



Strategic Environmental Assessment of the Worcestershire Minerals Local Plan Adoption Statement

Worcestershire County Council

Final report

Prepared by LUC

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Chapter 1

Introduction

1.1 Worcestershire County Council (hereafter referred to as WCC) adopted the Worcestershire Minerals Local Plan (hereafter referred to as the MLP) in July 2022.

1.2 During the preparation of the MLP, WCC was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the MLP as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports which were published alongside the different versions of the MLP during its development.

1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires WCC to make the final SA Report available alongside the adopted MLP.

1.4 The Sustainability Appraisal of the Worcestershire Minerals Local Plan Publication Version May 2019 [See reference 1] (hereafter referred to as the SA of the Publication Version MLP) was published alongside the Publication Version MLP for public consultation between August and September 2019. The MLP was submitted to the Secretary of State for independent examination in December 2019.

1.5 Examination hearings took place between November and December 2020, following which WCC worked with the Inspectors to prepare a Schedule of Main Modifications to the MLP. The Schedule of Main Modifications to the MLP was published for public consultation between August and October 2021. An SA Addendum, the Sustainability Appraisal of the Worcestershire Minerals Local Plan Main Modifications Addendum (July 2021) [See reference 2] (hereafter referred to as the July 2021 SA Addendum), was prepared and published

alongside the Schedule of Main Modifications during the consultation. The purpose of the July 2021 SA Addendum was to consider whether the proposed modifications were likely to have any new or different sustainability effects to those identified in the SA of the Publication Version MLP and, if so, to carry out SA of the proposed modifications.

1.6 The final SA report for the adopted MLP is therefore the SA of the Publication Version MLP, as amended by the July 2021 SA Addendum.

1.7 In the Inspectors' Report published in May 2022 the Inspectors concluded that the SA has been carried out satisfactorily and that the process was proportionate, objective and the judgements reached were reasonable. It was therefore concluded that the SA constitutes appropriate evidence to inform the Plan.

Requirement for the SEA Adoption Statement

1.8 In addition to the requirement in Regulation 26 of the Town and Country Planning (England) Regulations (2012) for the final SA report to be published alongside the adopted Plan, the SEA Regulations [\[See reference 3\]](#) also require a number of steps to be taken upon adoption of a plan (in this case the MLP). Specifically, SEA Regulation 16 sets out the post adoption procedures and requirements for SEA. The planning authority must, as soon as is reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public, Historic England, Natural England and the Environment Agency and the Secretary of State about the availability of these documents. The SEA adoption statement must explain:

- How environmental (and sustainability) considerations have been integrated into the Plan.

- How the Environmental Report has been taken into account during the preparation of the Plan.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan.

1.9 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the MLP. The remainder of the document is structured according to the SEA Regulation requirements listed above, as follows:

- Chapter 2 summarises how environmental considerations have been integrated into the MLP including by explaining who carried out the SA/SEA and what assessment framework was used.
- Chapter 3 summarises how the Environmental Report has been taken into account, considering the links between the plan-making and SA/SEA processes.
- Chapter 4 summarises the consultation opinions provided on the Environmental Report (the SA Report) at each stage and describes how the results were taken into account.
- Chapter 5 describes why the Adopted MLP was chosen, in light of the other reasonable alternatives dealt with.
- Chapter 6 describes how the significant environmental effects of the implementation of the MLP will be monitored.

Chapter 2

How Environmental Considerations have been integrated into the MLP

2.1 The SA (incorporating SEA) of the MLP started in 2012 with the preparation of the Worcestershire County Council Minerals Local Plan Sustainability Appraisal Scoping Report (October 2012) [See reference 4] by WCC (hereafter referred to as the SA Scoping Report). The preparation of the MLP included four Calls for Sites and a number of consultation stages, with an updated MLP and SA Report produced at each consultation stage. WCC carried out the Scoping stage of the SA alongside the First Stage Consultation, and prepared SA Reports at the Second and Third Stage Consultations. LUC was appointed by WCC in April 2018 to carry out the SA of the Fourth Stage Consultation (November 2018) [See reference 5] and has carried out all SA work since that point, including the preparation of this SA/SEA Adoption Statement.

2.2 The purpose of the SA was to assist WCC in preparing the MLP by identifying the key sustainability issues that face the county, to predict what the likely effects of the MLP on these issues would be, and to put forward recommendations to mitigate and monitor effects identified. The aim was to help ensure that the MLP has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible.

2.3 The SA was undertaken iteratively, such that at each stage of the MLP's preparation, the sustainability and environmental effects of the options for the Plan were assessed. SA Reports were produced to describe the approach taken, identify the likely effects of the MLP and make recommendations as to how significant negative effects could be avoided and mitigated and significant positive effects maximised. In this way, environmental and sustainability considerations were integrated into the MLP as it was developed. Chapter 3 expands on how the findings of the SA process have been taken into account through the plan-making process.

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2.4 The way in which the environmental and sustainability effects of the MLP were consistently described, analysed and compared was through the use of a set of SA objectives referred to as an 'SA framework'. The SA framework used to appraise the MLP was developed during the Scoping stage of the SA process in 2012 and was consulted upon as part of the SA Scoping Report in October 2012. The SA objectives were identified at the Scoping stage from the information collated in the review of plans and programmes, baseline analysis and identification of sustainability issues. The SA framework was refined following consultation on the SA Scoping Report. Further changes were made to the SA framework between the Second Stage Consultation and the Third Stage Consultation. These changes were intended to simplify the process and to avoid repetition and irrelevant content.

2.5 The SA framework was used to test the policy and spatial options emerging from plan-making.

2.6 The SA objectives which comprise the SA framework for the MLP are presented below. The 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives. The SA objectives are as follows:

1. Landscape: Safeguard and strengthen landscape character and quality and minimise negative visual impact.
2. Biodiversity and geodiversity: Conserve and enhance Worcestershire's biodiversity and geodiversity.
3. Cultural heritage, architecture and archaeology: Preserve and enhance the historic environment and deliver well-designed and resource-efficient development which respects local character and distinctiveness.
4. Material Assets: Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural lands, land of Green Belt

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value, maximising use of previously-developed land and reuse of vacant buildings, whilst safeguarding open space/green infrastructure.

5. Natural resources: Protect and enhance water and air quality.
6. Climate Change and energy: Reduce causes of and adapt to the impacts of climate change. Promote energy efficiency and energy generated from renewable energy and low-carbon sources.
7. Flooding: Ensure inappropriate development does not occur in high-risk flood-prone areas and does not adversely contribute to fluvial flood risks or contribute to surface water flooding in all other areas.
8. Access to services: Improve the quality of, and equitable access to, local services and facilities, regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment.
9. Health and amenity: Improve the health and well-being of the population and reduce inequalities in health.
10. Waste: Manage waste in accordance with the waste hierarchy: 1) reduce, 2) reuse, 3) recycling and composting, 4) recovery, 5) disposal.
11. Traffic and transport: Reduce the need to travel and move towards more sustainable travel patterns.
12. Growth with prosperity for all: Develop a knowledge-driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural.
13. Provision of housing: Provide decent affordable housing for all, of the right quality and tenure and for local needs, in clean, safe and pleasant local environments.

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14. Participation by all: Provide opportunities for communities to participate in and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.
15. Technology, innovation and inward investment: Promote and support the development of new technologies, of high value and low impact, especially resource efficient technologies and environmental technology initiatives.
16. Population (skills and education): Raise the skills levels and qualifications of the workforce.
17. Population (crime & fear of crime): Reduce crime, fear of crime and antisocial behaviour.

Habitats Regulations Assessment

2.7 The MLP was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended) [See reference 6] (and previous versions of these Regulations, as applicable at the time of preparing each stage of the HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the MLP was undertaken and reported on separately from the SA.

2.8 The HRA Report [See reference 7] that was submitted alongside the MLP was prepared by WCC in May 2019 in relation to the Publication Version MLP. An Outline of Record [See reference 8] was also prepared to summarise the HRA process and findings. Revised, 'post submission' versions of these documents were published in February 2020 to take into account advice shared in February and September 2019 outlining work Natural England was currently preparing towards the identification of land and watercourses considered to be Functionally Linked (FLL) to the Severn Estuary Special Protection Area (SPA) and Severn Estuary Special Area of Conservation (SAC). However, this did not

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change the overall conclusions of the HRA. The HRA Report concluded that no credible pathways exist through which likely significant effects may arise on any European Site as a result of the MLP either alone or in combination with other plans or projects. The HRA notes the potential for minerals site allocations to result in likely significant effects, but this will be considered through the emerging Mineral Site Allocations Development Plan Document (DPD), given that the MLP only identifies Areas of Search, rather than specific site allocations. The HRA has been an iterative process, with HRA reports also prepared to accompany each of the Second, Third and Fourth Stage Consultations.

2.9 An HRA [[See reference 9](#)] was prepared to accompany the Worcestershire Minerals Local Plan Schedules of Main and Additional Modifications. The HRA screening stage for the MLP incorporating Main and Additional Modifications concluded that there could be likely significant effects on the integrity of European sites and therefore Appropriate Assessment was required. It is noted that this was a result of additional evidence regarding the location and extent of proven and potentially functionally linked land and watercourses within Worcestershire, rather than the modifications themselves. Nevertheless, the Appropriate Assessment stage of the HRA for the MLP incorporating Main and Additional Modifications concluded that no adverse effect on the integrity of a European site is predicted, either alone or acting in combination with other plans or projects, and no residual effects are anticipated.

Chapter 3

How the Environmental Report has been taken into account

3.1 As explained above, the SA process for the MLP was undertaken iteratively, with the SA Reports at each stage informing the Plan. As part of the SA process, an assessment of the sustainability and environmental effects was made at each stage of the MLP's development.

3.2 The SA assessed all policies and proposals in each iteration of the MLP and their reasonable alternatives, including the Main Modifications made to the MLP following its submission. This helped WCC to formulate its approach with regards to which options to take forward, alongside other material planning considerations.

3.3 The preparation of the SA Reports (which meet the requirements of an 'Environmental Report' under the SEA Regulations) at each stage of the MLP's preparation, and how the SA was taken into account are set out below, according to the relevant MLP consultation stage.

Worcestershire Minerals Local Plan First Stage Consultation (2012)

3.4 The Council carried out a First Stage Consultation on the MLP between 9th October 2012 and 11th January 2013. The SA Scoping Report produced in October 2012 accompanied this stage.

3.5 The Scoping stage of the SA involved gathering information on the sustainability baseline and key issues in Worcestershire and set out the SA framework, against which plan options (including site options) were appraised.

Worcestershire Minerals Local Plan Second Stage Consultation (2013)

3.6 The Worcestershire Minerals Local Plan Second Stage Consultation built on responses received during the First Stage Consultation to provide a clearer direction for minerals working in Worcestershire. It set out:

- The likely scale of minerals that the plan would need to provide for, and ways in which these targets could be met.
- Key issues in a more accessible way through a 'Portrait of Worcestershire'.
- A draft vision and objectives.
- A range of options for addressing specific issues through policies.

3.7 The vision, objectives and broad policy options were subject to SA, the results of which were published for consultation alongside the MLP Second Stage Consultation document from 11th November 2013 to 31st January 2014.

3.8 The Worcestershire Minerals Local Plan Second Consultation Draft Initial Sustainability Appraisal (November 2013) [[See reference 10](#)] (hereafter referred to as the Initial SA Report) was produced at this stage. The Initial SA Report appraised the emerging options in order to inform the next stage of MLP preparation. Many aspects of the Second Stage Consultation presented a general direction for the MLP or discussed relevant issues, rather than identifying specific options. As such, much of the accompanying Initial SA Report provided general commentary on the MLP, rather than an assessment of specific options against each of the SA objectives. The SA also suggested a number of possible alternatives to the approach set out in the MLP, but most of these were not considered to be reasonable alternatives by WCC.

First and Second Calls for Sites (2014 and 2015)

3.9 The Council carried out the First 'Call for Sites' in Summer 2014 and the Second 'Call for Sites' in Summer 2015. These were designed to allow landowners and minerals operators the opportunity to propose locations for the Council to consider as site allocations for future mineral working.

3.10 The Call for Sites consultations were not accompanied by any SA documents as they did not themselves set out any proposals, and were part of the technical evidence base to inform the Third Stage Consultation.

Worcestershire Minerals Local Plan Third Stage Consultation (2016/2017)

3.11 The third consultation document was more detailed, setting out a full draft of proposed policies and site allocations. The consultation included a Third Call for Sites. Consultation was held between 14th December 2016 and 8th March 2017.

3.12 The Worcestershire Minerals Local Plan Third Stage Consultation Sustainability Appraisal Environmental Report (December 2016) [**See reference 11**] (hereafter referred to as the December 2016 SA Report) accompanied the Third Stage Consultation. The December 2016 SA Report appraised the emerging options in order to inform the next stage of MLP preparation. A number of additional options were considered for various aspects of the MLP, but these were generally not considered to be reasonable. The 30 site options submitted were appraised as part of the SA. All of the SA recommendations on the draft objectives in the Second Stage Consultation MLP were addressed in the Third Stage Consultation MLP, which also took into account consultation feedback to develop an additional MLP objective.

3.13 The results of the SA of the Third Stage Consultation MLP are presented in Appendix 12 of the SA of the Publication Version MLP.

Fourth Call for Sites (2017/2018)

3.14 The Council carried out the Fourth ‘Call for Sites’ between September 2017 and January 2018 in order to respond to concerns raised in the Third Stage Consultation which had highlighted that there were not enough mineral workings in Worcestershire to deliver the level of minerals supply required from the county.

3.15 The Call for Sites consultation was again not accompanied by any SA documents as it did not set out any proposals, and was instead part of the technical evidence base to inform the Fourth Stage Consultation.

Fourth Stage Consultation (2018/2019)

3.16 The Worcestershire Minerals Local Plan Fourth Stage Consultation set out the proposed vision and objectives for mineral development in Worcestershire and included the proposed strategic and development management policies that would be used to make decisions on planning applications. The Fourth Stage Consultation ran from 17th December 2018 to 8th February 2019. The Fourth Stage Consultation was accompanied by the Sustainability Appraisal of the Worcestershire Minerals Local Plan Fourth Stage Consultation (November 2018) (hereafter referred to as the November 2018 SA Report). The SA included assessments of updated and new policies and 167 Areas of Search.

3.17 The two new policies (Policies MLP 2 and MLP 3) were added largely in response to consultation comments and recommendations made in the SA. Consultation responses influenced Policies MLP 1 to MLP 32, which were updated and refined during the Fourth Stage Consultation.

3.18 In response to the Third Stage Consultation, concerns were raised about the ability of the plan to supply adequate sand and gravel resources and the reliance on windfall. This was due to the small number of specific sites and preferred areas proposed in the consultation document, the robustness of the site selection process and the large scale of strategic corridors (which had the status of areas of search) lacking certainty about where development would take place. Therefore, specific sites and preferred areas were no longer allocated in the Fourth Stage Consultation MLP, as it was decided that alternatives would be considered and appraised during preparation of the new separate Mineral Site Allocations DPD.

3.19 The November 2018 SA Report made a number of recommendations in relation to the vision, Policy MLP 29 and ensuring that minerals development did not limit the ability of waste sites to carry out their operations or restrict opportunities to expand. WCC took forward the recommendation for the Vision to make reference to supporting renewable energy provision within minerals development. Other recommendations were not taken forward as WCC did not consider them appropriate or necessary. Full details of the recommendations made and WCC's responses are contained within Table 9.1 of the SA of the Publication Version MLP.

3.20 Full details of the alternatives assessed in the Fourth Stage Consultation MLP were presented within Chapter 8 of the SA of the Publication Version MLP.

Worcestershire Minerals Local Plan Publication Version Consultation (2019)

3.21 Consultation on the Worcestershire Minerals Local Plan Publication Version Consultation was held between 19th August 2019 and 30th September 2019.

3.22 The Publication Version Consultation MLP was accompanied by the SA of the Publication Version MLP. The Publication Version Consultation MLP

included updates to a number of policies, which were assessed through the SA. Full details of the alternatives assessed in the Publication Version MLP were presented within Chapter 8 of the SA of the Publication Version MLP. No additional reasonable alternatives were identified to those discussed for previous stages of the SA and MLP. Updates to the SA required at this stage were relatively minor and the SA did not make any further recommendations for the MLP at this point.

Submission to the Secretary of State

3.23 The SA of the Publication Version MLP was submitted to the Secretary of State alongside the Worcestershire Minerals Local Plan Publication Version on 17th December 2019.

Sustainability Appraisal of the Worcestershire Minerals Local Plan Main Modifications Addendum (July 2021)

3.24 Examination of the MLP took place from December 2019 – May 2022.

3.25 Following Examination hearings, WCC worked with the Inspectors to prepare a Schedule of Main Modifications to the Publication Version MLP. The Proposed Main Modifications were subject to SA and the findings were presented in the Sustainability Appraisal of the Worcestershire Minerals Local Plan Main Modifications Addendum (July 2021) **[See reference 12]** (hereafter referred to as the July 2021 SA Addendum). The purpose of the SA Addendum was to consider whether the Proposed Main Modifications were likely to have any new or different sustainability effects to those identified in the SA of the Publication Version MLP and to carry out any necessary additional SA work.

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The Main Modifications included five new spatial strategy policies, which collectively replaced the previous Policy MLP 1 as set out in the Publication Version MLP. These new spatial strategy policies are:

- MLP 1: Spatial Strategy.
- MLP 2: Strategic Location of Development – Specific Sites and Preferred Areas.
- MLP 3: Strategic Location of Development – Areas of Search and Windfall Sites within the Strategic Corridors.
- MLP 4: Strategic Location of Development – Windfall Sites outside the Strategic Corridors.
- MLP 5: Extant Mineral Sites and Safeguarded Resources.

3.26 The Schedule of Main Modifications also presented five new Supply of Mineral Resources policies as follows:

- MLP 14: Scale of Sand and Gravel Provision.
- MLP 16: Scale of Crushed Rock Provision.
- MLP 18: Scale of Brick Clay Provision.
- MLP 20: Scale of Silica Sand Provision.
- MLP 22: Scale of Building Stone Provision.

3.27 The Main Modifications presented one new development management policy: MLP 29: Air Quality and alterations were presented to the boundaries of 27 areas of search. This included:

- Nine terrace and glacial sand and gravel areas of search.
- 10 solid sand areas of search.
- Seven silica sand areas of search.
- One brick clay area of search.

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3.28 These new policies and areas of search were appraised in the July 2021 SA Addendum. The proposed Main Modifications and accompanying SA Addendum were subject to consultation between 31st August 2021 and 12th October 2021.

3.29 Overall, whilst there were some changes to the SA findings that were presented in the SA of the Publication Version MLP, primarily in terms of assessing the new policies and areas of search, the overall intention of and strategy for the MLP remained the same, and therefore the overall sustainability of the MLP as a whole was not considered to be changed by the Main Modifications. As such, no further recommendations were made in the SA Addendum.

3.30 Following consultation on the Main Modifications and the associated SA Report, the Inspector's Report concluded that, with the inclusion of the recommended modifications, the MLP satisfies the requirements of Section 20 (5) of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness in the National Planning Policy Framework. No further SA work is required following the publication of this report.

Chapter 4

How opinions of consultation bodies and the public have been taken into account

4.1 At each stage of the Worcestershire Minerals Local Plan's development, an SA Report was published alongside the MLP document for consultation with the public and the consultation bodies specifically referred to in the SEA Regulations (Historic England, the Environment Agency and Natural England). The SEA Regulations require that the SEA Adoption Statement provides an account of how any opinions expressed by the public and the consultation bodies have been taken into account.

4.2 The MLP consultation stages and responses received relating to the SA documents are summarised below.

SA Scoping Report (October 2012)

4.3 The SA Scoping Report was subject to consultation between October 2012 and January 2013, including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency and Natural England).

4.4 This provided an opportunity for consultees to comment on the proposed scope of the SA, including whether the objectives in the SA framework provided a reasonable basis for assessing the likely significant effects of the MLP and whether the review of relevant plans, policies and programmes (the 'PPP' review) and baseline information were appropriate and complete.

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4.5 Comments received on the SA Scoping Report were taken into consideration and addressed in the following consultation stages. The majority of the comments related to minor text changes with potential revision of the SA framework in relation to extending supporting indicators. Full details of how each response was addressed were set out in Appendix 1 of the SA of Publication Version MLP.

Initial SA Report (November 2013)

4.6 The Initial SA Report accompanied the Second Stage Consultation MLP for consultation between November 2013 and January 2014. The Second Stage Consultation MLP built on responses received on the first consultation to provide a clearer direction for minerals working in Worcestershire. It set out the likely scale of minerals that the plan would need to provide for, and ways in which these targets could be met. It also set out the key issues in a more accessible way through a 'Portrait of Worcestershire', and included elements common to most planning policy documents. Consultation comments received in relation to the Initial SA Report were taken into account in further stages of the SA. Specific monitoring indicators for the historic environment were included in relation to comments received from Historic England. Full details of how each response was addressed were set out in Appendix 1 of the SA of the Publication Version MLP.

December 2016 SA Report

4.7 The December 2016 SA Report accompanied the Third Stage Consultation MLP for consultation between December 2016 and March 2017. Several changes were made to the SA framework between the Initial SA Report and the December 2016 SA Report. These changes were intended to simplify the process and to avoid repetition and irrelevant content.

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4.8 The Third Stage Consultation developed the issues set out in the Second Stage Consultation into proposed policies. These were informed by consultation responses and the Initial SA Report. The Third Stage Consultation MLP updated the MLP objectives in response to recommendations of the SA and consultation feedback, including developing an additional MLP objective.

November 2018 SA Report

4.9 The November 2018 SA Report accompanied the Fourth Stage Consultation MLP for consultation between December 2018 and February 2019.

4.10 A number of comments were received and responded to in relation to the November 2018 SA Report which related to monitoring indicators, support for the approach of Objective MO3, and clarity on why policy options were progressed. However, none of the comments resulted in changes to the SA report at future stages.

SA of the Publication Version MLP (May 2019)

4.11 The SA of the Publication Version MLP was published alongside the Publication Version Consultation MLP for consultation between August and September 2019 and was later submitted alongside the Publication Version Consultation MLP for examination. No representations were made relating to the SA of the Publication Version MLP. Therefore, it was not necessary to update the SA.

July 2021 SA Addendum

4.12 Following examination hearings held between November and December 2020, an SA Addendum (July 2021) was prepared and published alongside the Council's Schedule of Main Modifications for public consultation between August and October 2021. The purpose of the July 2021 SA Addendum was to consider whether the proposed modifications were likely to have any new or different sustainability effects to those identified in the SA of the Publication Version MLP and to carry out any additional SA work required. Following consultation on the Main Modifications, the consultation responses, Schedule of Main Modifications and July 2021 SA Addendum were sent to the Inspectors for consideration as part of the Examination.

Chapter 5

Why the Adopted Minerals Local Plan was chosen in light of the other reasonable alternatives dealt with

5.1 WCC considered a range of reasonable alternative options during the preparation of the MLP, particularly in relation to strategic policies addressing the scale and distribution of additional growth. Alternative options for development site allocations were also considered. However, it is important to note that the starting point for the preparation of the MLP was the evidence base and existing policy. As such, many elements of the MLP evolved through the various stages of consultation, rather than having a distinct set of alternatives from the start. WCC's 'Evolution of the Minerals Local Plan and Reasonable Alternatives up to Fourth Stage Consultation' (November 2018) document sets out this evolution in detail. No additional reasonable alternatives were identified in the subsequent stages of the MLP preparation.

5.2 Information considered by WCC before final decisions were made included:

- The SA findings, particularly the significant effects generated by each option.
- The MLP's vision and objectives.
- Results of consultation and engagement with the general public and key stakeholders.
- The evidence base for the MLP.

5.3 The options considered for the MLP are described below alongside a summary of WCC's reasons why the preferred options were selected over the reasonable alternatives. More detailed information about why individual options

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were selected or rejected can be found in Appendix 6 of the SA of the Publication Version MLP.

Vision and Objectives

5.4 The MLP sets the vision and strategic objectives for mineral development in Worcestershire, setting out what the Plan is aiming to achieve by 2036 and beyond. This includes providing for a steady and adequate supply of minerals, mitigating and adapting to climate change, supporting the local economy, and protecting and enhancing the health, well-being and safety of people and the environment.

5.5 The Vision and Objectives were appraised within the SA process starting with the Initial SA Report. The spatial approach within the MLP has been developed by WCC with the aim of delivering the spatial vision, informed by a range of technical evidence-based studies as well as the SA. The Initial SA recommended more clarity over the minerals supply objectives (1 and 2) and how they related to each other. The vision and objectives were further refined and updated through the consultation stages, each accompanied by an updated SA assessment. The vision and objectives are valuable parts of the MLP, but do not set policy and, as such, do not require the consideration of reasonable alternatives.

Areas of Search

5.6 The Publication Version MLP identified 167 Areas of Search within five categories:

- Building Stone (13 Areas of Search)
- Terrace and Glacial Sand and Gravel (70 Areas of Search)
- Silica Sand (41 Areas of Search)

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- Solid Sand and Gravel (30 Areas of Search)
- Brick Clay (13 Areas of Search)

5.7 Areas of Search are broad areas where extraction is considered appropriate. All 167 reasonable options identified were included in the Publication Version MLP, in order to provide flexibility and to maximise opportunities for minerals development to come forward in the county. No further reasonable alternatives were identified.

5.8 The Schedule of Main Modifications presented alterations to the boundaries of 27 Areas of Search. These comprised:

- Nine terrace and glacial sand and gravel Areas of Search.
- 10 solid sand Areas of Search.
- Seven silica sand Areas of Search.
- One brick clay Areas of Search.

5.9 In addition, four new Areas of Search for building stone were identified and included in the MLP for the same reasons set out above (to provide flexibility and maximise opportunities for minerals development). The new and revised Areas of Search were appraised through the July 2021 SA Addendum. For the majority of Areas of Search, the change in boundary did not affect the overall SA assessment that was presented in the SA of the Publication Version MLP, although there were some small changes in the particular environmental, historic and/or recreational assets that may be within or adjacent to the Areas of Search.

5.10 Note that 30 alternative specific site and preferred area options were identified through the First and Second Calls for Sites, all of which were subject to SA. However, specific sites and preferred areas were no longer included for consideration in the MLP as of the Fourth Stage Consultation MLP, and alternatives are instead being considered and appraised during preparation of the separate Mineral Site Allocations DPD.

Spatial Strategy Policies

5.11 The Spatial Strategy for the MLP is to encourage mineral development in Worcestershire to be located in the five strategic corridors, which contain clusters of key and significant mineral resources within coherent landscapes. The MLP contains a set of policies with different requirements for each strategic corridor which apply to all proposals within them, rather than specific policies for each area of search.

5.12 Although specific sites and preferred areas were considered in early iterations of the MLP, from the Fourth Stage Consultation MLP onwards WCC opted to maintain an approach of having site-specific criteria and broad Areas of Search, with specific sites and preferred areas to be allocated in a separate Mineral Site Allocations DPD. In the Second Stage Consultation MLP Areas of Search were only proposed for aggregate minerals and are discussed above. At the Second Stage Consultation, a range of options for delivering restoration priorities were identified and subject to SA in the Initial SA Report. These options included consideration of whether to develop a single set of policies to apply to all areas of search, or to develop separate policies for each.

5.13 At the Third Stage Consultation, two alternatives for identifying strategic corridors were identified and assessed in the Third Stage SA Report. These included whether to identify a larger number of smaller corridors, and whether to base corridors on Environmental Character Areas. However, the corridors are guided by an evidence base and, as such, once the approach was agreed the corridors were, to an extent, 'self-selecting'. In addition, the joined-up, landscape-scale benefits that are predicted under the corridor profiles are less likely to be realised if corridors are smaller and sites less well connected.

5.14 There were also two alternatives identified at this stage and subject to SA in the December 2016 SA Report, relating to whether to include specific thresholds or buffers (such as distances from sensitive receptors). However, these options were not subject to full SA as the issues were considered to be

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similar to those set out in the 'a larger number of smaller corridors' assessment as set out in the Spatial Strategy alternatives.

5.15 As well as establishing the five strategic corridors, the Third Stage Consultation identified four specific sites and two preferred areas for minerals extraction, although as explained above, these no longer form part of the MLP. Alternatives to Policy MLP 1 in the Third Stage Consultation MLP, concerning the strategic location of development, were subject to SA in the December 2016 SA Report.

5.16 During the Fourth Stage Consultation, Policies MLP 1 to MLP 8 were updated and refined to reflect recommendations made in the SA and consultation responses on the Third Stage Consultation. There were two new policies (Policies MLP 2 and MLP 3) which were added largely in response to consultation comments and recommendations of the SA. Minor policy updates were made to MLP 1-3 and Policies MLP 4-8 in the Publication Version Consultation MLP.

5.17 Appendix 2 of the adopted MLP sets out much of the Council's reasoning behind the approach taken. The priorities identified for each strategic corridor will drive how mineral working and restoration takes place in order to maximise multifunctional green infrastructure gains at a landscape scale to benefit the environment, the economy and communities.

5.18 While individual sites could deliver on-site green infrastructure benefits in isolation, greater gains can be delivered by pursuing a co-ordinated approach across a wider area. The priorities have been tailored to each strategic corridor, identifying integrated multifunctional priorities that are outcome focused. This will help to maximise the benefits which can be delivered by mineral working and restoration and result in benefits across multiple sites that are greater than could be achieved by considering each site in isolation.

5.19 Identifying these priorities provides certainty to developers and decision makers as to the expectations for mineral working and restoration, whilst the plan as a whole provides the flexibility for site-specific issues to be taken into

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account. As the identified priorities are multifunctional and are appropriate to the landscape character, ecology, geology and hydrology of the corridor, they should be cost-effective for developers to implement whilst maximising gains across the components of green infrastructure.

5.20 The new spatial strategy policies set out in the Main Modifications collectively replace the previous Policy MLP 1: Strategic Location of Development, as set out in the Publication Version MLP. These new spatial strategy policies are:

- MLP 1: Spatial Strategy.
- MLP 2: Strategic Location of Development – Specific Sites and Preferred Areas.
- MLP 3: Strategic Location of Development – Areas of Search and Windfall Sites within the Strategic Corridors.
- MLP 4: Strategic Location of Development – Windfall Sites outside the Strategic Corridors.
- MLP 5: Extant Mineral Sites and Safeguarded Resources

5.21 The new spatial strategy policies were developed in response to issues and recommendations raised through the Examination and were appraised in the July 2021 SA Addendum.

Steady and Adequate Supply of Mineral Resources

5.22 At the Second Stage Consultation, three reasonable alternatives for dealing with the provision of aggregates were identified, which included different assumptions regarding the permitted landbank and shortfall in landbank at the start of the plan period. These were subject to SA in the Initial SA Report. As a result of consultation feedback and new national Planning Practice Guidance,

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the Third Stage Consultation MLP adopted aggregates targets based on past sales. Evidence showed that Worcestershire did not have a sufficient landbank of resources to satisfy national policy requirements.

5.23 In relation to the annual requirements of aggregates, seven reasonable alternatives were identified and subject to SA in the Initial SA Report, which included adopting local aggregate assessment figures, adopting the 10 year sales average, expressing levels as a minima/maxima, whether or not to include a target for recycled/secondary materials and whether to separate out different elements of aggregate provision. However, following the Second Stage Consultation, guidance on the production of Local Aggregate Assessments was published in national Planning Practice Guidance. The Worcestershire Local Aggregate Assessment 2016 was developed in accordance with the latest guidance and was used to determine the annual requirements of aggregates. The MLP supports the use of recycled and substitute, secondary and recycled materials and minerals waste in aggregate supply. However, a lack of data on the use of substitute materials, as well as lack of data on recycled aggregates from mobile plant, means there is not enough evidence to set a specific target for this. As a result of the SA and consultation responses, the Third Stage Consultation considered sand and gravel requirements separately to crushed rock.

5.24 No further reasonable alternatives were identified within the Third Stage Consultation MLP as the draft policies were based on the evidence set out in the background documents.

5.25 At the Fourth Stage, Policies MLP 9 to MLP 16 were updated and refined to reflect recommendations made in the SA and consultation responses from the Third Stage Consultation. Policies MLP 11, 12, 13 and 16 were updated and refined to ensure consistency in the style of wording throughout the plan following the Fourth Stage Consultation. Further details are presented in Chapter 6 of the December 2016 SA Report.

5.26 The Schedule of Main Modifications presented five new Supply of Mineral Resources policies as follows:

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- MLP 14: Scale of Sand and Gravel Provision.
- MLP 16: Scale of Crushed Rock Provision.
- MLP 18: Scale of Brick Clay Provision.
- MLP 20: Scale of Silica Sand Provision.
- MLP 22: Scale of Building Stone Provision.

5.27 The five new policies were developed in response to issues and recommendations raised through the Examination and were appraised through the July 2021 SA Addendum.

Development Management Policies

5.28 The First Stage Consultation MLP did not propose any development management policies, but rather set out the broad issues that should be considered when developing such policies at the next stages of plan-making.

5.29 The Second Stage Consultation MLP included more detail on the likely topics for criteria-based policies, as a result of consultation feedback and the consideration of a significant amount of additional policy and guidance. The Initial SA Report was unable to appraise the likely sustainability impacts of this approach in detail, as there was insufficient information on the policies. Rather, the SA provided a broad commentary on the emerging policy direction, and found that, if addressed appropriately, the issues identified would help to ensure negative sustainability impacts were minimised during operational phases of mineral workings.

5.30 The Third Stage Consultation had developed the issues set out in the Second Stage Consultation into 11 proposed policies. The policies took account of all of the SA issues raised in the Initial SA Report, as recorded in Chapter 6 of the December 2016 SA Report.

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5.31 At the Fourth Stage, Policies MLP 17 to MLP 30 were updated and refined to reflect recommendations made in the SA and consultation responses from the Third Stage Consultation MLP, to reflect changes in national policy, or to ensure consistency in the style of wording throughout the plan. Policies MLP 18 to MLP 30 were further refined and updated within the Publication Version Consultation.

5.32 There were two new policies (Policies MLP 17 and MLP 18). Policy MLP 17 incorporated many of the points previously included in policy MLP 15 of the Third Stage MLP, but strengthened requirements to balance the need for mineral resources with the need to achieve final landforms and restoration that deliver multifunctional benefits, which was highlighted in consultation responses to the Third Stage Consultation MLP. Policy MLP 18 was added in response to consultation comments and recommendations of the SA, and reflects national Green Belt policy.

5.33 Previous Policy MLP 20 from the Third Stage Consultation MLP was split into two policies in the Fourth Stage Consultation MLP: to Policies MLP 24 and MLP 25, to ensure it was clear that all soil resources should be protected, not just those on high-quality agricultural land. Previous Policy MLP 22 from the Third Stage Consultation MLP was split into Policies MLP 27 and MLP 28, to add clarity around the issues of water quality and quantity (MLP 27) and flooding (MLP 28).

5.34 Previous Policies MLP 24 and MLP 25 from the Third Stage Consultation MLP were combined within Policy MLP 29 from the Fourth Stage Consultation MLP as WCC considered the majority of issues relating to transport within sites to be sufficiently covered by other policies. Previous Policy MLP 15 from the Third Stage Consultation MLP was no longer in the Fourth Stage Consultation MLP, largely because its contents were covered by other policies.

5.35 The Main Modifications presented one new development management policy: MLP 29: Air Quality, which was formerly part of MLP 19: Amenity in the Publication Version MLP. The separate air quality policy was developed in

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response to issues and recommendations raised through the Examination and was appraised within the July 2021 SA Addendum.

Safeguarding Minerals and Supporting Infrastructure

5.36 The First Stage Consultation recognised the need for safeguarding of mineral resources. However, no indication was provided on the policy approach to achieving this.

5.37 The Second Stage Consultation considered safeguarding in more detail. Although it did not propose specific policy at that stage, it did set out how the issues would be approached in the next stage(s) of the MLP. Two reasonable alternatives were identified and subject to SA in the Initial SA Report: considering whether to safeguard resources and infrastructure or not. The Second Stage MLP included policies relating to safeguarding mineral resources and supporting infrastructure, in order to ensure these are available for future use, if and when required. This approach was proposed as it satisfied the safeguarding requirements of national policy.

5.38 The Third Stage Consultation MLP addressed the points raised in the SA, as well as others made during the consultation. The approach to building stone was amended following consultation responses and the findings of the Initial SA Report. Further details are presented in Chapter 6 of the December 2016 SA Report.

5.39 At the Fourth Stage, Policies MLP 31 (Safeguarding Locally and Nationally Important Mineral Resources) and MLP 32 (Safeguarding Mineral Sites and Supporting Infrastructure) were updated and refined to reflect recommendations of the SA and consultation responses on the Third Stage Consultation MLP. Policies MLP 31 to MLP 32 were further refined and updated within the Publication Version Consultation. No additional SA appraisals were required as a result of the Main Modifications.

Chapter 6

How the significant environmental effects of the implementation of the MLP will be monitored

6.1 The SEA Regulations require that “The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” (Regulation 17), and that the Environmental Report should provide information on “a description of the measures envisaged concerning monitoring” (Schedule 2).

6.2 Planning Practice Guidance (PPG) on SA states that it is not necessary to monitor everything and monitoring should be focused on the significant sustainability effects, including significant effects where there is uncertainty and where monitoring would enable preventative or mitigation measures to be taken. However, in order to address the requirement in SEA Regulation 17 noted above to “identify unforeseen adverse effects at an early stage and be able to undertake appropriate remedial action”, and taking a precautionary approach, measures have been proposed to monitor sustainability effects for all the objectives in the SA framework.

6.3 The indicators recommended to be used by WCC to monitor the potential sustainability effects of implementing the MLP are set out by each SA objective below (*indicators taken from the MLP itself are marked with an asterisk):

- 1. Safeguard and strengthen landscape character and quality and minimise negative visual impact
 - All permitted mineral developments adequately demonstrate that they will conserve and enhance the character and distinctiveness of the

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landscape, including inherent landscape character and Areas of Outstanding Natural Beauty.*

- Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*
- Condition of the landscape.
- Planted ancient woodland sites restored to native woodland.
- 2. Conserve and enhance Worcestershire's biodiversity and geodiversity
 - All permitted mineral developments adequately demonstrate that they will conserve, enhance and deliver net gains for biodiversity.*
 - All permitted mineral developments adequately demonstrate that they will conserve and enhance geodiversity.*
 - Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*
 - Condition of European nature conservation sites.
 - Extent and condition of SSSIs.
 - Number of permitted developments coinciding with, or adjacent to, a designated site.
- 3. Preserve and enhance the historic environment and deliver well-designed and resource-efficient development which respects local character and distinctiveness.
 - All permitted mineral developments adequately demonstrate that they will conserve and, where possible, enhance the historic environment.*
 - Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks

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of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*

- Number of grade I and II* listed buildings 'at risk'.
 - Proportion of undesignated heritage assets at risk.
 - Number of permitted developments coinciding with, or adjacent to, a designated site.
- 4. Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural lands, land of Green Belt value, maximising use of previously-developed land and reuse of vacant buildings, whilst safeguarding open space/green infrastructure.
- All permitted mineral extraction and/or engineering operations within the Green Belt adequately demonstrate that they meet the requirements of policy MLP 27.*
 - All permitted mineral developments adequately demonstrate that they will avoid significant development of best and most versatile agricultural land unless they adequately demonstrate it to be necessary.*
 - All permitted mineral developments adequately demonstrate that they will safeguard the long-term potential of best and most versatile agricultural land by enabling the land to retain its longer-term capability for agricultural use.*
 - All permitted mineral developments adequately demonstrate how they will protect and conserve soil resources.*
 - Percentage of applications where the specific consultation response from Mineral Planning Authority with regard to safeguarding is given weight in the planning balance (as detailed in officer and committee reports).*
- 5. Protect and enhance water and air quality

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- All permitted mineral developments adequately demonstrate that they will protect and, where possible, enhance the quality, quantity and flow of surface water and groundwater resources.*
- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on air quality.*
- All permitted mineral developments adequately demonstrate how they will help to secure net improvements in overall air quality or adequately demonstrate why this is not possible.*
- All permitted mineral developments adequately demonstrate that they will minimise the use of water in buildings, plant and transport.*
- Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*
- Number of Air Quality Management Areas (AQMAs) in Worcestershire.
- Proportion of watercourses meeting 'good' status.
- Hectares of potentially contaminated land in Worcestershire.
- 6. Reduce causes of and adapt to the impacts of climate change. Promote energy efficiency and energy generated from renewable energy and low-carbon sources
 - All permitted mineral developments adequately demonstrate that they will use the most sustainable transport options for the movement of minerals and materials.*
 - All permitted mineral developments adequately demonstrate that they will minimise the use of energy in buildings, plant and transport.*
 - All permitted mineral developments adequately demonstrate that they will optimise energy generation from renewable and low-carbon sources.*
 - CO₂ emissions per capita.

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- Total CO₂ emissions by local authority.
- Total final energy consumption by local authority (GWh).
- 7. Ensure inappropriate development does not occur in high-risk flood-prone areas and does not adversely contribute to fluvial flood risks or contribute to surface water flooding in all other areas.
 - All permitted mineral developments adequately demonstrate that they will avoid increasing flood risk to people and property on site or elsewhere and contribute, where possible, to a reduction in overall flood risk.*
 - Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*
- 8. Improve the quality of, and equitable access to, local services and facilities, regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment
 - All permitted mineral developments adequately demonstrate that they will protect and enhance rights of way and public access provision.*
 - Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*
 - Net total km of PROWs lost or re-routed as a result of minerals development.
- 9. Improve the health and well-being of the population and reduce inequalities in health
 - All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on amenity or health and well-being from dust.*

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- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on amenity or health and well-being from odour.*
- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on amenity or health and well-being from noise and vibration.*
- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on amenity or health and well-being from light.*
- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse on amenity or health and well-being from visual impacts.*
- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on amenity or health and well-being from contamination.*
- All permitted mineral developments adequately demonstrate that they will not give rise to an unacceptable adverse effect on air quality.*
- All permitted mineral developments adequately demonstrate how they will help to secure net improvements in overall air quality or adequately demonstrate why this is not possible.*
- All permitted mineral developments adequately demonstrate that they will provide safe access for employees and visitors.*
- Percentage of permitted mineral development proposals that adequately demonstrate how they will conserve and enhance networks of green infrastructure throughout the life of the development by adequately taking account of each of the considerations listed in Policy MLP 7 (a-e).*
- Proportion of population in each ONS general health category.
- Number of formal complaints regarding loss of amenity due to minerals development.

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- 10. Manage waste in accordance with the waste hierarchy: 1) reduce, 2) reuse, 3) recycling and composting, 4) recovery, 5) disposal
 - Number of applications received for development which would enable the supply of minerals from substitute, secondary or recycled materials or mineral waste.*
- 11. Reduce the need to travel and move towards more sustainable travel patterns
 - All permitted mineral developments adequately demonstrate that they will use the most sustainable transport options for the movement of minerals and materials.*
 - All permitted mineral developments adequately demonstrate that they will not have an unacceptable adverse effect on safety or congestion of the local or strategic transport network.*
 - Method of travel to work.
- 12. Develop a knowledge-driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural
 - Maintain or increase % of Worcestershire's Gross Value Added (GVA) from mineral development in relation to the baseline.*
 - Average Worcestershire household income.
 - Percentage employment rate (working age).
 - GVA per hour worked in Worcestershire.
- 13. Provide decent affordable housing for all, of the right quality and tenure and for local needs, in clean, safe and pleasant local environments
 - New affordable homes built per year.
- 14. Provide opportunities for communities to participate in and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community
 - No monitoring necessary.

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- 15. Promote and support the development of new technologies, of high value and low impact, especially resource efficient technologies and environmental technology initiatives
 - No monitoring necessary.
- 16. Raise the skills levels and qualifications of the workforce
 - No monitoring necessary.
- 17. Reduce crime, fear of crime and antisocial behaviour
 - No monitoring necessary.

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References

- 1 LUC, in association with Worcestershire County Council, Sustainability Appraisal of the Worcestershire Minerals Local Plan Publication Version (May 2019)
- 2 LUC, in association with Worcestershire County Council, Sustainability Appraisal of the Worcestershire Minerals Local Plan Main Modifications Addendum (July 2021)
- 3 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).
- 4 Worcestershire County Council, Worcestershire County Council Minerals Local Plan Sustainability Appraisal Scoping report (October 2012)
- 5 LUC, in association with Worcestershire County Council, Sustainability Appraisal of the Worcestershire Minerals Local Plan Fourth Stage Consultation (November 2018)
- 6 The Conservation of Habitats and Species Regulations 2017
- 7 Worcestershire County Council Minerals Local Plan Habitats Regulation Assessment Record of Assessment (May 2019)
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- 9 Worcestershire County Council Minerals Local Plan Updated Habitats Regulation Assessment Screening and appropriate Assessment of the Minerals Local Plan incorporating the proposed Main and Additional Modifications (June 2021)
- 10 Worcestershire County Council, Worcestershire Minerals Local Plan Second Consultation Draft Initial Sustainability Appraisal (November 2013)
- 11 Worcestershire County Council, Worcestershire Minerals Local Plan Third Stage Consultation Sustainability Appraisal Environmental Report

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- 12** LUC, in association with Worcestershire County Council, Sustainability Appraisal of the Worcestershire Minerals Local Plan Main Modifications Addendum (July 2021)

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