



Worcestershire
Minerals Local Plan

Feedback on
**First Stage
Consultation**

April 2013

Find out more online:
www.worcestershire.gov.uk/minerals

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1. Introduction

- 1.1. The Council ran a consultation from 9th October 2012 –11th January 2013 on the first stage of the development of the new Minerals Local Plan, with a variety of ways to get involved:
 - **Open morning:** We held an open morning on Saturday 10th November 2012 at Worcester Woods Country Park so that people could pop along and find out more.
 - **Workshop:** We held a workshop on Wednesday 21st November where participants were invited to help us get to grips with the big issues for minerals in Worcestershire.
 - **Consultation document:** We developed a consultation leaflet which gave the background information on Minerals in Worcestershire and the reasons why having a Minerals Local Plan is so important. It included questions to help us to develop an evidence base for the Minerals Local Plan and understand the local issues.
 - **Background documents:** A suite of background documents were prepared to set out the evidence which the Minerals Local Plan will be based on and flag up some key issues. Some of these documents were quite detailed and some inevitably more technical, but we asked anyone who felt they had the expertise to help us out by looking at the background documents we had prepared so far. Further background documents will be prepared throughout the development of the Minerals Local Plan.
 - **An interactive quiz:** An interactive quiz on our website aimed to engage interested parties and was used as mechanism for gathering new contact details. A link to this quiz was used in publicity on facebook and twitter.
- 1.2. The consultation closed on 11th January 2013.
- 1.3. This document outlines the Council's initial response to the consultation and is structured into 4 parts considering the open morning, workshop, consultation document and background documents in turn. As the interactive quiz was intended to raise awareness and did not seek opinions there is no feedback given in this document.
- 1.4. The Council's comments in this document do not commit the council to a particular course of action in the future as further consultation and changes in context and government policy may result in other courses of action being considered more appropriate, however they do give an indication of the way in which comments will be considered in developing the next consultation document.

2. Open morning

- 2.1. We held an open morning on Saturday 10th November 2012 at Worcester Woods Country Park so that people could pop along and find out more.
- 2.2. The open-morning was attended by four members of the public and members of the Earth Heritage Trust, Worcestershire CPRE, Upton upon Severn Town Council, Ripple Parish Council, Hanley Castle Parish Council, Wolverley Parish Council, Longdon Parish Council and the Upton Partnership. Some of the attendees were part of more than one of these organisations. 30 copies of the consultation leaflet were also distributed to members of the public attending the Worcester Woods visitor centre and cafe. Four people registered on the consultation database and two registered to attend the workshop sessions.



Questions and answers

- 2.3. The purpose of the open morning was to enable people to drop-in and ask questions. The main questions and answers are set out below:
- **What resources are there and what sites are being looked at?**
The known resources (based on BGS data) are illustrated in the consultation leaflet. No specific resource areas or sites have been considered in detail at this stage.

An analysis of the resources is currently being undertaken and will be presented for comment during the next consultation which will take place in Autumn 2013.
 - **What sites are currently being worked and how long will these be worked for?**
There are currently 10 working sites. The life of the site will usually depend on the demand for material, which has been depressed through the recession.

The council is required to make provision for at least 7 years supply of sand, gravel and at least 10 years supply of crushed rock. At present

Worcestershire only has approximately 4 years supply and sand and gravel and less than this for crushed rock. This will need to be addressed in the new Minerals Local Plan which will need to enable appropriate mineral development.

- **How will supply requirements be calculated?**

The Draft Local Aggregates Assessment available on www.worcestershire.gov.uk/mineralsbackground sets out the main alternatives considered.

The current regional apportionment set out in the West Midlands Regional Spatial Strategy only extends to 2016. Although the national guidelines update the West Midlands apportionment to 2020 there is currently not sub-regional breakdown of this apportionment. Recently published government policy "Guidance on the Managed Aggregate Supply System" (DCLG October 2012) places more emphasis on using information on the level of past sales as the way to calculate how much we should provide in future. The method for the Local Aggregates Assessment will be revised following the publication of this guidance and responses received to this consultation. It will be based on the last 10 years sales data.

- **What are the economic benefits for Worcestershire?**

Economic benefits from minerals working can include royalties to the owners, business rates, modest employment, both on site and through associated haulers and trades, the aggregates levy (which is charged for each tonne of minerals sold). Fundamentally it can supply the building material required to meet local development needs, such as new housing and employment sites and the roads and other infrastructure that support them.

Site restoration can bring opportunities for development, recreation, tourism and agriculture. There is also potential for considerable educational, scientific and social value of geological sites at former mineral workings.

The new Minerals Local Plan will need to address these issues.

Main issues raised

2.4. A summary of the main issues raised is set out below. This details the points raised by attendees at the open morning and does not necessarily reflect the views of the Council:

- **The restoration of sites:** Concerns were raised that the use of the word 'restoration' could be misleading as sites were seldom restored to their original state.

Restoration potential was recognised by several attendees. There was support for the potential for working and worked quarries to be used for educational purposes. An example of the long history of mineral workings in the Upton area was also given, with specific reference to the potential

long-term benefits. The former brick clay workings which is now restored to a marina was cited as an example of a positive and useful afteruse. Opportunities for recreation and agriculture were also recognised although there were concerns that there maybe a shortage of infill material required for some restoration schemes.

Restoration will be given detailed consideration in the Minerals Local Plan and initial proposals will be set out for comment at the next stage of consultation on the Minerals Local Plan in Autumn 2013.

- **Current and future supply:** Questions were raised about the current situation and how future provision will be calculated. The need to have adequate material to supply local markets was also raised.

This is an issue that the council is aware of and will address through the Local Aggregate Assessment, which will be published in Summer/Autumn 2013.

- **Potential workable deposits:** One attendee referred to the existence of possible workable reserves in the Wolverley and Stourport areas. These resources will be assessed alongside other deposits across the county.

Preliminary assessments will be published at the next stage of consultation on the Minerals Local Plan in Autumn 2013.

- **A current application for sand and gravel extraction at Holdfast, near Upton on Severn:** Several issues were raised in relation to this application such as the consideration of flooding and impacts on the wider economy including tourism.

These issues have been reported to the case officer for the application. They also have relevance as broad concepts to be considered during the development of the Minerals Local Plan.

- **Planning blight affecting areas of known resource:** It was felt that this may be reduced if specific sites were identified, as fewer areas would be affected.

The Council intends to undertake an assessment of resources and identify areas of search. This will form part of the next Minerals Local Plan consultation in Autumn 2013. The information currently available is not considered detailed enough to identify specific sites.

- **Safeguarding residential properties and settlements:** It was considered that although some people are currently protected by stand-off zones through the current Minerals Local Plan others could see minerals development up to their property boundary.

This is an issue that will need to be considered as the Minerals Local Plan is developed.

- **Transport:** Most water and rail transport will require adequate road links to loading or unloading points. Barging can have an impact on fishing and can impact on local tourism industry (example Upton-on-Severn) where barges come near the town centre.

Transport is an important issue which needs further consideration. Background documents will be developed to fully consider these issues.

- **Flooding:** 'Spill' of material when loading and unloading can have an impact on the depth of the river bed, exacerbating flooding problems, particularly as the River Severn is no longer dredged. Specific concern was raised in relation to Upton on Severn, Tewkesbury and the potential influence of the Severn Bore. There was also concern about workings in the flood plain and the potential for loose materials to be washed away.

Flooding is an important issue which needs to be addressed in accordance with national and local policy. The Minerals Local Plan will take flooding into account when developing detailed policy proposals.

- **Impact on the Severn Way:** The east side of the river between Upton-on-Severn and Worcester has been worked extensively, whereas the west side has historically remained intact. This should continue to be preserved. Working on the west side would compromise the appeal of the Severn Way and would have a significant adverse impact on the tourism industry in Upton. The Upton to Tewkesbury stretch of the River Severn is also unspoilt and should remain this way.

Public rights of way and the potential impact of minerals working on other economic sectors will be considered in developing detailed policy proposals for the Minerals Local Plan.

- **Navigation for pleasure craft:** If loose materials and 'spill' from barge loading builds up on the river bed the sections of the River Severn around Upton-on-Severn could affect navigation for pleasure crafts. This would have a severe impact on the local tourism industry.

The potential impact of minerals working on other economic sectors will be considered in developing detailed policy proposals for the Minerals Local Plan.

- **The educational, scientific and social value of geological sites:** Whitman's Hill, Shavers End and Bewdley were cited as examples of previous mineral workings where geological features have been preserved or exposed. Whitman's Hill in particular has a strong educational role and close interest from the local community.

The Minerals Local Plan will encourage the development of the educational, scientific and social value of mineral workings where this is appropriate.

Event feedback

- 2.5. Several attendees said that they found the open morning helpful and worthwhile visiting. There was concern raised about the level of publicity, particularly in the areas around current planning applications in the south of the County. However public notices were posted in all local newspapers, press releases were circulated and all Parish Councils were informed.
- 2.6. In response to these issues attendees were encouraged to raise the profile of the consultation in their local areas and several took away extra copies of the consultation leaflet and questionnaire to distribute.

3. Workshop

Introduction

- 3.1. A workshop was held on Wednesday 21st November 2012, 9.30 – 12.00. The event was publicised in the consultation leaflet and in all publicity on the consultation in general. Key stakeholders were also contacted directly with telephone invitations to all local authorities in Worcestershire, all adjoining Mineral Planning Authorities, mineral operators which have known interests in the County and the organisations which are statutory consultees for the sustainability appraisal.
- 3.2. The workshop was chaired by the Council's Minerals and Waste Policy Manager and facilitated by officers from the Planning and Economic Development unit. It was attended by five County Councillors, 3 other council officers and participants from the following organisations:
- | | |
|--|--|
| <i>Local Authorities</i> | <i>Town and Parish Councils</i> |
| <ul style="list-style-type: none">• Bromsgrove District Council (Councillor and officer)• Herefordshire Council• Malvern Hills District Council• Warwickshire County Council• Wyre Forest District Council | <ul style="list-style-type: none">• Bourneheath Parish Council (2)• Upton Town Council |
| <i>Local residents</i> | <i>Special interests</i> |
| <ul style="list-style-type: none">• Mrs Spooner• Mrs Inchbald | <ul style="list-style-type: none">• Earth Heritage Trust• English Heritage• Environment Agency• Malvern Hills AONB Partnership• Nature After Minerals• Worcestershire LEP• Worcestershire Wildlife Trust |
| <i>Operators</i> | |
| <ul style="list-style-type: none">• Cemex• Tarmac | |
- 3.3. The workshop was structured into two sessions:
- **Spatial Strategy:** There was a short presentation about the council's proposed approach, then delegates were split into five groups to discuss a) whether they supported a restoration-led approach and if so what objectives should drive this and b) what other considerations should lead the strategy.
 - **Impacts of mineral workings:** The groups were asked to identify their main concerns in relation to mineral workings and to discuss potential ways that they could be addressed through policy.
- 3.4. The following notes set out the key ideas recorded on flip-charts by the nominated note takers in each group and the issues raised in the brief feedback sessions following each activity. As it is difficult to capture all aspects of discussions of this nature, attendees were encouraged to submit individual written responses. Where they have done so these written comments are recorded in section 4.

Workshop session 1: Spatial Strategy

- 3.5. A restoration-led approach was broadly supported, but would need to be holistic, flexible and to take into account other factors. Implementation and enforcement were key concerns.

Question a) Do you support a restoration-led approach and if so what objectives should drive this

- 3.6. One group felt that a restoration-led approach was vital, but that commercial viability is also a key factor. Another group considered that a more holistic approach was needed. This should be considered alongside area-based restoration priorities alongside demand, resource quality and other local issues.
- 3.7. As part of the exercise the groups were asked to think about the principles that could be used to guide a restoration-led approach and to give an indication of which issues they considered to be most important. To start this discussion the following examples were given: enhancing and linking habitats, managing flood risk, improvements for agriculture, supporting local tourism and recreation. Groups were asked to add any other relevant issues to this list.
- 3.8. Most groups expressed concern that a blanket policy or county-wide approach to such issues would not be appropriate, however there was general agreement that the use of area based priorities could have merit.
- 3.9. Although several of the groups did not undertake the scoring element of this exercise it served as a useful mechanism for prompting discussion and the following ideas were recorded:
- **Enhancing and linking habitats:** Minerals sites offer potential to link habitats. Habitat creation can also address other issues such as flood risk.
 - **Managing flood risk:** This is likely to become more important over time
 - **Improvements for agriculture:** There will be a need for some infilling to protect the availability of agricultural land. Flood alleviation schemes could protect low lying agricultural areas.
 - **Supporting local tourism and recreation:** Informal recreation opportunities can have a positive impact on health. Impacts on tourism and subsequently the local economy should be considered.
 - **Other:**
 - **Topography:** Including the creation of new landforms and development in the flood plain. Could affect delivery
 - **Appropriateness of the area for landfill:** If landfill is proposed issues such as leachate would need to be considered. The availability of material to fill voids should also be considered.
- 3.10. The scores for the groups that undertook this exercise indicated that managing flood risk, enhancing and linking habitats and protecting water resources should be a high priority. Improvements to agriculture and supporting local tourism and recreation were considered to be medium priorities.

- 3.11. Those who did not score the principles said this was because each of the principles was intrinsically linked. They also thought that the priorities would be site specific. The need to consider the broader area outside of the site boundary was also recognised by several groups, with water catchment areas being one issue raised.
- 3.12. The need for clear restoration plans was reiterated in several discussions. It was considered that this would help to ensure that issues such as water and drainage were understood upfront and would allow for consideration of the preservation of geological features and enhancement of wildlife corridors. Clear plans were also thought to aid ongoing monitoring both on and off-site.
- 3.13. A key issue of concern was the enforceability of restoration strategies on a site-by-site basis. Examples of 'failed' restoration schemes at previous mineral workings in the County were given to support this argument. However on the other hand flexibility was also thought to be important within the policy framework as restoration priorities may change over time.
- 3.14. The ring fencing of money through bonds was suggested by one group as a way to ensure that final restoration is undertaken to an adequate standard.

Question b) what other considerations should lead the strategy?

- 3.15. As part of the exercise the groups were asked to think about the principles that could be used to guide an alternative approach to the spatial strategy. Again they were asked to give an indication of which issues they considered to be most important. To start this discussion the following examples were given: promoting sustainable transport, protecting environmental assets and protecting agricultural land. Groups were asked to add any other relevant issues to this list.
- 3.16. Again this exercise served as a useful mechanism for prompting discussion. The following ideas were recorded:
- **Promoting sustainable transport:** Minimising transport distances should be a priority. Investment in infrastructure may be required, including pipelines, rail, canals and road capacity. It is vital to connect to other strategies. Water transport was supported by some groups, however others were concerned about the impacts on local communities and the potential for the loading of river vessels to increase flood risk.
 - **Protecting environmental assets:** The Malvern Hills were given as an example.
 - **Protecting agricultural land:** This issue was not discussed in significant detail by any of the groups.
 - **Other**
 - **Demand:** consider focusing extraction close to areas identified for significant future development. Local materials will be cheaper to import.
 - **Residential amenity**
 - **Landscape character**
 - **Cross-boundary co-operation:** including consideration of the regional context
 - **Employment:** particularly where it could contribute significantly to the rural economy.

- **Working local material to maintain local character**
- **Viability:** work the most viable deposits first.

3.17. Maximising the use of recycled material was supported by all groups. This will be an important consideration in the Minerals Local Plan and is supported in the Waste Core Strategy, however it is likely to have limited influence on the development of the Spatial Strategy in the Minerals Local Plan.

Conclusion to workshop session 1

3.18. During the feedback session participants were asked to raise their hands to indicate whether they thought:

- a) Restoration should be the main driver: 10 votes
- b) A restoration-led approach is quite a good idea: 12 votes
- c) A restoration-led approach is not a good idea: 2 votes.

Workshop session 2: Impacts of mineral workings

3.19. This discussion session considered how minerals sites should be worked and restored. The groups were asked to spend a few minutes thinking about

- What issues are important to you?
- Why they are important?

They were then asked to pick three issues to discuss in detail, thinking about:

- Solutions and safeguards
- Pros and cons of these safeguards

3.20. The following issues were identified. Several groups chose to discuss more than three issues and some issue were discussed by more than one group, therefore the level of detail recorded varies for each issue:

- **Non-compliance and enforcement:** There needs to be sufficient recourse. Monitoring should take place throughout the working life of the site and restoration.
Resourcing monitoring was considered to be an issue. The transparency and availability of monitoring reports was discussed as were the benefits of joined-up monitoring between different agencies.
- **Drainage:** The adequacy of the existing sewage system should be considered alongside the appropriateness of systems. An example was given – Leachate at Wildmoor pollutes further afield, the village 2.5 miles away was felt to be severely impacted.
- **Flooding and flood risk**
- **Hydrology and protection of aquifers**
- **Water resource management:** There is a need to protect aquifers which supply water for population and wildlife habitats. Joined-up thinking is needed to address fluvial and surface water.
- **Economic viability:** Finance needs to stack up for all aspects. This will vary for different materials.
- **Robust planning conditions**
- **Communication at a pre-application stage:** It is important that applicants provide sufficient information at the start so that key elements are checked and are in place before the application is submitted. Key stakeholders like the Environment Agency need to be on board at the pre-

application stage and impacts need to be considered from source to end destination.

- **Community engagement:** Including the management of relationships with the community, Local Planning Authority and other stakeholders. Maintaining good relations and understanding of the business and operations can be done through open days, school visits, education packs and regular community liaison. Liaison committees should be a condition of planning permission.
Community and neighbourhood planning and the localism agenda need to be taken into account.
- **Implementation:** Need to think about how unknown variables can be managed, such as market changes and engineering issues.
- **Environment:** This includes the natural, historic and built environment.
- **Archaeological resources:** Avoid & mitigate, where they are affected make sure there is a clear strategy and interpretation is recorded into the Historic Environment Record.
- **Landscapes:** The restoration or creation of new landscapes can include better community access.
- **Habitat creation:** Local priorities and objectives should be considered. Restoration of mineral workings provides a unique opportunity for habitat gain.
- **Geodiversity:** Geodiversity is a finite resource and should not be removed. A Local Geological Site and SSSI at Madeley has been removed as a result of mineral working. Geological education is also important.
- **Local impacts:** These can include noise, dust and vibration. A monitoring plan should be put into place. Impacts on residential properties, biodiversity sites and along transport routes should be considered. Controlling hours of operation could help to manage impacts. The use of existing amenity policies from District Councils' planning policies should be considered.
- **Building and roofing stone:** Long-term availability is an issue. Cotswold stone was highlighted as an example. There are benefits of extracting local material in terms of maintaining local character, however impacts on the landscape could be significant.
- **Availability of materials to fill void and facilitate restoration**
- **Impact on local transport network:** Including the suitability of local infrastructure.
- **Planning blight**
- **Impact on local tourism:** This issue was raised with particular reference to Upton-on-Severn.
- **Public rights of way**
- **Local employment**
- **Proximity to communities:** Workings should be at some distance from the community, but where restoration includes public access proximity to the public transport network should be considered.
- **Health impacts**
- **Different methods of extraction will have different impacts**
- **Phasing:** Restoration should be phased so that parts of the site are restored before other sections can be worked.
- **Impact of water transport on the River Severn:** Including impacts on river depth, navigability and riverside walks. Extraction should take place

in the second terrace which is not next to the river and should not be concentrated on the river corridor.

- **An holistic approach should be taken:** Considering the site from start to finish, including the legacy that it leaves. Local leadership is required to facilitate this.

Conclusions

- 3.21. It was clear from the issues identified and discussion taking place that an integrated approach needs to be developed that engages with a variety of stakeholders, regulators and other bodies. This approach would need to take account of a variety of factors including impact on environmental character, flooding issues, hydrology, impacts on tourism and pollution control. The potential for a 'River Severn' plan to deliver such an approach was suggested. Other issues discussed included the merits of traditional building stone and the need to consider landfill carefully. We will also use the concepts raised to ensure that all these matters are considered as part of the development of the next consultation.

Event feedback

- 3.22. The feedback from this event was positive, with stakeholders from a variety of different groups saying that they were satisfied with the discussion and found the event “positive”, “motivating”, “challenging” and “relaxed”.
- 3.23. There was some concern that industry and residents should not be asked to discuss these things together, however the majority of attendees felt that meeting different interests was useful. The Council agrees that discussion between different parties is useful and would seek to encourage such discussion in the future. Overall, attendees supported the idea of discussion events in the future. There was equal support for the options of using an open workshop format or using a focus group alternative.
- 3.24. Following the event one delegate tweeted about his attendance, further raising the profile of the Minerals Local Plan. Several stakeholders also known to have undertaken further discussions with consultees they had made initial contact with through the workshop. This is an encouraging result.

4. Consultation questionnaire

4.1. 37 consultees responded to the questions in the consultation document. The comments are recorded below, with an initial response from council officers.

Question 1: We have used 1:50,000 scale British Geological Survey Digital Data (bedrock and superficial deposits). Do you have any additional information on mineral resources including additional locations, or the quality and quantity of resources?

4.2. The following respondents indicated that they do not have any additional information on mineral resources:

- A5-1712b **Mr P Bladon**
- A6-1753 **Mr & Mrs GR Knowles**
- A7-740 Mr M Watt **Cotswolds Conservation Board**
- A9-547 Mrs Y Scriven **Chaddesley Corbett Parish Council**
- A15-659 Mr D Rook **Stourport-on-Severn Town Council**
- A18-634 Mrs A Dobbins **Pershore Town Council**
- A19-2293 Mr L Bracewell **Cyclists' Touring Club of Great Britain**
- A20-581 Mr J Sommerville **Guarford Parish Council**
- A24-1280 Miss K Burnett **Canal and River Trust**
- A25-813 Mr S Bloomfield **Worcestershire Wildlife Trust**
- A27-807 Mr C Wilkinson **RSPB**

4.3. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
A4-509 Mr Glyde, WCC, Worcestershire Archive and	Archaeology and Aggregates in Worcestershire – A Resource Assessment	Noted. This information will be considered as part of the evidence base for the minerals local plan.

Archaeology Service		
A5-1712b Mr P Bladon	<p>1) No; Thanks for asking</p> <p>2) When were the last geological surveys done?</p> <p>3) Who did the most recent government surveys? Done by government agencies, done by commercial companies minerals/petroleum etc?</p> <p>4) Where were the most recent surveys done, were some area of the county neglected?</p>	<p>1) Noted</p> <p>2) The geological information presented is from the British Geological Survey (BGS). The origin, date and details of the information varies. Further information is set out in the published geological memoirs which are available from the BGS (http://www.bgs.ac.uk/catalogue/home.html)</p> <p>3) The BGS published data is widely considered to be the best available information. However we have no detailed information on the origins of material published by the BGS, please contact them for details of who undertook the work.</p> <p>4) The dates of the surveys vary, even within a single document or across a small area. The BGS do not have recent surveys of some areas. The following link shows details of the maps available http://mapapps2.bgs.ac.uk/geoindex/home.html You will see that parts of the county, such as the Teme valley near Tenbury Wells are not well mapped. We intend to call for evidence of other survey work as part of our next consultation.</p>
A10-144 Mr M Rose, Wienerberger	We have site specific information regarding clay quality/quantity at our brickworks located in Waresley and Hartlebury.	Noted. We would be interested in discussing this information with you in the future.
A11-1791 Mr W Clent, Bromfield Sand and Gravel Co. Ltd	Bromfield Sand and Gravel Company Limited is a small independent mineral supplier located in south Shropshire. We quarry a small parcel of land owned by the Earl of Plymouth Estates and therefore have no interest in Worcestershire other than selling material into the region. We do not think that it is right	Noted. Contact details will be removed from the database.

	for the people of Worcestershire to consider our views when preparing planning policies for minerals and waste development in their area and therefore ask that we be removed from the database.	
A12-1939 Miss R Bust, The Coal Authority	The Coal Authority has provided GIS data to all MPAs which illustrates the surface coal resource, this information is a simplified version of the same data available from the BGS.	Noted. This information has been used in the consultation document and will continue to be used throughout the development of the Minerals Local Plan.
A21-1936 M Jenkins Earth Heritage Trust	Additional resources available at the Geological Records Centre: <ul style="list-style-type: none"> • British Geological Survey (BGS) memoirs accompanying 1:50 000 scale geological maps • 1:10 000 scale BGS paper maps and technical reports covering parts of the county. • Soil data in the form of memoirs and paper maps covering the county • Baseline data in the form of the geodiversity audit • Database and archive of sites – i.e. historical areas of minerals extraction in the form of quarries, e.g. the quarry lists supplied by BGS for the Strategic Stones Study. 	The council already has some of this information but we would be very interested in discussing your records with you in the future.
A22-716 A Smith English Heritage	In addition to those resources outlined in the consultation document, English Heritage recommends that appropriate consideration is also given to traditional building and roofing stone. A key data source for this is the Strategic Stone Study Database. This is available on a GIS base published via the British Geological Survey's website and gives data for each county in excel spread sheets and a written building stone atlas. For each county atlas, you can download a geological	We are developing a suite of background evidence and will take this information into account when addressing building stone.

	<p>information pdf and Excel spreadsheets containing:</p> <ul style="list-style-type: none"> • Known building stones used within the county • Representative examples of stone buildings and villages constructed from those stones • Known building stone quarries <p>This data and further information on the Study can be accessed via the following links: http://www.bgs.ac.uk/mineralsuk/mines/stones/eh_project.html http://www.bgs.ac.uk/mineralsuk/mines/stones/EH_atlases.html</p>	
A28-676 Mrs B Drew Wolverley and Cookley Parish Council	The only issue in our Parish is Court Farm, Wolverley. Sand and Gravel Quarry.	Court Farm Sand Gravel site has now been fully worked and was restored to playing fields over 10 years ago.
A29-1314 Mr D Brewer Confederation of UK Coal Producers (CoalPro)	The Confederation of UK Coal Producers (CoalPro) represents member companies who produce over 90% of UK coal output. CoalPro is pleased to be able to respond to this First Stop Consultation Questionnaire. In addition to BGS data, the Coal Authority has extensive information on shallow coal resources, set out on the Coal Authority Resource Maps. These maps are available for free from the Authority and it is CoalPro's view that they should also be used to establish the area underlain by shallow coal resources.	Noted. This information has been used in the consultation document and will continue to be used throughout the development of the Minerals Local Plan.
A30-2286 Mrs N Inchbald	In preparing for the currently approved Minerals Local Plan the County's Planning team undertook a huge amount of map-based constraints planning. This included identifying reserve sites that would be suitable for allocation for mineral extraction. Rather than re-inventing the wheel I consider that this would be a good starting point for the Council to evaluate for the new allocations for the revised Minerals Local Plan.	This information is being assessed as part of the next stage of developing the Minerals Local Plan.

	<p>Whilst Central Government Planning Guidance does not preclude mineral extraction within the flood plain it does preclude storage in those areas as this would cause displacement and therefore flooding. The new Minerals local plan should pay regard to the Environmental Agency Flood diagrams to ensure that no storage/stock piling should be allowed within the flood plain area. Furthermore, the workshop undertaken by the County Council provided a huge amount of evidence about the adverse impact on aquifers. The County Council, in consultation, with the Environment Agency, should exclude areas containing an aquifer from any potential mineral extraction area.</p>	<p>We will be working closely with the Environment Agency to determine how minerals development relates to water protection and flooding issues.</p>
<p>A32-2295 Mrs J Spooner</p>	<p>The sand in NorthWest Worcestershire (proximity of A491) is considered locally to be of poor quality. Sand is silica sand.</p>	<p>We are developing a suite of background evidence which will consider these issues.</p>
<p>A33-2296 Mr T Rowley Tony Rowley Associates on Behalf of Lechmere Estate</p>	<p>There is a substantial resource of river terrace sand and gravel at a site known as Severn End, new Hanley Castle and north of Upton upon Severn. The land is part of the Lechmere Estate. The site is identified on BGS 1:50,000 mapping as alluvium, 2nd, 3rd and 4th terrace deposits. A proposed mineral working site adjoining the River could realise a minimum of 2 million tonnes of good quality sand and gravel with potential for connection to river barging.</p>	<p>Noted. We will map and analyse this information further and use it as part of our assessment of what minerals resources to inform the process in identifying possible Areas of Search</p>
<p>A35-1077& 1920& 681 Mr D Clarke South Worcestershire Authorities</p>	<p>South Worcestershire contains areas where there are significant reserves of sand and gravel, clay, crushed rock, coal and salt.</p> <p>The location of many of these mineral resources coincides with international, national and local environmental and nature conservation designations. These policy constraints restrict future development options for minerals extraction and supply in</p>	<p>Noted, this is set out in the consultation document. Information about resources will be refined and published at the next consultation stage.</p> <p>International, national and local environmental designations will be considered in line with European and National Policy.</p>

	<p>South Worcestershire.</p> <p>In line with the National Planning Policy Framework (NPPF) the Worcestershire Minerals Local Plan should maintain an appropriate on-going supply whilst also encouraging the prudent use of mineral resources.</p> <p>It is important that the assessment of mineral resources in the County takes into account not only the geographical extent of the resources but also the depth and quality of the resources. Minerals operators and their representative bodies would be best placed to provide this information, although it is recognised that they may consider this information to be commercially confidential.</p>	<p>Noted and agreed.</p> <p>Noted and agreed.</p>
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Question 2: Do you have any information about what might be economically viable to work, including site size, minimum amounts of material, depth, overburden?

4.4. The following respondents indicated that they do not have any additional information on economic viability of mineral resources:

- A4-509 Mr Glyde, **WCC, Worcestershire Archive and Archaeology Service**
- A5-1712b **Mr P Bladon**
- A6-1753 **Mr & Mrs GR Knowles**
- A7-740 Mr M Watt **Cotswolds Conservation Board**
- A9-547 Mrs Y Scriven **Chaddesley Corbett Parish Council**
- A15-659 Mr D Rook **Stourport-on-Severn Town Council**
- A18-634 Mrs A Dobbins **Pershore Town Council**
- A19-2293 Mr L Bracewell **Cyclists' Touring Club of Great Britain**
- A20-581 Mr J Sommerville **Guarlford Parish Council**
- A21-1936 M Jenkins **Earth Heritage Trust**
- A24-1280 Miss K Burnett **Canal and River Trust**

- A25-813 Mr S Bloomfield **Worcestershire Wildlife Trust**
- A27-807 Mr C Wilkinson **RSPB**

4.5. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
A10-144 Mr M Rose, Wienerberger	Within the brick industry we normally use a figure of 25 years of supply of mineral to make a site economically viable, this allows the capital to be paid off over a reasonable period so that it does not cause the mineral to be over priced in accounting terms. The minimum amount for a site would be approx 2 million m3 for a new green field development but this would be dependant on quality. Overburden, size and depth are all linked and would be site specific.	Noted. This information is useful. We would welcome the opportunity to discuss this with you.
A12-1939 Miss R Bust, The Coal Authority	There is no need to set out any figures for the provision of energy minerals in terms of documents such as there is for aggregates. The provision of energy minerals is based upon national need.	Noted and agreed.
A29-1314 Mr D Brewer Confederation of UK Coal Producers (CoalPro)	The viability of any mineral deposit depends upon its market price as well as the features listed in Question 2. Whilst the market price for many lower value minerals can remain stable for many years, that for higher value, internationally-traded minerals can vary sharply over short periods of time. The international coal price, for example, has varied between \$35/te and over \$200/te within the last ten years and currently stands at \$90/te. Hence, resources not viable at one point in time may become viable within a relatively short period.	Noted and agreed. We will need to make some assumptions about viability to ensure the Minerals Local Plan is deliverable, however we acknowledge the need to be flexible.
A30-2286 Mrs N Inchbald	Mineral extraction is now a national and international business and our discussions with industry indicate than	Noted. We will take this into account alongside other views and will consult further on these issues later this

	any extraction less than 1 million tonnes is not economically viable. We need more information from industry on this point.	year.
A32-2295 Mrs J Spooner	In the above are quarrying limited by an aquifer. Zone II over most of area. (Local view if considered is that sand itself is not viable to these depths - only economically viable due to inert filling of hole).	We will be working closely with the Environment Agency regarding water protection issues. The Waste Core Strategy sets out planning policies restricting landfill. You raise an interesting point. We intend to consider viability based on mineral extraction. However, the restoration of sites will inevitably be a consideration in developing deliverable policies.
A33-2296 Mr T Rowley Tony Rowley Associates on Behalf of Lechmere Estate	In my experience a stand-alone sand and gravel site requiring a new plant site and appropriate infra-structure needs a resource of 1.5 to 2 million tonnes to be viable. An extension to an existing site of 0.5M tonnes or greater would be viable. However, it should be noted that planning costs are similar for a project of 0.5M or 5M tonnes. The depth of mineral and overburden is less important than the ratio of depths. In the past a ratio of mineral to overburden of 1:1 an operator was ideal. However because of the scarcity of mineral resources a lesser ratio of mineral to overburden may be viable if the quality is good.	Noted. We will take this into account alongside other views and will consult further on these issues later this year.
A35-1077& 1920& 681 Mr D Clarke South Worcestershire Authorities	The South Worcestershire Authorities do not have any information about what areas / sites might be economically viable but we do consider it important that the Minerals Local Plan address this issue, if possible. In accordance with the NPPF, the emerging SWDP includes a policy to safeguard the use of minerals by consulting the County Council on all proposals for development within Minerals Consultation Areas	Noted. This is one of the issues we intend to address in the Minerals Local Plan. We will be developing criteria in discussion with City, Borough and District Councils to ensure that consultation is appropriate.

	<p>(MCA's). Currently, MCA's are any areas where there are known to be minerals deposits. Whilst it is recognised that viability can change over time, depending on the market price of minerals compared to the cost of extraction, it would be helpful if the Minerals Local Plan could indicate areas where minerals extraction is unlikely to be economically viable in the foreseeable future. These "unviable" deposits could then be excluded from MCA's and reduce the need for unnecessary consultations.</p>	
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Question 3: Do you have any initial comments on these figures? If you have any knowledge or expertise in relation to these matters it would be helpful if you could read the background documents and answer the questions posed in them

4.6. The following respondents indicated that they do not have any comment on these figures:

- A5-1712b **Mr P Bladon**
- A6-1753 **Mr & Mrs GR Knowles**
- A7-740 Mr M Watt **Cotswolds Conservation Board**
- A9-547 Mrs Y Scriven **Chaddesley Corbett Parish Council**
- A15-659 Mr D Rook **Stourport-on-Severn Town Council**
- A18-634 Mrs A Dobbins **Pershore Town Council**
- A21-1936 M Jenkins **Earth Heritage Trust**
- A22-716 A Smith **English Heritage**
- A24-1280 Miss K Burnett **Canal and River Trust**
- A25-813 Mr S Bloomfield **Worcestershire Wildlife Trust**
- A27-807 Mr C Wilkinson **RSPB**
- A28-676 Mrs B Drew **Wolverley and Cookley Parish Council**

4.7. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
A3-1907 Mr Parrish, Yorkshire Dales National Park	There may from time to time be some High PSV material sent from the Yorkshire Dales to Worcestershire, but not in quantities that would be relevant to your Plan. We will not wish to contribute to your Local Plan process.	Noted.
A8-2294 Mr E Walker	<p>Coal: At present mining of the considerable coal reserves within Worcestershire seems uneconomic. However, with the radical changes in the cost of energy provision which are beginning to happen these reserves could well become economic within a very small number of years. New techniques and technology already make these resources much more viable than when the last mines were closed and any new venture would be a very major advantage to the county in terms of jobs as well as making a significant contribution to the energy consumption of the county (the present level of energy production and generation within the county is woeful).</p> <p>The Minerals Local Plan should contain provision for a "watching brief" on the viability of these reserves along with an acknowledgement that economic viability could change very soon, dependent on the cost of energy.</p> <p>If there is any "unspoken" understanding that "dirty" coal extraction is not wanted in some of the rural, now prestige housing, areas where many of the reserves are located this should be clearly stated and pragmatically addressed in the light of the coming energy crisis.</p>	<p>Noted. Current evidence from BGS and the Coal Authority indicate that coal resources in Worcestershire are likely to remain unviable for quite some time. We have addressed coal in more detail in the background paper "Coal in Worcestershire" which is available on our website www.worcestershire.gov.uk/mineralsbackground.</p> <p>The period covered by the Minerals Local Plan is intended to be 15 years to offer certainty. However, it will be updated and reviewed if the situation changes.</p> <p>The council is not aware of this as an issue.</p>
A10-144 Mr M Rose, Wienerberger	We have enough permissions for clay extraction for Waresley and Hartlebury brickworks to take us to the 2030 date.	Noted, this will be taken into account.
A19-2293 Mr L	Not in position to comment, but extraction levels would decrease if	This is outside the remit of the Minerals Local

<p>Bracewell Cyclists' Touring Club of Great Britain</p>	<p>more journeys were made by sustainable means rather than by motorised transport.</p>	<p>Plan. However, we are developing a suite of evidence which will consider opportunities for the transport of minerals by rail and water as well as road.</p>
<p>A20-581 Mr J Sommerville Guarford Parish Council</p>	<p>Is there any possibility of increasing the recycled aggregates?</p>	<p>The method for estimating the realistic provision of recycled and secondary aggregates uses the projections of construction & demolition (C&D) waste made in the Waste Core Strategy and assumes that between 75% and 100% of this waste will be available for use as recycled aggregate. There are no known producers of secondary aggregate in the County. To encourage any increase in C&D waste would be contrary to the Waste Framework Directive and the Waste Hierarchy which seeks to reduce waste arisings in the first instance.</p> <p>The consultation document contained an error, stating that 5-7 million tonnes could come from secondary and recycled aggregates. This should have been 6.6 – 8.8 million tonnes as set out in the Draft Local Aggregates Assessment.</p>
<p>A29-1314 Mr D Brewer Confederation of UK Coal Producers (CoalPro)</p>	<p>The paper states that the coal resources in Worcestershire are not thought to be viable. However, even if that were the case, for the reasons set out in our response to Question 2, CoalPro considers that they could become viable over a relatively short period of time.</p>	<p>Noted. Current evidence from BGS and the Coal Authority indicate that coal resources in Worcestershire are likely to remain unviable for quite some time. If you have any further evidence we would be interested in discussing this with you.</p>

	CoalPro has examined the background paper on coal and has only one comment to make. Para 4.5 states that one of the reasons for refusing a small application in 1978 was that it was thought approval "would encourage other surface mining operations in the area, and this was not considered to be desirable". Such reasoning is inappropriate. Each application should be considered on its merits in accordance with the NPPF.	The background paper records the refusal reasons from 1978. It is unlikely that such a reason would be considered appropriate today. The Minerals Local Plan will be developed to accord with the NPPF.
A30-2286 Mrs N Inchbald	This represents 100% difference and needs to be vigorously challenged. The County need to assess the level that is required to meet the regional targets bearing in mind that we are a relatively restrained County compared to others such as Staffordshire and Cambridgeshire. Furthermore, a concerted effort needs to be made about the contribution that could be made from re-cycled minerals including gravel from river dredging and demolition.	<p>Noted. Although the top end of this range would require almost twice as much provision to be made in the Minerals Local Plan than at the bottom end of the range, the quantities are still relatively small. The annual requirements for example still only account for between 8% and 15% of the provision that needs to be made by the current West Midlands AWP area.</p> <p>We note the need to consider cooperation with other authorities but the current regional apportionment set out in the West Midlands Regional Spatial Strategy only extends to 2016. Although the national guidelines update the West Midlands apportionment to 2020 there is currently not sub-regional breakdown of this apportionment. Recently published government policy "Guidance on the Managed Aggregate Supply System" (DCLG October 2012) places more emphasis on sales, the Draft Local Aggregates Assessment will be updated in light of this new guidance.</p>
A32-2295 Mrs J Spooner	Eg Sand and Gravel. Insufficient linkage of Sales - table 1.1. Annual apportionment 0.9mt, Recycling Secondary aggregates 0.3-0.4mt.	We will be revising the assessment in accordance with recently published government

	Evidence shows need for Silica Sand reducing (reduction of industrial need plus importing of recycling) (Methods and Options all seem to have difficulty in projecting with any accuracy.)	guidelines which place more emphasis on sales. We agree that industrial need for silica sand is reducing and we will be developing further background evidence on this issue. We agree that all methods for projecting need have limitations, these are set out in the " <i>Draft Local Aggregates Assessment</i> " and " <i>Ensuring adequate and steady supply of industrial and energy minerals</i> ", however we need to develop a method of projection which is as robust as possible.
A33-2296 Mr T Rowley Tony Rowley Associates on Behalf of Lechmere Estate	Having read in background documents – particularly “Local Aggregates Assessment in Worcs.” – I am of the opinion that the assessments are fair and give some flexibility towards meeting the expected demand for aggregates over the Plan period. I also believe the plan needs to cater towards the upper end of the range for sand and gravel in view of potential problems posed by other adjoining County Councils within the Region, namely Warwickshire and Staffordshire.	Noted. We will be revising the assessment in accordance with recently published government guidelines. We will continue to work with the Aggregates Working Party to explore these issues.
A35-1077& 1920& 681 Mr D Clarke South Worcestershire Authorities	<p>Construction aggregates (sand and gravel and crushed rock) are essential for built development and the construction and maintenance of infrastructure (e.g. roads, flood defences). They are therefore essential to deliver growth, create and maintain sustainable communities and to deliver the SWDP.</p> <p>The draft SWDP (which covers the period from 2006 to 2030) proposes major new housing development across South Worcestershire, additional employment sites and infrastructure improvements. The draft SWDP makes provision for a net increase of 23,200 new homes during the Plan period – an average of around 1,000 per annum (a similar level to the annual average number of</p>	<p>Noted and agreed.</p> <p>Noted.</p>

	<p>completions in recent years).</p> <p>In order to maintain adequate and steady supplies of materials on the one hand, and protect valuable landscapes and communities on the other, a managed minerals supply system will be essential. The South Worcestershire Authorities note that the current Aggregate Working Party sub-regional apportionment for sand and gravel in Worcestershire is 0.871 million tonnes per annum – which would equate to 15.7 million tonnes between now and 2030. The current apportionment of crushed rock for Worcestershire is 0.163 million tonnes per annum – 2.9 million tonnes to 2030.</p> <p>It is also noted, however, that the NPPF requires Mineral Planning Authorities to maintain landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock. It is noted that the landbanks for both sand and gravel (4.19 years in 2009) and crushed rock (0 years) are significantly below the minimum recommended in national policy.</p> <p>As a guide to the overall level of minerals that will be required during the Plan period, it is suggested that the level of development outlined in Local Plans (including the draft SWDP) for the next ten years (compared to levels of development in the previous ten years) could provide a useful guide. It would also be helpful if the Minerals Local Plan included a phasing policy which indicated the likely level of minerals required to 2015, 2015 – 2020 etc.</p> <p>It is recognised that the level of future development may require additional materials to be found by defining areas for new minerals extraction. However, the demand for primary aggregates could be reduced by maximising the use of secondary and recycled materials</p>	<p>National policy is to move away from a centrally managed aggregates supply system. The Minerals Local Plan needs to be developed within this context. The current regional apportionment set out in the West Midlands Regional Spatial Strategy only extends to 2016. Although the national guidelines update the West Midlands apportionment to 2020 there is currently not sub-regional breakdown of this apportionment. Recently published government policy "Guidance on the Managed Aggregate Supply System" (DCLG October 2012) places more emphasis on sales, the Draft Local Aggregates Assessment will be updated in light of this new guidance.</p> <p>Noted.</p> <p>Noted. These issues will be considered in developing the final methodology for the Local Aggregates Assessment.</p>
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	<p>in construction projects wherever possible.</p> <p>The First Stage Consultation document indicates that 5 – 7 million tonnes of secondary and recycled aggregates will be required between now and 2030 - which equates to between 14% and 18% of total aggregates required. This, however, is lower than the 23% outlined in national guidelines.</p> <p>It is recognised that the delivery and use of alternative materials will require better collection of data (e.g. through regular Aggregate Working Party surveys of secondary aggregates, waste management capacity monitoring, and monitoring of on-site recycling through the development management process) and a</p>	<p>Noted and agreed, however City, Borough and District Councils have a role to play in encouraging the use of secondary and recycled materials through their Local Plans.</p> <p>The method for estimating the realistic provision of recycled and secondary aggregates uses the projections of construction & demolition (C&D) waste made in the Waste Core Strategy and assumes that between 75% and 100% of this waste will be available for use as recycled aggregate. There are no known producers of secondary aggregate in the County. The secondary and recycled aggregates figure is therefore lower than the national guidelines, however the guidelines are based on national assumptions. To encourage any increase in C&D waste locally would be contrary to the Waste Framework Directive and the Waste Hierarchy which seeks to reduce waste arisings in the first instance.</p> <p>The consultation document contained an error, stating that 5-7 million tonnes could come from secondary and recycled aggregates. This should have been 6.6 – 8.8 million tonnes as set out in the Draft Local Aggregates</p>
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	<p>greater emphasis being placed on the reuse and recycling of on-site materials, particularly in the urban areas.</p> <p>It should be noted that to safeguard the use of primary aggregates, the draft SWDP already encourages developers to recycle and reuse materials on site in construction projects, subject to environmental considerations of any proposed operations.</p> <p>The Minerals Local Plan also needs to acknowledge that not all of the minerals consumed in Worcestershire are produced in the County, and not all of the material produced in Worcestershire is sold in the County. It is therefore important that the Minerals Local Plan includes assumptions on the level of sand and gravel and crushed rock that will come from imports outside the County and the likely levels to be exported.</p>	<p>Assessment.</p> <p>The Council will be working with the Resource Technical Advisory Body for Waste on these issues. It is acknowledged that this information is poor, however the Waste Core Strategy is based on the best available information and will be monitored through the Council's Annual Monitoring Report. It is therefore considered appropriate to base assumptions about recycled aggregates on estimates of construction and demolition waste arisings. There is currently no known source of secondary aggregates in the county. The role of the Aggregate Working Party is currently under review.</p> <p>This has been noted and considered in the "<i>Draft Local Aggregates Assessment</i>" and "<i>Ensuring adequate and steady supply of industrial and energy minerals</i>".</p>
<p>A36-1793 Mr S Denny Cemex UK Materials Ltd</p>	<p><u>Draft Local Aggregates Assessment</u></p> <ol style="list-style-type: none"> 1. Whilst it is acknowledged that over the period 1999 to 2009 sand and gravel supply has often not achieved the annual apportionment for the County of 0.871 mtpa, if the data for that period is averaged it equates to a supply of 0.87 mtpa, a remarkably good fit with the sub apportionment exercise. 	<p>Noted and agreed.</p>

	<p>2. That the 10 yearly sales average and the sub apportionment figure for the County are so closely aligned is evidence to the Company that despite its imperfections the system is a robust approach to estimating future supply needs within the County.</p> <p>3. As such the Company prefers option R.1 as the means of forecasting future aggregate needs within the County as to date it is proven to be quite accurate over the long term. R.2 and R.3 are considered less desirable as they include subjective and unproven variables. W.1 is also considered to be of significant merit, but it is felt that as the economy begins to grow once more and aggregate demand increases, recent years of poor sales will mean that the LAA and the Development Plan derived from it will underestimate the need for aggregates in the County, acting as a brake on growth. W.2 is felt to add little to the accuracy of the process beyond W.1 and W.3 has little basis in the realities of supply and demand as it is acknowledged that the County is not self sufficient.</p> <p>4. The draft rightly identifies that a landbank can only be maintained if planning applications are submitted, and that the County's sand and gravel landbank has lain below the "at least 7 years" policy aim for some years. There seems to be little or no analysis of why this might be the case however. There are, no doubt both geological and short/medium term economic factors at play, but in the Company's view a significant element contributing to the current situation is the age of the extant</p>	<p>Noted. Recent government guidance supports this approach.</p> <p>Noted, these comments will be taken into account in refining the Draft Local Aggregate Assessment. With regard to method R.1 the current regional apportionment set out in the West Midlands Regional Spatial Strategy only extends to 2016. Although the national guidelines update the West Midlands apportionment to 2020 there is currently not sub-regional breakdown of this apportionment. Recently published government policy "Guidance on the Managed Aggregate Supply System" (DCLG October 2012) places more emphasis on sales, the Draft Local Aggregates Assessment will be updated in light of this new guidance.</p> <p>The consultation document notes that the Council's current policies set out in the 1997 Minerals Local Plan and Worcestershire County Structure Plan are dated and need replacing.</p> <p>We agree that engagement with the trade bodies and individual operators is important in developing the Minerals Local Plan. However</p>
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	<p>Minerals Local Plan and the types of site it identifies as Preferred Areas. Since the adoption of the current MLP the aggregates industry has evolved into a very different entity, and sites which may have appeared economically viable then may not appear so now. In drafting both the LAA and Development Plan the Company urges the County Council to engage proactively with its trade body and individual operators to identify the strengths and weaknesses of the sites the current MLP identifies, to identify the criteria the modern industry employs when looking to establish a facility in order to develop a robust methodology for identifying sites for the future.</p> <p>5. The urge to propose via Table 4.4 a range of aggregate provision is understandable but unhelpful as an attempt to encourage applications for the supply of aggregate as it introduces uncertainty into the planning process. The level of uncertainty is compounded by the wide range contained within the table. The Company suggests that Table 4.4 be populated by the application of option R.1 alone.</p>	<p>interest from industry in this consultation was lower than anticipated. This is something that we will seek to address prior to the next stage of consultation.</p> <p>You raise an interesting point about the application of a range. Method R.1 the current regional apportionment set out in the West Midlands Regional Spatial Strategy only extends to 2016.</p> <p>Although the national guidelines update the West Midlands apportionment to 2020 there is currently not sub-regional breakdown of this apportionment. Recently published government policy "Guidance on the Managed Aggregate Supply System" (DCLG October 2012) places more emphasis on sales, and is therefore supportive of method W.1. The Draft Local Aggregates Assessment will be updated in light of this new guidance.</p>
A37-1899 Mr M	The Mineral Products Association (MPA) is the trade association for	Noted.

<p>Ratcliffe Mineral Products Association</p>	<p>the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.</p> <p>Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website. http://www.mineralproducts.org/documents/MPA_MTL_Document.pdf</p> <p>Question 3 & Draft LAA</p> <p>We have a number of comments to make on this Draft LAA.</p> <ol style="list-style-type: none"> 1. We note that Fig 1.1 and Tabs 1.1 & 1.2 show the decline in sand and gravel production coinciding with the decline in the landbank to miniscule levels. This is a cause of great concern to the industry. The text observes that sand and gravel production has been declining noticeably in the county since 	<p>Noted. This document will be taken into account as we develop the Minerals Local Plan.</p> <p>Noted.</p>
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	<p>before the recession but does not draw any conclusions from this.</p> <p>2. The text also points out that the maintenance of a landbank is dependent on sufficient applications being made by the industry and that these have also declined recently. Part of the reason for this decline in applications will be explained by the current deep recession, but equally the mpa needs to ask if there might be other reasons, such as the lack of undeveloped allocated sites remaining from the existing plan or the extent of unfavourable planning constraints. Regarding the former our members have indicated to us that they are actively pursuing new sites for Worcestershire. Regarding the latter, operators will not invest the substantial sums of money needed to secure mineral rights and obtain planning permission if there is uncertainty in the planning regime that means consent cannot be relied on. We believe that some relaxation of planning constraints may be necessary in the future if the county is to provide anywhere near its share of aggregates consumption.</p> <p>3. Paragraphs 1.14 & 4.1 suggest that over-provision of aggregates enables 'excessive development'. This is simply not borne out by experience. If more is provided than is capable of being sold in the market, it stays in the ground until the market catches up, which is what we are seeing at the moment. One cannot therefore in these terms 'over-provide' aggregates and we should like to see such sentiments removed from future documents.</p>	<p>The consultation document notes that the Council's current policies set out in the 1997 Minerals Local Plan and Worcestershire County Structure Plan are dated and need replacing.</p> <p>It is interesting to know that your members have indicated an interest in land in Worcestershire. We would encourage any operator with interest in the County to engage in the development of the Minerals Local Plan. This can be done through engagement in the formal consultation process and discussion with officers.</p> <p>The Draft LAA says that the minimum provision that the County considers that the Minerals Local Plan needs to make for aggregates is set out in Table 1.4. This should not be considered as a limit on production but will be used to guide the Minerals Local Plan by making sure it enables enough mineral development but that it is also deliverable and does not compromise long-term supply by enabling excessive development during the life of the strategy. Paragraph 142 of the NPPF states that "since minerals are a finite resource....it is important to</p>
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	<p>4. Tables 1.4, 4.1 & 4.2 set out the ranges that the MPA has calculated for the purposes of this consultation. Whilst we understand the reasons for specifying a range, we believe that this first LAA should set the precedent for all subsequent LAAs which should be formulated with a model methodology. In addition, the MPA will by now have the benefit of the DCLG's guidance on LAAs published after this document, which contains more detailed guidance on the content of a LAA. This advice specifies that MPAs should closely follow the advice of AWP's for a 'regional' perspective. For this reason, we believe that the Worcestershire-only option W3 should be dropped, since it is an underestimate of total consumption and that you should concentrate on the 'regional' options. In essence, we prefer option R1 with due recognition of sales and resource availability trends (i.e. option W1).</p> <p>5. Total consumption is seriously underestimated by the 2009 data, especially for forward planning. The figures in Table 11 of the 2009 National Collation do show a consumption of 364ktpa (which includes Welsh imports) but this needs to be treated with caution as it is an acknowledged underestimate. There is</p>	<p>make best use of them to facilitate their long term conservation." One of the issues we will need to consider is that whilst ensuring that the county has the capability to meet its proper share of the market we need to ensure that we do not enable other Planning Authorities to evade their own responsibility in this regard by supplying material that they could and should supply themselves.</p> <p>You raise an interesting point about the application of a range. Method R.1 the current regional apportionment set out in the West Midlands Regional Spatial Strategy only extends to 2016, the national guidelines only update this to 2020 and the future of agreement through the AWP is currently uncertain.</p> <p>Recently published government guidelines place more emphasis on sales and are therefore supportive of method W.1, the Draft Local Aggregates Assessment will be updated in light of this new guidance.</p> <p>Noted. This will be taken into account when identifying which method to take forward in the Local Aggregate Assessment.</p>
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	<p>a large component of 'Unknown' tonnage in the region (1494 ktpa) some of which will have been used in Worcestershire. Moreover, a check can be made against other counties. For example, the Worcs figure is about 60% of the Hereford figure even though Hereford has a much smaller population and is only 25% bigger in area. Also, Warwicks is comparable in both population and area to Worcs and this has a consumption of at least 1160ktpa.</p> <p>6. The comparable figures for the 2005 survey show that Hereford & Worcs together consumed 2306 ktpa albeit there was a very large Unknown destination figure of 3705ktpa to apportion on top of that. Again, this was comparable to the figures for Warwicks (including Solihull & Coventry).</p> <p>7. We would therefore say that Worcs is likely to have a consumption figure of closer to 1.2 Mtpa in 2009 and a pre-recession consumption of primary aggregates of about 2.0 Mtpa split 48:52 rock & gravel (Table 2b 2009 National Collation). If you retained option W3 you would need to adjust the figure for consumption accordingly. Even if it is not feasible to be self sufficient in aggregates, knowing what the likely consumption is, will give an appreciation of the efforts needed to produce a 'fair share' of aggregates demand locally.</p> <p>8. In terms of a way forward, we suggest that the NPPF methodology of a moving average of the last ten years' sales data, is a start for the consideration of an apportionment. However, we also suggest that consideration is given to the reasons why sales have been underperforming for a decade and why it appears insufficient applications are being made to</p>	<p>Noted.</p> <p>Noted. This will be taken into account when identifying which method to take forward in the Local Aggregate Assessment.</p> <p>Noted. This will be taken into account when identifying which method to take forward in the Local Aggregate Assessment.</p>
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	<p>maintain the landbank. This might give an indication whether the lack is systemic or related to particular circumstances.</p> <p>9. We further suggest that you give consideration to adjusting the ten year average to take into account the likely upsurge in demand when the current recession ends, perhaps by using the pre-recession consumption and production figures as a guide.</p> <p>10. In addition, we believe that overly complicated methodologies for calculating apportionment are to be avoided since they tend to give a spurious 'scientific' gloss to what are still essentially value judgments. The simpler the calculation, the more transparent the reasoning, the better. We therefore believe options R2 & R3 are not a good way forward.</p> <p>11. Paragraph 4.9 - we agree that the MPA needs to take into account local factors as we have already discussed. In particular, it is unlikely that the apportionment is too low given the net imports of aggregates that the county receives according to survey results. The low landbank and paucity of applications could be the result of resource unavailability but more likely, it is because of an unfavourable planning regime that over constrains resources and means that minerals cannot be sourced indigenously. We believe that is certainly the case with crushed rock, which would have to be won from AONBs in future. The mpa needs to look at sourcing rock from AONBs in order to have a realistic apportionment.</p> <p>12. Table 4.3 - recycled aggregates should be apportioned using regional data so that a consistent approach is adopted across</p>	<p>Noted. This will be taken into account when identifying which method to take forward in the Local Aggregate Assessment.</p> <p>Noted. This will be taken into account when identifying which method to take forward in the Local Aggregate Assessment. However this will depend to some extent on agreement at a regional level through the AWP.</p> <p>At present evidence suggests that there are no viable resources in the part of the Cotswolds AONB which is in Worcestershire. The legislative context surrounding mineral working in the Malvern Hills AONB is set out in <i>Background Document: The Malvern Hills Acts</i> available on www.worcestershire.gov.uk/mineralsbackground. This issue will be considered further as we develop the Minerals Local Plan.</p> <p>Option A uses the projections of construction & demolition (C&D) waste made in the Waste</p>
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	<p>the region. We do not therefore favour Option A. Moreover, we do not understand how it is possible to 'encourage any increase in (arisings of) C&D waste'. Are owners going to demolish valuable buildings just to crush them up and use them as aggregate? Surely, if the recycled component of the apportionment is set too high, it will merely depress the primary aggregate figure and encourage more imports? Option C is unrealistic since there is no necessary correlation between the production of primary and recycled aggregates; the availability of the latter being determined by the extent of redevelopment in an area. Once again, in the absence of hard data, we believe that estimates of recycled aggregates use should be as simple as possible and we prefer Option B but using only R1.</p> <p>13. Table 4.4 – we understand the reasons for presenting a range of figures but believe this is ultimately unhelpful since the range is too wide to be useful. We would prefer if the mpa adopted a single figure which was derived from a methodology common to all mpas in the West Midlands.</p>	<p>Core Strategy and assumes that between 75% and 100% of this waste will be available for use as recycled aggregate. There are no known producers of secondary aggregate in the County. We therefore do not consider that to rely on higher levels of secondary and recycled aggregate would be realistic or deliverable.</p> <p>We note that this figure is lower than the national guidelines, however there guidelines are based on national assumptions. We consider that to rely on secondary and recycled aggregates at a figure higher than the level of C&D waste locally would be contrary to the Waste Framework Directive and the Waste Hierarchy which seeks to reduce waste arisings in the first instance.</p> <p>The consultation document contained an error, stating that 5-7 million tonnes could come from secondary and recycled aggregates. This should have been 6.6 – 8.8 million tonnes as set out in the Draft Local Aggregates Assessment.</p> <p>Noted. This will be taken into account when identifying which method to take forward in the Local Aggregate Assessment.</p>
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	<p>14. Paragraph 4.39 – we recognise that NPPF requires an annual update of the LAA but this does not mean that the Local Plan apportionment and divisor of the landbank equation will change every time it is carried out. This would result in an unmanageable change to basic data for the Plan whilst it is in the process of publication, submission, examination and adoption. We believe the right way to handle this uncertainty is to get the methodology of the LAA right at the outset, present a figure which represents the best data available, get agreement to it from the AWP and follow that through the Local Plan formulation process. Subsequent LAAs will then monitor the situation, and the mpa can take action to revise the figure when the data suggests it is becoming widely different from expectations. In essence, this is a variation of the previous RAWP apportionment process which was only amended each time new national figures were published.</p> <p>Industrial Minerals – Silica Sand</p> <p>1. Paragraphs 4.5-4.8 – you are correct that NPPF does not outline a method for calculating need for silica sand in the same way that it does for aggregates. However, it does contain a proxy method, through its statements on minimum levels of permitted reserves. You are correct in your analysis of NPPF paragraph 146 bullet 3 about stocks of permitted reserves being provided at each individual silica sand site of a minimum of 10 years and 15 years if there is significant new capital investment at a processing plant (not necessarily on the same production site). We would point out that this stock of permitted reserves is not the same thing as a county landbank for aggregates, in that it is based on individual site requirements. Therefore, need is established by the operators’</p>	<p>The need for certainty is noted. The comments made will be taken into account when identifying which method to take forward in the Local Aggregate Assessment. However there will need to be a process in place to ensure that any approach based on sales figures does not become outdated over time.</p> <p>Noted. We are seeking to engage with industry where appropriate.</p>
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	<p>requirements for such individual extractive sites (not production plants) whether it might be to extend capacity, increase it or install new capacity. We would therefore judge that you should seek the views of the operators about their intentions on continued working and seek to provide allocations to meet those aspirations at more than minimum policy levels.</p> <p>Other Matters</p> <p>1. We note that you have made no assessment of dimension stone requirements in the consultation documents. There was only one site recorded in Worcestershire by the Symonds Report on Planning for Natural Building and Roofing Stone in England and Wales (2004) and this was a disused site. We wonder if you have made any assessment of future requirements for building stone in the county, or canvassed operators. If there is a limited response we suggest that you give consideration to an opportunistic policy on Building Stone if subsequent proposals are made.</p>	<p>Thank you for raising this issue. We are currently assessing information on building stone from English Heritage and the Earth Heritage Trust and intend to include information on this issue in future consultation documents.</p>
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Question 4: Are there any other issues we should consider?

4.8. The following respondents indicated that they do not know of any other issues which should be considered:

- A4-509 Mr Glyde, **WCC, Worcestershire Archive and Archaeology Service**
- A7-740 Mr M Watt **Cotswolds Conservation Board**
- A9-547 Mrs Y Scriven **Chaddesley Corbett Parish Council**
- A15-659 Mr Rook **Stourport-on-Severn Town Council**

4.9. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
<p>A1-717 Mrs L Horner, Natural England</p>	<p>Green Infrastructure (GI) is recognised as a significant positive benefit for the environment and society – for nature, for well-being and the economy. Mineral development is piecemeal by nature, but cumulatively creates larger opportunities including core areas, corridors and stepping stones of GI for greater gains.</p> <p>The adjoining Nature Improvement Area may allow opportunities for a joint approach with other authorities.</p>	<p>Noted and agreed. The council will consider how the Minerals Local Plan can contribute to Green Infrastructure in Worcestershire.</p> <p>The Birmingham and Black Country Nature Improvement Area borders the north of Bromsgrove District. We will be liaising with adjoining local authorities and Natural England in order to consider any opportunities to benefit both areas.</p>  <p>Location of the Birmingham and Black Country Nature</p>

		Improvement Area, source: http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/funding/nia/projects/default.aspx
A5-1712b Mr P Bladon	In the next 18 years (during the period covered under the MLP) there may be potentially workable deposits found. Currently resources may not be considered viable, however during and beyond the MLP various developments/factors may create situations that will require serious debate and definite decisions to exploit materials.	We will need to make some assumptions about viability to ensure the Minerals Local Plan is deliverable, however we acknowledge the need to be flexible. The period covered by the Minerals Local Plan is intended to be 15 years from adoption to offer certainty. It will be updated and reviewed if the situation changes.
A6-1753 Mr & Mrs GR Knowles	Local residents should be asked their views about noise and dust and any increase in traffic in local roads and lanes i.e. where there are no pavements	This is the first of several stages of consultation on the Minerals Local Plan. Individual applications are consulted on as a matter of course.
A8-2294 Mr E Walker	The positive impact on local employment, particularly in rural areas and areas where full-time manual work is almost absent.	Noted and agreed. We are developing a suite of evidence which will address economic impacts and opportunities from mineral working.
A12-1939 Miss R Bust, The Coal Authority	The topics stated are appropriate	Noted.
A13-579 S Jefferey Great Witley Parish Council	As Clerk to Great Witley & Hillhampton Parish Council I have been asked to contact you with the following feedback from the Parish Council. In the first stage consultation for the Worcestershire Minerals Local Plan you have asked for feedback from local bodies to help shape the Plan and ensure that future policies take account of the views of people living in the area. Great Witley Parish Council wishes to put on record its	National policy does not currently preclude mineral working from any areas, including National Parks and other areas identified for their environmental value. It is therefore unlikely that the retention of this policy would be in line with the National Planning Policy Framework (NPPF). We will however endeavour to take account of locally important characteristics through the development of the Minerals Local Plan.

	<p>view that Policy 5 of the existing (1997) Minerals Plan, relating to the exclusion of mineral extraction within the Abberley Hills should be adhered to and form part of the new Plan. Our concerns are specifically over the possibility of restoration of working at Woodbury Hill and Shavers End quarries as well as the introduction of any other new site within the Abberley and Malvern Hills Geopark.</p> <p>We appreciate that the Minerals Local Plan will only determine broad areas for extraction and not identify specific sites, but because the Abberley Hills area has been recognised as one of significant geological and environmental value we feel that there should be a specific statement within the Plan confirming its continued exclusion and protected status.</p> <p>We trust that this view will be given favourable consideration in the planning process that is now under way and that we will be included in the feedback that you propose to make in Spring 2013.</p>	
<p>A14-719 H Berry Environment Agency</p>	<p>Introduction</p> <p>We recognise the economic importance of the minerals industry and the requirements of Mineral Planning Authorities to develop local mineral plans across their authorities. In our advice we have regard to our duties under the Water Resources Act 1991 and the Water Act 2003 to conserve and protect water resources and to preserve and, where appropriate enhance, conservation of the water environment. We are aware of the balance that needs to be maintained between meeting the need for</p>	<p>Noted.</p>

	<p>minerals and ensuring no significant harm is caused to the environment.</p> <p>Groundwater</p> <p>The major raw materials of the minerals industry often come from Principal and Secondary aquifers which raises potential conflicts of interest. We recommend that you consult our policies and guidance which are available on our web site www.environment-agency.gov.uk to guide your protection of the water environment and water users from activities which may lead to harm to water resources. Our new updated groundwater policy – Groundwater Protection: Principles and Practice (GP3) was released for public use on our web site on 22 November 2012.</p> <p>We have interests 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. We have developed aquifer classification maps to assist you to identify aquifers which are important to protect from a water resource and environmental perspective. These aquifers are used for drinking water supply and to support river flows and wetland ecosystems. Protection of aquifers from any quarrying activities which have the potential to impact upon them is therefore critical. 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</p>	<p>Noted. We will take this information into account in developing our evidence base and will work closely with the Agency to ensure that these matters are given all the protection they need.</p> <p>Noted. We will take this information into account in developing our evidence base and will work closely with the Agency to ensure that these matters are addressed in the proposed policies and given the protection they need.</p>
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	<p>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>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. 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>We will develop draft policies in consultation with the Environment Agency to make sure that dewatering is covered appropriately in the Minerals Local Plan to prevent unacceptable adverse effects on groundwater.</p> <p>We will develop draft policies in consultation with the Environment Agency to make sure that dewatering is covered appropriately in the Minerals Local Plan to prevent unacceptably adverse effects on groundwater. Where appropriate S106 agreements can also be used to control these effects and we will consider how they can best be included within the policy framework as we develop the plan.</p>
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	<p>Hydrogeological Impact Assessments (HIA) exploring the effects of quarry developments on water resources should support new quarry applications as part of the planning process. We may object to any new proposal for mineral extraction where there is demonstrable harm to water resources and the water environment, unless measures to mitigate any effects can be agreed within planning controls. For further information on HIA please see the guidance on our web site. It is important that both you and any individual applicant consult us at the earliest possible opportunity so that any potential impact upon water interests can be identified and appropriate investigations initiated by the developer under a HIA. We will require that any HIA includes an adequate assessment to meet our concerns specifically in assessing dewatering operations near to sensitive water resources receptors. Groundwater level monitoring of such dewatering activities from onsite (and sometimes offsite) groundwater monitoring networks are vital to this understanding pre, during and post quarrying operations to provide an early warning should dewatering have a detrimental impact on water resources.</p> <p>From a restoration perspective, the removal of rock and minerals from aquifers also leaves large void spaces which can have significant 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 over looked. Back filling of voids with waste materials can have a detrimental effect on the water</p>	<p>Noted, we expect to develop policies that ensure that the issues are explored as part of planning applications and any such effects can be prevented.</p> <p>Noted, we acknowledge the importance of these concerns. The Council has already adopted policies in the Waste Core Strategy to control backfilling and prevent any such effects, we anticipate that these will prevent any harm to ground or surface waters.</p>
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	<p>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>Biodiversity In relation to Question 4, a key consideration in the allocation of any sites for mineral extraction must be to avoid damaging sites and features of high ecological value and to prioritise sites where the most ecological and environmental benefits can be gained through mineral extraction. Mineral extraction can help to deliver the County's Biodiversity Action Plan habitats and help to secure the County's contribution to the national target of 200,000 ha of habitat creation by 2020. Mineral workings are often ideal sites for wetland and river restoration and the final restoration should be a key consideration in allocating sites, with sites offering the best habitat opportunities being a high priority.</p> <p>Mineral workings can have a direct impact upon ground and surface waters. In allocating preferred sites for future extraction the direct and indirect impacts upon ground and surface waters should be fundamental in the decision making process. Where an extraction is likely to result in a reduction in ground and surface waters, particularly where associated habitats will be detrimentally affected, we would advise seeking a presumption against permission being granted.</p>	<p>Noted and agreed. We intend to make policy provision for restoration-based approaches that deliver biodiversity priorities, alongside other local green infrastructure objectives. We are considering how this approach could be used to contribute to the strategic resilience of ecological networks. We want to work with partners such as the Worcestershire Wildlife Trust and Natural England to ensure that all sites and species of nature conservation value are protected and enhanced.</p> <p>Noted and agreed in principle. Policies will be developed to ensure that proposals would not have unacceptable effects on ground and surface waters and associated habitats. The Environment Agency will be consulted on planning applications which could have implications for water resources and related matters, including ecology and their advice will always be given considerable weight in determining proposals.</p>
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	<p>Flood Risk It is important that you carry out a Strategic Flood Risk Assessment (SFRA) in the preparation of the Minerals Local Plan. This should inform which sites may be taken forward. Individual sites will subsequently require a site specific Flood Risk Assessment (FRA) in accordance with the National Planning Policy Framework and PPS25 Practice guide. Careful consideration should be given to the detailed FRA to ensure that there are no negative impacts and that there is an overall betterment in terms of flood risk.</p> <p>Interaction with waste and mineral needs We support the minimisation of waste and the promotion of the waste hierarchy. Recycling rather than using new mineral resources should be encouraged.</p> <p>Waste Management Plans should be required on Mineral Sites where appropriate.</p> <p>The following comments are offered as possible further lines of investigation: - We understand that recycled aggregates may be at maximum and wonder whether this could impact on primary aggregate extraction unless other secondary minerals are available – mining spoil, cement/steel by-products, power station ash, tyres...etc - What will the role of inert waste be in quarry restoration?</p>	<p>Noted a Strategic Flood Risk Assessment (SFRA) will be prepared and part of the plan and its scope and content agreed with consultees, particularly the Environment Agency.</p> <p>Noted and agreed, the Plan will seek to maximise the use of recycled and secondary aggregates as an alternative to extracting primary materials. This issue is also addressed through the adopted Waste Core Strategy.</p> <p>Noted, site waste management plans are already required in the Waste Core Strategy as part of new development, over the next year we will consider and consult on how they can be addressed in the Minerals Local Plan.</p> <p>These are all very interesting comments which we will need to consider as we develop the plan. At present however the evidence does suggest that the availability of recycled materials may be close to maximum and there is little suggestion that other, secondary materials are likely to be available at any scale in the foreseeable future. It is inevitable therefore that most of the materials we need will have to be provided from new quarries and gravel pits.</p>
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	<p>Will there be enough if sites are required to infill back to original levels for agriculture. Will sufficient Grade 1, 2 and 3a agricultural land be restored?</p> <ul style="list-style-type: none"> - The restoration and waste link could benefit from further investigation and justification - Are sufficient links to the separate Waste Local Plan made regarding recycled aggregates, co-location, alternatives.... etc - Consideration should be given to the options for using overburden as a source of secondary aggregate or for infill and restoration – what is the most sustainable option? <p>Outcome of Workshop</p> <p>Following the workshop and to reflect the group discussion, I feel it is important to emphasise the need for protection of water resources as a critical resource for people and the economy as well as for the environment. As water resources (such as uncontaminated and usable ground and surface water) are difficult to replace once lost and are essential to our ongoing life, our recommendation is that this is emphasised as a high priority in developing the Minerals Plan. We acknowledge the difficulties in the adequate control and protection of such resources, but advise that this should feature as core to the emerging Minerals Plan. Water resource protection is seen as vital as it is the building block for many other local and planning aims.</p> <p>Flood risk and waste management are two issues closely linked to water resource management which emerged from discussions as very important to the local economy,</p>	<p>The amount of inert waste available for the restoration of existing workings is already limited. The demand for new landfill space is declining and the Waste Core Strategy effectively discourages landfilling other than in exceptional circumstances. One of the issues we need to consider over the next year will therefore be how future workings could and should be worked and restored if infilling is no longer the easy option.</p> <p>Noted and agreed. The council has some experience of addressing these matters as part of the Waste Core Strategy, they will be high priorities in how we develop the Minerals Local Plan.</p>
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	<p>community and environment which we emphasise as also needing high priority in a sustainable holistic approach. The potential for appropriate habitat and landscape creation, with its wide ranging benefits eg wildlife, health, safety and well being, sense of place, education, tourism and economic benefit etc in association with water resource protection, flood risk reduction and waste management is emphasised.</p> <p>In hindsight (using previous planning and local personal experiences), we recommend the importance of early dialogue with potential developers on these points, tying down conditions and adequate developer contributions/bonds initially for the future, while also allowing the developer sufficient flexibility for economic activity in a changed global setting. The need for a substantial financial bond has been proven from past experience.</p> <p>The importance of adequate monitoring to provide evidence and enforcement in the long lifetime of mineral planning permissions also needs consideration and is stressed as being critical to sustainable outcomes. The often far reaching extent of the water catchment of a potential mineral operations must be investigated and confirmed by a developer prior to any grant of planning permission, to enable appropriate monitoring and effective resource management, pollution prevention and flood risk reduction. Impact boundaries which are site specific, rather than defined by arbitrary distances, could be more useful in formulating effective risk reduction strategies and mitigation</p>	<p>Noted and agreed in principle, some of these matters will however be more easily addressed at the pre application stage rather than as part of developing the plan.</p> <p>Your support for financial bonds is noted but the issue is a complex one in planning law and we intend to wait for further advice from government before committing the council to requiring them.</p> <p>Noted and agreed in principle. What should be monitored and how will be part of our consultations as we develop the plan. Some of these matters will however be best addressed in connection with the determination of specific applications for planning permission.</p>
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	<p>measures.</p> <p>Close liaison and cooperation between all statutory bodies and local interest groups (including cross boundary cooperation due to the global demand/supply concept and the often extensive water catchments involved) will be necessary from the earliest stages to achieve sustainable outcomes - including the Local Authority, the Water and Sewerage Companies, the Environment Agency, Natural England. Our River Basin Management Plan should be used in your evidence base. It would be helpful if details of operator management systems are confirmed as adequate by technical specialists from all parties prior to determination of any planning permission.</p> <p>The issue of sustainable transport would benefit from further investigation and definition – should the lowest carbon footprint overall be utilised? Is river use by freight compatible with sustainable habitats? The Sustainability Appraisal should help address such points.</p> <p>If you have any queries on the content of this letter, please do not hesitate to get in touch with me.</p>	<p>Noted and agreed in principle. Again, some of these matters will however be best addressed in connection with the determination of specific applications for planning permission.</p> <p>Noted, we are currently preparing g background evidence on transport issues and these matters will be considered as part of the Sustainability Appraisals we prepare during the course of developing the plan.</p> <p>Noted, with thanks.</p>
A18-634 Mrs A Dobbins Pershore Town Council	The movement of bulk materials wherever possible should be by way of rail or waterways. If heavy goods vehicles transporting minerals use the highways network then extraneous traffic through towns and villages should be avoided.	We are developing a suite of evidence which will consider opportunities for the transport of minerals by rail and water as well as considering the issues of transport by road.
A19-2293 Mr L Bracewell Cyclists'	Conditions should be attached to maintain and improve public access by foot and bicycle to and around areas affected both during and after extraction activities have	We intend to use Green Infrastructure principles to deliver multifunctional benefits from mineral workings where possible. One of the principles considered in the County's

<p>Touring Club of Great Britain</p>	<p>taken place. S106 and CIL funding should be sought to offset adverse effects and as a way of improving the cycle and footpath network.</p>	<p>GI Framework documents is access and informal recreation, and we will consider opportunities for how walking and cycling routes near to mineral workings can be improved and how walkers' and cyclists' experience of using them around working and restored workings can be made both safer and more attractive. We will be considering how planning obligations such as S106 or CIL should be applied to minerals development. However, CIL only applies to buildings and is therefore unlikely to be a significant factor in most minerals developments. There is considerable legal protection to ensure that existing Public Rights of Way are protected from and during the course of development and nothing we propose will diminish this.</p>
<p>A20-581 Mr J Sommerville Guarford Parish Council</p>	<p>CO2 emissions from machinery? (including motor vehicles)</p>	<p>We are developing a suite of background evidence. One of the issues considered will be climate change. This will take account of CO2 emissions from mineral operations, including those from machinery and transport.</p>
<p>A21-1936 M Jenkins Earth Heritage Trust</p>	<p>Yes – geological conservation and the impacts on the geological environment through extraction.</p> <p>If minerals are finite resources, then you are effectively destroying geological features and therefore mitigation factors need consideration. An important example of this is the case of Madeley Heath SSSI. This finite deposit has been totally removed by gravel extraction despite being a designated Site of Scientific Interest for its Geology. Natural England are extending the boundary of the SSSI to enclose more of the deposit but there is a planning application to extract gravel from this area. It is vital that all</p>	<p>Noted.</p> <p>Noted. Geodiversity and protection of geological features will be considered as we develop the Minerals Local Plan.</p>

	<p>of this finite resource should not be removed.</p> <p>Restoration plans after quarrying should consider the geodiversity interest. Broadway Quarry is currently being restored, as per the agreed restoration plan (mixed geodiversity, biodiversity and agricultural use). A feasibility study has been carried out which hopefully will be enacted. This is an example of best practice in terms of joined up thinking. It can be found on the Earth Heritage Trust's website. http://www.earthheritagetrust.org/pub/wp-content/uploads/Broadway-Quarry-Feasibility-Study.pdf Broadway Quarry exposes rock strata such as the Harford Member which is not exposed better elsewhere.</p> <p>The minerals policy does not deal with building stones. It is important that there should be a source of local building stone for the repair of historic buildings. The Earth Heritage Trust is about to commence a Building Stones Project to investigate in detail the stone built heritage of parts of the county.</p> <p>Restoration plans could also be based on the good example of the Earth Heritage Champions Project run by the Earth Heritage Trust. Nine sites in Worcester now have community 'Champions', members of the local community, who have been trained in geoconservation techniques and have learnt about their local geodiversity, history and wildlife. These champions work with the landowners to organise events each year, including guided walks, music festivals, photography competitions and other recreational</p>	<p>Geological conservation will be taken into account when developing a policy approach to restoration. This best practice example will be useful in informing our approach.</p> <p>We look forward to the results of this project. Information about building stone produced by English Heritage will also be taken into account in developing the Minerals Local Plan.</p> <p>In line with the localism agenda, the Minerals Local Plan will encourage community participation where appropriate.</p>
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	<p>uses of the sites. They also teach other local people about the geology of their sites. These include Shavers End Quarry in the Abberley Hills, Hadley Quarry, Tank Quarry, Westminster Bank Quarry and Dingle Quarry in the Malvern Hills, Callow Hill Quarry, Scar Cottage Quarry, Barnt Green Road and Warren Lane Quarries in the Lickey Hills and sites near Bewdley.</p>	
<p>A22-716 A Smith English Heritage</p>	<p>English Heritage welcomes the commitment that the historic environment, including archaeology, will be addressed as part of the Plan's environmental policy context. A useful overview of how to address the historic environment in relation to the winning, working and safeguarding of minerals is set out in the English Heritage advice note: Mineral Extraction and the Historic Environment (2008). The national policy context for the conservation and enhancement of the historic environment is set out in the National Planning Policy Framework (particularly paras 126-141), however, English Heritage believes the advice note still contains useful advice, guidance and case studies. The advice note is available at: http://www.english-heritage.org.uk/publications/mineral-extraction-and-historic-environment/</p> <p>Information in support of the historic environment includes the Strategic Stone Study Database as outlined in Question 1. Additionally, the County has a completed Archaeology and Aggregates Resource Assessment (2007) [further information contact Mike Glyde, Adam Mindykowski – Worcestershire County Council]. The Resource Assessment will be of particular use in helping to</p>	<p>Support noted. The council is developing a suite of background evidence. The historic environment is one of the issues that will be addressed. The English Heritage advice note will be taken into account.</p> <p>The council is developing a suite of background evidence. The historic environment is one of the issues that will be addressed. This information will be taken into account.</p>

	<p>inform the potential archaeological interest of aggregate resource areas as well as assist in the appraisal of the Plan and site specific allocations and approaches to mitigation and future management. The Assessment also incorporates detailed mapping and descriptions of the County's aggregates resource and hence also of relevance to Question 1.</p> <p>Of relevance to the historic environment and landscape is the county-wide Historic Landscape Characterisation. This complements the existing Landscape Character Assessment in providing more detailed information (GIS based) on the evolution of the landscape and its surviving historic character in the present day landscape. The HLC provides a strategic, landscape-scale framework for considering the historic environment. In conjunction with site specific data held in the county Historic Environment Record, the HLC offers a means to understand the sensitivity and capacity of the landscape to accommodate and respond to change. The latter can include the extraction of resources, but also the restoration, aftercare and after-use of sites and ensuring that proposals appropriately sustain and enhance the historic character of the landscape and the setting of heritage assets.</p> <p>We recommend that the County historic environment officers (Mike Glyde and Adam Mindykowski) are contacted at an early stage to identify opportunities for applying the HLC and HER in support of the Plan and building on other existing evidence including the Archaeology Resource Assessment. I understand, for example, that Derbyshire County Council is using HLC to help inform the preparation</p>	<p>The council is developing a suite of background evidence. The historic environment is one of the issues that will be addressed. This information will be taken into account.</p>
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	<p>of the mineral plan.</p> <p>As a general comment on the working and restoration of mineral sites, we recommend that the Plan addresses all types of mineral working and including opportunities for the small-scale (and often temporary) working (including reopening) of traditional building and roofing stone.</p>	<p>Noted. This is an issue which will be explored during the development of the Minerals Local Plan.</p>
<p>A24-1280 Miss K Burnett Canal and River Trust</p>	<p>Within Worcestershire our interests include Staffordshire and Worcestershire Canal, Worcester and Birmingham Canal, Droitwich Canal and River Severn Navigation. In regard to how mineral sites should be worked and restored, Canal & River Trust have the following comments to make:-</p> <p>Canal & River Trust consider that while the scope for transporting freight on waterways may be limited due to the size of the navigations and the available navigation routes, where it is appropriate to move freight by water this option should not be disregarded.</p> <p>Canal & River Trust are aware that minerals/materials are currently transported by barge along the River Severn, demonstrating that due to its size and available navigation routes, it is appropriate to move freight by water.</p> <p>Working mineral sites adjacent to waterways which can accept/accommodate the disposal of materials from the dredging of canals could reprocess the materials to sell on as aggregates. Sites adjacent to waterways can be used for the disposal of material from the dredging of canals as part of a restoration programme.</p>	<p>Noted.</p> <p>Agreed. We are developing a suite of background evidence and will address transportation by water, rail and road.</p> <p>Agreed, this is an approach we would like to encourage where appropriate. The merits and challenges of this local example will be considered as we develop the Minerals Local Plan.</p> <p>You raise an interesting point, and this would need to be considered in line with the policies in the Waste Core Strategy and the rest of the development plan.</p>

	<p>Redundant mineral workings could accommodate marina and mooring basin developments, the creation of waterbodies for watersports and the creation of nature reserves as part of a restoration programme/scheme for the mineral site. The restoration of mineral sites can offer biodiversity benefits for the site itself and adjacent waterways.</p> <p>Canal & River Trust would require any mineral development adjacent or in proximity to the Staffordshire and Worcestershire Canal, Worcester and Birmingham Canal, Droitwich Canal and River Severn Navigation to; not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network.</p>	<p>You raise some interesting suggestions. We are developing a suite of background evidence that will address the possibilities for mineral site restoration. We anticipate publishing our proposals on restoration for comment in summer 2013.</p> <p>Noted. These are all issues that will be taken into account as we develop the policy framework.</p>
<p>A25-813 Mr S Bloomfield Worcestershire Wildlife Trust</p>	<p>Yes. The Minerals Plan should address the capacity of restored minerals workings to deliver multi-functional benefits. For example seeking to link biodiversity enhancement and flood amelioration opportunities where appropriate. Recognising the potential for restored minerals sites to provide so-called 'ecosystem services' of benefit to the wider area and local communities will be important and ought to be a criteria against which site restoration plans are judged. In some cases this may include elements of direct public access but offsite benefits in terms of visual amenity, flood defence etc. must also be recognised.</p>	<p>We intend to use Green Infrastructure principles to deliver multifunctional benefits from mineral workings. We are developing a suite of background evidence that will address the possibilities for mineral site restoration. We anticipate publishing our proposals on restoration for comment in summer 2013.</p>

	<p>We assume that in addressing the environment the plan will make policy provision for restoration-based approaches that deliver against biodiversity, Water Framework Directive and Green Infrastructure priorities, in line with guidance in the NPPF (see for example paras. 9, 109, 114, 118) and your biodiversity duty under section 40 of the Natural Environment and Rural Communities Act 2006 but we would also suggest that it recognises the significant economic and climate-change mitigation value that can be associated with a biodiverse and flood tolerant landscape. Accordingly we would recommend that the plan includes commentary on the potential economic and other benefits of choosing alternatives to the traditional agriculture-led restoration approach. In doing so we would expect the plan to be guided by locally agreed priorities (including for example the protection and enhancement coherent networks of sites and habitats of importance coming forward through the Sub-Regional GI Framework) and it should seek to achieve demonstrable improvements in both quality and quantity of biodiverse landscape. This is particularly relevant to the Minerals Plan because many likely extraction sites will fall in well documented biodiversity target areas where buffering and re-linking existing high quality sites is a priority. Of particular value will be the likely opportunities for river restoration and wetland enhancement in the Severn Vale and the potential for acid grassland / heathland re-creation in the north of the county. With this in mind the plan should be bold about working with partners to seek new methods of extraction that can maximise later environmental gains. A good example would be working with the Environment Agency</p>	<p>Noted. It is our intention to make policy provision for restoration-based approaches that deliver against biodiversity and other local green infrastructure priorities and we will be consulting again on this approach. We will actively seek to engage with the Environment Agency and other partners to achieve this.</p> <p>We are developing a suite of background evidence and will address biodiversity target areas, climate change mitigation value and flood tolerance amongst other issues.</p> <p>The background evidence we are developing will also assess some alternatives to agriculture-led restoration. Any additional information regarding the potential economic benefits of choosing alternatives to traditional approaches would be useful in informing our assessment of the deliverability of the Strategy.</p>
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	and partners to allow for riverside extraction that can offer river restoration benefits.	
A26-512 A Watson Abberley Parish Council	<p>In the first stage consultation for the Worcestershire Minerals Local Plan you have asked for feedback from local bodies to help shape the Plan and ensure that future policies take account of the views of people living in the area. Abberley Parish Council wish to put on record that we fully support the response to the consultation already sent to you from Great Witley & Hillhampton Parish Council.</p> <p>Abberley Parish Council also wishes to put on record its view that Policy 5 of the existing (1997) Minerals Plan, relating to the exclusion of mineral extraction within the Abberley Hills should be adhered to and form part of the new Plan. The concerns are specifically over the possibility of restoration of working at Woodbury Hill and Shavers End quarries as well as the introduction of any other new site within the Abberley and Malvern Hills Geopark. We appreciate that the Minerals Local Plan will only determine broad areas for extraction and not identify specific sites, however, because the Abberley Hills area has been recognised as one of significant geological and environmental value we feel that there should be a specific statement within the Plan confirming its continued exclusion and protected status.</p> <p>We trust that the views of both Abberley Parish Council and Great Witley and Hillhampton Parish Council will be given favourable consideration in the planning process that is now under way and that we will be included in the feedback that you propose to make in Spring 2013.</p>	<p>Noted. Comments from Great Witley Parish Council are also recorded in this document.</p> <p>National policy does not currently preclude mineral working from any areas, including National Parks and other areas identified for their environmental value. It is therefore unlikely that the retention of this policy would be in line with the National Planning Policy Framework (NPPF). We will however endeavour to take account of locally important characteristics through the development of the Minerals Local Plan.</p> <p>All comments received have been recorded in this document.</p>

<p>A27-807 Mr C Wilkinson RSPB</p>	<p>Yes. The Minerals Local Plan should address provision of rights of way and informal recreation (e.g. walking and birdwatching) on restored mineral sites, recognising the associated health benefits that would result from this informal recreation. The Minerals Local Plan should also address the how mineral sites and mineral site restoration can help to address flooding issues, for example, through the provision of flood storage capacity, and support the implementation of the Water Framework Directive, for example, through river restoration.</p> <p>For mineral extraction in river corridors, the Minerals Local Plan should consider the option of allowing mineral extraction right up to the river, where this would result in creation of wetland habitat as part of a river restoration scheme, rather than leaving a 'buffer' between the mineral extraction and the river. This could potentially provide a financial incentive for mineral operators and landowners to support biodiversity-led restoration of mineral sites, rather than restoration to agriculture, as it would allow more minerals to be extracted. Such as scheme would need to ensure that habitat creation was technically viable, given the wide range of river levels, and did not increase flood risk elsewhere.</p> <p>Presumably, the intention to address 'habitats and species' includes the protection of designated nature conservation sites (international, national and local). Addressing 'habitats and species' should go beyond protecting the existing habitats, species and designated sites. It should focus on biodiversity-led mineral restoration, seeking a 'net-</p>	<p>Noted. We are developing a suite of background evidence and will consider:</p> <ul style="list-style-type: none"> • the provision of rights of way and informal recreation, and the associated health benefits, • flooding issues and flood storage capacity, and • the Water Framework Directive. <p>This background evidence will be consulted on.</p> <p>Noted. This is an option that we will explore in some detail. Discussions have already been held with the Environment Agency and details will be published shortly as part of the suite of background evidence informing the development of the Minerals Local Plan.</p> <p>Yes, this includes the protection of designated nature conservation sites. It is also our intention to make policy provision for restoration-based approaches that deliver against biodiversity priorities, alongside other local green infrastructure objectives. We are considering how this approach could be used to contribute to the strategic</p>
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	<p>gain' in biodiversity and identifying how the location and restoration of mineral sites can best contribute to the creation of a coherent and resilient ecological network in Worcestershire and across county boundaries, in line with the National Planning Policy Framework, the England Biodiversity Strategy and the Natural Environment White Paper (see also Q7 below).</p> <p>The Minerals Local Plan should also consider the issue of climate change, as biodiversity-led restoration of mineral sites and the creation of a coherent and resilient ecological network would make a significant contribution to climate change adaptation.</p>	<p>resilience of ecological networks.</p> <p>We are developing a suite of background evidence and will consider climate change adaptation and resilience.</p>
A28-676 Mrs B Drew Wolverley and Cookley Parish Council	An issue of concern is access to site [Court Farm, Wolverley] if it opens as a Quarry and the impact upon the Community. If it were to be opened as a Quarry the Parish Council would like the area to be put back to and amenities park or Agricultural Land.	<p>There are not currently any proposals to re-open this site. Any application would need to be assessed on its merits against the development plan policies at the time.</p> <p>The Minerals Local Plan will not make site specific proposals, but will set out a policy framework for considering site access and restoration.</p>
A29-1314 Mr D Brewer Confederation of UK Coal Producers (CoalPro)	The Minerals Local Plan should address all the issues referred to in the National Planning Policy Framework (NPPF) including the national and local economic benefits of extraction.	Noted and agreed.
A30-2286 Mrs N Incbald	The 'sieve test' needs to be updated and expanded to include the need to locate mineral excavations away from listed buildings and scheduled ancient monuments. The employment contribution of tourism and leisure needs to be	The new Minerals Local Plan will set out a new policy framework and will not be an update to the existing Minerals Local Plan. It is therefore not clear at this stage whether the sieve test in its current form will be retained.

	<p>taken into account. For example, disruption to the national footpath - The Severn Way should be avoided. In addition, the plan needs to consider the ability of the highway network to accommodate and access plant and machinery and employee accessibility even where the mineral extraction is proposed to be removed by river. Furthermore, the Plan needs to reflect Central Government legislation regarding Localism and the contents of Parish and Neighbourhood plans.</p>	<p>However the policies in the new Minerals Local Plan will consider the protection of listed buildings and scheduled ancient monuments as required by the NPPF.</p> <p>We are developing a suite of background evidence and will consider the economic contribution of tourism and leisure amongst other issues.</p> <p>Local issues will be taken into account in the preparation of the new Minerals Local Plan, however it is clear in the National Planning Policy Framework that neighbourhood plans and orders should not undermine the strategic policies set out in the Local Plan (of which the Minerals Local Plan forms part. The Localism Act 2011 also excludes county matters, including minerals development, from consideration in neighbourhood plans and orders.</p>
<p>A32-2295 Mrs J Spooner</p>	<p>1. Restoration issues to be a priority from onset of discussions with developers.</p> <p>2. In a local area there should only be one quarry developed at a time. This will reduce the negative impact on residents living in the area.</p>	<p>Noted and agreed.</p> <p>This is an issue which will be explored in subsequent consultations. There is an ongoing investigation by the competition commission which may influence our approach to this issue.</p>
<p>A33-2296 Mr T Rowley Tony Rowley Associates on Behalf of Lechmere</p>	<p>The issues stated covering the environment, transport and impact are very relevant in considering how sites are worked and restored.</p> <p>From my point of view I feel there should be a greater emphasis on transport using water and rail where possible.</p>	<p>Noted.</p> <p>Noted.</p>

<p>Estate</p> <p>A35-1077& 1920& 681 Mr D Clarke South Worcestersh ire Authorities</p>	<p>The working and restoration of mineral sites should be carried out to the highest possible environmental and operational standards if sustainable development objectives are to be met.</p> <p>Proposals for minerals extraction must be required to show that high standards will be maintained during the period of working. Issues which should be addressed during the working of a site include:</p> <ul style="list-style-type: none"> • impacts on those living nearby (noise, dust, vibrations, visual impacts, site operating times) • impacts on the environment (habitats, species, landscape, archaeology, historic environment, surface and ground water) and • transport (site access and methods for transporting materials). <p>Proposals in the Green Belt must contribute to Green Belt purposes by maintaining its openness and visual amenity.</p> <p>In relation to transport, any proposals for mineral working must include an assessment of the likely generation of traffic and its impact upon the local highway network.</p>	<p>It is our intention to make policy provision for restoration-based approaches that deliver against biodiversity priorities, alongside other local green infrastructure objectives. Such an approach would require appropriate restoration to be undertaken. The policy framework will also set out policies to ensure minimum environmental standards are maintained during the working of the site.</p> <p>Noted. We intend to address these issues through the policy framework in the Minerals Local Plan.</p> <p>These issues will be considered in the MLP, however it should be noted that the NPPF identifies mineral extraction as a form of development that is not inappropriate in the Green Belt provided that development preserve the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt.</p> <p>The Minerals Local Plan will include policies to assess the impacts of development on the highways network. We are developing a suite of background evidence and will</p>
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	<p>Wherever possible, the delivery of minerals and mineral related products should be by sustainable transport. It is also recognised, however, that proposals for rail or water borne transport must be realistic and capable of being delivered. Planning permission for minerals extraction should only be granted where the access along local highways would be adequate in both physical and environmental terms for the likely traffic generated by the working.</p> <p>For successful restoration, the end use of the site should be decided upon before excavation takes place. All proposals for mineral development should therefore be accompanied by detailed reclamation and aftercare proposals. Planning consents should be conditional on reclamation proposals being completed within a reasonable timescale.</p> <p>In restoring sites, it should be recognised that there may be opportunities to increase and enhance woodland cover, biodiversity and habitats, public access and in some cases provide sports and recreation provision. Where there are extensive mineral workings in river valleys, this may have the potential to make significant contributions to retaining and improving landscape character and meeting local biodiversity targets.</p> <p>The South Worcestershire Authorities recognise that it may sometimes be appropriate to use inert materials to raise the land surface to its original levels. However, if the practice of landfill is allowed, schemes need to be properly designed</p>	<p>consider the potential for transport by rail, water and other appropriate methods.</p> <p>Noted and agreed.</p> <p>Noted and agreed. It is also our intention to make policy provision for restoration-based approaches that deliver against biodiversity priorities, alongside other local green infrastructure objectives.</p> <p>The adopted Waste Core Strategy sets out the development plan policies for landfill in Worcestershire. Any proposal including infilling would need to be assessed against these policies.</p>
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	<p>at the outset and properly managed during the life of the working. It would be important to determine that the highway network was capable of coping with the additional traffic, that landfill operations would not pose a threat of pollution to water sources, would not adversely affect the amenities of neighbouring properties and would not prejudice the proposed afteruse of the site.</p> <p>Where the proposed afteruse was agriculture, every effort needs to be made to restore the land to the highest possible quality. In the case of the best and most versatile agricultural land, it should be restored to a high standard. Proposals for minerals extraction where the method of working would result in lakes being formed must be able to demonstrate that a lake(s) would be appropriate in the landscape and be accompanied by proposals for the maintenance of the lake(s).</p> <p>Proposals for mineral extraction where the proposed afteruse is nature conservation, forestry or outdoor recreation must be accompanied by proposals for the long-term management of the scheme.</p>	<p>Noted and agreed. We are developing a suite of background evidence which will consider impacts on and opportunities for agriculture and forestry. Our approach will also be informed by the Landscape Character Assessment.</p> <p>Noted and agreed.</p>
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Question 5: Is there any information you are aware of that would help us develop these policies?

4.10. The following respondents indicated that they were not aware of any further information that would help us to develop these policies:

- A5-1712b **Mr P Bladon**
- A6-1753 **Mr & Mrs GR Knowles**
- A7-740 Mr M Watt **Cotswolds Conservation Board**
- A9-547 Mrs Y Scriven **Chaddesley Corbett Parish Council**

- A15-659 Mr D Rook **Stourport-on-Severn Town Council**
- A18-634 Mrs A Dobbins **Pershore Town Council**
- A20-581 Mr J Sommerville **Guarlford Parish Council**
- A33-2296 Mr T Rowley **Tony Rowley Associates on Behalf of Lechmere Estate**
- A32-2295 **Mrs J Spooner**

4.11. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
A4-509 Mr Glyde, WCC, Worcestershire Archive and Archaeology Service	Archaeology and Aggregates in Worcestershire – A Resource Assessment, Mineral Extraction and Archaeology practice guide (English Heritage).	Noted. The report and practice guide will be taken into account.
A14-719 H Berry Environment Agency	The river restoration that has occurred along the Tame Valley in northern Warwickshire and southern Staffordshire is a very good example of how mineral workings can achieve good river restoration and at the same time secure additional minerals. Any sand and gravel extraction that is in close proximity to a watercourse should be planned, implemented and restored in a manner that maximises the habitat and river restoration opportunities.	Noted. This best practice example will be taken into account when considering our approach to restoration.
A21-1936 M Jenkins Earth Heritage Trust	Yes – Earth Heritage Trust expertise, database held at the Geological Records Centre and Geodiversity Action Plan for Worcestershire.	Noted, this information would be useful to take into account in developing the Minerals Local Plan and we will be in contact shortly.
A24-1280 Miss K Burnett Canal and River	The National Planning Policy Framework at paragraph 143 refers to safeguarding “existing, planned and potential...wharfage and associated storage, handling	Noted and agreed. The Minerals Local Plan will be developed in accordance with the NPPF and will take these factors into account.

Trust	<p>and processing facilities for the bulk transport by...inland waterways of minerals including recycled, secondary and marine dredged materials..." and "...ensure worked land is reclaimed at the earliest opportunity...and that high quality restoration and aftercare of mineral sites takes place, including for...biodiversity...and recreation." Environmental criteria should be set out within Mineral Local Plans to "...ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment...including from noise, dust, visual intrusion, traffic, tip and quarry slope stability...increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site..." which is supportive of Canal & River Trust' views on the working and restoration of mineral sites and the provision of policies within the local plan for addressing the environment, transport and impact on those nearby.</p>	
A27-807 Mr C Wilkinson RSPB	<p>The RSPB has produced a report called 'Nature After Minerals: how mineral site restoration can benefit people and wildlife' (http://www.rspb.org.uk/Images/natureaftermineralsreport_tcm9-257075.pdf), which identifies the unique contribution that the biodiversity-led restoration of mineral sites can make to achieving national targets for the creation of priority habitat. For example, the report identifies that mineral site restoration has the potential to achieve 100% of the habitat creation targets for nine priority habitats, as well as making a significant</p>	<p>Noted. We are already aware of this report and are working closely with the Nature After Minerals team in developing the Minerals Local Plan.</p>

	<p>contribution to many other priority habitat targets.</p> <p>The Nature After Minerals project (www.afterminerals.com), which is funded by the RSPB and Natural England, has produced an advice sheet for mineral planners on issues that should be addressed within Mineral Plans to maximise biodiversity gains from mineral extraction and mineral site restoration.</p> <p>There are a number of Mineral Plans that demonstrate best practice in relation to biodiversity and mineral site restoration. Two of the best examples are the Cambridgeshire and Peterborough Minerals and Waste Plan and the Surrey Minerals Core Strategy Development Plan Document.</p> <p>The National Planning Policy Framework(NPPF) has a number of policies to ensure that the planning system should contribute to, and enhance, the natural environment, including paragraphs 9, 14, 17, 109-125, 165and 180.</p> <p>The England Biodiversity Strategy (http://www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/), the Natural Environment White Paper (http://www.defra.gov.uk/environment/natural/whitepaper/) and the Lawton Review (http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf) all promote the creation of a coherent and ecological network.</p>	<p>Noted. We are already aware of this advice sheet and are working closely with the Nature After Minerals team in developing the Minerals Local Plan.</p> <p>Noted. These best practice examples will be taken into account when considering our approach to restoration.</p> <p>Noted. The Minerals Local Plan will be developed in accordance with the NPPF and will take these factors into account.</p> <p>Noted. The Minerals Local Plan will be developed in accordance with national policy to promote the creation of ecological networks alongside other local green infrastructure priorities.</p>
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	<p>The Worcestershire Biodiversity Action Plans (http://www.worcestershire.gov.uk/cms/biodiversity/action-plans.aspx) and the Worcestershire Biodiversity Delivery Areas (http://www.worcestershire.gov.uk/cms/biodiversity/landscape-scale-conservation.aspx#Delivery) set out the biodiversity priorities for Worcestershire. Worcestershire Wildlife Trust's 'Living Landscape' set out similar priorities (http://www.worcswildlifetrust.co.uk/your-living-landscape).</p> <p>Defra's Severn River Basin District Eel Management Plan (http://archive.defra.gov.uk/foodfarm/fisheries/documents/fisheries/emp/severn.pdf) provides a policy hook for biodiversity, stating that recent habitat loss (i.e. reedbeds) should be addressed and obstacles to fish movement removed.</p>	<p>Noted, these will be taken into account in developing the Minerals Local Plan.</p> <p>Noted, this will be taken into account in developing the Minerals Local Plan.</p>
<p>A28-676 Mrs B Drew Wolverley and Cookley Parish Council</p>	<p>If this facility [Court Farm, Wolverley] is developed it could have an impact on a high residential property area and this would need to be seriously considered.</p>	<p>There are not currently any proposals to re-open this site. Any application would need to be assessed on its merits against the development plan policies at the time.</p> <p>The Minerals Local Plan will not make site specific proposals, but will set out a policy framework for considering local amenity.</p>
<p>A29-1314 Mr D Brewer Confederation of UK Coal Producers</p>	<p>The NPPF is the source of such information.</p>	<p>Noted and agreed.</p>

(CoalPro)		
A30-2286 Mrs N Inchbald	The work undertaken for the last Minerals Local Plan, Local Plans and Parish Plans. Local Parish Councils.	We are currently assessing this information.
A35-1077& 1920& 681 Mr D Clarke South Worcestershire Authorities	It is suggested that policies in the adopted Minerals Local Plan should provide a starting point for outlining how sites should be worked and restored, updated in the light of national good practice and advice from other minerals planning authorities on the Aggregates Working Party.	The new Minerals Local Plan will set out a new policy framework and will not be an update to the existing Minerals Local Plan. The information which informed the current Minerals Local Plan is being assessed alongside up to date information.

Where Minerals Should Be Extracted:

Question 6: Are you aware of any other plans or programmes that we should consider?

4.12. The following respondents indicated that they were not aware of any further information that would help us to develop these policies:

- A4-509 Mr M Glyde, **WCC, Worcestershire Archive and Archaeology Service**
- A5-1712b **Mr P Bladon**
- A6-1753 **Mr & Mrs GR Knowles**
- A15-659 Mr D Rook **Stourport-on-Severn Town Council**
- A18-634 Mrs A Dobbins **Pershore Town Council**
- A20-581 Mr J Sommerville **Guarlford Parish Council**
- A24-1280 Miss K Burnett **Canal and River Trust**
- A29-1314 Mr D Brewer **Confederation of UK Coal Producers (CoalPro)**
- A33-2296 Mr T Rowley **Tony Rowley Associates on Behalf of Lechmere Estate**

4.13. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
A1-717 Mrs L Horner, Natural England	The Birmingham and Black Country NIA adjoins the County boundary. Opportunities should be sought where appropriate for restoration in accordance with the	Noted and agreed, opportunities to contribute positively to these objectives will be explored.

	<p>objectives of the NIA.</p> <p>The Worcestershire Green Infrastructure Study.</p>	<p>We intend to use Green Infrastructure principles to deliver multifunctional benefits from mineral workings. We are developing a suite of background evidence that will address the possibilities for mineral site restoration, this will utilise the Green Infrastructure Framework Documents and will take account of the principles in the Green Infrastructure Strategy.</p>
<p>A7-740 Mr M Watt Cotswolds Conservation Board</p>	<p>Cotswolds AONB Management Plan</p>	<p>Noted, this will be taken into account in developing the Minerals Local Plan.</p>
<p>A9-547 Mrs Y Scriven Chaddesley Corbett Parish Council</p>	<p>As near as possible to the point of use.</p>	<p>Minerals can only be worked where they exist. Proximity to likely sources of demand for minerals from development is one of many issues which will need to be considered.</p>
<p>A12-1939 Miss R Bust, The Coal Authority</p>	<p>The Coal Authority welcomes the recognition that Mineral Safeguarding Areas are to be defined. These should be defined using the 2011 BGS/The Coal Authority practice Guide, and should apply to minerals of national and local importance as defined in the NPPF. The Coal Authority therefore considers that the surface coal resource as a mineral of national importance should all be defined within the MSA in order to prevent its sterilisation from potential development.</p>	<p>Noted. We will consult on safeguarding areas during the development of the Minerals Local Plan.</p>
<p>A14-719 H Berry Environment</p>	<p>Evidence/data: We suggest that you refer directly to the Severn River Basin Management Plan (RBMP), available on our</p>	<p>Noted, this will be taken into account in developing the Minerals Local Plan.</p>

Agency	website www.environment-agency.gov.uk/research/planning/33106.aspx	
A21-1936 M Jenkins Earth Heritage Trust	Yes – Geodiversity Action Plan – county and UK	Noted, this will be taken into account in developing the Minerals Local Plan.
A22-716 A Smith English Heritage	<p>In our response to other questions we have identified a number of key information sources that also include a strategic element, including:</p> <ul style="list-style-type: none"> • the Strategic Stone Study Database; and • Worcestershire Archaeology and Aggregate Resource Assessment. <p>An additional plan that may be of relevance is the Worcestershire Green Infrastructure Framework.</p> <p>In developing criteria based policies, we advise that careful consideration is given to the guidance on the historic environment set out in the National Planning Policy Framework, and in particular key concepts dealing with understanding and assessing the significance of heritage assets, including the contribution made by their setting.</p> <p>We would be happy to continue to input to the development of the Plan and its supporting evidence and policy framework.</p>	<p>Noted, this information will be taken into account in developing the Minerals Local Plan.</p> <p>We intend to use Green Infrastructure principles to inform the Minerals Local Plan. The approach will utilise the Green Infrastructure Framework Documents and will take account of the principles in the Green Infrastructure Strategy.</p> <p>The Minerals Local Plan will be developed in accordance with the National Planning Policy Framework.</p> <p>Your continued input is appreciated.</p>
A25-813 Mr S	As well as the significant drivers for action contained in	Noted, we will take this evidence into account in

<p>Bloomfield Worcestershire Wildlife Trust</p>	<p>the NERC Act and NPPF there is a wealth of locally based information pertaining to biodiversity and wider GI restoration targets available and we would suggest that you use this to help guide the Minerals Plan approach. In particular the Sub-Regional GI Framework guidance (led by the County GI Partnership) provides useful information for helping to target restoration priorities that link to wider environmental delivery. Emerging SWDP policy on biodiversity, GI and ecological networks provides a helpful background for work affecting the southern half of the county and the Wyre Forest local Plan gives useful policy backing to biodiversity enhancement in the north that may be of use in your deliberations. Local and national BAP documents and direct input from the GI Partnership will also be useful sources of information. We would also be pleased to provide direct information and advice to the minerals team if that would be helpful.</p>	<p>developing the Minerals Local Plan. We are investigating the possibility of a GI working party as one of the ways to help steer the development our next consultation proposals.</p>
<p>A28-676 Mrs B Drew Wolverley and Cookley Parish Council</p>	<p>Minerals should only be extracted in the most easily accessible areas as a first resort.</p>	<p>Minerals can only be worked where they exist. Access to resources is one of many issues which will need to be considered.</p>
<p>A32-2295 Mrs J Spooner</p>	<p>Take into account spatial strategy as well so that locations are really investigated in terms of restoration and locality.</p> <p>?Industrial research to determine potential use of minerals in the future (so avoiding the blanket amounts in Mt for each year)</p>	<p>We will be developing a spatial strategy which will address these issues. We will be consulting on this in summer 2013.</p> <p>Potential demand was one of the alternatives considered in the draft Local Aggregates Assessment. However, there has been more support for an approach based on</p>

		past sales. A sales-based method is also in accordance with national policy.
A35-1077& 1920& 681 Mr D Clarke, South Worcestershire Authorities	<p>The First Stage Consultation document suggests that the approach to where minerals should be extracted “should be based on working viable resources in areas where there is greatest potential to achieve restoration priorities”. The document suggests that these priorities will be informed by economic policies, environmental policies, community strategies and cross-cutting policies. The South Worcestershire Authorities consider that the identification of areas where mineral extraction is preferred should also be informed by:</p> <ul style="list-style-type: none"> • the National Planning Policy Framework (NPPF) • Local Plans (including the SWDP) will provide an indication of the likely level and distribution of demand for minerals in the County over the plan period. The identification of preferred areas for mineral extraction and planning applications should also be assessed against relevant Local Plan policies. In the case of the SWDP, this will include policies related to AONB’s, Landscape Character, Green Infrastructure Network, Biodiversity and Geodiversity, Local Green Networks, Flood Risk etc • Malvern Hills Acts. As stated in the Malvern Hills Acts Background Document (October 2012) “there are five private acts of parliament relating to the Malvern Hills, three of which make specific 	<p>This is correct.</p> <p>Agreed.</p> <p>Agreed, these factors will be taken into account. However it must be noted that minerals can only be worked where they exist and it is often not possible to apply the proximity principle to mineral development.</p> <p>Local Plan Policies will inform the Minerals Local Plan and any proposal must be considered against all relevant policies in the development plan.</p> <p>The Malvern Hills Acts will be taken into account in the development of the Minerals Local Plan.</p>

	<p>reference to quarrying. The express intention of the Malvern Hills Act 1924 is to control quarrying. There are also Ministerial planning decisions and House of Lords Judgements relating to these acts. As such the legislative framework around quarrying in the Malvern Hills is nationally unique and will require careful consideration in the development of the Minerals Local Plan”</p> <ul style="list-style-type: none"> • Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. In addition to Malvern Hills (see above), the Cotswolds will require careful consideration in the development of the Minerals Local Plan • Worcestershire Green Infrastructure Strategy (WGIS). It is important that mineral extraction does not compromise the accessibility, connectivity or function of the Strategic Green Infrastructure Corridors which are identified in the WGIS. • Adopted Minerals Local Plan. Where the environmental sensitivity of a particular location has significantly changed, where more sustainable sites come forward, or where there is no longer the particular need upon which the working was originally permitted, there may be a case for 	<p>National policy does not currently preclude mineral working from any areas, including Areas of Outstanding Natural Beauty and other areas identified for their environmental value. We will however endeavour to take account of locally important characteristics through the development of the Minerals Local Plan and expect to develop policies to ensure that the character of protected areas is enhanced wherever possible by mineral related development.</p> <p>This is will be taken into account in the development of the Minerals Local Plan. It will be considered alongside the potential for restored mineral workings to enhance and restore the accessibility, connectivity or function of Strategic Green Infrastructure Corridors.</p> <p>The new Minerals Local Plan will set out a new policy framework and will not be an update to the existing Minerals Local Plan. It is not currently the intention to allocate specific sites, but to identify areas of search.</p>
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	reviewing allocations in the adopted Mineral Local Plans, particularly inactive sites. In light of this, it is suggested that the revised Minerals Local Plan reviews the appropriateness of allocated but unworked sites at Aston Mill, Grimley and Strensham in South Worcestershire.	
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4.14. In addition to the plans and programmes given in response to the consultation we will also consider the following when preparing the next consultation document:

- **The Access and Informal Recreation Strategy 2009 - 2019** prepared by the Worcestershire Parks and Countryside Task Group. This Strategy identifies the issues and sets the policy direction for informal access and recreation in the county.

Question 7: Do you have any comments on this approach?

4.15. The following respondents indicated that they did not have any comments on this approach at this time:

- A4-509 Mr M Glyde, **WCC, Worcestershire Archive and Archaeology Service**
- A6-1753 **Mr & Mrs GR Knowles**
- A9-547 Mrs Y Scriven **Chaddesley Corbett Parish Council**
- A15-659 Mr D Rook **Stourport-on-Severn Town Council**
- A21-1936 M Jenkins **Earth Heritage Trust**
- A24-1280 Miss K Burnett **Canal and River Trust**

4.16. The following comments were also made in response to this question:

Respondent	Comment	Initial officer response
A1-717 Mrs L Horner, Natural England	We welcome the approach to consider restoration proposals on a wider scale.	Support noted.
A5-1712b Mr P Bladon	Reference to page 8 "Mineral companies can help us" Please provide the names of all companies the Council has invited to contribute to this consultation. And please	The following operators and trade organisations were contacted. Responses were received from those highlighted in bold and are included in this report:

	<p>also indicate which companies have submitted information/views etc.</p>	<ul style="list-style-type: none"> • British Aggregates Association • British Ceramic Confederation • Cemex UK Operations • Coal Authority • Confederation of British Industry • Confederation of UK Coal Producers • Hills Group • Hutton Stone Co Ltd • Kaolin & Ball Clay Association UK • Mineral Products Association • Smith & Sons (Bletchington) Ltd. • Smiths Concrete Ltd • SSG Quarries • Tarmac Ltd. • The Concrete Centre • The Mining Association of the UK • The Stone Federation of Great Britain • Wienerberger Ltd • Wildmoor Quarry (Cinetic Sand) Ltd. <p>137 other companies and organisations who might be expected to have an interest in the Plan were also contacted and sent a reminder letter inviting them to be included in our consultation database. Very few replied. We expect to amend the database after each consultation and will report the names of those who replied after each consultation.</p>
<p>A7-740 Mr M Watt Cotswolds Conservation</p>	<p>Support.</p>	<p>Support noted.</p>

Board		
A14-719 H Berry Environment Agency	Question 7: We welcome the approach where Water Framework Directive (WFD) and Biodiversity Action Plans (BAP) are key factors in determining appropriate locations and restoration measures for minerals sites. We would recommend that sites offering the best opportunities for restoration and help to deliver significant BAP targets and river restoration opportunities should be prioritised for working. Any restoration plan for a particular site should aim to achieve multi-functional benefits - for example, river restoration, BAP habitat creation, flood attenuation, rural sustainable drainage (SUDS) and recreation.	Support noted.
A18-634 Mrs A Dobbins Pershore Town Council	The approach taken seems reasonable.	Support noted.
A20-581 Mr J Sommerville Guarford Parish Council	No, apart from the need to address Flooding Risk. This risk is likely to increase in the next 10-20 years.	Flood risk is one of the factors that the council intends to consider. It is noted that you do not support the wider approach.
A25-813 Mr S Bloomfield Worcestershire Wildlife Trust	The Trust is pleased to support a restoration-led approach to minerals extraction in the county. Working viable resources in areas where there is the greatest ability to achieve restoration priorities seems sensible to us and offers significant opportunities for biodiversity enhancement (especially in terms of contributing to coherent ecological networks), ecosystem service provision and long-term economic benefit. Delivery of a key diagram and a series of strategic priorities for each broad area will help to guide future restoration decisions and give certainty to minerals companies, landowners and	Support noted.

	<p>local communities about likely outcomes in given circumstances.</p> <p>Robust policies to control the potentially adverse effects of mineral workings operation should be efficiently covered by the standard development management policies found in extant and emerging local plans for Worcestershire and we do not believe that they need to be repeated in the Minerals Plan.</p> <p>We would very strongly advocate that the plan takes a biodiversity / ecosystem function and GI led approach to restoration in recognition of the key drivers for enhancements in these areas enshrined in the NPPF and local planning documents mentioned above. We consider that this would be an effective way for the Minerals Plan to contribute to the wider objectives of the County Council and its partners as outlined in the Sub-regional GI framework and other documents. In particular we believe that this would help contribute to climate change adaptation priorities, WFD requirements, Biodiversity Action Plan targets and economic sustainability. We are already engaged in work with partner organisations to bring forward more detail on the environmental restoration priorities that might be relevant to each broad area and we would welcome the chance to work closely with the minerals team on these emerging data sets in due course.</p>	<p>Noted. This is an issue that requires further consideration due to the variation of policy style and detail across the County, however there could be merit in taking this approach.</p> <p>Agreed. We intend to use Green Infrastructure principles to guide the approach in the Minerals Local Plan. This will be based on the evidence in the Worcestershire Green Infrastructure Framework and the principles in the Green Infrastructure Strategy.</p> <p>Additional background evidence is also being developed to explore the relationship between mineral working and Green Infrastructure locally. We intend to consider issues including climate change adaptation, Water framework Directive Requirements, Biodiversity Action Plan targets and economic sustainability.</p> <p>Engagement of the Worcestershire Green Infrastructure Partnership in this work is encouraged.</p>
<p>A27-807 Mr C Wilkinson RSPB</p>	<p>The RSPB supports a restoration-led approach to minerals planning, in which viable mineral resources are worked in areas where there is the greatest ability to achieve restoration priorities. The RSPB also supports</p>	<p>Support noted.</p>

	<p>the proposal for the Minerals Local Plan to provide a key diagram, which directs development to broad areas where extraction is preferred and identifies the restoration priorities in these areas.</p> <p>The RSPB particularly supports the biodiversity-led restoration of mineral sites, as promoted by the Nature After Minerals (NAM) project. To this end, John Mills, the NAM Planning Adviser, based at the RSPB's Midlands Regional Office, recently arranged a meeting (8th January 2013) with colleagues from Worcestershire County Council, Worcestershire Wildlife Trust, Natural England and the Environment Agency. The objective of the meeting was to develop a process for identifying areas in Worcestershire where mineral extraction and mineral site restoration could potentially deliver maximum biodiversity gain.</p> <p>It is anticipated that this process for identifying areas of maximum biodiversity gain will be taken forward through a report currently being produced by Worcestershire County Council's Ecologist, Cody Levine, and through the County Council's Green Infrastructure process. In the first instance, priority will be given to identifying areas within the Severn & Avon Vales Biodiversity Delivery Area (BDA), as this is where most mineral extraction is likely to take place (primarily sand and gravel) and where there is likely to be the greatest scope for biodiversity gain. Areas to be considered at a later stage will include the Wyre Forest Acid Grassland BDA.</p>	<p>Supported note. This meeting was a useful step in developing this approach. It is our intention to make policy provision for restoration-based approaches that deliver against biodiversity and other local green infrastructure priorities.</p> <p>The details of this approach are yet to be finalised and initial thoughts will be published for consultation in Summer 2013. The consultation document is likely to include details of the areas where mineral resources are found and to set out the aspects of green infrastructure which need to protection, or could be enhanced in these areas.</p> <p>The report currently being prepared by the Council's ecology team will be made available for comment in parallel to the wider consultation on the development of the Minerals Local Plan.</p>
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	<p>The datasets / criteria that should be taken into account when developing a restoration led approach, especially in relation to biodiversity, include the :</p> <ul style="list-style-type: none"> • known mineral resource • current ecological network (designated nature conservation sites, ancient woodland, priority habitat, nature reserves, etc) • agri-environment scheme target areas • floodplain • BDAs and Living Landscapes • National Character Areas and local landscape character assessments • Best and Most Versatile (BMV) soils <p>The restoration-led approach should identify gaps in the current ecological network and the locations where creation of priority habitat (on restored mineral sites) would make the ecological network more coherent and more resilient. These locations would then be identified in the Minerals Local Plan 'key diagram' as priority areas for the biodiversity-led restoration of mineral sites.</p>	<p>Noted and agreed.</p> <p>The detail of how a restoration-led approach will be developed has yet to be finalised. This will be developed following consultation on the broader principles in Summer 2013. This is one of the alternatives that will be considered.</p>
<p>A28-676 Mrs B Drew Wolverley and Cookley Parish Council</p>	<p>All consultees should have input into any planning considerations especially Local Councils.</p>	<p>We will continue to engage with local authorities and parish councils throughout the development of the Minerals Local Plan and we welcome your input into the process. Relevant Local Authorities and Parish Council are also consulted on individual planning applications.</p>
<p>A29-1314 Mr D Brewer Confederation</p>	<p>CoalPro agrees with the application of criteria-based location policies to any proposal to extract coal. Given the limited area of the County underlain by shallow coal</p>	<p>Noted and agreed. We will be consulting on proposed Mineral Consultation/Safeguarding Areas.</p>

<p>of UK Coal Producers (CoalPro)</p>	<p>resources, we do not feel that it is appropriate to define broad areas where extraction is preferred, but it is CoalPro's view that a mineral safeguarding area should be established covering the entire shallow coal resource area.</p>	
<p>A31-1762 Mr S Williams Highways Agency</p>	<p>The Highways Agency (HA) is responsible for maintaining and managing the Strategic Road Network (SRN) in England, which includes all motorways and major trunk roads. The SRN in Worcestershire comprises the M5 and M50 motorways and the A46 trunk road. In light of this the HA is concerned with assessing the likely impacts of the Minerals Local Plan on the SRN.</p> <p>We appreciate the plan is at an early stage and welcome this opportunity to provide formative comments. The First Stage Consultation document states that the Minerals Local Plan will direct development to broad areas where extraction is preferred. In addition the plan will develop criteria-based location policies to assess the suitability of the site when proposals are brought forward. The HA requests to be consulted on the development of these policies to ensure adequate consideration is given to the assessing the impacts of proposed sites on the SRN.</p> <p>The HA would also take this opportunity state our position on access arrangements for new sites from the SRN. In accordance with the Department of Transport's Circular 02/2007 there is a general presumption against new accesses to the motorway network. For trunk road there is a presumption in favour of utilising existing access arrangements.</p>	<p>Noted.</p> <p>Noted. We will continue to actively engage with the Highways Agency in relation to these issues.</p> <p>Noted. This Circular and any revised guidance will be taken into account when developing the Minerals Local Plan.</p>

	We look forward to working with you in the development of more detailed proposals.	We appreciate your continued engagement.
A32-2295 Mrs J Spooner	The approach should be as wide ranging as possible.	Noted.
A33-2296 Mr T Rowley Tony Rowley Associates on Behalf of Lechmere Estate	<p>I am a little concerned that the MLP will not identify specific sites. However if the intention is to propose an area of search approach then such flexibility should overcome any concerns.</p> <p>All sites previously allocated in the former MLP should be carried forward in addition to any undetermined non-allocated sites already in the planning system.</p>	<p>Your concerns are noted. We will be consulting on the further development of the plan in summer 2013.</p> <p>The new Minerals Local Plan will set out a new policy framework and will not be an update to the existing Minerals Local Plan. It is not currently the intention to allocate specific sites, but to identify areas of search. Previously allocated areas will be given equal consideration as we assess mineral resources against modern considerations in developing the Minerals Local Plan.</p>
A34-2297 D Snaddon, Rowney Green Association	<p>We wish to bring to your attention the attached copies of two letters, dates 12th August/23 August, 1983 and 10th July, 1992, from Worcestershire Nature Conservation Trust (now called Worcestershire Wildlife Trust), concerning an area north of Storage Lane, Rowney Green, Alvechurch. These describe the detrimental effect of extracting sand and gravel in this area, and affecting parts well away from the extraction site.</p> <p>The Special Wildlife Site referred to, SP 07/12, is Rowney Green Bog. A second Special Wildlife Site, Peck Wood, is close by, which could also be irrevocably damaged or destroyed by sand and gravel extraction on the hillsides</p>	<p>The text from these letters is copied below.</p> <p>The Minerals Local Plan will set out a policy framework for protecting and enhancing European, National and locally designated sites. It will not identify specific sites for mineral extraction.</p> <p>Worcestershire Wildlife Trust and Natural England are actively engaged in the development of the Minerals Local Plan and are also consulted on individual planning applications.</p>

around Newbourne Hill, Rowney Green.

Text from the attached letters:

Letter 1

Ref PJLF/JS

The Planning Officer,
Bromsgrove District Council

Dear Sir,

Planning Application No.B11079

We are particularly concerned to receive information about this Planning Application which we have since inspected at your office. The area in which it is proposed to extract gravel is part of a site known since Victorian times a "Rowney Green Bog" and is of considerable value for its wildlife.

The Valley in which this site lies has many springs originating from the gravels capping the hills around. These have created wet flush sites which have developed layers of acid peat. Some parts of these have been colonised by alder trees making an unusual type of valley side woodland. In addition several rare plants occur in the valley:-

- Marsh Forget-me-not – *Myostis secunda* – only known in one other site in Worcs
- Marsh Violet – *Viola palustris* – only known in a

	<p>couple of sites in Worcs.</p> <ul style="list-style-type: none"> • Meadow Lousewort – <i>Pedicularia sylvatica</i> – now rare as wet pastures have been destroyed • Wood Horsetail – <i>Equisetum sylvestris</i> – only known in a few places in NorthWorcs. • Bog Moss – <i>Sphagnum sub nitens</i> – only known from Wyre Forest apart from here <p>It is also an important area for undisturbed wet and dry acid grassland and represents one of the most valuable sites of this type in the county. Apart from these plants listed above it has a wide variety of other less unusual species.</p> <p>Although this application only affects part of the site there is a strong possibility that other areas will be physically damaged during operations, damaged by water runoff and more likely damaged by changes in the water systems in the hills which could affect parts well away from the working area.</p> <p>We urge your Council most strongly to oppose this application. The proposal could irrevocably damage or destroy a most important area for wildlife. We do not consider the gains to the community of this proposal warrant such long term effects.</p> <p>Yours faithfully, For Worcestershire Nature Conservation Trust</p> <p>A.J.L. Fraser</p>	
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	<p>Conservation Officer</p> <p>Copy of letter sent to Bromsgrove District Council on 12th August 1983 and to Hereford and Worcester County Council on 23rd Aug 1983</p> <p>Letter 2 The Worcestershire Nature Conservation Trust Ltd 10th July 1992</p> <p>Your ref. P/407313 JJR/MAC</p> <p>FOR THE ATTENTION OF Miss J. J. READ</p> <p>County Engineer and Planning Officers Hereford and Worcester County Council County Hall Spetchley Road Worcester WR5 2NP</p> <p>Dear Sir</p> <p>Proposed Extraction of Sand and Gravel Land North of Storage Lane, Alvechurch</p> <p>Thank you for your letter of 3rd July concerning this proposal.</p> <p>As you will be aware, just to the north of the proposed sand and gravel extraction site is a valley which lies south</p>	
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of the village of Rowney Green. This valley supports a complex mosaic of habitats, including dry and wet acid woodland, dry acid grassland and valley bogs, a very uncommon habitat in Worcestershire. The valley bog in the bottom of the valley supports several species of plant which are uncommon or rare in the County. At least two of these, marsh violet **Viola palustris** and smooth-stalked sedge **Carex laevigata** occur in only one or two other sites in Worcestershire.

To our knowledge this valley system with the bog around its perimeter is unique in Worcestershire. Because of this interest the valley system has been notified to your Council by the Trust as Special Wildlife Site No. SP 07/12. This SWS includes the acid grassland which lies on the application site, and the land to the north of it which is partially valley bog, but still within the ownership of the same person.

The valley bog relies for its water supply on a series of springs which flow out from the valley sides. These form where the underlying Mercian Mudstone rocks are overlain by the gravels and sands in which the applicant is interested. Rain falling on the surface of these permeable gravels and sands flows through it until it reaches the underlying landscaped surface of the Mercian Mudstones, and then flows over this until it reaches the valley side where it appears as springs. The survival of the habitat and all of the wildlife it supports is totally dependent on the continuing supply of water formed by this system. If the water supply at any point is interrupted or changes its

	<p>characteristics, e.g. becoming more basic, then the future of the bog and its wildlife is under threat.</p>	
<p>A35-1077& 1920& 681 Mr D Clarke South Worcestershire Authorities</p>	<p>The South Worcestershire Authorities consider that the process of identifying areas where mineral extraction is preferred should seek the best balance of community, social, environmental and economic interests, consistent with the principles of sustainable development. Regard needs to be given to economic viability, the environmental capacity of the area and the impact on the local community. Whilst the identification of restoration opportunities should be a factor in the identification of preferred areas, we do not consider it to be the primary criteria, as implied in the consultation document.</p> <p>It is considered that primary criteria for identifying preferred areas for mineral extraction should include:</p> <ul style="list-style-type: none"> • Availability – the existence of economically workable deposits which are likely to be available within the plan period • Suitability – an absence of physical constraints (eg, safe access to the public highway, no loss of important landscape features or increased flood risk), no policy constraints (sites in international, national and local designations should not be permitted unless there are very special circumstances, whilst best and most versatile agricultural land should be avoided if restoration to a high standard seems unlikely), and no adverse 	<p>Noted.</p> <p>Noted and agreed. As set out in the consultation document “We think this should be based on working viable resources in areas where there is the greatest ability to achieve restoration priorities” (<i>emphasis added</i>).</p> <p>We agree that these are important points which will need to be considered. However, we intend to use Green Infrastructure principles to guide the approach in the Minerals Local Plan. This will be based on the evidence in the Worcestershire Green Infrastructure Framework and the principles in the Green Infrastructure Strategy. Background evidence is being developed to explore the relationship between mineral working and Green Infrastructure locally. We intend to produce a policy</p>

	<p>impacts which cannot be adequately mitigated (eg, visual impact of the working, impact on residential amenity)</p> <ul style="list-style-type: none"> • Achievability – can working and restoration of the site be carried out to the highest possible environmental and operational standards. <p>In order to ensure that appropriate levels of planned and future supplies can be maintained whilst also limiting the blighting effects on local communities it is considered that a limited number of preferred areas for sand & gravel and crushed rock extraction are identified.</p> <p>Planning permission should be granted for mineral extraction in the preferred areas, subject to the proposals meeting other relevant Development Plan policies and submission of acceptable site working and restoration proposals.</p> <p>Applications for planning permission in areas not within a preferred area for extraction should be assessed against the same criteria as those used in identifying the preferred areas to ensure consistency. Exceptionally, permission could be granted on sites which failed the constraints criteria if there was an overriding need to meet a specialist end-use and no suitable alternative sources had been permitted in the County or surrounding area.</p> <p>To minimise the need for new sites it is considered that</p>	<p>framework which protects Worcestershire's assets but also takes opportunities to enhance them where possible, therefore we will be considering carefully how to balance these issues in a sophisticated manner rather than seeing them as absolute constraints.</p> <p>This is an issue which will need to be addressed for all minerals development and the Minerals Local Plan will develop a policy framework to manage this.</p> <p>We intend to identify areas of search which will enable the requirements of the Local Aggregates Assessment to be met. We will be refining and consulting on this as we develop the Minerals Local Plan.</p> <p>This is an issue which will need to be addressed for all minerals development and the Minerals Local Plan will develop a policy framework to manage this.</p> <p>Noted, this is an issue that we will explore.</p>
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	<p>comprehensive working of permitted reserves in existing quarries should be encouraged.</p> <p>Also, subject to conformity with the constraints criteria, extensions to existing quarries should be examined prior to identifying new quarries.</p> <p>To ensure a consistency of approach, it is suggested that the extraction of other surface minerals (eg salt) be considered against the same criteria as aggregates extraction.</p> <p>Coal will remain important as a contributor to the diversity and flexibility of UK electricity production into the foreseeable future. South Worcestershire contains reserves of unworked coal but further underground working is considered unlikely and does not justify the formulation of a specific policy in the minerals Local Plan. Any application for underground mining should be dealt</p>	<p>The new Minerals Local Plan will set out a new policy framework and will not be an update to the existing Minerals Local Plan. It is not currently the intention to allocate specific sites, but to identify areas of search. Previously allocated areas and existing sites will be given equal consideration as we assess mineral resources against modern considerations in developing the Minerals Local Plan. A policy of favouring extensions to existing sites could have implications for competition. The Competition Commission is currently assessing the practices of the minerals industry and we will need to assess the implications of their findings.</p> <p>The Minerals Local Plan will develop policies for the consideration of proposals for the working of both aggregates and non-aggregates. It should be noted that in Worcestershire Salt occurs as Brine, this would require pumping, rather than surface working and might require special criteria of its own. We will be consulting on these issues as we develop the policies.</p> <p>We have produced a background document "Coal in Worcestershire" which states that working coal is not likely to be viable in Worcestershire for the foreseeable future. However, the Minerals Local Plan will need to contain policies to assess any applications which may come forward. We will be discussing these issues with the Coal Authority.</p>
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	<p>with on its merits and take account of national guidelines in relation to coal mining, together with any other relevant Development Plan policies.</p> <p>To safeguard mineral deposits of economic importance from sterilisation by surface development, it is suggested that in Minerals Safeguarding Areas prospective developers be required to undertake a geological survey to assess the scope for extraction before development (which would lead to the sterilisation of the deposit) takes place. If economic deposits are shown to exist, the mineral should be extracted prior to the commencement of surface development if practicable and environmentally feasible. It should be noted that the draft SWDP includes this requirement.</p> <p>The adopted Minerals Local Plan recognises that the landscape of the Abberley Hills is of such importance as to merit its exclusion from further consideration for hard rock extraction. The South Worcestershire Authorities endorse this position and would propose that the existing Abberley Hills Quarrying Policy be carried forward into the revised Minerals Local Plan.</p> <p>The South Worcestershire Authorities also consider that the Minerals Local Plan needs to include a policy which addresses the potential cumulative environmental and community impact of proposed and existing sites in an area.</p>	<p>Agreed. Inclusion of this approach in the SWDP is supported.</p> <p>National policy does not currently preclude mineral working from any areas, including National Parks and other areas identified for their environmental value. It is therefore unlikely that the retention of this policy would be in line with the National Planning Policy Framework (NPPF). We will however endeavour to take account of locally important characteristics through the development of the Minerals Local Plan.</p> <p>Noted and agreed.</p>
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	<p>The identification of preferred areas for mineral extraction should be subject to testing of environmental acceptability through a Sustainability Appraisal / Strategic Environment Assessment and Habitats Regulations Assessment.</p> <p>The South Worcestershire Authorities also consider that the delivery of a steady and planned supply primary aggregates and the use of secondary and recycled aggregates needs to be monitored on an annual basis.</p>	<p>The Minerals Local Plan, including the policy framework and any locations identified will be informed by a Sustainability Appraisal (incorporating a Strategic Environmental Assessment) and a Habitats Regulation Assessment.</p> <p>The Local Aggregates Assessment will be updated annually as required by the National Planning Policy Framework and monitored through the Annual Monitoring Report. We will also be developing monitoring criteria for inclusion in the Minerals Local Plan.</p>
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4.17. As well as taking into account the comments made on the Minerals Local Plan First Stage Consultation we will consider issues which have been highlighted as important through other consultation activities and research undertaken by the Council.

- In the 2009 Worcestershire Citizen's panel view point survey , 93% of residents classed parks and open spaces as either "important" or "very important", and it is estimated that 10 million visitors came to Worcestershire in 2004, with the natural environment being one of the county's attractions.

Comments on background documents

Respondent	Comment	Initial officer response
A5-1712a Mr P Bladon	<p>I've just started reading the following report: Salt and Brine in Worcestershire Background Document.</p> <p>Under 2.1 I'm horrified to see the use of imperial units! "There is approximately 2.5 lbs. of salt per gallon in brine; this is ten times stronger than sea water". I hope this is the only example - which will be corrected very quickly.</p>	<p>We accept that metric measures should be used in official documents, however one of the main issues about the salt industry in Worcestershire is that it closed during the 1970s and Imperial measures were in use for almost its entire history. The reference dates from that time. Converted into metric the phrase becomes 0.25kilos/litre. We have noted your comment and will revise the reference if other comments suggest that metric measures are perceived to make the point more effectively.</p>

		The background papers are all "living documents" and will be revised as necessary over the course of developing the plan.
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Other: No comments to make at this stage but would like to continue to be consulted

- Royal Mail Group Ltd (A2-137)
- Network Rail (A23-2288)

Other: Request a meeting

- Mr R Parton: Salop Sand and Gravel/Wildmoor Quarry Products (A17-1845)