologists/ hydrogeologists should be consulted further on this aspect as plant communities have varying tolerances to changes in the hydraulic regime dependant on root depth and water content in the underlying formations.

Due to the very close proximity of the proposed extension areas in G/F area, Ashmoor Common SSSI also has several ponds and ditch watercourses which could also be influenced by changes to the hydrogeological regime from the proposed dewatering from this quarry extension which has the ability to affect the shallow groundwater table/ capillary fringe related to Ashmoor Common SSSI. Although we note the mitigation proposed in the ES for the Ashmoor Common watercourse in particular, what about the large northern pond which potentially could be dewatered during drawdown operations in Zone G?

Dewatering is a process which lowers the groundwater table in the vicinity of the pumping void area and the assessment presented in the ES has predicted a radius of influence for each zone using a distance/ drawdown approach. The predicted *worst case* radius of influence for each zone indicates for zone G: 1.3m drawdown at 10m distance, 0.6m drawdown at 50m distance and 0.2m drawdown at 100m distance.

In our view the proximity of Ashmoor Common SSSI to the proposed quarry may impact upon the diverse ecology and plant communities who rely on water for their existence in the northern half of Ashmoor Common SSSI in particular especially within the capillary fringe dewatering those deposits directly underneath the wetland feature.

The predictions presented are only one-dimensional deterministic calculations (subject to the variables in the calculations as discussed in the ES) based on a worst case scenario, but a precautionary approach should always be adopted where an impact

could or is likely to occur. These calculations are useful as a tool to get general understanding, but other lines of field evidence and past knowledge of conditions should also be considered as detailed below.

Regarding the proposed buffer zone of 25m between zones G/F extension areas and Ashmoor Common SSSI. Even with this standoff of 25m Ashmoor Common SSSI the worst case zone of influence calculations indicate that risk from dewatering could exist. What is the rationale behind the 25m buffer zone?

We note the comment in section 9.302 that: *'During the operational phase of extraction drawdown effects have been assessed for water features identified in the locality, with particular consideration relating to Ashmoor Common SSSI. Temporary drawdown is likely to occur within the permeable deposit beneath the SSSI, but this has been shown to be hydraulically isolated from the surface environment by a significant thickness of near surface clay.'*

From our experience of many years of involvement with the site and through discussions with other consultants, including Hafren Water and Natural England who are the primary regulator for the SSSI, Ashmoor Common SSSI may not be entirely disconnected or isolated from the underlying sand and gravels aquifer regime. Both water chemistry, local groundwater level borehole data and the plant communities present has been used to understand whether continuity exists or not with groundwater.

The same sand and gravel deposits which are the target mineral for extraction for this extension (notably from zones G/F adjacent to the SSSI) also underlie the Ashmoor Common SSSI, however we do understand from past experience of working on this site and from the geological evidence provided in previous assessment and in this ES report that a layer of peaty clay is present underlying the SSSI, which could make you infer that the SSSI is therefore hydraulically disconnected from the sands and gravels by the geologic nature of clay being of lower permeability.

However, the water levels experienced in hydrographs from the piezometers over the 18 years of data collection within the SSSI are often similar when compared for groundwater level and trend (see piezometers starting ACPX which are constructed into the peat) to those groundwater levels in the underlying sand and gravel deposits (see piezometers ACBH 1 and ACBH 2 which are constructed into the sand and gravels through Ashmoor Common SSSI). Water quality data presented by Hafren Water (see reference below) also indicated a likely groundwater component within the SSSI as well as a surface water/ rainwater component.

The consultants Hafren Water have been working for Tarmac Ltd on the current quarry operational site and provide an ongoing Section 106 monitoring report on a sixth monthly basis from a network of piezometers across this SSSI as an early warning from any effects from dewatering works within the current quarry development. Discussions in 2008 between the Agency, Tarmac and Hafren water (please refer to letter attached dated 18 July 2008 addressed to Mr S Lawrence, Tarmac Ltd), acknowledge that Ashmoor Common SSSI may be partly groundwater fed and monitoring data from the onsite piezometers have confirmed in the past that there are *'instances of groundwater levels above the surface, indicating an upward gradient, and the potential for groundwater seepage discharge, should a pathway exist through the low permeability clay which overlies the gravel.'* Please refer to the letter for further information.

The same letter goes on to propose mitigation measures for the current quarry and a *'corrective actions table'* strategy defined should an impact occur and certain boreholes

had triggers levels set as an early warning indicator of a possible impact (NB: These trigger level boreholes were revised at a later date from the 18 July 2008 letter to include other sites including ACP 1, ACP4, ACBH01, ACP7, P5 and ACP 8). The EIA presented for the extension area does not consider any mitigation measures are required for Ashmoor Common SSSI and in light of the information presented above we believe this is be a serious omission from this assessment and further re-evaluation is required for this wetland feature in light of this information.

A precautionary approach must always be adopted and if there is any reasonable doubt, appropriate assessment and mitigation must be proposed to protect critical water features such as Ashmoor Common SSSI because once environmental damage occurs, it is often an irreversible effect to return back to the baseline conditions.

The assessment of dewatering impacts on Ashmoor Common SSSI should be as robust as possible taking into account all of the issues discussed above as we have concerns that the groundwater regime in and around the SSSI could be affected by dewatering operations. A precautionary approach should be adopted where uncertainty lies.

### **Water features, surface water and groundwater licences**

We have concerns for those water features within the predicted zones of influence, especially under the worst case scenario.

Water abstraction licences have protected rights and the activity of dewatering must not interfere with that right to abstract water whether it is from surface or groundwater. We note that L1 licence 18/54/08/0204, L4 licence 18/54/08/0372 and L7 licence 18/54/08/0416 are all located on what has been called in the ES the *Ashmoor Common watercourse*. All of these licences could be at risk from flow loss and water quality issues mainly from suspended solids from the activity of dewatering in the quarry extension areas D through to G.

We acknowledge the mitigation proposed for the Ashmoor Common watercourse in providing compensation water which will fall under a discharge consent control, and if operated effectively during quarry works should provide the flows and water of quality to ensure protection to the licences and flows in the watercourses.

However, this is a higher risk approach to take, particularly as these licences are relied upon to support the water rights of other local agricultural businesses who also require water. Any loss of flow or level could lead to legal action being taken by licence holders.

The springs and seepages on the eastern side of Ashmoor Common SSSI which could also be at risk from dewatering provide an important contributory input to the watercourses in the area and seem to have been ruled out from further assessment and mitigation proposals for various reasons. However, it is our opinion that these features should at least be monitored during dewatering operations with a mitigation programme in place should corrective action need to implemented to protect these features from the effects of dewatering the sand and gravel aquifer locally in Zones G/F.

Licences L5 18/54/08/0397 and L6 licence 18/54/08/0397 abstractions from the sand and gravel irrigation pond could also be at risk from derogation and appropriate mitigation should be considered to protect this licence.

One licence which has recently gone through a licence variation concerns groundwater licence 18/54/08/0427 at Baynhall Farm which would not have come up on searches. This licence now has four boreholes spread out across the farm. Further details can be

provided upon request.

### **Existing and proposed monitoring for surface and groundwater**

We are in agreement that the existing programme of monitoring for surface and groundwater monitoring should be expanded into the new extension area as suggested. However, we do not necessarily agree that the implementation of mitigation measures should be provided during periodic review of the data during operational quarry dewatering works. Mitigation proposals should be flagged and defined well before any impact becomes apparent from dewatering upfront of any issue occurring.

We would like to be in a position where we can agree an appropriate mitigation strategy with the applicant for this extension area. The Hafren Water letter of 18 July 2008 discusses such proposals which in our opinion should be further refined and defined along a similar nature as part of these new extension proposals. After consideration of the discussion about, to try and eliminate risk to the water environment, Zones G/F could be worked wet to reduced the impact upon the surrounding water features/ environment? We would like to see trigger conditions set for groundwater levels across the network of boreholes and a mitigation plan of action defined now at this stage.

The suggested groundwater monitoring points list in table 9/0 also appears to be a much small subset list for the more historic monitoring points which we would also query the rationale behind this.

For further understanding of the interaction of Ashmoor Common SSSI with the underlying aquifer we would recommend that the applicant contact Hafren Water for further advice on the long term monitoring programme already undertaken so that a full and complete conceptual model is presented and all risks to this critical water feature are assessed.

### **Water Framework Directive**

In our scoping opinion dated 1 May 2015 we advised that the ES should demonstrate that there will not be any deterioration in the ecological value or physico-chemical quality of any watercourse as a result of the development. There are small tributaries of the River Severn within the proposed area that could potentially be affected.

The above is important in the context of the Water Framework Directive (WFD). We request the ES is updated accordingly and an assessment in the context of the WFD is undertaken. The ES should demonstrate the proposals will not cause harm to the water environment and align with the objectives of the Water Framework Directive (WFD). In brief summary these include:

- To prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters
- To achieve at least good status for all waters by 2015. Where this is not possible, and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027.
- To conserve habitats and species that depend directly on water.
- To reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment
- To reduce the pollution of groundwater and prevent or limit the entry of pollutants
- To help reduce the effects of floods and droughts

Development needs to be planned carefully so that it does not result in deterioration or further pressure on the water environment and compromise WFD objectives. Failure to

comply with WFD requirements may lead to the European Commission bringing legal proceedings against the UK. Local Authorities have a general responsibility not to compromise the achievement of UK compliance with EC Directives.

## **Flood Risk**

The proposed extension to the quarry is partly within Flood Zone 2 (medium risk). Due to the size and nature of the application a Flood Risk Assessment (FRA) is required. The applicant has submitted a FRA as part of the EIA (Appendix 9, ref B\_LTL\_CLF\_FRA14.001)

The proposed extension phases to the quarry: A, B and C are in areas at risk of flooding from the Severn, the remaining phases are largely within Flood Zone 1. The works are considered water compatible; providing the works are carried out in such a way not to obstruct flood flows. The FRA confirms areas that are currently effective as an informal flood defence (north area of phase C) will remain in place.

We would recommend the proposed batching plant is suitably protected and located above the 100 yr plus climate change level (design flood level) of 14.0m AOD.

Given the detail provided in the FRA and the potential for areas of the site to flood, it is important that the site has an appropriate flood management plan to ensure safe withdrawal and further control of runoff within the site when the downstream watercourses are restricted; such as indicated in the report when the flap valve on the A38 is closed due to high River Severn levels.

Controlling run off from the site will be essential in terms of protecting downstream areas from increased flood risk. The FRA proposes a mechanism to how this will be controlled. The Lead Local Flood Authority (LLFA) should be consulted to review the surface water flood risks to and from the development as we are no longer a statutory consultee in this regard.

Given the scale and nature of the proposals (and the local flood sensitivities) we would welcome opportunities be explored to provide flood risk betterment.

## **Regulatory Framework**

The Mining Waste Directive (MWD) requires that extractive wastes from mines, quarries and other mineral extractions are managed in a way that minimises impacts on the environment and human health. Extractive wastes are wastes generated from the prospecting, extraction, treatment and storage of mineral resources and the working of quarries.

An Environmental Permit is held by Tarmac Ltd to operate a mining waste operation at Clifton Quarry. This permit will require a variation to increase the boundary of the operation to incorporate the extension. Any new or differing activities which do not fit within the conditions of the Environmental Permit would also require prior variation. Please contact Environment Officer Helen Bayliss, or our Permitting Support Centre on 03708 506506 for more information.

## **Summary**

We object to the proposals as submitted for the reasons detailed above. Our objection aligns with the guiding principles set out in the NPPF and NPPG. Given the inherent complexities of this application we would be happy to meet with the applicant, Natural

England and yourself.

I trust that the above is clear and of use but should you wish to discuss in further detail please do not hesitate to get in touch.

Yours sincerely

**Mr Carl Cording**  
**Planning Specialist**

Direct dial 01684 864382

Direct e-mail [carl.cording@environment-agency.gov.uk](mailto:carl.cording@environment-agency.gov.uk)

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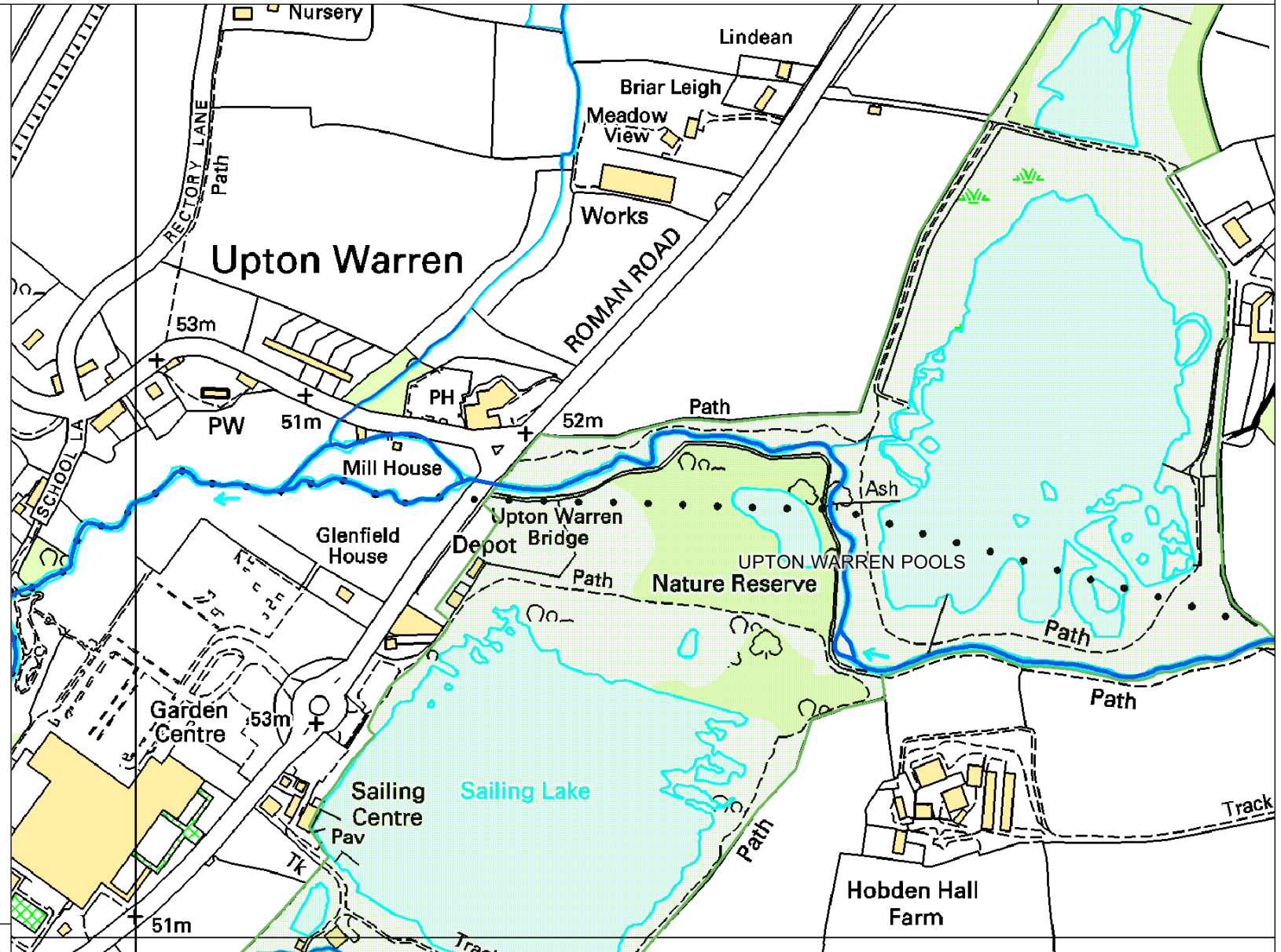


# Greenfields Farm, Upton Warren



## Legend

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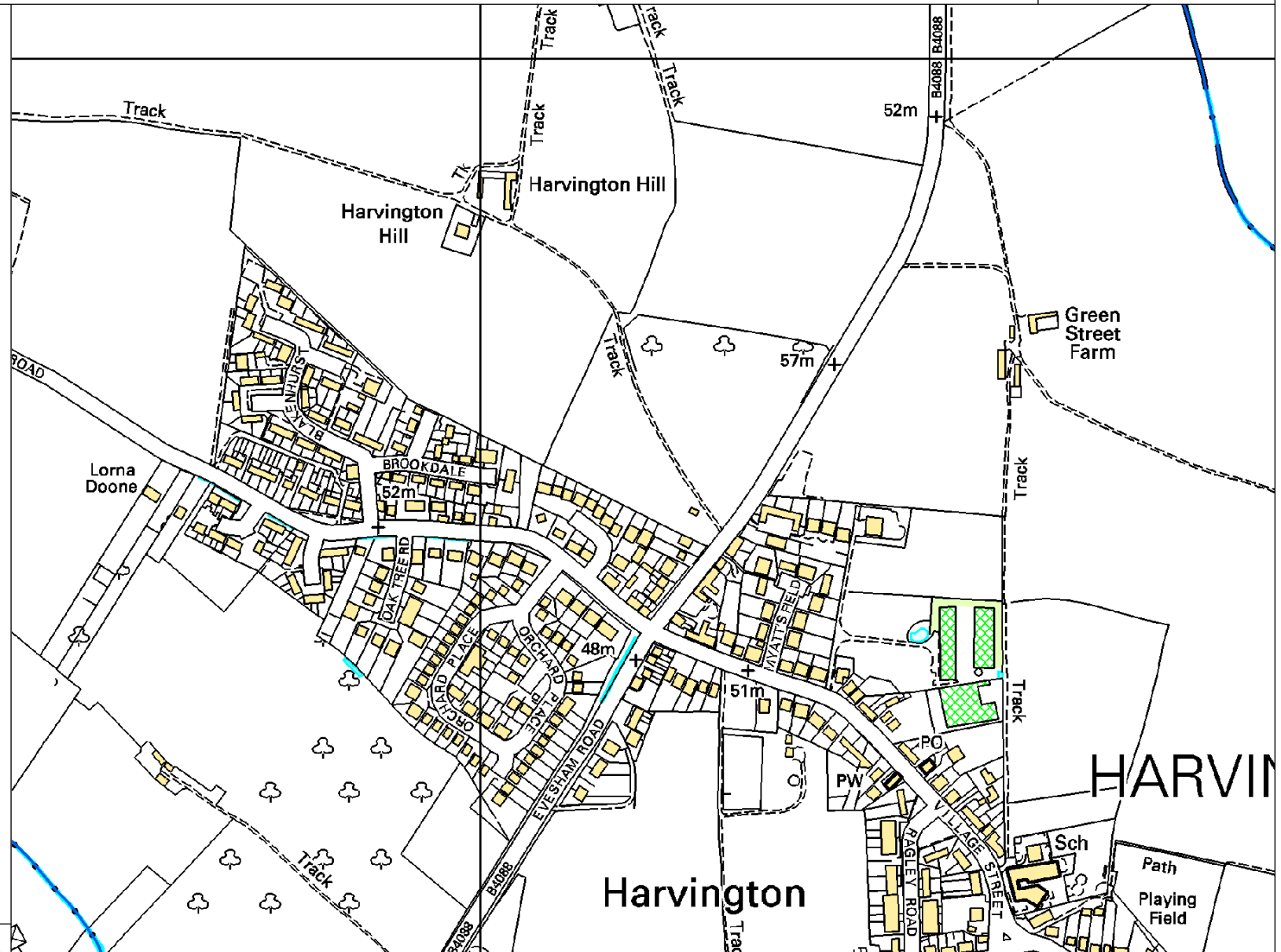
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# Harvington Sites



## Legend

- Detailed River Network**
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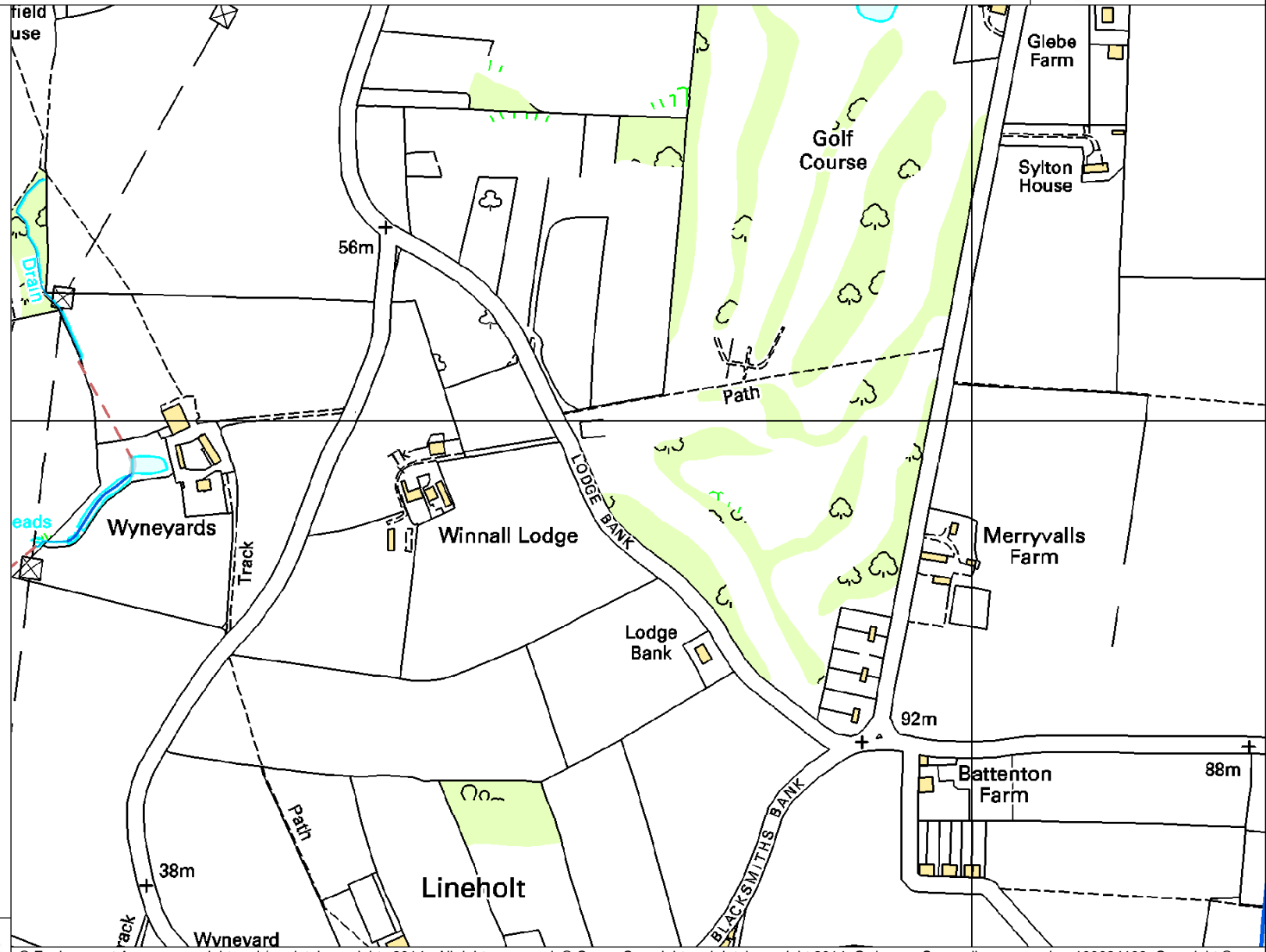


# Ombersley Lineholt Sites



## Legend

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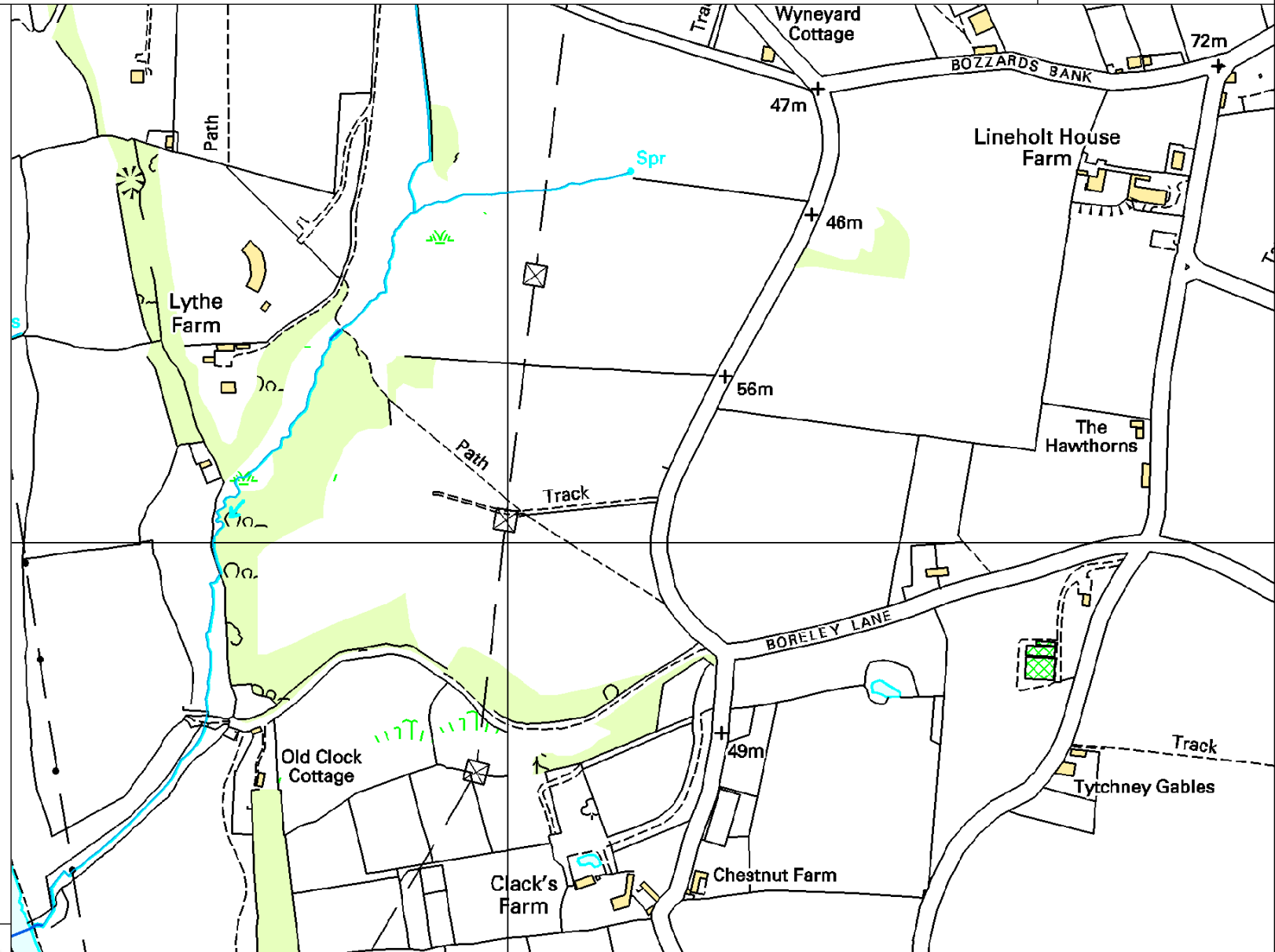


# Ombersley West of Boresley Lane



## Legend

- Detailed River Network**
- Primary River
  - Secondary River
  - Tertiary River
  - Lake / Reservoir
  - Canal
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- Special Protection Areas (SPA) Wales**
- Special Protection Areas (SPA) Wales



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# Ripple East



## Legend

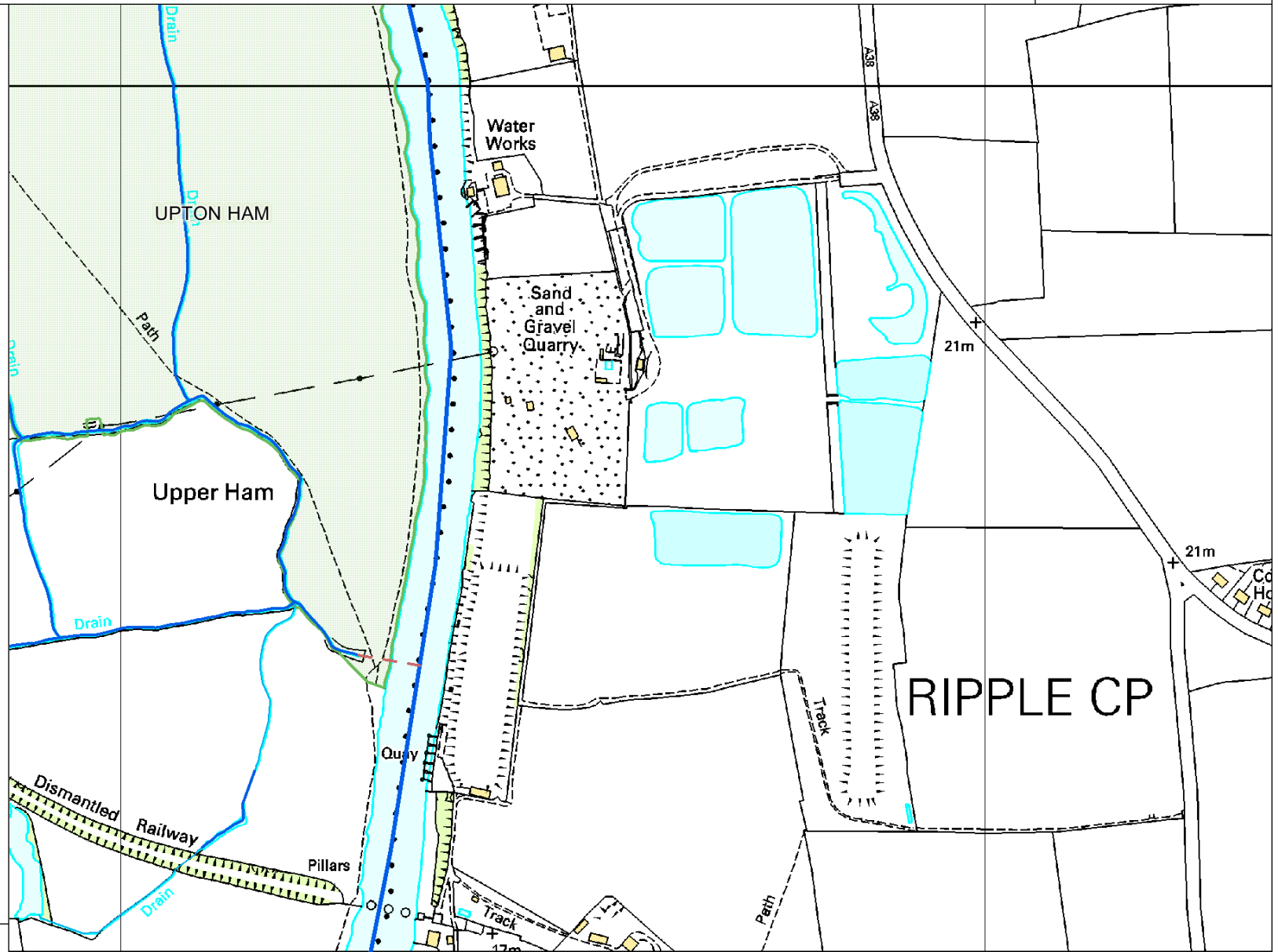
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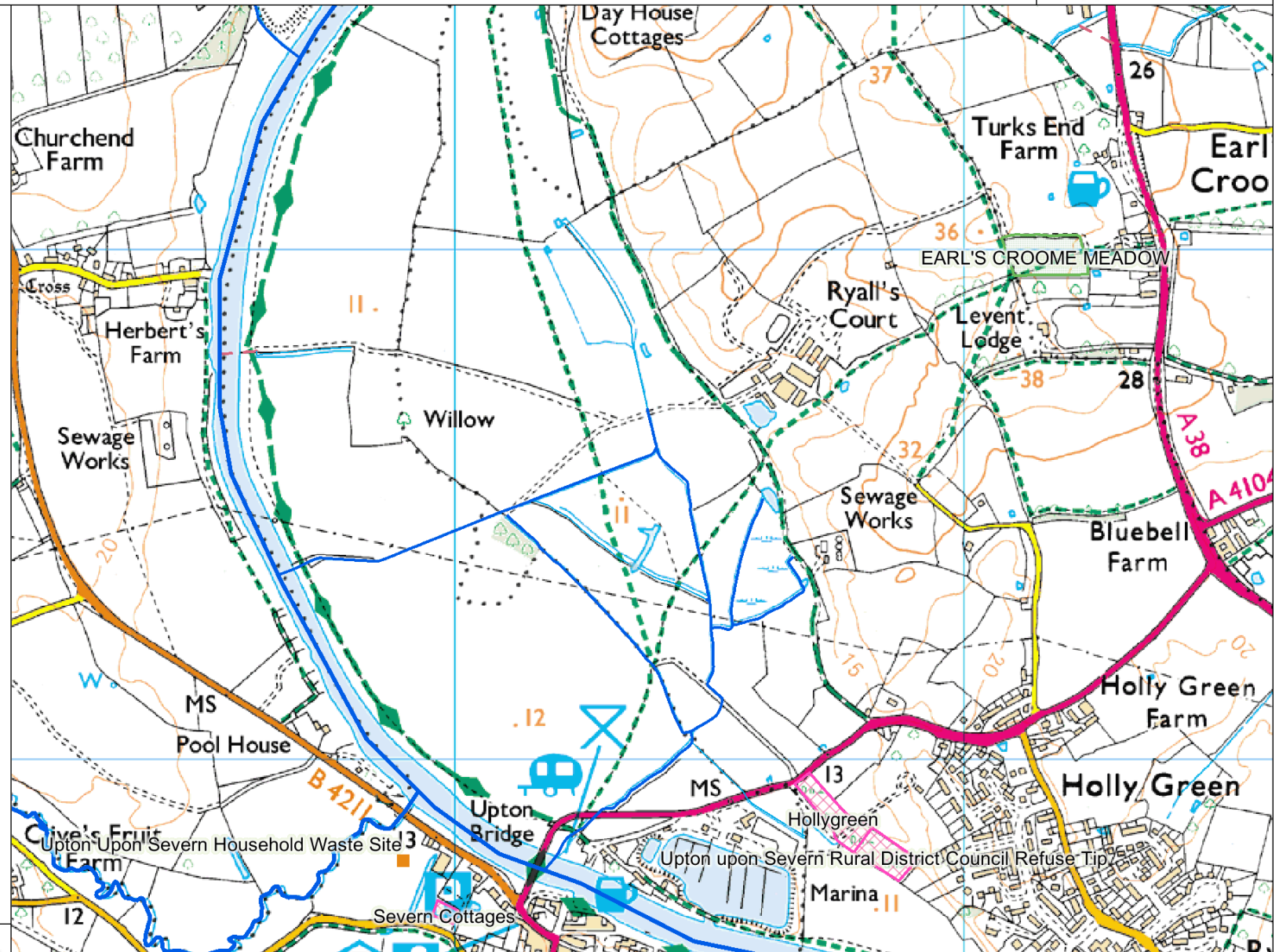
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# Ryall North



## Legend

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Mr Steven Aldridge  
Worcestershire County Council  
Development Control  
County Hall  
Spetchley Road  
Worcester  
Worcestershire  
WR5 2NP

**Our ref:** SV/2015/108418/01-L01  
**Your ref:** 15/00013/CM  
**Date:** 10 June 2015

Dear Mr Aldridge

**PROPOSED EXTRACTION OF SAND AND GRAVEL AND ERECTION OF TEMPORARY WHARF WITH PROGRESSIVE RESTORATION TO A LANDSCAPED LAKE- LAND AT RYALLS COURT, RYALLS COURT LANE, RYALL, UPTON UPON SEVERN, WORCS, WR8 0PU.**

Thank you for referring the above application. We object to the proposal as submitted and request further information is provided to address our concerns. We wish to make the following comments accordingly:

**Flood Risk**

The proposed sand and gravel extraction site is located near the left bank of the River Severn, upstream of Upton upon Severn and is within Flood Zone 3 ('High Risk') and within 3b ('Functional Flood Plain') as defined in the National Planning Policy Framework (NPPF).

Hydro-Logic's Flood Risk Assessment (FRA) checklist confirms that the site floods when the agricultural bunds overtop in a 1 in 5 year event. The site is also shown to lie within the historic floodplain of the River Severn. It has been proposed that approximately 650,000 m<sup>3</sup> of sand and gravel will be extracted from this site; over a seven year period. In accordance with the NPPF and NPPG sand and gravel workings are considered water compatible development, however the applicant must undertake a detailed FRA to demonstrate that:

- the site can remain operational and safe for users during times of flood
- there is no net loss of floodplain storage
- the operations do not impede water flows; and
- there is no increased flood risk elsewhere as a result of these proposals
- an adequate flood management plan is produced in liaison with Emergency Planners place using the Environment Agency flood warning service

The applicant has submitted a FRA checklist, however, this is a limited and descriptive review of the flood risk relevant to the site and the impacts downstream. It is not considered a detailed FRA to allow development of the site and we do not believe the document was intended for this purpose.

Environment Agency  
Newtown Industrial Estate (Riversmeet House) Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

The report has given some indication as to the changes in flood storage and how the site will respond to flooding, but acknowledges a more detailed assessment is required to assess the flood risk elsewhere. The conclusion of this limited assessment (below) highlights our concerns and the need for more detailed 2D modelling to be undertaken to fully understand and quantify the impacts of the quarry for all phases of the development and the impacts on third parties:

*'As suggested above, the effect of creating a surge pile within the floodplain would be to increase flood levels. The indicative 40 m wide pile and associated base raises the 1:100 year flood level by 0.11 m. The increased flow conveyance associated with the quarry excavation offsets that effect and using the indicative values given above and the approximations provided by the Manning analysis, the net effect would be a small lowering of flood levels, overall. This analysis is indicative only, for a number of reasons:*

- 1) Most of the input values used are approximate*
- 2) The single cross-section ignores the effects of features downstream*
- 3) Water level at this site is relatively unimportant; it is flood risk at Upton upon Severn which requires detailed consideration.*
- 4) The situation would change with each phase of development and each should be modelled and examined in detail. This simple analysis does allow comparison of the existing floodplain with a floodplain in which a large surge pile is present, showing that this can be offset by a large excavation of the type proposed. In order to better understand the overall effect of introducing these features, it is recommended that this stretch of the River Severn should be subjected to detailed hydraulic modelling and that 2-Dimensional techniques should be employed, to properly represent the complex flows across the floodplain during all the proposed phases of development.'*

A detailed FRA needs to be undertaken. The River Severn and watercourses across the site should be modelled using 2-dimensional techniques for a full suite of flood returns for the phases of the development (20%, 10%, 5%, 1% 1% cc and 0.1%). The primary concern as identified in the report submitted is to demonstrate no increase in flood risk. The 2-dimensional modelling is also important to demonstrate that as well as not increasing the level of floods risk elsewhere, any changes in flow conveyance should not result in faster inundation for sites elsewhere. The assessment should also further investigate flooding on the site when River Severn levels are high and water cannot discharge from the site.

Once this modelling has been undertaken we will be in a position to comment fully on the flood risk issues relating to these proposals. Until this time we must object on flood risk grounds as an appropriate assessment of the risks to and from the site has not been carried out in accordance with the NPPG and NPPF. Indeed, given the local flood sensitivities the site should be providing for flood risk betterment and opportunities explored accordingly.

It is disappointing the applicant's flood risk consultant did not engage in pre-application discussions as offered. Much of the above could have been dealt with at earlier stages in the planning process. Given the scale of the development and the flood risk sensitivities locally we would advocate the development to explore flood risk betterment opportunities.



## **Groundwater Impacts**

We recognise the economic importance of the minerals industry and the needs of Mineral Planning Authorities to provide sand and gravel extraction in quarries within their county boundary. We will support applications which do not have any adverse impact upon the water environment and will object to those sites which indicate more of a risk and detrimental impact on the water environment unless overriding mitigation proposals can be provided in support of the application.

Quarrying is an activity which physically removes the aquifer and the usable groundwater resources contained within aquifers which may lead to severe impacts on the water environment as groundwater flows can alter, especially if watercourses derive baseflows from this same source of groundwater or wetlands rely on this water for their existence. The natural baseline conditions can change significantly from quarrying activities, so assessments will need to be robust and where appropriate mitigation applied to reduce any risks to the water environment to a minimum.

We have more concerns where quarries are worked sub-water table to enable sand and gravels to be extracted as dewatering by pumping can lower the water table within a zone of influence and impact surrounding water features such as watercourses, ponds, springs and wetlands which rely on the same source of groundwater.

It is the responsibility of the applicant to ensure that the development will also not adversely affect any existing legal water interests including abstraction licences in the area nor any natural water features such as springs, watercourses and ponds which rely on groundwater for their existence. All licences have protected rights to abstract water and these are afforded a high degree of protection from activities which have the potential to cause derogation such as dewatering from a sand and gravel quarry where the effects are not always seen straight away but over a period of extended time.

### **Protection of groundwater & connected water features**

Given the sensitive hydrogeological setting of the proposed subject site in the flood plain and the close proximity to the River Severn, it is our opinion that dewatering could have more significant impacts on surrounding water features (including the River Severn) than anticipated in the ES and affect the groundwater flow regime.

The setting suggests that hydraulic continuity in the shallow groundwater will exist in the surrounding superficial aquifers including the sand and gravels (the target mineral for extraction). Therefore, dewatering activities within the quarry to allow for the extraction of sand and gravel has the potential to draw in River Severn water within the zone of influence of pumping within the quarry. This effect will have its greatest risk in times of lower flows (i.e. drought periods) in the river and may affect certain reaches depending on the location of dewatering during quarry operations and the mitigation measured adopted during operations.

There are a number of water licences which rely on the river flows for abstraction and any loss in flow could affect these licences who have rights to abstract water. Also, other water features could also be reliant on groundwater baseflows including the smaller surface watercourses passing through the subject site, any ponds and wet boggy features. An impact assessment should also consider such water features and mitigation provided where necessary. Within the ES, we cannot find an impact assessment assessing in detail the *quantitative* effects on these features.

Despite the scoping calculations presented in the ES (Chapter 9/ Appendix 9/2) we

have reservations about the potential drawdown effects on water features notably the close proximity to the River Severn and the hydraulic connectivity through river terrace aquifer deposits and other permeable superficial deposits in this location. Leakage through the bed and banks of the river from the activity of artificially drawing down the groundwater table and dewatering at the subject site could potentially place the River Severn within the zone of influence. This may lead to losses in the river along certain reaches and we have concerns that abstractions could be affected and indeed any other water features within this zone of influence as discussed already.

The assessment presented is limited and simplistic concerning the potential quantitative impacts on surrounding water features notably the adjacent River Severn from dewatering activities. We are not confident that the assessment presented adequately looks at the risks to surrounding water features in enough detail. This assessment is usually undertaken using a quantitative tiered Hydrogeological Impact Assessment (HIA) approach as discuss further below.

We would like to see more evidence provided for the hydrogeological conceptual model including the proposed subject site dewatering locations in relation to the River Severn including detailed hydrogeological cross sections with the water table annotated up to the river and the geologic formations present in proximity to the river and across the subject site. We note the groundwater level monitoring boreholes (Table 9-8) with data from 2005 – 2014 but we cannot find any detailed monitoring data tables or hydrographs in the appendices other than this summary table in the main ES report.

The 'Effects of Dewatering' calculations provided in Appendix 9/2, are useful scoping calculations, however they are simple Tier 1 analytical equations (see HIA guidance below). Such equations must always be used with care, bearing in mind all the assumptions on which the equations are based. The Sichardt equation for example, used for calculation of the radius of influence is based on a uniform thickness of homogeneous sands which are unconfined in nature and of infinite areal extent, which doesn't necessarily fit with the hydrogeology presented in the ES. Despite these assumptions, the sensitivity analysis undertaken for the subject site indicates that the radius of influence can vary from 204m (best case) to 4611m (worst case) which shows the variability and uncertainty in this type of simple analysis and the results should be treated with a high degree of caution as reality can be quite different. These equations are useful to a degree, but should not be wholly relied upon considering the real possibility of impacts on the water environment as once impacts occur, they can be difficult to reverse.

Other lines of evidence can also be used but the impact on the River Severn on the balance of information presented in the current ES indicates the river flows could be affected by dewatering at the subject site and the other water features including small streams/ drains, wet boggy areas indicating that they should be the subjected to further assessment. If the risks appear to be medium-high (which they do in this case, particularly for the River Severn receptor), then a Tier 2 assessment can be considered as outlined in our HIA guidance below. The IGARF model (Impact of Groundwater Abstractions on River Flows) is one such tool which can be used in Tier 2 to understand impacts further.

Another simple comparison of Environment Agency River Severn level data (referred to as *stage* at Saxons Lode river gauging station) to the groundwater levels presented in the ES on the subject site (Table 9-8 and figure dated Nov 2006: *Ryall Court Farm Quarry - Groundwater Hydrograph for River Terrace Deposits*) suggest that hydraulic continuity is possible and therefore, direct influence from dewatering could draw water

from the River Severn into the quarry. We acknowledge that it is intended to discharge dewatered waters back into the river, but this could be downstream of any impacted reaches. We would request that the impact on reaches is further assessed so measures can be put in place to reduce any risks on those specific reaches. The other smaller watercourses which may be hydraulically connected to groundwater should also be assessed further and any other notable features including ponds and wet bog lands which also rely on groundwater.

We acknowledge the comment in the ES stating that the aquifer pinches out towards the River Severn where lower permeability alluvium could be present, but further evidence of this aspect as geological mapping and groundwater level data might suggest the aquifers are connected up to the River Severn through more permeable deposits such as those being extracted within the subject site. In our opinion, the information provided is inconclusive as borehole data does not appear to go up to the river's edge to demonstrate the geologic deposits present. The nature of these deposits also means that they are variable over shorter distances depending on how they were laid down geologically and will not form a uniform deposit being intermixed with clays, sands and gravels. Therefore, it is too simplistic to assume that the River Severn is isolated hydraulically from the radius of influence from dewatering and we would expect to see more evidence provided in support of these conclusions in the ES as they appear to be more assumptions or based on simple analytical equations with large margins for error.

Risks to the water environment could be removed entirely should due consideration be given to working the sand and gravel *wet* to reduced the impact upon the surrounding water features/ environment without the requirements to dewater voids to allow extraction of the minerals.

One of the conclusions drawn in the ES (Section 14.5) is that the 'calculations demonstrate that the radius of influence of dewatering would be *limited to the extent of the aquifer*'. However, we would challenge this statement after consideration of the discussion above.

### **Hydrogeological Impact Assessment (HIA) approach**

We have guidance on the assessment of quarry dewatering activities through a Hydrogeological Impact Assessment (HIA) approach which assesses the full potential of any quantitative impacts on the water environment which could take place from the activity of quarrying, notably from any dewatering activities in voids.

This is a tiered assessment approach (with 14 stages) depending on the risks involved and we request that this approach be adopted for applications such as this. We acknowledge that the ES for the subject site does include some of the information which is found in the 14 stage HIA approach. Although, we would query if the assessment provided in the ES follows this approach in sufficient detail in examining the impacts from quarry dewatering on surrounding water features?

Our summary guidance on assessing the impact of dewatering on water resources (in this case from quarry dewatering) can be found at this link and we would expect to see this methodology used in any HIA assessment:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/290526/scho0407bmaf-e-e.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/290526/scho0407bmaf-e-e.pdf)

Our main detailed report entitled: Hydrogeological impact appraisal for dewatering abstractions can be found at:

## **Restoration Proposal**

We understand that the long term site restoration proposals are for open water due to the locally high groundwater levels. From a hydrogeological point of view we have no concerns with this restoration proposal. However, the high groundwater level referred to in our opinion gives good evidence for hydraulic connectivity to the adjacent River Severn through the shallow aquifer.

## **Biodiversity**

However, we do believe that the restoration plan fails to deliver an acceptable environmental outcome in terms of biodiversity. Sand and gravel extraction represents one of the best methods of Britain achieving its targets for creating priority wetland habitats and contributing towards the aims of the WFD.

The current restoration plan fails to deliver a diverse mosaic of wetland that incorporates extensive shallows and reed bed. The current proposal is to create a large, deep, open body of water. This habitat type is not uncommon across the Severn Vale, due in large part to previous gravel workings. Worcestershire is lacking large areas of shallows and reedbed. A diverse 16-20ha reed bed could be created by reinstating the working area with extensive shallows interspersed with deep channels. A diverse mosaic of wetland habitats would have a far greater overall biodiversity value.

## **Connecting the Wetland to the River**

The restored gravel workings should be connected to the river in a manner that allows the free movement of fish between the river and the wetland.

The fifth otter Survey of England 2009-10 found that there has only been a small increase in positive sites in the Severn below Worcestershire. This lack of consolidation is not in line with national trends and is cause for concern as this is a key dispersal route for otters into the Lower Severn Catchment. This is likely to be a result of poor food supply and lack of appropriate habitat for otters and their prey.

Acoustic surveying has confirmed that fish density between Upton on Severn and the Teme confluence are very low. The River Severn in this area has been degraded as a result of channelisation for navigation and as a result channel diversity and associated marginal vegetation is lacking in this reach.

Backwaters have proved very important for fish fry on degraded rivers. One of the best ways to create effective backwater refuges is to incorporate them into floodplain sand and gravel extraction restoration plans. The added benefit of connecting to the river is that a greater volume of mineral can potentially be extracted.

We recognise that the proposed site is on the landward side of an agricultural flood embankment and connecting to the river has the potential to affect flood risk. However there are several measures that could be put in place that would overcome any increased flood risk and could provide betterment. Firstly it would be possible to construct a flapped outfall at the confluence with the river and connecting channel. This could sit open until river levels rise above a set limit. From a flood risk perspective the outfall could allow flood water that is trapped behind the flood defence to be released earlier, reducing the impact period of inundation to local farmers. Another option would be to divert the flood embankment around the gravel workings. This would have the

added benefit of providing greater floodplain connectivity.

### **Enhancement of the River Severn**

The proposals will result in the disturbance to the banks of the River Severn. The restoration plan should include enhancements to the River Severn to increase the ecological value of the river. These should include: Replacement fencing, tree planting, bank profiling to allow a greater diversity of habitats at a range of flows.

### **Regulatory Framework**

CEMEX UK Materials Limited hold an environmental permit referenced: EPR/YP3199VG/A001 at Ryall Quarry, Tewkesbury Road, Upton upon Severn, Worcestershire WR8 0PU. The most recent permit variation was issued on 2 September 2011.

The permit allows the storage, treatment and disposal of inert extraction wastes and unpolluted soil resulting from the prospecting, extraction, treatment and storage of mineral resources and the working of quarries at a mine or quarry.

The permit also allows the discharge of trade effluent via an outlet to the River Severn at national grid reference SO 86400 39550. The discharge comprises site drainage and gravel washwater in admixture.

The Mining Waste Directive (MWD) requires that extractive wastes from mines, quarries and other mineral extractions are managed in a way that minimises impacts on the environment and human health. Extractive wastes are wastes generated from the prospecting, extraction, treatment and storage of mineral resources and the working of quarries.

The applicant should discuss how to comply with their permit, and any variations needed, with Helen Bayliss on: 01684 864356.

### **Water Framework Directive**

The ES should demonstrate that there will not be any deterioration in the ecological value or physico-chemical quality of any watercourse, particularly the Severn, as a result of the development.

The above is important in the context of the Water Framework Directive (WFD). We request the ES is updated accordingly and an assessment in the context of the WFD is undertaken. The ES should demonstrate the proposals will not cause harm to the water environment and align with the objectives of the Water Framework Directive (WFD). In brief summary these include:

- To prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters
- To achieve at least good status for all waters by 2015. Where this is not possible, and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027.
- To conserve habitats and species that depend directly on water.
- To reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment
- To reduce the pollution of groundwater and prevent or limit the entry of pollutants

- To help reduce the effects of floods and droughts

Development needs to be planned carefully so that it does not result in deterioration or further pressure on the water environment and compromise WFD objectives. Failure to comply with WFD requirements may lead to the European Commission bringing legal proceedings against the UK. Local Authorities have a general responsibility not to compromise the achievement of UK compliance with EC Directives.

### **Summary**

We object to the proposals for the reasons detailed above. We request further information is submitted with regards the following topics to ensure the proposals accord with the guiding principles of the NPPF and NPPG:

- Flood Risk
- Groundwater
- Biodiversity
- WFD

I trust that the above is clear and of use but should you wish to discuss in further detail please do not hesitate to get in touch.

Yours sincerely,

**Mr Carl Cording**  
**Senior Planning Advisor**

Direct dial 01684 864382

Direct e-mail [carl.cording@environment-agency.gov.uk](mailto:carl.cording@environment-agency.gov.uk)

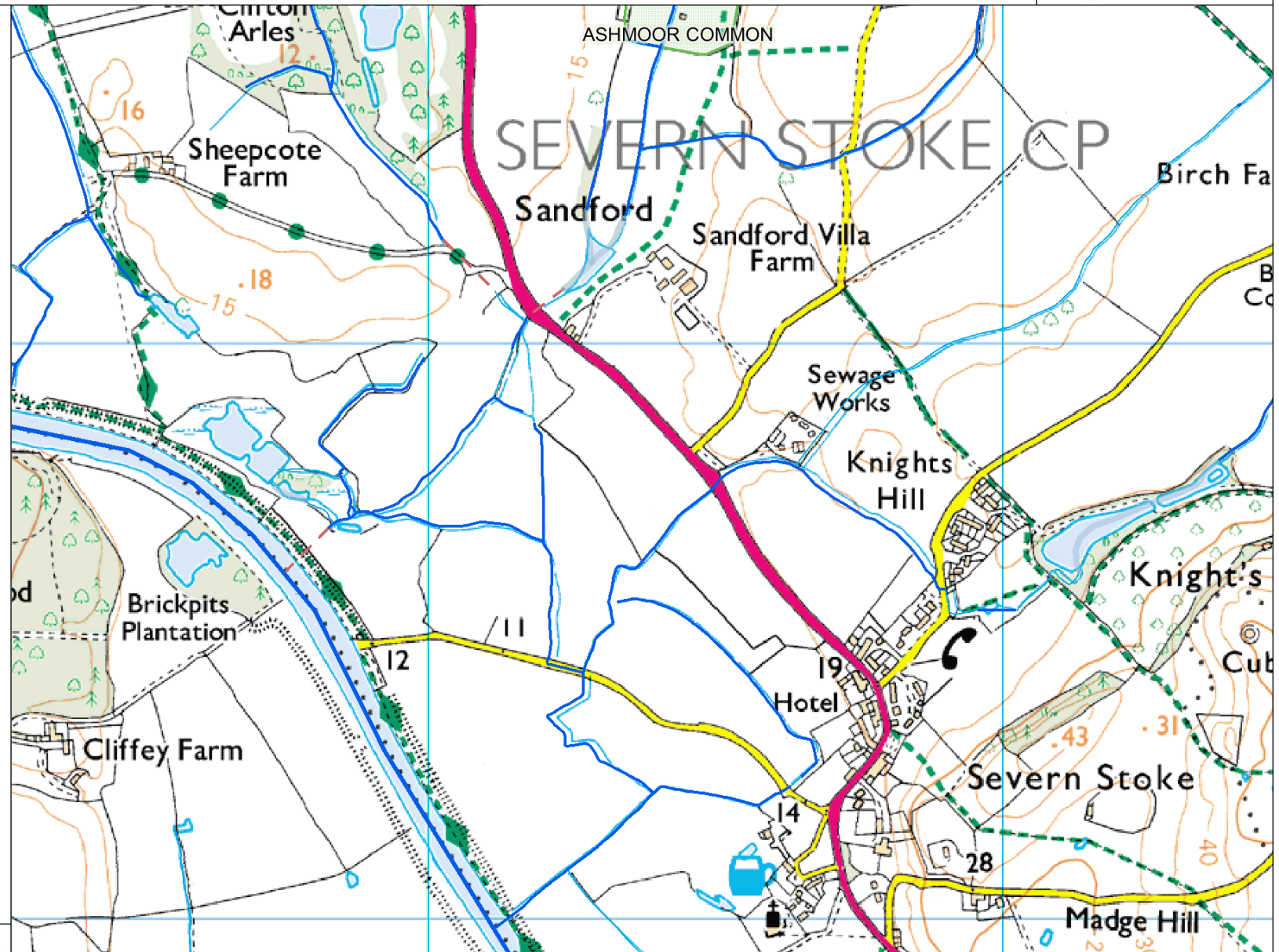


# Severn Stoke Sites



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# Strong Farms



## Legend

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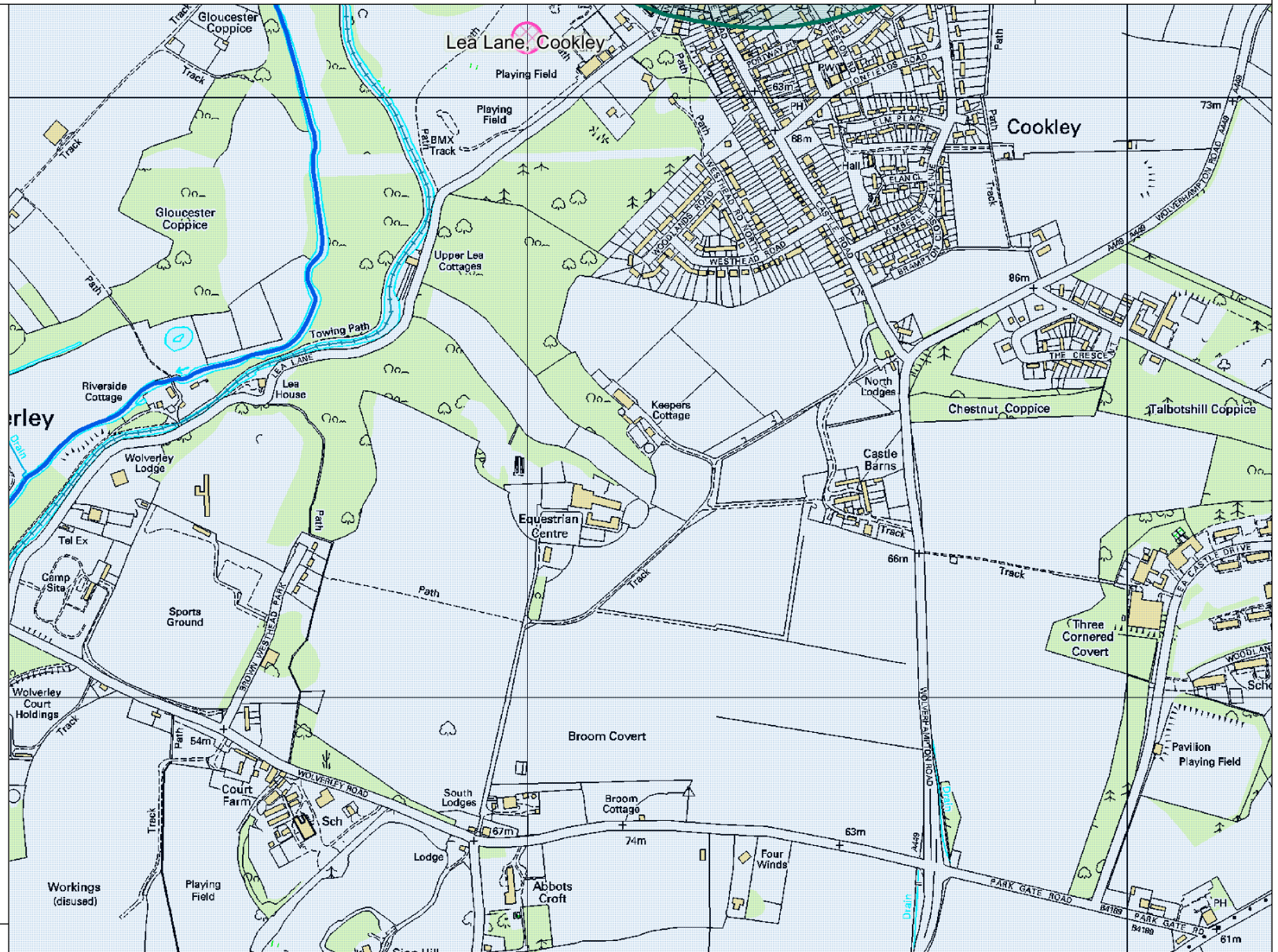
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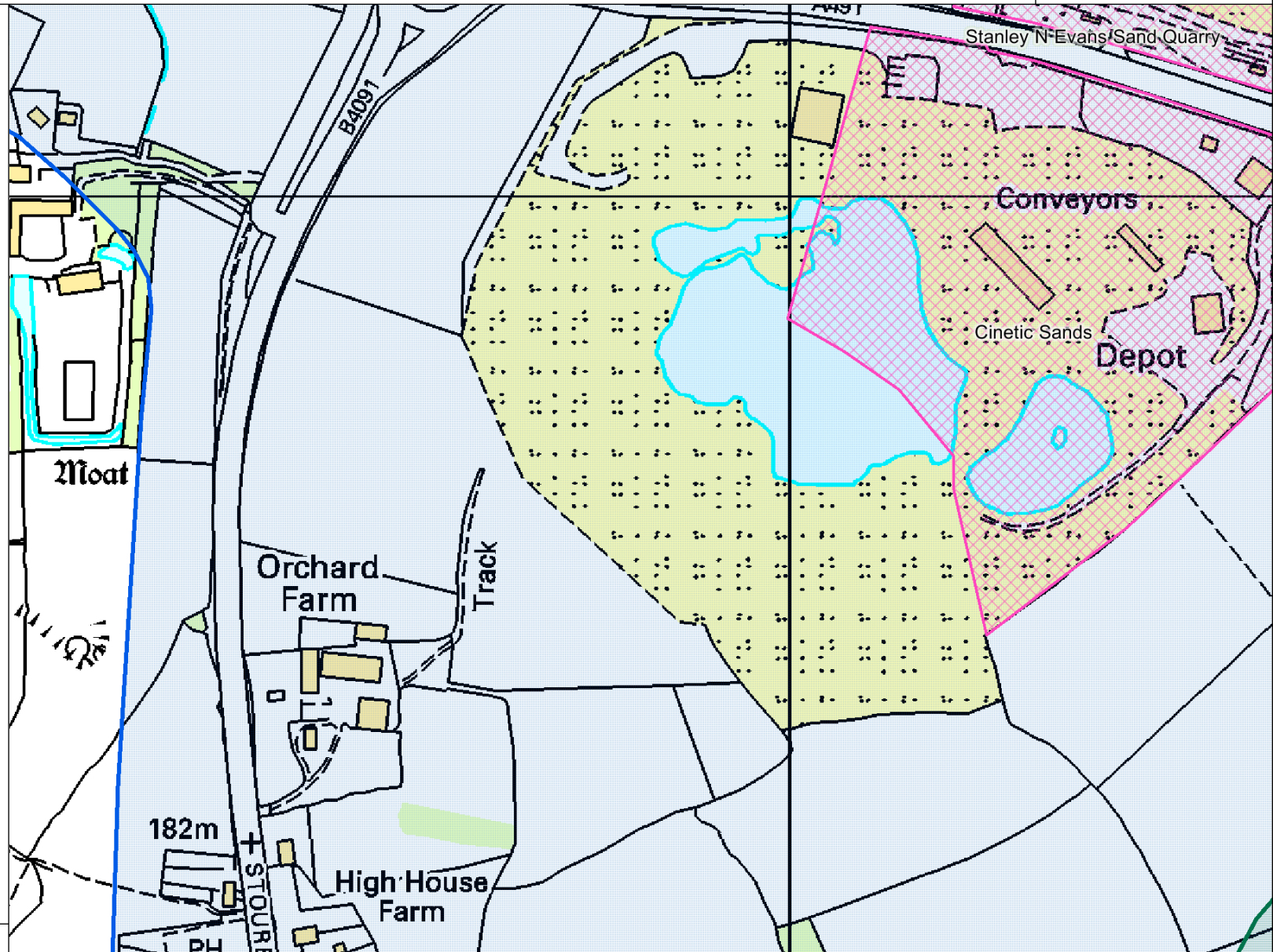


# Wildmoor Quarry



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# Wolverley Glebe



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# Flood Risk and Coastal Change

## Climate Change allowances for planning (SHWG area)

March 2016

The National Planning Practice Guidance refers to Environment Agency guidance on considering climate change in planning decisions which is available online: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

This has been updated and replaces the September 2013 guidance.

It should be used to help planners, developers and advisors implement the National Planning Policy Framework (NPPF)'s policies and practice guidance on flood risk. It will help inform Flood Risk Assessments (FRA's) for planning applications, local plans, neighbourhood plans and other projects.

### Fluvial flooding – peak river flows

Table 1 of the guidance advises that an allowance should be added to 'peak river flows' to account for 'climate change' which should be specific to a river basin district catchment.

In Shropshire, Herefordshire, Worcestershire and Gloucestershire area, we would refer you to the relevant extract from Table 1 below. This outlines the '**peak river flows**' within the 'Severn River Basin District', and specifies the range of percentage allowances to reflect individual development's lifetime and vulnerability. For example, residential would be 100 years (so 2070-2115).

Table 1 Extract

Severn Peak River Flows: Total potential change anticipated	2015-39	2040-2069 (less vulnerable)	2070-2115 (more vulnerable)
Upper end	25%	40%	70%
Higher central	15%	25%	35%
Central	10%	20%	25%

### Sea Level rise allowances

Table 3 of the guidance (extract below) indicates that net sea level risk remains unchanged from the 2013 version.

Area of England	1990 - 2025	2026 - 2050	2051 - 2080	2081 - 2115	Cumulative (1990 - 2115)
South West	3.5mm p/a	8mm p/a	11.5mm p/a	14.5mm p/a	1.18m

## Flood Risk Assessment considerations:

The design flood (1% flood level fluvial, or 0.5% tidal, plus climate change allowance) should be used to inform the sequential test, including appropriate location of built development; consideration of flood risk impacts, mitigation/enhancement and ensure 'safe' development.

### Vulnerability classification

- Development classed as 'Essential Infrastructure' (as defined within Table 2 - Flood Risk Vulnerability Classification, Paragraph: 066 Reference ID: 7-066-20140306 of the NPPG) should be designed to the 'upper end' climate change allowance (70%).
- For highly vulnerable or more vulnerable development e.g. housing, the FRA should use the 'higher central' climate change allowance (35%), as a minimum, to inform built in resilience; but aim to incorporate managed adaptive approaches/measures for the 'upper end' allowance (70%) where feasible.
- For water compatible or less vulnerable development e.g. commercial, the FRA should use the 'central' climate change allowance (20%), as a minimum, to inform built in resilience; but aim to incorporate managed adaptive approaches/measures for the 'higher central' allowance (25%) where feasible.

### Modelling approach

- Major Development:

For 'major' development (as defined within The Town and Country Planning Development Management Procedure (England) Order 2015)\*, see definition note below, we would expect a detailed FRA to provide an appropriate assessment (hydraulic model) of the 1% with relevant climate change ranges.

There are two options:

Scenario 1 - Produce a model and incorporate relevant climate change allowances in Table 1.

Scenario 2 - Re-run an existing model and incorporate relevant climate change allowances in Table 1.

- Non Major Development:

For 'non major' development, we would advise that a model is produced or existing model is re-run, similar to the above approach (Scenario 1 and 2). This would give a greater degree of certainty on the design flood extent to inform a safe development.

However, for 'non major' development only, in the absence of modelled climate change information it may be reasonable to utilise an alternative approach. To assist applicants and Local Planning Authorities we have provided some 'nominal' climate change allowances within the 'Table of nominal allowances' below. These should be considered as appropriate within any FRA. There are three additional options:

Scenario 3 - Where previous modelled data (for a variety of return periods) is available, you could interpolate your own climate change figure (see note iv below).

Scenario 4 - Where the 1% level is available from an existing model add on the relevant 'nominal climate change allowance' provided in the 'Table of nominal allowances' below.

Scenario 5 - Establish the 1% level, for example using topographical levels (including LiDAR) and assessment of watercourse flow and nature and then add on the relevant 'nominal climate change allowances' provided in the 'Table of nominal allowances' below.

\*Note: For definitions of 'major' development see 'Interpretation 2.—(1)', on page 5, at [www.legislation.gov.uk/ukxi/2015/595/pdfs/ukxi\\_20150595\\_en.pdf](http://www.legislation.gov.uk/ukxi/2015/595/pdfs/ukxi_20150595_en.pdf)

## Table of Nominal Allowances

Watercourse	20% - 25%	35% - 40%	70%
Upper Severn	600mm	850mm	1500mm
River Wye			
River Teme			
River Avon			
Lower Severn	400mm	600mm	1000mm
Tributaries and 'ordinary watercourses'	200mm	300mm	500mm

Notes to above:-

(i) Watercourse definition:

The "Upper Severn"/"Lower Severn" boundary is taken as Lincomb Weir, Worcestershire (national grid reference SO8196869458).

An 'Ordinary Watercourse' is a watercourse that does not form part of a main river. Main Rivers are indicated on our Flood Map. You can also check the classification of the watercourse with the LLFA, some of which have produced Drainage and Flooding Interactive Maps.

(ii) Where a site is near the confluence of two, or more, watercourses, the FRA should use the larger river climate change allowances.

(iii) We may hold more precise information for some of the "tributaries". We would recommend that you seek this information from us via a 'pre-planning enquiry/data request', to the email address below.

(iv) We would also recommend that you contact us for our modelled '20%' allowances and associated flow data. This is available for some rivers. This data may help inform a more detailed climate change analysis (where necessary), including any interpolation of levels or flow to create a 'stage discharge rating' in order to estimate the required percentage; or be of assistance to inform 'less vulnerable' or 'water compatible' development proposals.

### IMPORTANT NOTE

Please note the nominal climate change allowances are provided as a pragmatic approach, for consideration, in the absence of a modelled flood level and the applicant undertaking a detailed model of the watercourse. Use of nominal climate change allowances are not provided/ recommended as a preference to detailed modelling and historical data.

The Local Planning Authority may hold data within their Strategic Flood Risk Assessment (SFRA), or any future updates, which may help inform the above.

### FREEBOARD NOTE

It is advised that Finished Floor Levels should be set no lower than '600mm' above the 1% river flood level plus climate change. Flood proofing techniques might be considered where floor levels cannot be raised (where appropriate). This 600mm freeboard takes into account any uncertainties in modelling/flood levels and wave action (or storm surge effects).

## Surface Water

Table 2 of the guidance also indicates the relevant increases that surface water FRA should consider for an increase in peak rainfall intensity.

The following table is for 'peak rainfall intensity' allowance in small and urban catchments. Please note that **surface water (peak rainfall intensity) climate change allowances should be discussed with the Lead Local Flood Authority (LLFA).**

Peak Rainfall Intensity - Applies across all of England	Total potential change anticipated for 2010-2039	Total potential change anticipated for 2040-2059	Total potential change anticipated for 2060-2115
Upper end	10%	20%	40%
Central	5%	10%	20%

Note to above:-

For river catchments around or over 5 square kilometres, the peak river flow allowances are appropriate.

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