

Worcestershire Minerals Local Plan

Response Document

Fourth Stage Consultation on the Worcestershire Minerals Local Plan and

Consultation on proposed methodology for Mineral Site Allocations Development Plan Document

*Contact: Minerals Planning Policy
Economy and Infrastructure
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP*

Email: minerals@worcestershire.gov.uk

Tel: 01905 766374

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1. Introduction

Background to the consultation

The fourth stage consultation on the Worcestershire Minerals Local Plan and consultation on proposed methodology for Mineral Site Allocations Development Plan Document ran from 17th December 2018 to 8th February 2019.

The documents were available on the Council's website, in all Worcestershire public libraries and printed copies were available on request. The consultation was publicised through public notices in the County's newspapers, press releases promoting the consultation and open day, and direct mail to those people registered on the Minerals Local Plan Consultation database, including key stakeholders, members of the public who have registered an interest and all local authorities and parish councils in and adjoining the county.

Consultation on the Sustainability Appraisal and the Habitats Regulations Assessment of the fourth stage consultation version of the Minerals Local Plan was included as part of this. These were made generally available, as well as to the statutory consultees. The responses received on these documents have been passed to the officers preparing the Sustainability Appraisal and Habitats Regulations Assessment and have also been included in this document.

This document sets out the Council's initial officer response to all the comments received. These responses are intended to give the direction of current thinking but may change during the development of the Publication Version of the Minerals Local Plan and the development of the Mineral Site Allocations Development Plan Document.

Many responses used the consultation questionnaire, but those which were written as general responses have been considered under the relevant questions. All responses received up to the close of the consultation on 8th February 2019 have been included, and late responses received by 15th February 2019 have also been included in this document.

Comments received on any of the background documents as part of this consultation are also recorded in this document.

Consultation methods

Details of the consultation and the variety of ways to access the information and respond to the consultation was sent on 17th December 2018 by letter to 136 postal addresses and by email to 626 organisations and individuals registered in our consultation database to receive information on minerals planning¹ (a total of 762 consultees).

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

¹ 94 specific consultees and 42 general consultees by post, 399 specific and 227 general addresses by email.

Public notices were placed in all the newspapers in the county. Media releases were sent at the start of the consultation and again in early January 2019 before the open day event but no outlets chose to run the story.

Social media was also used to raise awareness of the consultation:

- Twitter: five tweets about the consultation and the open day were posted on the County Council's Twitter feed over the consultation period, linking to the dedicated section on the Council's website. The number of impressions from these posts ranged from 715-1,273, with 34 link clicks in total.
- Facebook: five items about the consultation and the open day were posted on the County Council's Facebook page over the consultation period, linking to the dedicated section on the Council's website. The number of people reached by these posts ranged from 1,006 to 2,659, with 39 link clicks in total.
- LinkedIn: five items about the consultation and the open day were posted on the County Council's LinkedIn page over the consultation period, linking to the dedicated section on the Council's website. The number of impressions from these posts ranged from 759-997, with 53 link clicks in total.

An open day was held at the Hive, Worcester, on 21st January 2019. This was designed for residents, parish councils and other interested parties to drop-in and ask us any questions about the consultation. The location for the open day was chosen to be central within the county and took place on a weekday afternoon and in to the evening to try to give people an opportunity to drop in at a time convenient to them. A number of key pages from the consultation document were produced at poster scale, including all of the strategic corridor maps, and these were displayed at each event. The Sustainability Appraisal and Habitats Regulations Assessment documents and the interactive web map were also available for the public to peruse during the events. Digital copies of the documents were available online, with printed consultation documents and paper questionnaires available for the public to take away. A total of 12 people (parish and district Councillors, and members of the public) attended this event. These attendees had specific questions or concerns over the likelihood of development coming forward in their area, and the timescales. There were also more general queries over the process of development and the timescales for adopting the Minerals Local Plan.

Two workshops were also held during the consultation period, by invitation:

- A workshop for members of the minerals green infrastructure steering group to discuss how green infrastructure has been integrated throughout the Fourth Stage Consultation version of the Minerals Local Plan, the changes to green infrastructure priorities for the strategic corridors since the Third Stage, to highlight how green infrastructure assets have been included in the proposed site selection methodology, and to discuss the possibility of developing a Statement of Common Ground. The workshop was held on 10th January so that members could reflect on the workshop discussions as part of their formal responses to the consultations if they wished to.
- A workshop for planning policy and development management officers of the City, Borough and District Councils in Worcestershire to discuss the proposed mineral safeguarding policies. The purpose of the workshop was to explore whether the policies are robust and implementable, and that they avoid conflict with the city, borough and district plans as far as possible, and to discuss the possibility of

developing a Statement of Common Ground. The workshop was held on 24th January so that officers could reflect on the workshop discussions as part of their formal responses to the consultations if they wished to.

A **total of 33 responses** were received by 15th February 2019. This gives an overall response rate of 4.3%.

Summary of responses

The main issues raised in response to this consultation concerning the Minerals Local Plan were:

- The need for flexibility in sand and gravel supply, and potential differences in the markets for sand and gravel deposits in the north and the south of the county.
- Policies were broadly supported, but some points raised to ensure policy wording closely reflects national policy and guidance, specifically in relation to silica sand, biodiversity, the historic environment, and health impact assessments.
- The importance of Worcestershire's river terrace geology in understanding how it was formed and the paleolithic archaeology it may hold. Potential impacts on non-designated archaeology.
- Support for the green infrastructure approach, but with the need for flexibility and ability to manage any conflicting priorities.
- Concern that the strategic corridors and areas of search could result in blight for properties and landowners.
- Updated data availability and minor data errors in some mapped information.
- Transport impacts and the suitability of local road networks for transporting minerals, and concerns over implementation and monitoring to ensure conditions are met.

The main issues raised in response to this consultation concerning the proposed methodology for site selection were:

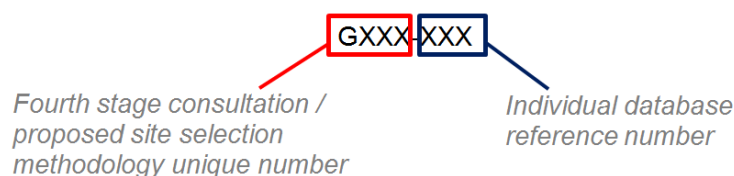
- The need to ensure the best available and most up to date evidence would be used, both in terms of screening criteria and information about individual sites.
- Confusion about thresholds used for analysing mineral deposits and whether these apply to the selection of individual sites.
- Information in relation to particular sites, including the proposal of a further site for consideration.
- The implications of applying the methodology and how the screening criteria would be balanced against the need to facilitate the steady and adequate supply of minerals.
- Queries or suggestions in relation to individual screening criteria and cumulative impacts.

Notes on how the detailed responses sections are organised

The detailed responses sections are organised by question and include all responses received. Individual responses can be viewed on request.

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

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



- Where respondents submitted only general comments, their responses have been split and recorded against the most appropriate "best fit" question from the questionnaire. The responses section follows the format of the questionnaire:
 - Section 2: Consultees who responded to confirm they had no comments
 - Section 3: Fourth stage consultation on the Minerals Local Plan (questions 1-16)
 - Section 4: Minerals Local Plan background documents (question 17)
 - Section 5: Minerals Local Plan statutory assessments (questions 18 – 21)
 - Section 6: Mineral Site Allocations Development Plan Document (DPD) – proposed methodology (question 22)
 - Section 7: Satisfaction with the consultation process (question 23)

Officer responses refer to policy and page references in the Fourth Stage Consultation document and the August 2018 version of the *Location of development: screening and site selection methodology*. These may change in future versions of the documents. Copies of all of the consultation documents and further copies of this document are available on our website www.worcestershire.gov.uk/minerals, or on request.

If you would like any further details please contact:

Minerals and Waste Planning Policy Team
Directorate of Economy and Infrastructure
County Hall
Spetchley Road
Worcester
WR5 2NP

(01905) 766374

minerals@worcestershire.gov.uk

Next steps

All comments received on the Fourth Stage Consultation document (questions 1-16), the minerals local plan background documents (question 17), the statutory assessments of the Minerals Local Plan (questions 18 – 21) and the proposed methodology for the Mineral Site Allocations Development Plan Document (DPD) have been considered and amendments will be made to the relevant documents as necessary.

A Publication Version of the Minerals Local Plan will be considered by Worcestershire County Council's cabinet in June 2019 and Full Council in July 2019. If approved by Full Council, consultation will be undertaken in order to allow representations to be made under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012), before the Plan is submitted to the Secretary of State for independent examination.

The site selection methodology, amended as necessary to address the issues raised in response to this consultation, will be applied to all of the sites which have been proposed in response to the Second Stage Consultation on the Minerals Local Plan, the four subsequent calls for sites, and the additional site put forward in response to this consultation.

Consultation on a draft of the Mineral Site Allocations Development Plan Document will be undertaken in the second half of 2020. The sites which have been proposed can be viewed on the interactive Mineral Sites DPD mapping tool on the Mineral Site Allocations DPD page at www.worcestershire.gov.uk/minerals. As all sites will be considered afresh, no weight will be attached to how a site scored against previous selection criteria.

2. Consultees who responded to confirm they had no comments

Table 1. List of consultees who responded to confirm they had no comments on the Fourth Stage Consultation

Consultees who responded to confirm they had no comments on the Fourth Stage Consultation: 2
G002-1939 Coal Authority G027-1957 Worcestershire County Council in relation to Public Rights of Way

Table 2. List of consultees who responded to confirm they had no comments on the Site Selection Methodology

Consultees who responded to confirm they had no comments on the Site Selection Methodology: 3
G003-2416 National Grid (Wood on behalf of National Grid) G008-1939 Coal Authority G030-2185 Gloucestershire County Council

3. Responses to questions about the Fourth Stage Consultation on the Minerals Local Plan

Question 1. Are any wording changes needed to **CHAPTER 1: Introduction** to improve clarity or to reflect any other issues that should be considered?

Table 3. Overview, showing consultees who responded to Question 1

Consultees who answered "Yes": 1	Consultees who answered "No": 5	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G001-232 Worcestershire Acute Hospitals NHS Trust G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust

Table 4. Detailed comments on Question 1

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	From 1.13 It is understood that the focus of the planning system should be about acceptable use and the impacts of those uses, however the County Council's reliance or assumption that other regimes will operate 'effectively' (perhaps in support) is we consider misplaced. Other regimes exhibit differing approaches to development and do not always act in an effective way in regard to planning issues. A recent and local example was in regard to the Environment Agency granting a permit for the operation of a bottom ash incinerator plant in the green belt. This application was fortunately refused by the County Council when it was considered at the Planning Committee stage due primarily to its green belt location. However the	The National Planning Policy Framework makes clear that the planning system should not duplicate other regimes which control processes or emissions. We consider that the Fourth Stage Consultation version of the Minerals Local Plan approach accords with paragraph 183 of the National Planning Policy Framework, which states: <i>"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning</i>

Consultee	Consultee comments	Initial officer response
	Environment Agency were not on the same page.	<p><i>decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities."</i></p> <p>Changes will be made to paragraph 1.13 to further clarify this.</p>
G017-1081 Worcestershire Wildlife Trust	This Chapter seems clear and appropriate to us.	Support noted.

Question 2. Are any wording changes needed to **CHAPTER 2: Portrait of Worcestershire** to improve clarity or to reflect any other issues that should be considered?

Table 5. Overview, showing consultees who responded to Question 2

Consultees who answered "Yes": 2	Consultees who answered "No": 4	Consultees who provided written comments (see below)
G009-800 Herefordshire & Worcestershire Earth Heritage Trust G012-2459 Wildmoor Residents Association	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G007-1700 Worcestershire Regulatory Services (air quality, contamination) G009-800 Herefordshire & Worcestershire Earth Heritage Trust G012-2459 Wildmoor Residents Association G014-680 Bromsgrove District Council G017-1081 Worcestershire Wildlife Trust G027-1957 Worcestershire County Council G029-717 Natural England G033-2450 Heaton Planning on behalf of Tarmac

Table 6. Detailed comments on Question 2

Consultee	Consultee comments	Initial officer response
G007-1700 Worcestershire Regulatory Services (air quality, contamination)	We note the inclusion of a plan showing Air Quality Management Areas and Air Quality Consultation Areas (Figure 2.18). The resolution of the plan makes it difficult to be sure but it appears that the AQMAs shown require updating, for example the AQMA at Hagley has recently been revoked, whilst a new AQMA has been declared in Wychbold. We are able to provide up to date GIS files if this would be helpful. With regard to the Air Quality Consultation Areas, these	Noted. Figure 2.18 and the interactive minerals mapping tool will be updated.

Consultee	Consultee comments	Initial officer response
	<p>are designed to be a tool for screening planning applications that WRS would like to be consulted on with regard to local air quality management. Please be aware that they are subject to regular review and amendment, again we are happy to provide up to date GIS files if this would be useful.</p>	
<p>G009-800 Herefordshire & Worcestershire Earth Heritage Trust</p>	<p>p37, para 2.110 replace final sentence with: These landscapes closely reflect Worcestershire’s unusually rich and diverse geology.</p>	<p>Noted, a change will be made to this paragraph to reflect this comment.</p>
<p>G009-800 Herefordshire & Worcestershire Earth Heritage Trust</p>	<p>p40, para 2.118 (new para?) Worcestershire’s geology is exceptional as it not only has the oldest rocks in England, in the Malvern Hills, it also represents eight of the twelve subsequent geological periods, culminating in the Quaternary formations created during recent glacial and interglacial times. They include the internationally important Severn and Avon river terraces [ref1], from where our sand and gravel is mostly extracted. These can reveal the dates of formation and tell us much about the river patterns and environments in which they were formed. They can also be a rich source of fossils, exemplified by the extensive finds around 1960 at Upton Warren [ref2] and the discovery in 2016 of mammoth remains at Clifton [ref3]</p> <p>ref1 Bridgland, D. R. 2010. The record from British Quaternary river systems within the context of global fluvial archives. <i>J. Quaternary Sci.</i>, Vol. 25 pp. 433-446. ref2 Coope, G.R., Shotton, F.W., Strachan, I., 1961. A Late Pleistocene fauna and flora from Upton Warren, Worcestershire. <i>Philosophical Transactions of the Royal Society of London</i>, B244, 379-421. ref3 Lovett, P., 2017. Archeological investigations 2012-2016 at Clifton Quarry, Kempsey, Worcestershire. <i>Worcestershire Archaeology (Archive</i></p>	<p>The importance of Severn and Avon river terraces is noted. Changes will be made to the geodiversity section of the Portrait of Worcestershire to reflect this.</p>

Consultee	Consultee comments	Initial officer response
	and Archaeology Service).	
G012-2459 Wildmoor Residents Association	In 2. Portrait of Worcestershire – Greater emphasis should be made about the importance of the Green Belt and the natural beauty of many parts of the County in addition to referring to (as in 2.5) ‘high-quality environmental assets’.	Noted, changes will be made to the context section of the Portrait of Worcestershire.
G012-2459 Wildmoor Residents Association	<p>From 2.12 reference is made to silica sand, yet in earlier consultations high silica sand was not available in Worcestershire. However it is recognised that the naturally bonded moulding sand (cinetic sand) found only in some of the Wildmoor sandstones which once supplied foundries on a large scale is now considerably diminished as referred to in 2.47 and 2.48.</p> <p>In addition as referred to in 2.50 and 2.51, the now very low demand for this type of sand indicates that there will be no future demand for this sand and hence no need for its extraction in the Wildmoor area.</p>	<p>Previous consultations, and the Fourth Stage Consultation, have recognised that high-grade silica sands are not known to be present in Worcestershire. However, the National Planning Policy Framework is clear that mineral planning authorities need to "provide for the extraction of mineral resources of local and national importance", and it defines these as minerals which are necessary to meet society's needs, including silica sand. It does not limit this to only high-grade silica sands.</p> <p>The Fourth Stage Minerals Local Plan therefore refers to, and plans for, the "naturally bonded moulding sands" which is the type of silica sand found in the county. Although in recent years sales of this material have been relatively small (2,000 tonnes for foundry uses in 2013), we understand from the mineral operator that this small amount of material supplies multiple small foundries around the UK, and therefore demand for the material cannot be discounted.</p>
G012-2459 Wildmoor Residents Association	It is recognised in 2.102 that the majority of mineral movements in Worcestershire are transported by road. In Wildmoor there have been four active sand quarries operating simultaneously and all within a short distance of one another. The consequences of those permissions has intensified HGV movements on local roads for many years, which continues. Surely it should be appreciated that granting permission to separate sites in	<p>Policy MLP 29 in the Fourth Stage consultation addresses transport issues, requiring use of the most sustainable transport options and for mineral development not to have unacceptable adverse effects on transport safety or congestion, including not having unacceptable adverse effects on the environment or amenity along transport routes.</p> <p>Paragraph 6.141 states that the</p>

Consultee	Consultee comments	Initial officer response
	<p>close proximity creates considerable pressure on local roads and highways. There needs to be some limit on the scale of transport envisaged and its effect on the local road system in the granting of future permissions.</p>	<p>assessments required by the policy should take account of any cumulative effects from other existing or proposed development.</p> <p>A change to Policy MLP 29 will be made to ensure it is clear that impacts on the local road network must be considered, as well as the strategic transport network.</p>
<p>G012-2459 Wildmoor Residents Association</p>	<p>Under 2.113 and 2.116 it needs to be recognised that the timescales for the restoration or even getting to a point of restoration are measured over some 15 years plus. It is unlikely that most of the Residents of our Wildmoor area will ever see the restoration of the Wildmoor Quarry which appears to be in a perpetual state of continued operation by one means or another. Within the document greater emphasis should be given to the concept of restoration and the required phasing of land restoration and its time margin within permitted quarrying development. Also requiring developers to achieve restoration by a due date rather than allowing them to drag things out indefinitely and to their advantage and not that of the local community. We think it is also fair that local communities (i.e. Parish Councils) should be consulted concerning the detailed restoration of sites.</p>	<p>Changes will be made to the Landscape and Biodiversity sections of the Portrait of Worcestershire to highlight the benefits of high-quality restoration at the earliest opportunity. This concept also forms part of the requirements of policy MLP 17.</p>
<p>G012-2459 Wildmoor Residents Association</p>	<p>Under 2.124 – The landscape of our North East Worcestershire area is in sharp contrast to the large urban conurbation to the north of it. It is a largely rural area of green belt and undulating land forms which are quite beautiful. Not surprisingly with Clent and the Lickey Hills providing a great deal of environmental amenity to the population. The selection of sand extraction sites needs to have a balance against downgrading such assets and causing and preventing the enhancement of this environmental quality. Therefore selection of sites could be more discerning with regard</p>	<p>The landscape differences between different parts of the county are acknowledged and highlighted through the identification of the five strategic corridors and green infrastructure priorities which are appropriate to each of their unique qualities. The policies for each corridor (MLP 4 to MLP 8) require mineral development to contribute towards the quality, character and distinctiveness of the corridor through the delivery and enhancement of green infrastructure networks.</p> <p>Policy MLP 23 (Landscape) also</p>

Consultee	Consultee comments	Initial officer response
	to sand particularly in the north of Worcestershire.	requires mineral development to protect, conserve and enhance the character and distinctiveness of the landscape.
G012-2459 Wildmoor Residents Association	Under 2.126 – Water Environment – whilst figure 2.15 provides the overall County mapping, in Wildmoor there is an aquifer and pumping station (Zone 1) which supplies some 19,000 homes in Bromsgrove. The Surrounding land area of Wildmoor is located in Zone 2 falling off to Zone 3 as it approaches Junction 4 of the M5. The interaction of quarrying and the depth of the watertable is a constant concern for local people. Recent years of flash flooding has also raised questions in this regard. Given the statements made in 2.133 and 2.134 it is extremely important that the Wildmoor aquifer and its surrounding water protection zones are safeguarded.	Source Protection Zones 1 and 2 are shown on Figure 2.17, and this information can also be viewed in the supporting information on the interactive minerals mapping tool at www.worcestershire.gov.uk/minerals . Changes will be made to the text introducing the North East and North West Worcestershire Strategic Corridors to highlight the presence of multiple Source Protection Zones. Policy MLP 27 also requires mineral developments to protect and enhance the quality, quantity and flow of surface water and groundwater resources, and Source Protection Zones are also included in site screening criteria in the <i>Location of development: screening and site selection methodology</i> which was consulted on alongside the Fourth Stage Consultation.
G014-680 Bromsgrove District Council	The Kidderminster Road, Hagley Air Quality Management Area was revoked by Council on the 24 th July 2018 (item 8/18). Therefore this needs to be removed from Figure 2.18 on pg. 46. Please see the following link for the agenda and minutes from this meeting: https://moderngovwebpublic.bromsgrove.gov.uk/mgAi.aspx?ID=24580	Noted. Figure 2.18 and the interactive minerals mapping tool will be updated.
G017-1081 Worcestershire Wildlife Trust	We consider that this chapter presents a clear and appropriate summary of the county and we do not see the need for changes at this stage.	Support noted.
G027-1957 Worcestershire County Council	The MLP fourth stage consultation is well considered in terms of the historic environment. The policies, justifications and expected mitigation are clearly articulated. The one area where the document could perhaps be strengthened is in that of Palaeolithic	Noted, change to be made to the Historic Environment section of the Portrait of Worcestershire to highlight the potential for Palaeolithic artefacts and remains.

Consultee	Consultee comments	Initial officer response
	<p>archaeology and the potential of mineral deposits (particularly sand and gravel) to contribute to our understanding of this period. Understanding of Palaeolithic archaeology can only be achieved in the context of a greater understanding of the geology and we support the comments of the H&WEHT with regard to the internationally important Severn and Avon terraces. Research conducted as part of two separate projects (Russell and Daffern 2014, Fairchild et al. 2018 and Hedge et al. 2019) has enhanced our understanding of the Palaeolithic potential of various parts of the county. We now have refined and targeted research questions for the Palaeolithic. Mineral extraction in the county is likely to impact on significant archaeology of this period and this should be accounted for in any mitigation strategies.</p> <p>Paragraph 2.121: Recommend adding a sentence to the end of paragraph 2.121 as follows: <u>"These glacial deposits often contain not just artefacts of Palaeolithic date, but also faunal and environmental remains that allow us to understand the period and provide context for the artefacts."</u></p>	
G027-1957 Worcestershire County Council	<p>Figure 2.13 Geodiversity assets: Gullet Quarry geological unconformity (beach deposit) is not shown. It may be worth confirming whether this is a SSSI or a local geological site, or part of the wider Malvern Hills SSSI. Clifton Quarry, Ashmoor Common SSSI appears to be missing. This former channel of the river Severn (east of the A38) is a geological and biological SSSI.</p>	<p>Noted. SSSIs which are designated for both biological and geological interest had been omitted from Figure 2.13 in error, although they were displayed in the supporting data of the interactive minerals mapping tool at www.worcestershire.gov.uk. Figure 2.13 will be updated to rectify this error.</p>
G027-1957 Worcestershire County Council	<p>Figure 2.18: An AQMA has now been extended to all of Worcester City.</p>	<p>We have been advised by Worcestershire Regulatory Services that the Air Quality Management Areas (AQMA) in Worcester City as shown on</p>

Consultee	Consultee comments	Initial officer response
		<p>Figure 2.18 in the Fourth Stage Consultation document still stand at present. Although Worcester City Council's Licensing and Environmental Health Committee (8th January 2018) approved the declaration of the city-wide AQMA and revocation of the St Johns, Dolday, and Lowesmoor/Rainbow Hill AQMAs, the official order and ratification has not yet been completed.</p> <p>A change will be made to the air quality section of the Portrait of Worcestershire to highlight this.</p>
G029-717 Natural England	Natural England welcomes the changes in paragraph 2.114 and 2.118 that gives the correct number of SSSIs, further to our comment in the 3rd stage consultation.	Support noted.
G033-2450 Heaton Planning on behalf of Tarmac	Paragraph 2.6 indicates significant levels of growth planned within Worcestershire. It is acknowledged that minerals are required to meet this growth. However, it is not considered that the approach to mineral supply within the emerging Minerals Local Plan reflects the likely demand. The Minerals Local Plan needs a stronger emphasis on ensuring aggregate supply/delivery.	<p>Paragraph 2.8 states that "The primary purpose of the Minerals Local Plan is to enable a steady and adequate supply of minerals from Worcestershire", and 2.12 states that "the most important issues for the Worcestershire Minerals Local Plan are... the steady and adequate supply of aggregates (sand and gravel and crushed rock) to meet identified needs to 2035 and beyond..."</p> <p>The Policies in chapter 4 (spatial strategy) and chapter 5 (supply of mineral resources) are intended to provide a positive framework to ensure the delivery of a steady and adequate supply of aggregates.</p> <p>Of the total "key" and "significant" sand and gravel resources in Worcestershire, 59.9% of terrace and glacial and 80.75% of solid sand resources are included within the strategic corridors and are proposed to be allocated as Areas of Search to facilitate the minerals industry to find and put forward sites. A separate Mineral Site Allocations Development Plan Document is also being prepared to facilitate mineral supply by</p>

Consultee	Consultee comments	Initial officer response
		<p>providing certainty to both the minerals industry and Worcestershire's residents about where minerals development is most likely to be acceptable.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Figure 2.2: Worcestershire has a clear divide in available resource. The northern half of the County and the solid sands (building and mortar markets) with the concreting sand and gravels from the terrace and glacial deposits in the south of the County. The two different resources serve different and distinct markets. Their location within the County will affect the distance they need to travel to market as well as the demand/pull on resources from outside the County to meet demand. The number of active and permitted sites (but non-operational) sites are also small in number which may affect the distance the reserves travel to market. This should be reflected in the County portrait and when reviewing the number of sites required for allocation as well as their location.</p>	<p>Figure 2.2 and the text in paragraphs 2.13-2.29 set out the context of the sand and gravel resources in Worcestershire. Figure 2.2 shows that bedrock solid sand resources of the Wildmoor Sandstone Formation and Kidderminster Formation occur in the north of the county, whilst superficial deposits of terrace and glacial sand and gravel occur across the south of the county, but also overlie the solid sands in the north.</p> <p>Whilst sands of the Wildmoor Sandstone Formation principally provide building and mortar sands, the sand grains of the Kidderminster Formation are coarse to fine grade, and pebbles and cobbles can also be found.² This indicates that there is potential for sand and gravel working in this Formation to provide materials to the concrete market, as well as the building sand and mortar markets.</p> <p>River terrace sand and gravels are generally more varied, and there is evidence from mineral companies' responses to the West Midland Aggregate Working Party's annual surveys that some sales from some sites in the southern half of the county are for building or mortar sands, albeit as a significantly smaller proportion of sales than concreting sand and gravels.</p> <p>Paragraph 2.13 highlights the primary markets for the solid sand resources and the terrace and glacial sand and gravel resources, but also sets out that due to the overlap in their potential markets, they are considered together</p>

² British Geological Survey and Department of the Environment, Transport and the Regions (1999) *Mineral Resource Information for Development Plans. Herefordshire and Worcestershire: Resources and Constraints.*

Consultee	Consultee comments	Initial officer response
		<p>as "sand and gravel" to facilitate mineral operators in supplying all available markets from each resource.</p> <p>A change will be made to this section to strengthen recognition that where a particular resource serves a distinct market, or where suitable resources are not available more locally, materials may travel longer distances to meet demand.</p> <p>As paragraph 2.28 states that "multiple sand and gravel workings are likely to be required over the life of the plan" in order to deliver anticipated sand and gravel requirements, the Mineral Planning Authority does not currently intend to limit the number of sites which could be allocated in the Mineral Site Allocations Development Plan Document. Rather, to maximise the ability for demand to be met and to ensure there is some flexibility for the minerals industry in Worcestershire, all of the sites which have been submitted will be considered against selection criteria, and those which meet the criteria could be allocated as "Specific Sites" or "Preferred Areas" (subject to further consultation and Examination in Public).</p>
G033-2450 Heaton Planning on behalf of Tarmac	<p>Figure 2.3: Figure 2.3 reviews the average sales of sand and gravel. Whilst the 10 year average sales are circa 600,000 tonnes per annum, 2016 figures are showing a decline to 399,000 tonnes. Paragraph 2.23 provides some clarification that the number of 'active sites' were just 3 within the County. Comments regarding this and available productive capacity are provided above in response to the LAA. The reduction in sales should not be construed as a fall in demand. It is essential that the MPA and the Plan forecast future demand (NPPF para 207a) and not solely review historical sales data.</p> <p>With the permitted but inactive</p>	<p>The Mineral Planning Authority agrees that flexibility is required to enable sites to come forward to contribute to sand and gravel supply and to ensure productive capacity in the county would not be significantly impacted by unanticipated events at any particular site. This is recognised in Chapter 5 (supply of mineral resources), and policy MLP 10 in relation to sand and gravel is positively framed, stating that planning permission will be granted for mineral development that will contribute to maintaining a steady and adequate supply of sand and gravel, with policy points requiring information about the contribution the development would make to</p>

Consultee	Consultee comments	Initial officer response
	<p>reserves excluded, the County cannot provide a sufficient landbank of sand and gravel. This leaves the County vulnerable to maintaining the current demand for sand and gravel should there be a down turn in production at any of the active sites either as an operational constraint or the quality of reserves is not as anticipated or in the event of site closures. As a result it is essential that the Plan provides sufficient flexibility for sites to come forward to contribute to the sand and gravel supply.</p>	<p>maintaining the landbank of sand and gravel reserves and/or enabling Worcestershire's productive capacity to be maintained or enhanced.</p> <p>In addition, policy MLP 1 (Strategic Location of Development) is intended to enable mineral development within the Strategic Corridors (part a) which contain 70 areas of search for terrace and glacial sand and gravel and 30 areas of search for solid sand, and through changes at existing sites (part b,i).</p> <p>A separate Mineral Site Allocations Development Plan Document is also being developed to provide additional certainty to both mineral developers and local communities about where mineral development is most likely to be acceptable and to come forward. Producing this as a separate document will also enable it to be reviewed and revised more quickly than the whole Minerals Local Plan could be revised should monitoring indicate that further site allocations are required.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Table 2.1 is indicating the amount of sand and gravel imported and exported from the County. As per comments on figure 2.2 above, the distance of active mineral working to market is likely to determine where it travels to. The number of sites close to the border are an indication that quantities of sand and gravel are likely to be supplying adjacent counties. In addition, the scarcity of resource will dictate markets and may increase travelling distance. Although the table is indicating that in both 2009 and 2014 the County was a net exporter of sand and gravel, the significant increases in imports (almost 2.5 times) between 2009 and 2014 indicates that the active sites and their location are not meeting the demand from within the County and there is a reliance on imports.</p>	<p>As noted above, a change will be made to this section to strengthen recognition that where a particular resource serves a distinct market, or where suitable resources are not available more locally, materials may travel longer distances to meet demand.</p> <p>Cross-boundary movements of minerals are a normal part of the market. The need to understand demand factors is recognised by the Mineral Planning Authority and is addressed as fully as possible in the Local Aggregate Assessment, but the lack of available data makes it extremely difficult to do this with a high level of certainty.</p> <p>Although it is the best source of data we have available on the imports and</p>

Consultee	Consultee comments	Initial officer response
		<p>exports of sand and gravel, significant caution should be applied when considering the data presented in Table 2.1. As noted in footnote 45 on paragraph 2.24, discussion with the authors of the Aggregate Minerals Surveys for England and Wales 2009 and 2014 revealed that the information does not represent a complete dataset from all mineral operators. For 2009, responses were only received for two quarries in Worcestershire, and in 2014 for only 1 quarry. We do not have any information about how reliable the data is from elsewhere in the country.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Paragraph 2.25 discusses the typical distance that aggregates travel. However, the scarcity of resource and the fact that they can only be worked where they are found will dictate the market and the distance it becomes economical for aggregate resource to travel. Within Worcestershire, the supply picture is indicating this is happening – see comments on table 2.1 above. In addition, the supply position within neighbouring Counties – for example Herefordshire and the limited number of active sites will have a ‘knock on’ effect on the availability and demand for reserves within Worcestershire.</p>	<p>As noted above, a change will be made to this section to strengthen recognition that where a particular resource serves a distinct market, or where suitable resources are not available more locally, materials may travel longer distances to meet demand.</p> <p>Worcestershire County Council participates in the West Midlands Aggregate Working Party and has undertaken ongoing discussions with neighbouring mineral planning authorities under the Duty to Cooperate to ensure that supply patterns are understood as fully as possible.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Whilst the NPPF does advocate the use of 10 year sales as part of the assessment for forecasting aggregate demand, this should be used with some caution. As paragraph 2.27 indicates, the sales are not necessarily a reflection of current demand. The total sales can only be the productive capacity of active workings. As per comments above on table 2.1, the demand for aggregate and the amount of resource required for imports may also be a factor in indicating that demand is higher than the average sales. In light of the above the Plan should focus on providing ‘at least’ 11.53 million tonnes of sand and gravel</p>	<p>The baseline Local Aggregate Assessment (using data up to 31st December 2016) was prepared in line with National Planning Policy Framework and Planning Practice Guidance requirements, and the Planning Officers Society and Mineral Products Association's Practice Guidance on the Production and Use of Local Aggregate Assessments (April 2015). The average of the past 10 years sales was used as a starting point, and then other relevant local information considered to determine whether deviation from that figure was warranted. In the baseline Local Aggregate Assessment, no deviation</p>

Consultee	Consultee comments	Initial officer response
	<p>over the Plan period but this should not be construed as a maximum amount. We also support recognition in paragraph 2.28 that a spread of permitted resource is important in ensuring indigenous supply of sand and gravel within the County. In addition to an indication of total Plan requirement, the LAA and the Plan needs to clearly show that sites can meet the annual requirement for sand and gravel provision. From a review of permitted reserves alone identified within the LAA, the life span of these sites will not reach the end of the Plan period.</p>	<p>was required, but that does not mean that it may not be required in future, depending on the information and data available at the time.</p> <p>Your support for paragraph 2.28 is noted. Footnote 53 on paragraph 2.28 recognises that the estimated figure of 11.53 million tonnes of sand and gravel which will need to be permitted over the life of the plan is based on the production guideline from the baseline Local Aggregate Assessment, but that "the plan includes sufficient flexibility to adapt to any changes in the production guideline". For example, paragraph 5.11 refers to the provision of "at least a further 11.53 million tonnes of sand and gravel", and figures for annual production and lifetime provision have purposefully not been included in the policies themselves because the annual production guideline figure in the Local Aggregate Assessment will inevitably vary from year to year. Policy MLP 10 supports mineral development which will contribute to maintaining a landbank for sand and gravel of <u>at least</u> 7 years, whilst being flexible enough to accommodate changes to the balance of demand and supply identified in the Local Aggregate Assessment annually.</p> <p>The Minerals Local Plan recognises that existing permitted sites are unlikely to be sufficient over the life of the plan, which is why areas of search are identified in Chapter 4, and specific sites and preferred areas will be allocated in the separate Mineral Site Allocations Development Plan Document. Paragraph 2.28 recognises that multiple sand and gravel workings are likely to be required over the life of the plan in order to maintain a landbank of at least 7 years.</p>

Question 3. Does **CHAPTER 3: Vision and Objectives** set the appropriate priorities to address the key issues for mineral planning in Worcestershire?

Table 7. Overview, showing consultees who responded to Question 3

Consultees who answered "Yes": 3	Consultees who answered "No": 2	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G021-1942 Historic England G033-2450 Heaton Planning on behalf of Tarmac

Table 8. Detailed comments on Question 3

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	In Chapter 3 Vision and objectives item 3.2 – the visual beauty of the landscape has not been properly addressed sufficiently in existing and previous mineral sites, resulting in a deterioration of the natural environment. This new minerals plan should seek to redress that.	The statements in the vision that minerals development will be part of a holistic approach to delivering sustainable economic growth, supporting health and quality of life, and enhancing the built, historic, natural and water environment, that together contribute to the diverse character of the county and surrounding area, and that mineral sites will make prudent use of mineral resources, balancing the need to extract as much material as possible with the need to achieve final landforms and restoration that delivers multifunctional benefits and is appropriate in the landscape are a direct result of lessons learnt from both good and bad practice in Worcestershire and beyond in the past. Following the Wildmoor Residents' Association's comments on the Third Stage Consultation, it was noted that

Consultee	Consultee comments	Initial officer response
		<p>concerns remained over whether the objectives and policy framework set out in the Third Stage Consultation would be able to achieve the aim stated in the vision. Changes were incorporated in the Fourth Stage Consultation (both in the Vision and in Policy MLP 17, Prudent Use of Resources) to strengthen this concept. Policy MLP 23 (Landscape) also requires proposals for mineral development to demonstrate that they will not have an unacceptable adverse effect on the inherent landscape character.</p>
<p>G012-2459 Wildmoor Residents Association</p>	<p>In regard to item 3.7 and the above comments regarding quarries in close proximity, we would agree that the policy framework needs to ensure that adverse impacts are minimised. It is also recognised that the importance of the green infrastructure as outlined in items 3.10 and 3.11, this paragraph is of considerable significance in the Wildmoor area / the North East Worcestershire Strategic Corridor and must be reinforced for future developments – as currently there is little or no evidence of it. Water protection zones should also be considered as an integral part of the green infrastructure.</p>	<p>Support for paragraphs 3.7, 3.10 and 3.11 noted.</p> <p>As noted above, changes will be made to the text introducing the North East and North West Worcestershire Strategic Corridors to highlight the presence of multiple Source Protection Zones.</p>
<p>G017-1081 Worcestershire Wildlife Trust</p>	<p>We are pleased to support the proposed Vision for the Minerals Local Plan and in particular the references (in paragraphs 1 and 3) to enhancing the natural environment and enhancing multi-functional Green Infrastructure. Minerals development offers considerable potential to deliver net gain in both these areas and we are pleased to see this reflected positively in the county vision. With that in mind we are pleased to support objectives MO2 and MO3 and consider them to be essential in delivering sustainable minerals development in Worcestershire.</p>	<p>Support noted.</p>
<p>G021-1942 Historic</p>	<p><u>Draft Local Plan Objectives and the SA</u> In relation to the Objectives of the</p>	<p>Noted.</p>

Consultee	Consultee comments	Initial officer response
England	<p>Plan, Objective MO3 addresses the built, historic, natural, and water environments in the round which could potentially be of concern since impacts for certain elements could be diluted through any generalised assessment. However, we note that the SA addresses these elements individually. This approach of the SA is supported since, whilst Plan Objective MO3 refers to all the matters, the SA approach provides opportunity for full consideration as separate elements and highlighting synergy where relevant. As such, Historic England has no concerns that Objective MO3 refers to the historic environment with other environmental elements in the round.</p>	
G033-2450 Heaton Planning on behalf of Tarmac	<p>Paragraph 3.2: The footnote to paragraph 3.2 states that, ‘none of the MPA’s around Worcestershire have identified any needs that cannot be met which the Worcestershire Minerals Local Plan needs to address’. It is considered that this should be further quantified having regard to the level of export/import identified within the Plan. Are neighbouring Authorities adequately factoring in the reliance that Worcestershire has on crushed rock supply when there are no active sites? In addition, the Herefordshire LAA has identified that there is only one currently active sand and gravel site within the County (Wellington). Working including the existing and permitted reserve as well as the extensions (subject to gaining planning permission) will not cover the whole of the Herefordshire Plan period. In light of this, it is considered that Worcestershire is likely to have to provide/make some contribution to sand and gravel supply within Herefordshire. In addition, there is more than likely going to be a knock on effect from major infrastructure projects – including HS2 – affecting adjoining Counties. The aggregate requirements for these projects</p>	<p>As noted above, there is limited reliable data relating to the balance of imports and exports of minerals in Worcestershire.</p> <p>Worcestershire County Council has undertaken constructive, active and ongoing discussions with neighbouring authorities and surrounding Aggregate Working Parties under the Duty to Cooperate in relation to the supply of minerals, and particularly in relation to crushed rock, as set out in <i>Worcestershire County Council (2018) Minerals Local Plan Background Document - Strategic cross boundary issue: Crushed rock supply in Worcestershire. Summary of action undertaken under the duty to cooperate</i>, available at www.worcestershire.gov.uk/mineralsbackground.</p> <p>As no crushed rock has been produced in Worcestershire since 2010, the minerals market is already supplying demand from Worcestershire from outside the county, as stated in paragraph 2.37. This is therefore already being reflected in those authorities' sales figures, and being factored this in as they develop their</p>

Consultee	Consultee comments	Initial officer response
	<p>particularly within Staffordshire and the West Midlands will place pressure on other counties including Worcestershire to meet supply. The LAA and emerging Plan should discuss any potential implications for Worcestershire resource over the Plan period.</p>	<p>own Minerals Local Plans. Changes will be made to the footnote (213 in the Fourth Stage Consultation) to clarify this.</p> <p>Herefordshire Council is currently in the process of developing a Minerals and Waste Local Plan, including additional site allocations. Ongoing discussions have not indicated that Herefordshire is seeking to rely on supply from Worcestershire over and above the cross-boundary movements which are a normal part of the minerals market.</p> <p>A Local Aggregate Assessment will be produced annually and considered by the West Midlands Aggregate Working Party. It will consider these issues and the potential impact of HS2 as data becomes available.</p> <p>The Minerals Local Plan has been developed to be flexible enough to enable the required quantum of mineral production as the "production guideline" in the Local Aggregate Assessment alters over the life of the plan. This is recognised in Chapter 5 (supply of mineral resources).</p>

Question 4. Are any changes needed to **Figure 4.1: Key diagram** to improve clarity in indicating broad locations for strategic development?

Table 9. Overview, showing consultees who responded to Question 4

Consultees who answered "Yes": 1	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association

Table 10. Detailed comments on Question 4

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	Because of its scale this Figure 4.1 is of use only as an overview.	Noted. The interactive minerals mapping tool, available at www.worcestershire.gov.uk/minerals , was provided to enable people to see these items in more detail. Changes will be made to make the links to the mapping tool more obvious.
G012-2459 Wildmoor Residents Association	Item 4.8 is concerning as it indicates that 'There is a policy preference in policy MLP1 for mineral development within extant or allocated sites', This seems to imply concentrations of development will be continued.	The policy preference for mineral development within extant or allocated sites is intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan, to facilitate the minerals industry to find and put forward sites, and (combined with the strategic corridor priorities in policies MLP 4 to MLP 8) to provide as much certainty as possible to communities over where and how mineral development might take place. Changes will be made to this section to highlight that the policy preference for

Consultee	Consultee comments	Initial officer response
		<p>mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p>

Question 5. Are any changes needed to the **interactive minerals mapping tool** (which incorporates the Policies Map) to improve clarity?

Table 11. Overview, showing consultees who responded to Question 5

Consultees who answered "Yes": 2	Consultees who answered "No": 4	Consultees who provided written comments (see below)
G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G001-232 Worcestershire Acute Hospitals NHS Trust G009-800 Herefordshire & Worcestershire Earth Heritage Trust G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association

Table 12. Detailed comments on Question 5

Consultee	Consultee comments	Initial officer response
G011-2505 Bright & Associates	The WCC interactive mapping does not differentiate between 'key', 'Not significant' and 'Compromised' for sand and gravel resource areas.	<p>The interactive minerals mapping tool contains two sections: the Policies Map, and Supporting Data.</p> <p>The Policies Map section defines the Minerals Local Plan's land-use designations and allocations, showing the strategic corridors, the areas of search, the Mineral Safeguarding Areas and the Mineral Consultation Areas. This does not differentiate between "key", "significant", "not significant" and "compromised" sand and gravel resources, but only those which are "key" or "significant" were taken forward for designation, as set out in the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground).</p> <p>The Supporting Data section includes "Resources", and this shows the differentiation between key", "significant", "not significant" and "compromised" sand and gravel</p>

Consultee	Consultee comments	Initial officer response
G011-2505 Bright & Associates	There is not a facility for identifying sites put forward in the Call for Sites process, instead these are currently shown on a separate interactive map as Mineral Site allocations DPD (Sites submitted for consideration) http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1 It would helpful to bring information together.	resources. As the sites put forward will not be included in the Minerals Local Plan, and no decisions have yet been made over which should be allocated, it was considered that it would be misleading to include these on the interactive minerals mapping tool supporting the Minerals Local Plan. Instead, they are shown on the separate map for the Mineral Site Allocations DPD. We envisage that once both documents are adopted, then the allocated Specific Sites and Preferred Areas from the DPD will be transferred to the Policies Map section of the main interactive mapping tool.
G012-2459 Wildmoor Residents Association	The interactive mapping tool is a well prepared tool / document but it indicates areas which in all probability would not be able to accommodate extraction – the mapping includes some areas of largely residential land. Aspects of the mapping tool e.g. water environment are useful.	Support for the interactive minerals mapping tool noted. We recognise that some dispersed development may be within the proposed Areas of Search. This has been taken into account when considering the likely importance of mineral deposits in the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground), as the method accounts for some remaining land being overlain by more dispersed development and that not all of the deposit may be available for development. Only those deposits which were still considered "key" or "significant" after adjusting for this have been taken forward for allocation as areas of search, as set out in the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground). As it is not possible to assess which parts of some areas of search may not be suitable for development at strategic scale, this has been further addressed by specifically removing the settlements defined by the City,

Consultee	Consultee comments	Initial officer response
		<p>Borough and District Councils and all site allocations in adopted Local Plans from the proposed Areas of Search and Strategic Corridors.</p> <p>Areas of search are defined in Planning Practice Guidance³ as "areas where knowledge of mineral resources may be less certain [than specific site or preferred area designations] but within which planning permission may be granted, particularly if there is a potential shortfall in supply". The areas of search and strategic corridors are intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan, to facilitate the minerals industry to find and put forward sites, and to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>Changes will be made to Chapter 4 to highlight that the level of certainty of mineral development taking place is lower in areas of search than will be the case for any specific sites and preferred areas which will be allocated in the separate Mineral Site Allocations Development Plan Document, and that the policy preference for mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p>

³ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

Question 6. Are any changes needed to the Strategic Corridors in **CHAPTER 4: Spatial Strategy** to increase certainty over where mineral development is likely to take place or to minimise conflict with other parts of the Development Plan?

Table 13. Overview, showing consultees who responded to Question 6 in relation to the Avon and Carrant Brook Strategic Corridor

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G027-1957 Worcestershire County Council G033-2450 Heaton Planning on behalf of Tarmac

Table 14. Detailed comments on Question 6 in relation to the Avon and Carrant Brook Strategic Corridor

Consultee	Consultee comments	Initial officer response
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	p68, para 4.51: append At the same time, it can deliver and preserve important information about the internationally important river terrace system	Changes will be made to the introductory text about the Avon and Carrant Brook Strategic Corridor to reflect this comment.
G027-1957 Worcestershire County Council	Strategic Corridor boundaries: It is unclear if these follow identifiable features on the ground, such as hedgerows, roads, railway lines and rivers. It is considered that the Strategic Corridor boundaries should be drawn to identifiable boundaries/features.	The strategic corridor boundaries largely follow landscape character types (these are precise boundaries set by the Landscape Character Assessment for individual parcels of land, reflecting where the landscape character changes) and exclude defined settlements and site allocations in adopted Local Plans. The other factors which have been used to define the boundaries of each strategic corridor are set out in Appendix 2 of the Fourth Stage Consultation. The boundaries can also be seen in more detail on the interactive minerals mapping tool at www.worcestershire.gov.uk/minerals .
G033-2450	Whilst it is helpful for the strategic	It is considered that the final paragraph

Consultee	Consultee comments	Initial officer response
<p>Heaton Planning on behalf of Tarmac</p>	<p>corridor policies to set out opportunities for development to deliver green infrastructure priorities, they should not be inflexible. Operators in ensuring that they can deliver sites need to balance the aspirations of the Mineral Planning Authority with that of the landowner and their long term requirements for site restoration. In light of this, the final paragraph to these policies is overly onerous and place a weighting on environmental protection and enhancement which is unjustified. Particularly when weighted against the need to ensure that sites are delivered to maintain a steady and adequate supply of mineral resource.</p>	<p>of each strategic corridor policy (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits. Such justification may include the economic, social and/or environmental benefits of the landowner's aspirations.</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. The balance between any competing priorities or requirements will need to be considered as part of the development management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.</p>

Table 15. Overview, showing consultees who responded to Question 6 in relation to the Lower Severn Strategic Corridor

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G025-2524 David Harrison G033-2450 Heaton Planning on behalf of Tarmac

Table 16. Detailed comments on Question 6 in relation to the Lower Severn Strategic Corridor

Consultee	Consultee comments	Initial officer response
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	p73, para 4.79, 2 nd sentence: replace 'gravel terraces' by 'internationally important gravel terraces'	Changes will be made to the introductory text about the Lower Severn Strategic Corridor to reflect this comment.
G025-2524 David Harrison	First of all, I would like to comment, on trying to get hold of the map showing the proposed "allocations" for mineral extraction and I am in particular looking at my local area which is south of Worcester City along the River Severn corridor. I was unable to find the links to the correct maps within the consultation document of 212 pages. I did eventually find it by searching on the website via Google.	Within the Fourth Stage Consultation document, the proposed areas of search for allocation are shown on Figure 4.1 (Key diagram), and are further shown on the maps for each strategic corridor. For the area you are interested in, the Lower Severn Strategic Corridor, this was Figure 4.3 on page 72. A note was included underneath the maps in the Fourth Stage Consultation document highlighting that an interactive mineral mapping tool was available at www.worcestershire.gov.uk/minerals , and that this mapping tool incorporates the Policies Map which defines the Minerals Local Plan's land-use designations and allocations, and also includes additional supporting data to assist in the use and implementation of the Minerals Local Plan. Changes will be made to make this clearer. An open day was also held at The Hive,

Consultee	Consultee comments	Initial officer response
		<p>Worcester, from 2pm-8pm on Monday 21st January 2019 to enable any questions to be answered. Contact details for the Minerals Planning Policy Team were also provided in the "How you can get involved" section of the consultation document.</p>
<p>G025-2524 David Harrison</p>	<p>I refer to the map on page 72 – Lower Severn strategic corridor and cannot understand why this was put into MLP 4 and not within MLP 5 starting on page 75. Again the North East Worcestershire strategic corridor map on page 79 should be within the MLP 6 section starting on page 82. This makes all comments very confusing.</p>	<p>The maps for each Strategic Corridor appeared in the Fourth Stage Consultation document as the first item under the section heading for that corridor, followed by information about that corridor prior to the policy appearing (i.e. the section on the Lower Severn Strategic Corridor started on page 72, with paragraph 4.74-4.84 highlighting the characteristics of the corridor, policy MLP 5 appearing on page 75, followed by the reasoned justification in policies 4.88-4.103 to assist with the interpretation and implementation of the policy).</p> <p>It is noted that this is not sufficiently clear, and changes will be made to rectify this.</p>
<p>G025-2524 David Harrison</p>	<p>Having looked on the website map, I was very surprised that this was just a blanket map and included houses, gardens and even areas granted planning permission for housing and even the local churchyard within the conservation area of Kempsey and an area also known as "the Rocky" also in the conservation area. Trying to decipher what area is put forward with these plans is absolutely ridiculous.</p>	<p>As you mentioned above that you found maps via google, it is not clear exactly what map you viewed. An open day was held at The Hive, Worcester, from 2pm-8pm on Monday 21st January 2019 to enable any questions to be answered. Contact details for the Minerals Planning Policy Team were also provided in the "How you can get involved" section of the consultation document.</p> <p>The interactive minerals mapping tool published alongside the Fourth Stage Consultation shows that the village of Kempsey (based on the settlement boundaries defined by the District Council) is not within the Lower Severn Strategic Corridor, and no areas of search cover the settlement. There is a small part of the conservation area around the church which is outside the defined settlement boundary, and has therefore been included in the Strategic</p>

Consultee	Consultee comments	Initial officer response
		<p>Corridor, but no conservation areas are within any of the areas of search as they have been "screened out" as one of the national designations which should be afforded the highest level of protection, as set out in the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground).</p> <p>We recognise that some dispersed development may be within the proposed areas of search. This has been taken into account when considering the likely importance of mineral deposits in the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground), as the method accounts for some remaining land being overlain by more dispersed development and that not all of the deposit may be available for development. Only those deposits which were still considered "key" or "significant" after adjusting for this have been taken forward for allocation as areas of search, as set out in the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground).</p> <p>Areas of search are defined in Planning Practice Guidance⁴ as "areas where knowledge of mineral resources may be less certain [than specific site or preferred area designations] but within which planning permission may be granted, particularly if there is a potential shortfall in supply". The areas of search and strategic corridors are intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered</p>

⁴ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

Consultee	Consultee comments	Initial officer response
		<p>over the life of the plan, to facilitate the minerals industry to find and put forward sites, and to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>Changes will be made to Chapter 4 to highlight that the level of certainty of mineral development taking place is lower in areas of search than will be the case for any specific sites and preferred areas which will be allocated in the separate Mineral Site Allocations Development Plan Document, and that the policy preference for mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p>
<p>G025-2524 David Harrison</p>	<p>I have looked at the objectives – MO2, MO3, MO4 and MO5 on pages 173 to pages 175 for the policy MLP 5.</p> <p>This book and fourth stage consultation is so technical that it is probably not for the general public which means that it is very difficult for the general public to decipher what is required and what is not required in this consultation.</p>	<p>Once adopted, the Minerals Local Plan will form part of the statutory Development Plan. It has therefore been developed to ensure that it is sufficiently detailed to enable its use by developers and decision makers with as little ambiguity as possible. This inevitably means that it uses technical language where necessary. However, we understand that it is also of interest to the general public, and the Minerals Local Plan has also been developed to use plain English wherever possible, and includes a glossary in Appendix 3 to explain technical terms.</p> <p>An open day was held at The Hive, Worcester, from 2pm-8pm on Monday 21st January 2019 to enable any questions to be answered. Contact details for the Minerals Planning Policy Team were also provided in the "How you can get involved" section of the consultation document.</p>
<p>G025-2524 David Harrison</p>	<p>One of the difficulties in having a document like this in the public domain is that it includes a lot of areas which are not going to be developed for the</p>	<p>As set out above, we recognise that some dispersed development may be within the proposed areas of search. Areas of search are defined in Planning</p>

Consultee	Consultee comments	Initial officer response
	<p>extraction of minerals because of the inaccuracies in the map. This immediately brings into the equation of how these sites for extraction within the plan are to be "accessed" and also why they include various houses which I would hope our not going to be developed for extraction but nowhere does it say this. The plan on the website even includes areas which are owned by the Department of Transport and known locally as the M5 motorway. This map also includes various common land within the Powick Hams, the Kempsey Hams which are protected areas. This Lower Severn strategic corridor runs from Worcester along the River Severn corridor to the south of the Worcestershire boundary just north of Tewkesbury. The map on page 72 does not correspond to the map on the website in particular for the Severn Stoke area where in the book, the map does not show extraction whereas on the Internet it shows extraction.</p>	<p>Practice Guidance⁵ as "areas where knowledge of mineral resources may be less certain [than specific site or preferred area designations] but within which planning permission may be granted, particularly if there is a potential shortfall in supply". The areas of search are intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan, to facilitate the minerals industry to find and put forward sites, and (in combination with the priorities set out for the strategic corridors in policies MLP 4 to MLP 8) to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>Changes will be made to Chapter 4 to highlight that the level of certainty of mineral development taking place is lower in areas of search than will be the case for any specific sites and preferred areas which will be allocated in the separate Mineral Site Allocations Development Plan Document, and that the policy preference for mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p> <p>As you mentioned above that you found maps via google, it is not clear exactly what map you viewed, as the interactive minerals mapping tool published at www.worcestershire.gov.uk/minerals alongside the Fourth Stage Consultation showed the same boundaries for the strategic corridors and for the areas of search⁶ as were shown within the</p>

⁵ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

⁶ Except as outlined in the *Addendum to the Fourth Stage Consultation*, available at www.worcestershire.gov.uk/minerals.

Consultee	Consultee comments	Initial officer response
		<p>consultation document itself. Both Figure 4.3 on page 72 of the Fourth Stage Consultation and the interactive minerals mapping tool show that the village of Severn Stoke is not within the boundary of the Lower Severn Strategic Corridor, and no areas of search overlie the village. This is also confirmed in paragraph A2.32 (Appendix 2), which set out that Severn Stoke was one of the settlements which had been removed from the Lower Severn Strategic Corridor when defining the corridor boundaries .</p>
<p>G025-2524 David Harrison</p>	<p>Trying to make head or tail of this is a nightmare – there are no details of which land is going to be used, there are no details of what quantities of sand, gravel, rock, etc are available and if it is economical to extract them. This means that properties within this area as shown "are blighted and it is probable that details of this "Worcestershire minerals local plan" could and probably will be shown on some solicitors searches. This could mean that some local roads are used for a large quantity of lorries for extraction purposes, and somewhere there has to be the sites to deal with the extraction. This will cause dust, noise and lots of inconvenience to where these are placed – okay this will eventually come up under planning, but details should have been forthcoming at this stage which is the last time that members of the public can comment on "your plan", i.e. Worcestershire County Council minerals extraction plan.</p>	<p>Whilst the Fourth Stage Consultation version of the Minerals Local Plan proposes to allocate areas of search within five strategic corridors, and policy MLP 1 directs the majority of minerals development to those corridors, it does not allocate individual sites. Paragraph 4.6 stated that "A Mineral Site Allocations Development Plan Document (DPD) will also be prepared to allocate specific sites and preferred areas." There will be opportunities for members of the public to comment on that document and the allocations it proposes as it is developed.</p> <p>The Fourth Stage Consultation version of the Minerals Local Plan proposes to allocate areas of search within five strategic corridors. The presence of an area of search does not mean that all minerals within that area will be worked, but it does indicate that viable resources may exist. Areas of search are defined in Planning Practice Guidance⁷ as "areas where knowledge of mineral resources may be less certain [than specific site or preferred area designations] but within which planning permission may be granted, particularly if there is a potential shortfall in supply". The areas of search and strategic corridors are intended to</p>

⁷ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

Consultee	Consultee comments	Initial officer response
		<p>provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan (as required by national policy), to facilitate the minerals industry to find and put forward sites, and to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>A separate Mineral Site Allocations Development Plan Document is also being prepared which will allocate "specific sites" and "preferred areas" to provide greater certainty to both the minerals industry and Worcestershire's residents about where minerals development is most likely to be acceptable. The sites which have been put forward to date can be viewed at http://gis.worcestershire.gov.uk/WebSite/MineralsLocalPlan/?I=1, but no decisions have yet been made about which of these should be allocated.</p> <p>Changes will be made to Chapter 4 to highlight that the level of certainty of mineral development taking place is lower in areas of search than will be the case for any specific sites and preferred areas which will be allocated in the separate Mineral Site Allocations Development Plan Document, and that the policy preference for mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p> <p>Any proposals for mineral development have to apply for planning permission, even if the site is allocated in the Minerals Local Plan or Mineral Site Allocations Development Plan Document. The Minerals Local Plan sets out the policy framework against which proposals will be assessed (once it is adopted). It is intended that, once</p>

Consultee	Consultee comments	Initial officer response
		<p>adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which should be implemented and are able to be enforced. Policy MLP 19 (Amenity) requires consideration to be given to issues of air quality, dust, odour, noise and vibration, light, visual amenity and visual intrusion, land instability, and contamination to ensure there will not be unacceptable harm to sensitive receptors, including people in their homes. Policy MLP 29 (Transport) requires mineral development to use the most sustainable transport options and for proposals to demonstrate that there will not be an unacceptable adverse effect on transport safety or congestion. A change to Policy MLP 29 will be made to ensure it is clear that impacts on the local road network must be considered, as well as the strategic transport network.</p> <p>It should be noted that "blighted land" has a specific meaning under schedule 13 of the Town and Country Planning Act 1990, and the allocations within the Minerals Local Plan and forthcoming Mineral Site Allocations Development Plan Document do not fall within this definition.</p>
G025-2524 David Harrison	<p>I now turn to proposition that was put forward to the local councils when "Clifton Quarry" was first proposed. The carrot for the local area was that they would provide recreational lakes when the extraction was completed and these lakes would be used for recreation including sailing etc. This is obviously not happened and now we have more lakes holding more water close to footpaths with no safety measures in place.</p>	<p>Clifton Quarry is an active quarry with planning permission already in place. There are no planning conditions attached to this planning permission which require public access to the lakes.</p> <p>Any planning applications which come forward within the Lower Severn Strategic Corridor once the Minerals Local Plan is adopted would need to address the requirements of the policies in the plan, including policy MLP 5 which sets green infrastructure priorities for the corridor, one of which is to create accessible semi-natural green space.</p>

Consultee	Consultee comments	Initial officer response
G025-2524 David Harrison	I cannot possibly see how this submitted local plan in its present form could be approved by an "independent inspector" appointed by the Secretary of State.	Noted.
G033-2450 Heaton Planning on behalf of Tarmac	Whilst it is helpful for the strategic corridor policies to set out opportunities for development to deliver green infrastructure priorities, they should not be inflexible. Operators in ensuring that they can deliver sites need to balance the aspirations of the Mineral Planning Authority with that of the landowner and their long term requirements for site restoration. In light of this, the final paragraph to these policies is overly onerous and place a weighting on environmental protection and enhancement which is unjustified. Particularly when weighted against the need to ensure that sites are delivered to maintain a steady and adequate supply of mineral resource.	<p>It is considered that the final paragraph of each strategic corridor policy (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits. Such justification may include the economic, social and/or environmental benefits of the landowner's aspirations.</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. The balance between any competing priorities or requirements will need to be considered as part of the development management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.</p>

Table 17. Overview, showing consultees who responded to Question 6 in relation to the North East Worcestershire Strategic Corridor

Consultees who answered "Yes": 1	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G033-2450 Heaton Planning on behalf of Tarmac

Table 18. Detailed comments on Question 6 in relation to the North East Worcestershire Strategic Corridor

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	Only in regard to the item in question 5.	Your comment relating to the strategic corridors covering areas of largely residential land is noted and addressed under question 5 (Table 12).
G033-2450 Heaton Planning on behalf of Tarmac	Whilst it is helpful for the strategic corridor policies to set out opportunities for development to deliver green infrastructure priorities, they should not be inflexible. Operators in ensuring that they can deliver sites need to balance the aspirations of the Mineral Planning Authority with that of the landowner and their long term requirements for site restoration. In light of this, the final paragraph to these policies is overly onerous and place a weighting on environmental protection and enhancement which is unjustified. Particularly when weighted against the need to ensure that sites are delivered to maintain a steady and adequate supply of mineral resource.	It is considered that the final paragraph of each strategic corridor policy (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits. Such justification may include the economic, social and/or environmental benefits of the landowner's aspirations. The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will

Consultee	Consultee comments	Initial officer response
		be both possible and appropriate for some elements of the priorities to be incorporated. The balance between any competing priorities or requirements will need to be considered as part of the development management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.

Table 19. Overview, showing consultees who responded to Question 6 in relation to the North West Worcestershire Strategic Corridor

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G033-2450 Heaton Planning on behalf of Tarmac

Table 20. Detailed comments on Question 6 in relation to the North West Worcestershire Strategic Corridor

Consultee	Consultee comments	Initial officer response
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	p89, para 4.140, first sentence: extend as follows There are several designated sites for geodiversity interest in the corridor, and the river terraces there may hold clues to the events surrounding establishment of the present course of the River Severn in glacial times.	Changes will be made to the introductory text about the North West Worcestershire Strategic Corridor to reflect this comment.
G033-2450 Heaton Planning on behalf of Tarmac	Whilst it is helpful for the strategic corridor policies to set out opportunities for development to deliver green infrastructure priorities, they should not be inflexible. Operators in ensuring that they can deliver sites need to balance the aspirations of the Mineral Planning Authority with that of the landowner and their long term	It is considered that the final paragraph of each strategic corridor policy (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to

Consultee	Consultee comments	Initial officer response
	<p>requirements for site restoration. In light of this, the final paragraph to these policies is overly onerous and place a weighting on environmental protection and enhancement which is unjustified. Particularly when weighted against the need to ensure that sites are delivered to maintain a steady and adequate supply of mineral resource.</p>	<p>allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits. Such justification may include the economic, social and/or environmental benefits of the landowner's aspirations.</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. The balance between any competing priorities or requirements will need to be considered as part of the development management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.</p>

Table 21. Overview, showing consultees who responded to Question 6 in relation to the Salwarpe Tributaries Strategic Corridor

Consultees who answered "Yes": 0	Consultees who answered "No": 3	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
	<p>G009-800 Herefordshire & Worcestershire Earth Heritage Trust</p> <p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	<p>G001-232 Worcestershire Acute Hospitals NHS Trust</p> <p>G011-2505 Bright & Associates</p> <p>G012-2459 Wildmoor Residents Association</p>	<p>G033-2450 Heaton Planning on behalf of Tarmac</p>

Table 22. Detailed comments on Question 6 in relation to the Salwarpe Tributaries Strategic Corridor

Consultee	Consultee comments	Initial officer response
G033-2450 Heaton Planning on behalf of Tarmac	<p>Whilst it is helpful for the strategic corridor policies to set out opportunities for development to deliver green infrastructure priorities, they should not be inflexible. Operators in ensuring that they can deliver sites need to balance the aspirations of the Mineral Planning Authority with that of the landowner and their long term requirements for site restoration. In light of this, the final paragraph to these policies is overly onerous and place a weighting on environmental protection and enhancement which is unjustified. Particularly when weighted against the need to ensure that sites are delivered to maintain a steady and adequate supply of mineral resource.</p>	<p>It is considered that the final paragraph of each strategic corridor policy (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits. Such justification may include the economic, social and/or environmental benefits of the landowner's aspirations.</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. The balance between any competing priorities or requirements will need to be considered as part of the development</p>

Consultee	Consultee comments	Initial officer response
		management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.

Question 7. Do you agree with the proposed method for identifying Areas of Search? (More information on this can be found in Worcestershire County Council's background document *Location of development: screening and site selection methodology* (August 2018) available at www.worcestershire.gov.uk/mineralsbackground)

Table 23. Overview, showing consultees who responded to Question 7

Consultees who answered "Yes": 6	Consultees who answered "No": 1	Consultees who answered "Don't know": 0	Consultees who provided written comments (see below)
G001-232 Worcestershire Acute Hospitals NHS Trust	G005-2392 Charlton Parish Council		G005-2392 Charlton Parish Council
G009-800 Herefordshire & Worcestershire Earth Heritage Trust			G012-2459 Wildmoor Residents Association
G011-2505 Bright & Associates			
G012-2459 Wildmoor Residents Association			
G017-1081 Worcestershire Wildlife Trust			
G029-717 Natural England			

Table 24. Detailed comments on Question 7

Consultee	Consultee comments	Initial officer response
G005-2392 Charlton Parish Council	In identifying potential sites for working there appears to have been little thought given to the adverse impact on existing settlements, in particular in the Avon & Carrant Brook corridor. It is an established fact that many of the local roads were not originally designed or constructed to cope with continual use by heavy goods vehicles. For example in order to access Charlton 2 nd terrace site (16/1) any	In developing the strategic corridors, consideration has been given to whether there are links to the strategic transport network, as set out in paragraphs 4.54, 4.82, 4.111, 4.141 and 4.177 of the Fourth Stage Consultation. Transport linkages to each of the individual areas of search have not been considered in further detail, as this will need to be addressed as site proposals are considered for potential allocation as specific sites or preferred areas in the separate Mineral Site

Consultee	Consultee comments	Initial officer response
	<p>vehicles need to pass through at least 2 villages which are already subject to 7.5tonne weight limits and in some cases are extremely narrow.</p> <p>Any site selected should have direct access to a major trunk road.</p>	<p>Allocations Development Plan Document, and/or as sites come forward as planning applications, when sufficient detail is known about how a site might be worked and what the transport implications are likely to be.</p> <p>Policy MLP 29 requires mineral development to use the most sustainable transport options and for proposals to demonstrate that there will not be an unacceptable adverse effect on transport safety or congestion. A change to Policy MLP 29 will be made to ensure it is clear that impacts on the local road network must be considered, as well as the strategic transport network.</p>
G012-2459 Wildmoor Residents Association	<p>We would agree that in 2.4 of the Site Selection Methodology only sites of a certain size should be taken forward identifying significant and not insignificant deposits. In the analysis of resources Table 1 only the estimated volume of resources seem to have been taken into account.</p>	<p>Both of the factors you refer to relate to the analysis of mineral deposits and have led to the proposed areas of search:</p> <ul style="list-style-type: none"> • Paragraph 2.4 of the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground) refers to the first step in analysing the mineral resources in the county for whether they were likely to be suitable and commercially attractive for exploitation during the lifetime of the plan. This initial filtering of mineral deposits was based on minimum size thresholds, meaning that only those deposits mapped by the British Geological Survey which were greater than 10 hectares in area and greater than 200m wide were taken forward for further analysis. This is as set out in paragraphs 3.3-3.4 of the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground). • Table 1 (in both the <i>Location of</i>

Consulte	Consultee comments	Initial officer response
		<p><i>development: screening and site selection methodology and the Analysis of Mineral Resources) is a later step (as set out in paragraphs 3.23-3.27 of the Analysis of Mineral Resources), and sets out the thresholds which were used to determine the significance of deposits based on the tonnage of mineral resource they were estimated to contain.</i></p> <p>A separate methodology for the consideration of individual sites for allocation was set out in Chapter 5 of the <i>Location of development: screening and site selection methodology</i>, and does not rely on the filters and thresholds discussed above.</p>

Question 8. Are any wording changes needed to any of the policies or reasoned justification in **CHAPTER 4: Spatial Strategy** to improve clarity, or to reflect any other issues that should be considered?

Table 25. Overview, showing consultees who responded to Question 8 in relation to policy MLP 1 (Strategic Location of Development)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
	<p>G011-2505 Bright & Associates</p> <p>G012-2459 Wildmoor Residents Association</p> <p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	<p>G001-232 Worcestershire Acute Hospitals NHS Trust</p>	<p>G018-2460 Mineral Products Association</p> <p>G033-2450 Heaton Planning on behalf of Tarmac</p>

Table 26. Detailed comments on Question 8 in relation to policy MLP 1 (Strategic Location of Development)

Consultee	Consultee comments	Initial officer response
G018-2460 Mineral Products Association	<p>Part a) ii of this policy states; <i>it is demonstrated that the mineral resource has qualities which mean a sustainable supply of the mineral cannot be delivered from extant or allocated sites.</i></p> <p>We believe this is unsound as it is not effective and is not planning positively in that it threatens the ability to maintain or increase the productive capacity of aggregate production, particularly sand and gravel production. Furthermore, it could be argued to be anti-competitive to new entrants. It also implies a maximum landbank approach which is also against planning guidance where at para 27-084-20140306 it states that; <i>There is no maximum landbank level</i></p>	<p>Part a of Policy MLP 1 seeks to direct minerals development to the strategic corridors. Part a) i. enables mineral development within allocated sites (both the areas of search shown on the key diagram and defined on the Policies Map, and the specific sites and preferred areas which will be allocated in the Mineral Site Allocations Development Plan Document. There are 167 areas of search within the strategic corridors. Together, these areas of search mean that the Fourth Stage Consultation version of the Minerals Local Plan proposed to allocate:</p> <ul style="list-style-type: none"> • 59.9% of the key and significant terrace and glacial sand and gravel resources in the county • 80.7% of the key and significant solid sand resources in the county • 19.5% of the Mercia Mudstone

Consultee	Consultee comments	Initial officer response
	<p><i>and each application for minerals extraction must be considered on its own merits.....</i></p> <p>This also appears to go against paragraph 5.1 bullet 2 of the Plan and also policy MLP 10 and 11 where both policies seek to maintain or enhance productive capacity for sand and gravel and crushed rock respectively.</p> <p>It is therefore suggested that this part of the policy is deleted in full.</p>	<p>Group resources in the county</p> <ul style="list-style-type: none"> • 52.4% of the Wildmoor Sandstone Formation which contains silica sand resources • 13 of the screened former building stone quarries in the county. <p>All of the mineral resources which have been assessed as being potentially suitable and commercially attractive for exploitation during the lifetime of the plan in the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground) and which fall within the strategic corridors have been proposed as areas of search.</p> <p>Part a) ii. is also intended to enable mineral development. It provides further opportunity for mineral development to take place within the strategic corridors where a sustainable supply of the mineral cannot be delivered from allocated sites under part a) i. or from extant sites under part b) i.</p> <p>It is considered that these policy points together do plan positively to enable landbanks and productive capacity to be maintained and enhanced, both for aggregates and for other types of mineral, and the allocation of these extensive areas of search and lack of preference for extensions to existing sites should facilitate new entrants.</p>
G033-2450 Heaton Planning on behalf of Tarmac	<p>The spatial strategy seeks to locate minerals development within 1 of 5 strategic corridors. Paragraph 4.3 identifies that there will be clear priorities set for development within each strategic corridor to prescribe how minerals development can best enhance green infrastructure corridors to deliver social, economic and environmental benefits. It goes on to state that, ‘this will enable the coordination of benefits from multiple mineral developments in the same strategic corridor’. The theory of this is</p>	<p>Support for the strategic corridor priorities noted.</p> <p>Each of the policies for the strategic corridors (policies MLP 4 to MLP 8) require technical assessments to demonstrate how, throughout its lifetime, the development will <u>optimise opportunities</u> to deliver the green infrastructure priorities. This means that where opportunities to deliver a particular priority do not exist (or delivering them would not be practicable) on a particular site, this</p>

Consultee	Consultee comments	Initial officer response
	<p>supported and Tarmac welcome engagement with the MPA in pursuing planning applications for mineral development. However, it is unclear how it will be operated in practice. Can Applicants choose from the list of requirements what they are seeking to deliver through restoration? The MPA must ensure that objectives are kept broad enough that they can be delivered but allow flexibility for operators to enter agreements with landowners over the long term restoration requirements. These should not be overly onerous and potentially restrict delivery of mineral operations and restoration.</p>	<p>can be demonstrated and taken into account in the development management process. However, where opportunities do exist, the technical assessment should demonstrate how delivering them will be <u>optimised</u>. The term "optimised" has been included to recognise that there may be circumstances where delivering a priority could conflict with other parts of the development plan, or other material considerations.</p> <p>The strategic corridor priorities should be considered alongside the requirements of policy MLP 3, which expects holistic consideration of the local context and site-specific considerations to influence how green infrastructure will be delivered on individual sites whilst contributing towards the relevant strategic corridor priorities (paragraph 4.32).</p> <p>The final paragraph of each strategic corridor policy (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits. Such justification may include the economic, social and/or environmental benefits of the landowner's aspirations.</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. As the identified priorities are multifunctional and are appropriate to the landscape character, ecology, geology and</p>

Consultee	Consultee comments	Initial officer response
		<p>hydrology of the corridor, they should be cost-effective for developers to implement whilst maximising gains across the components of green infrastructure, and the fact that they have been developed in consultation with multiple stakeholders through a Minerals Green Infrastructure Steering Group should mean that proposals which deliver against the priorities are more likely to be supported by those stakeholders.</p> <p>The balance between any competing priorities or requirements will need to be considered as part of the development management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Policy MLP1 – Strategic Location of Development It is assumed that the policy is advocating a preference/criteria based approach to decision making – i.e applications for development that meet criteria (a) – allocated sites - are in preference to criteria (b) – within the boundary of extant sites, borrow pit or for prior extraction - and then (c) – outside of the strategic corridors. However, this is unclear.</p>	<p>Policy MLP 1 sets the criteria for decision making in terms of the location of mineral development. If any of these tests are met, then development will be considered acceptable in those locations.</p> <p>The criteria are intended to focus the majority of mineral development within allocated sites and within the strategic corridors (part a), but they set out further criteria where development will be considered acceptable, namely:</p> <ul style="list-style-type: none"> • extant sites, both within and outside the strategic corridors - part b) i. • borrow pits which meet the requirements of policy MLP 2, both within an outside the strategic corridors – part b) ii. • where it would prevent sterilisation of a resource, both within and outside the strategic corridors – part b) iii. • Where the mineral has qualities which mean a sustainable supply of that mineral cannot be delivered from within the strategic corridors.

Consultee	Consultee comments	Initial officer response
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Given comments above on the landbank, the number of active sites and the vulnerability of the County to meeting current annual supply requirements there is concern regarding an approach which is relying on the Mineral Plan/Strategy document having to be approved, followed by the time lag that will be required for preparing and adopting a Mineral Site Allocations DPD. It is not considered that this approach provides sufficient certainty and will therefore be an effective strategy. This is contrary to the advice within the NPPF paragraph 23 which seeks to ensure, 'broad locations for development should be indicated on a key diagram and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward and at a sufficient rate, to address objectively assessed needs over the Plan period'. Objectively assessed needs includes making sufficient provision for minerals (NPPF paragraph 20).</p> <p>It is considered that the current policy is ineffective and requires greater clarification/direction on the principle of development prior to the adoption of a site-specific allocations document. The strategic locations are helpful in that they are seeking to spread minerals development within the County and they identify known areas of mineral resource. However, in the absence of a Site Allocations DPD containing site specific allocations, the appropriateness of mineral development coming forward cannot be determined against this policy. It therefore does not provide certainty/assurance to developers nor is it an effective decision-making tool. There are also concerns that the use of annual sales data could be construed as a maximum supply requirement.</p>	<p>The Local Development Scheme sets out the programme for the production of minerals and waste development plan documents over the next three years. The Local Development Scheme was updated in July 2018, and this introduced a timetable for the preparation of a separate Mineral Site Allocations Development Plan document. This is intended to ensure that the strategic elements of the Minerals Local Plan can be progressed as quickly as possible to provide certainty over the vision, objectives, spatial strategy and development management policies, whilst also building in flexibility for Mineral Site Allocations to be reviewed and revised if necessary without affecting certainty around the strategic policies set out in the Minerals Local Plan.</p> <p>This is consistent with the revised National Planning Policy Framework in relation to setting out strategic policies, and takes into account the new requirement that, from April 2018, under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), local planning authorities must review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.</p> <p>It is considered that the Minerals Local Plan does conform to the requirements of paragraph 23 of the National Planning Policy Framework. Broad locations for development are indicated on the key diagram at Figure 4.1, showing the five strategic corridors and 167 areas of search within them. These designations and allocations were also identified on the draft Policies Map as part of the interactive minerals mapping tool published alongside the Fourth Stage</p>

Consultee	Consultee comments	Initial officer response
	<p>It is considered that a more effective strategy would be one that identifies specific tests. For example: to maintain a steady and adequate supply; as an extension to existing sites; there is a demonstrated need for development to maintain supply; replacement sites or sites required to ensure current production capacity is maintained/enhanced.</p> <p>Paragraph 4.8 emphasizes the above point. There needs to be flexibility built into the Plan to ensure a sustainable supply of minerals if extant and/or allocated sites are failing to deliver the requirements. Paragraph 4.8 is identifying this to be 'a limited circumstance'. However, the preference/emphasis needs to be on maintaining a 'steady and adequate supply of aggregate'. Given the position in regards to permitted reserves and the need for sites to come forward to meet the Plan requirements over the Plan period (the LAA is identifying a shortfall in sand and gravel reserve later in the Plan period and there is currently no crushed rock supply) there needs to be some level of assurance for mineral developers if they have sites within or outside the strategic corridors that they can bring these forward as planning applications.</p>	<p>consultation at www.worcestershire.gov.uk/minerals. The Policies Map will be added to when further allocation of specific sites and preferred areas are made through the Mineral Site Allocations Development Plan Document.</p> <p>The strategic policies of the spatial strategy (Chapter 4) set out a clear strategy for where mineral development should take place, and the strategic policies on the supply of mineral resources (Chapter 5) set a positive strategy for maintaining a sufficient supply of minerals (for aggregates, the policies promote a steady and adequate supply to be maintained in terms of both landbanks and productive capacity), with sufficient flexibility to adapt to any changes in objectively assessed needs over the life of the plan. For example, paragraph 5.11 refers to the need for the provision of <u>at least</u> a further 11.53 million tonnes of sand and gravel, and figures for annual production and lifetime provision have been referred to in the reasoned justification but purposefully not included in the policies themselves because the annual production guideline figure in the Local Aggregate Assessment will inevitably vary from year to year.</p> <p>Paragraph 4.8 refers to development proposals within the strategic corridors but not within allocated or existing sites. This is facilitated by part a) ii. of policy MLP 1, which is intended to enable mineral development by providing further opportunity for mineral development to take place within the strategic corridors where a sustainable supply of the mineral cannot be delivered from allocated sites under part a) i. or from extant sites under part b) i.</p> <p>To ensure that there is an emphasis on</p>

Consultee	Consultee comments	Initial officer response
		<p>enabling the steady and adequate supply of minerals to be maintained, the proposed 167 areas of search will allocate:</p> <ul style="list-style-type: none"> • 59.9% of the key and significant terrace and glacial sand and gravel resources in the county • 80.7% of the key and significant solid sand resources in the county • 19.5% of the Mercia Mudstone Group resources in the county • 52.4% of the Wildmoor Sandstone Formation which contains silica sand resources • 13 of the screened former building stone quarries in the county. <p>All of the mineral resources which have been assessed as being potentially suitable and commercially attractive for exploitation during the lifetime of the plan in the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground) and which fall within the strategic corridors have been proposed as areas of search. Paragraph 4.8 therefore states that the circumstances where development within a strategic corridor but outside an allocated or extant site will be limited.</p> <p>Changes will be made to highlight that the areas of search have been designated to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan, to facilitate the minerals industry to find and put forward sites, and (combined with the strategic corridor priorities in policies MLP 4 to MLP 8) to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>Mineral development outside the strategic corridors will be acceptable only where the tests set in parts b) or c) are met, in order to give certainty to communities and to ensure that the</p>

Consultee	Consultee comments	Initial officer response
		other objectives of the plan will be delivered as set out in the vision.
G033-2450 Heaton Planning on behalf of Tarmac	Paragraph 4.12 should be amended. Extensions to extant/existing sites will ensure a continuation in mineral supply and assist in maintain current productive capacity level which is advocated in the Plan. Notwithstanding comments above regarding the overall strategy in Policy MLP1, these would meet the preference criteria for new mineral development within Worcestershire and should be supported.	<p>Policy MLP 1 facilitates development within the boundary of sites with extant planning permission, with paragraph 4.11 recognising that alterations to planning permissions may be required over the life of a site.</p> <p>Paragraph 4.12 is intended to set out Worcestershire County Council's stance towards extensions to existing sites. Proposals for extensions beyond the existing red line boundary of a site will be considered on their own merits against the tests of Policy MLP 1 and the rest of the Development Plan, and no greater preference is given to them than to proposals for new sites. This should help to facilitate new entrants to the market in Worcestershire. However, the fact that all of the mineral resources which have been assessed as being potentially suitable and commercially attractive for exploitation during the lifetime of the plan in the Analysis of Mineral Resources background document (available at www.worcestershire.gov.uk/mineralsbackground) and which fall within the strategic corridors have been proposed as areas of search, means that most potential extensions to existing sites would fall under part a) i. of policy MLP 1. Changes will be made to this section to clarify this stance.</p>

Table 27. Overview, showing consultees who responded to Question 8 in relation to policy MLP 2 (Borrow Pits)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
	<p>G011-2505 Bright & Associates</p> <p>G012-2459 Wildmoor Residents Association</p> <p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	<p>G001-232 Worcestershire Acute Hospitals NHS Trust</p>	<p>G027-1957 Worcestershire County Council</p>

Table 28. Detailed comments on Question 8 in relation to policy MLP 2 (Borrow Pits)

Consultee	Consultee comments	Initial officer response
G027-1957 Worcestershire County Council	Policy MLP 2: Borrow Pits: We [the Development Management team] welcome the inclusion of this policy and the requirement to be operationally related to a specific project.	Support noted.

Table 29. Overview, showing consultees who responded to Question 8 in relation to policy MLP 3 (Green Infrastructure)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G017-1081 Worcestershire Wildlife Trust	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G017-1081 Worcestershire Wildlife Trust G021-1942 Historic England G027-1957 Worcestershire County Council G028-719 Environment Agency G029-717 Natural England G033-2450 Heaton Planning on behalf of Tarmac

Table 30. Detailed comments on Question 8 in relation to policy MLP 3 (Green Infrastructure)

Consultee	Consultee comments	Initial officer response
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this important policy and welcome the clear guidance it gives in relation to Green Infrastructure requirements. We believe that effective delivery against this policy will be essential in meeting the aspirations of the plan vision and that it should be given significant weight in the decision-making process. With that in mind we also support the commentary presented in the associated reasoned justification and in particular the guidance given on long term management requirements. Effective management of restored sites will often be critical in delivering the intended GI outcomes and so this guidance is both helpful and necessary. It would therefore be useful to add additional wording on the benefits of	Support noted. Changes will be made to this section to refer to emerging green infrastructure standards and 'benchmarking'.

Consultee	Consultee comments	Initial officer response
	using a 'benchmarking' system to quantify GI enhancements. Options including 'Building with Nature' could perhaps be signposted. It would also be helpful to draw attention to emerging national GI standards, accepting that these may evolve over time.	
G021-1942 Historic England	Policy MLP3: Green Infrastructure - It is noted that Criteria d) iii includes the word 'protect' in relation to the historic environment. We would recommend 'protect' be replaced with 'conserve' in line with NPPF terminology. A definition of 'conservation' is usefully included in the NPPF glossary and sets out that it relates to maintaining and managing change 'in a way that sustains' and enhances its significance. As such, 'conserve' would provide the provisions of the Plan with more flexibility than by including 'protect'.	Noted, a change will be made to policy MLP 3 as suggested.
G027-1957 Worcestershire County Council	Paragraph 4.26: Suggest the last sentence is amended as follows: <i>"The underlying principle of green infrastructure is that the same area of land can frequently offer potential for delivering multiple benefits should be maximised"</i> .	This sentence in paragraph 4.26 directly reflects text in the <i>Worcestershire Green Infrastructure Strategy 2013-2018</i> .
G027-1957 Worcestershire County Council	Paragraph 4.27: Suggest amending second sentence as follows: <i>"It can enhance <u>and restore</u> the setting of heritage assets..."</i>	Noted, a change will be made to this sentence as suggested.
G027-1957 Worcestershire County Council	Natural England's reference to high-tide bird counts within the Severn Estuary SAC/SPA raises a question with regards how best we balance conflicting GI priorities, particularly where these prove to be mutually incompatible. For example, features which have (or will have) biodiversity value but which are also sensitive to disturbance (e.g. opportunities for breeding/over-wintering birds) and recreational end use (such as boating lakes or public footpaths). How and where will the plan provide sufficient weight to one particular GI theme	Policy MLP 3 expects holistic consideration of the local context and site-specific considerations to influence how green infrastructure will be delivered on individual sites whilst contributing towards the relevant strategic corridor priorities (paragraph 4.32), but changes will be made to policy MLP 3 to ensure it is clear that the delivery of multiple benefits should be <u>optimised</u> , allowing room for any benefits and conflicting priorities to be given appropriate weight in the development management process at application stage. This will align with the policies for the strategic corridors (policies MLP 4 to MLP 8) which require technical assessments to demonstrate

Consultee	Consultee comments	Initial officer response
	<p>over others in such scenarios? I recommend that we highlight these potential conflicts and include an expectation that the CPA will require additional evidence supporting GI designs in such scenarios. This is outlined in para's 4.40/4.41 but without direction as to which priorities may be given more weight and in which scenarios; I recommend that further consideration is given to this and some direction included in policy wording to avoid future conflict. I recommend the potential for GI incompatibilities in otherwise multifunctional designs is also clarified through one or more case-studies in the plan. Ideally, we'd illustrate a scheme where biodiversity benefits have emerged from well-designed and multi-functional GI (for example servicing flood volumes, water quality and biodiversity).</p>	<p>how, throughout its lifetime, the development will <u>optimise opportunities</u> to deliver the green infrastructure priorities.</p> <p>This means that where opportunities to deliver a particular priority do not exist (or delivering them would not be practicable) on a particular site, this can be demonstrated and taken into account in the development management process.</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. The term "optimised" has been included to recognise that there may be circumstances where delivering a corridor priority or a site-specific opportunity could conflict with other parts of the development plan, or other material considerations.</p> <p>The final paragraph of Policy MLP 3, and of each of the strategic corridor policies (MLP 4 to MLP 8) provides the flexibility for deviation from the identified priorities, where justification is provided by demonstrating that specific local economic, social and environmental benefits will be delivered. A change will be made to allow further flexibility by allowing justification on the grounds of specific local economic, social and/or environmental benefits.</p> <p>The balance between any competing priorities or requirements will need to be considered on a case-by-case basis as part of the development management process, and applicants are encouraged to explore this through pre-application discussions with the Mineral Planning Authority and relevant stakeholders.</p>

Consultee	Consultee comments	Initial officer response
		It is not considered appropriate to include case studies within the Minerals Local Plan itself, but this could be explored through supplementary guidance if necessary.
G027-1957 Worcestershire County Council	Additionally, I would encourage the plan to promote opportunities to create new functionally linked habitat opportunities for waders and wildfowl previously recorded within the SAC/SPA/RAMSAR. This would be particularly appropriate within the Lower Severn Strategic Corridor and perhaps Avon and Carrant Strategic Corridor where open water and wet grassland habitat creation/restoration are anticipated outputs from a proposed mineral development.	Natural England, in response to Question 19 about the Habitats Regulations Assessment (see Table 100), provided information about the emerging evidence base in relation to the Severn Estuary SPA 'High tide roost report'. Natural England suggested the possibility that, at times of flooding or other extreme weather, wintering bird populations search much further afield than under normal conditions for food and shelter, and that they can travel across and up the Vale to the Cotswolds Scarp and as far north as Longdon Marsh. Such land is likely to form 'functionally linked land' (FLL) with respect to the Severn Estuary SPA. Changes will be made to refer to this in the text about the Lower Severn Strategic Corridor and the Avon and Carrant Brook Strategic Corridor.
G028-719 Environment Agency	<p>Policy MLP 3: Green Infrastructure- We commend this ambitious policy. We would suggest greater reference to river corridor enhancement and habitat creation as a priority of this policy however. We would also recommend reference to the Water Framework Directive (WFD) and its aims within the reasoned justification. Given the riparian location of most of the sites being brought forward greater emphasis should be placed on the need to protect and enhance river corridors and embed this more explicitly within the policy wording.</p> <p>We would recommend the above for all of the Strategic Corridors too. We would be happy to meet with you to discuss the specific wording for each corridor to ensure a locally distinctive policy base.</p>	<p>Support for policy MLP 3 noted.</p> <p>Policy MLP 3 requires consideration of site specific opportunities to conserve, restore and enhance ecological networks and deliver net gains for biodiversity, as well as to protect and enhance the surface water and groundwater resources at the local and catchment scale. Although many of the sites proposed to date for potential allocation in the Mineral Site Allocations Development Plan Document are in riparian locations, this is not the case for all of the sites, and is not the case for all the areas of search proposed for allocation in the Minerals Local Plan. As not all site proposals over the life of the plan will necessarily be within riparian locations, it is considered that a specific reference to river corridor enhancement in Policy MLP 3 or its reasoned justification</p>

Consultee	Consultee comments	Initial officer response
		<p>would not be appropriate. However, a change will be made to include the site's relationship to wider ecological networks as part of the consideration of the local context. River corridors would be captured by this where relevant to a particular site.</p> <p>The reasoned justification for this policy is quite high level, as it covers all green infrastructure components, and therefore cannot provide detail about each of them. Changes will be made to ensure the information required by the development management policies in Chapter 6 is drawn upon in the consideration of the local context and site-specific opportunities.</p> <p>Changes will be made to the text introducing the riverine corridors of the Lower Severn and Avon and Carrant Brook to refer to river corridor enhancements. Whilst there may also be some opportunities for river corridor enhancement in the other strategic corridors as sites are developed, they are not fundamentally riverine in character.</p>
G029-717 Natural England	Natural England commends Worcestershire County Council for taking a thorough Green Infrastructure approach throughout this plan.	Support noted.
G033-2450 Heaton Planning on behalf of Tarmac	The thrust of Policy MLP 3 is supported in seeking to maximize opportunities to protect and enhance green infrastructure. However, the policy should not be a 'catch all' and needs to be selective over criteria which is applicable to green infrastructure and what may be covered by other Environmental Policies. For example, 'the protection and enhancement of the condition, legibility and understanding of heritage assets and their setting' is overly onerous and not justified when seeking to maximise green infrastructure objectives.	<p>Support noted.</p> <p>Strategic consideration has already been given to the opportunities to protect and enhance green infrastructure, leading to the identification of the priorities for each strategic corridor in policies MLP 4 to MLP 8. As the majority of sites are expected to be within these corridors, mineral development will be able to deliver green infrastructure enhancement by implementing those priorities. Policy MLP 3 provides a mechanism to ensure that any site-specific considerations which could not be assessed at a strategic scale are</p>

Consultee	Consultee comments	Initial officer response
		<p>taken into account in determining the appropriate balance on a case-by-case basis. Changes will be made to highlight that the information required by the development management policies in Chapter 6 should be drawn upon in the consideration of the local context and site-specific opportunities.</p> <p>Policy MLP 3 also ensures that any mineral development which is proposed outside the strategic corridors will also be required to protect and enhance green infrastructure.</p>

Table 31. Overview, showing consultees who responded to Question 8 in relation to policy MLP 4 (Avon and Carrant Brook Strategic Corridor)

Consultees who answered "Yes": 0	Consultees who answered "No": 3	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
	<p>G012-2459 Wildmoor Residents Association</p> <p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	<p>G001-232 Worcestershire Acute Hospitals NHS Trust</p> <p>G011-2505 Bright & Associates</p>	<p>G017-1081 Worcestershire Wildlife Trust</p> <p>G021-1942 Historic England</p> <p>G027-1957 Worcestershire County Council</p> <p>G029-717 Natural England</p>

Table 32. Detailed comments on Question 8 in relation to policy MLP 4 (Avon and Carrant Brook Strategic Corridor)

Consultee	Consultee comments	Initial officer response
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this policy and its associated reasoned justification. The corridor priorities appear sensible to us and we concur with the priority features listed for conservation, enhancement and creation.	Support noted.

Consultee	Consultee comments	Initial officer response
G021-1942 Historic England	<p>Policy MLP4: Avon and Carrant Brook Strategic Corridor Para 4.52; The Strategic Corridors clearly have potential for unknown buried archaeology due to the riverside locations with gravel terraces where the paleolithic potential is high and this is recognised in text that accompanies the policies. In addition, the Plan sets out in its introductory sections that there is potential for aggregates along the rivers. However, the consideration of the impact on non-designated archaeology is not highlighted in any of the above policies and raises a concern in respect of soundness. It is recommended that reference to non-designated assets is included specifically within Policy MLP22, as set out in comments below, or that a specific criteria relating to the matter is included within Policy MLP4, MLP5, MLP6, MLP7 and MLP8 individually.</p>	Part c of policy MLP 22 relates to non-designated assets, with paragraph 6.89 highlighting that there is significant potential for mineral development to impact on heritage assets with known or unknown archaeological interest. A change will be made as suggested to clarify within policy MLP that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.
G027-1957 Worcestershire County Council	<p>Paragraph 4.52: Recommend amending the first sentence as follows: <i>"There are large numbers of designated heritage assets within the corridor, as well as large areas with very high archaeological potential including extensive Areas of Paleolithic Potential. This includes extensive areas of Palaeolithic potential and Pleistocene faunal and environmental remains."</i></p>	Noted, change to be made as suggested.
G029-717 Natural England	Natural England do not suggest any changes to this policy currently but please cross reference to our comments on the HRA.	Changes will be made to refer to the potential for functional links with the Severn Estuary SPA in the text about the Avon and Carrant Brook Strategic Corridor and the Lower Severn Strategic Corridor.

Table 33. Overview, showing consultees who responded to Question 8 in relation to policy MLP 5 (Lower Severn Strategic Corridor)

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates	G017-1081 Worcestershire Wildlife Trust G021-1942 Historic England G029-717 Natural England

Table 34. Detailed comments on Question 8 in relation to policy MLP 5 (Lower Severn Strategic Corridor)

Consultee	Consultee comments	Initial officer response
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this policy and its associated reasoned justification. The corridor priorities appear sensible to us and we concur with the priority features so far listed for conservation, enhancement and creation. However, we are aware that Natural England has recommended some additional commentary in relation to the functional links between this corridor and the Severn Estuary SPA. We strongly recommend that you seek further advice from them on any changes needed.	Support noted. Changes will be made to refer to the potential for functional links with the Severn Estuary SPA in the text about the Avon and Carrant Brook Strategic Corridor and the Lower Severn Strategic Corridor.
G021-1942 Historic England	Policy MLP5: Lower Severn Strategic Corridor Para 4.79; The Strategic Corridors clearly have potential for unknown buried archaeology due to the riverside locations with gravel terraces where the paleolithic potential is high and this is recognised in text that accompanies the policies. In addition, the Plan sets out in its introductory sections that there is potential for aggregates along the rivers. However, the consideration of the impact on non-designated archaeology is not highlighted in any of	Part c of policy MLP 22 relates to non-designated assets, with paragraph 6.89 highlighting that there is significant potential for mineral development to impact on heritage assets with known or unknown archaeological interest. A change will be made as suggested to clarify within policy MLP that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.

Consultee	Consultee comments	Initial officer response
	<p>the above policies and raises a concern in respect of soundness. It is recommended that reference to non-designated assets is included specifically within Policy MLP22, as set out in comments below, or that a specific criteria relating to the matter is included within Policy MLP4, MLP5, MLP6, MLP7 and MLP8 individually.</p>	
<p>G029-717 Natural England</p>	<p>Natural England do not suggest any changes to this policy currently but please cross reference to our comments on the HRA.</p>	<p>Changes will be made to refer to the potential for functional links with the Severn Estuary SPA in the text about the Lower Severn Strategic Corridor and the Avon and Carrant Brook Strategic Corridor.</p>

Table 35. Overview, showing consultees who responded to Question 8 in relation to policy MLP 6 (North East Worcestershire Strategic Corridor)

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G011-2505 Bright & Associates	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G021-1942 Historic England G022-2523 Association of Black Country Authorities G027-1957 Worcestershire County Council

Table 36. Detailed comments on Question 8 in relation to policy MLP 6 (North East Worcestershire Strategic Corridor)

Consultee	Consultee comments	Initial officer response
G011-2505 Bright & Associates	The Policy and Reasoned Justification emphasises the importance of landscape restoration. This is an important aspect of any proposal, however each site will present its own opportunities and constraints. Each site restoration should be developed to take account of the policy text but not constrained by it. The text should be more general.	The priorities for the North East Worcestershire Strategic Corridor are not only about landscape restoration, but are multifunctional green infrastructure priorities. Policy MLP 6 requires a technical assessment to demonstrate how, throughout its lifetime, the development will <u>optimise opportunities</u> to deliver the green infrastructure priorities. This means that where opportunities to deliver a particular priority do not exist (or delivering them would not be practicable) on a particular site, this can be demonstrated and taken into account in the development management process. However, where

Consultee	Consultee comments	Initial officer response
		<p>opportunities do exist, the technical assessment should demonstrate how delivering them will be <u>optimised</u>. The term "optimised" has been included to recognise that there may be circumstances where delivering a priority could conflict with other parts of the development plan, or other material considerations.</p> <p>The strategic corridor priorities should be considered alongside the requirements of policy MLP 3, which expects holistic consideration of the local context and site-specific considerations to influence how green infrastructure will be delivered on individual sites whilst contributing towards the relevant strategic corridor priorities (paragraph 4.32).</p> <p>The plan recognises that in some cases it may not be possible or desirable to deliver all priorities on a single site, but it is considered that in most cases it will be both possible and appropriate for some elements of the priorities to be incorporated. 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, and the fact that they have been developed in consultation with multiple stakeholders through a Minerals Green Infrastructure Steering Group should mean that proposals which deliver against the priorities are more likely to be supported by those stakeholders.</p> <p>The balance between any competing priorities or requirements will need to be considered as part of the development management process, and applicants are encouraged to explore this through pre-application</p>

Consultee	Consultee comments	Initial officer response
		discussions with the Mineral Planning Authority and relevant stakeholders.
G012-2459 Wildmoor Residents Association	Item 4.110 highlights the importance of this strategic recreation asset.	Noted.
G012-2459 Wildmoor Residents Association	Item 4.112 would be a very welcome improvement if it was implemented properly as opposed to the current situation where it has not happened at all!	Noted. It is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which should be implemented and are able to be enforced. We agree that this is a key part of the effective operation of the planning system.
G012-2459 Wildmoor Residents Association	Item 4.114 should make mention of or reference to water Source Protection Zones and their significance.	Changes will be made to the text introducing the North East Worcestershire Strategic Corridor to highlight the presence of multiple Source Protection Zones.
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this policy and its associated reasoned justification. The corridor priorities appear sensible to us and we concur with the priority features listed for conservation, enhancement and creation.	Support noted.
G021-1942 Historic England	Policy MLP6: North East Worcestershire Strategic Corridor Paragraph 4.109; The Strategic Corridors clearly have potential for unknown buried archaeology due to the riverside locations with gravel terraces where the paleolithic potential is high and this is recognised in text that accompanies the policies. In addition, the Plan sets out in its introductory sections that there is potential for aggregates along the rivers. However, the consideration of the impact on non-designated archaeology is not highlighted in any of the above policies and raises a concern in respect of soundness. It is recommended that reference to non-designated assets is included specifically within Policy MLP22, as set out in comments below, or that a specific criteria relating to the matter is included within Policy MLP4, MLP5,	Part c of policy MLP 22 relates to non-designated assets, with paragraph 6.89 highlighting that there is significant potential for mineral development to impact on heritage assets with known or unknown archaeological interest. A change will be made as suggested to clarify within policy MLP that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.

Consultee	Consultee comments	Initial officer response
	MLP6, MLP7 and MLP8 individually.	
G022-2523 Association of Black Country Authorities	Given their location in relation to the Black Country, these 'strategic corridors' appear to be well placed to supply development projects in Dudley and possibly also Sandwell, in addition to the other areas of 'planned growth' mentioned in the introductory paragraphs 4.111 and 4.141. We suggest adding a reference to this in these paragraphs.	Noted, a change will be made to refer to the potential to serve planned growth in the West Midlands conurbation, rather than Birmingham.
G027-1957 Worcestershire County Council	Figures 4.4 and 4.5 (and possibly other figures): there is a spelling error in the scale key (it says "kilometers" rather than "kilometres").	Noted, this will be amended.

Table 37. Overview, showing consultees who responded to Question 8 in relation to policy MLP 7 (North West Worcestershire Strategic Corridor)

Consultees who answered "Yes": 0	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
	<p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	<p>G001-232 Worcestershire Acute Hospitals NHS Trust</p> <p>G011-2505 Bright & Associates</p> <p>G012-2459 Wildmoor Residents Association</p>	<p>G013-1971 Wyre Forest District Council</p> <p>G017-1081 Worcestershire Wildlife Trust</p> <p>G021-1942 Historic England</p> <p>G022-2523 Association of Black Country Authorities</p> <p>G027-1957 Worcestershire County Council</p>

Table 38. Detailed comments on Question 8 in relation to policy MLP 7 (North West Worcestershire Strategic Corridor)

Consultee	Consultee comments	Initial officer response
G013-1971 Wyre Forest District Council	<p>1 Wyre Forest District Council welcomes the fourth stage consultation on the Worcestershire Minerals Local Plan. The council recognises that the North West Worcestershire Strategic Corridor has been reduced in size by 11.1%, from 6061 ha to 5391 ha, since the Third Consultation stage in 2013. (Worcestershire Minerals Local Plan Background Document: Location of development: screening and site selection methodology, August 2018, p14)</p> <p>2 The council also notes that the settlements of Blakedown, Broadwaters, Cookley, Kidderminster, Stourport-on-Severn and Wolverley have been removed</p>	Noted.

Consultee	Consultee comments	Initial officer response
	<p>from the corridor.</p> <p>3 It should also be noted that a substantial part of the North West Worcestershire Corridor lies within the West Midlands Green Belt. As discussed in paragraph 4.142, mineral extraction in itself is not inappropriate in the Green Belt, providing that it preserves the Green Belt openness and does not conflict with the purposes of including land within it, which is further outlined in Policy MLP 18: Green Belt. (NPPF, July 2018, Paragraph 146)</p> <p>4 Further to this paragraph 6.26 of the Minerals Plan <i>notes that 'very special circumstances may need to be demonstrated for mineral developments (in the Green Belt) or elements of them, if they are to be considered acceptable'</i>. Indeed this was the basis that the case of <i>R (Samuel Smith Old Brewery (Tadcaster) and Oxton Farm) v North Yorkshire County Council and Darrington Quarries Ltd</i> was successfully appealed on. (https://www.publiclawtoday.co.uk/property/313-property-features/37603-mineral-extraction-in-the-green-belt)</p> <p>5 The council notes policy MLP 7 in reference to the North West Worcestershire Corridor in that planning permission will only be granted for mineral development that 'contributes towards the quality character and distinctiveness of the corridor through the delivery and enhancement of green infrastructure networks' (Worcestershire Minerals Local Plan-</p>	

Consultee	Consultee comments	Initial officer response
	Fourth Stage Consultation, 2018, p90). Any proposed mineral extraction will need to preserve and maintain the Green Infrastructure of the district.	
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this policy and its associated reasoned justification. The corridor priorities appear sensible to us and we concur with the priority features listed for conservation, enhancement and creation.	Support noted.
G021-1942 Historic England	Policy MLP7: North West Worcestershire Strategic Corridor Para 4.139; The Strategic Corridors clearly have potential for unknown buried archaeology due to the riverside locations with gravel terraces where the paleolithic potential is high and this is recognised in text that accompanies the policies. In addition, the Plan sets out in its introductory sections that there is potential for aggregates along the rivers. However, the consideration of the impact on non-designated archaeology is not highlighted in any of the above policies and raises a concern in respect of soundness. It is recommended that reference to non-designated assets is included specifically within Policy MLP22, as set out in comments below, or that a specific criteria relating to the matter is included within Policy MLP4, MLP5, MLP6, MLP7 and MLP8 individually.	Part c of policy MLP 22 relates to non-designated assets, with paragraph 6.89 highlighting that there is significant potential for mineral development to impact on heritage assets with known or unknown archaeological interest. A change will be made as suggested to clarify within policy MLP that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.
G022-2523 Association of Black Country Authorities	Given their location in relation to the Black Country, these 'strategic corridors' appear to be well placed to supply development projects in Dudley and possibly also Sandwell, in addition to the other areas of 'planned growth' mentioned in the introductory paragraphs 4.111 and 4.141. We suggest adding a reference to this in these paragraphs.	Noted, a change will be made to refer to the potential to serve planned growth in the West Midlands conurbation, rather than Birmingham.
G027-1957 Worcestershire County Council	Figures 4.4 and 4.5 (and possibly other figures): there is a spelling error in the scale key (it says "kilometers"	Noted, this will be amended.

Consultee	Consultee comments	Initial officer response
	rather than "kilometres").	

Table 39. Overview, showing consultees who responded to Question 8 in relation to policy MLP 8 (Salwarpe Tributaries Strategic Corridor)

Consultees who answered "Yes": 0	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G017-1081 Worcestershire Wildlife Trust G021-1942 Historic England

Table 40. Detailed comments on Question 8 in relation to policy MLP 8 (Salwarpe Tributaries Strategic Corridor)

Consultee	Consultee comments	Initial officer response
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this policy and its associated reasoned justification. The corridor priorities appear sensible to us and we concur with the priority features listed for conservation, enhancement and creation.	Support noted.
G021-1942 Historic England	Policy MLP8: Salwarpe Tributaries Strategic Corridor Para 4.174 The Strategic Corridors clearly have potential for unknown buried archaeology due to the riverside locations with gravel terraces where the paleolithic potential is high and this is recognised in text that accompanies the policies. In addition, the Plan sets out in its introductory sections that there is potential for aggregates along the rivers. However, the consideration of the impact on non-designated archaeology is not highlighted in any of the above policies and raises a concern in respect of soundness. It is	Part c of policy MLP 22 relates to non-designated assets, with paragraph 6.89 highlighting that there is significant potential for mineral development to impact on heritage assets with known or unknown archaeological interest. A change will be made as suggested to clarify within policy MLP that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.

Consultee	Consultee comments	Initial officer response
	recommended that reference to non-designated assets is included specifically within Policy MLP22, as set out in comments below, or that a specific criteria relating to the matter is included within Policy MLP4, MLP5, MLP6, MLP7 and MLP8 individually.	

Question 9. Are any wording changes needed to any of the policies or reasoned justification in **CHAPTER 5: Supply of mineral resources** to improve clarity, or to reflect any other issues that should be considered?

Table 41. Overview, showing consultees who made general comments in relation to Chapter 5 (Supply of mineral resources) in response to Question 9

Consultees who provided written comments (see below)
G018-2460 Mineral Products Association

Table 42. General comments on chapter 5 (Supply of mineral resources)

Consultee	Consultee comments	Initial officer response
G018-2460 Mineral Products Association	<p>Chapter 5. Supply of mineral resources (strategic policies) We believe the wording of para 5.1 needs altering to make it with consistent with national policy at para 207 of the NPPF Proposed Changes (deletions in striketrough; new text in bold) <i>Minerals provide the raw materials to support sustainable economic growth and quality of life. It is essential that there is a steady and adequate sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. To ensure that minerals are readily available to meet market demand and to minimise uncertainty and volatility in supply, it is important for the Minerals Local Plan to ensure that....</i></p>	<p>Paragraph 5.1 is relevant to all types of minerals. The term "sufficient supply" has been used to reflect the terminology used in paragraph 203 of the National Planning Policy Framework. Whilst the National Planning Policy Framework requires mineral planning authorities to plan for a steady and adequate supply of aggregates (paragraph 207) and industrial minerals (paragraph 208), it does not require the same for energy minerals (paragraphs 209-211).</p>

Table 43. Overview, showing consultees who responded to Question 9 in relation to policy MLP 9 (Contribution of Substitute, Secondary and Recycled Materials and Mineral Waste to Overall Minerals Supply)

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates	G012-2459 Wildmoor Residents Association G013-1971 Wyre Forest District Council G027-1957 Worcestershire County Council

Table 44. Detailed comments on Question 9 in relation to policy MLP 9 (Contribution of Substitute, Secondary and Recycled Materials and Mineral Waste to Overall Minerals Supply)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	Following what is said in the Consultation Stage 4 document, it would seem to make a constant and significant contribution in relation to sand production.	Noted.
G013-1971 Wyre Forest District Council	14 Whilst recognising the need for aggregate mineral extraction to serve housing demand for Worcestershire and to maintain at least a seven year land bank, other construction methods could also be used for development. For example, modular off site homes could be used to alleviate some housing demand. Central Housing Investment Consortium have recently installed a Build Smart Show Home in Kidderminster (Wyre Forest Planning ref 18/0398/FULL) for a two year period (http://www.chicltd.co.uk/accelerated-delivery-chics-modular-showhome-arrives-in-kidderminster/), whilst We Can Make It have carried out a community led off-site house building project in Knowle West, South Bristol	Noted. It is unclear what level of impact of modular housing may have on demand for mineral resources, or on what timescales this might be felt. It is considered that the Minerals Local Plan includes sufficient flexibility to adapt to any changes in demand over the life of the plan.

Consultee	Consultee comments	Initial officer response
	<p>(https://kwmc.org.uk/projects/wecanmake/).</p> <p>15 This may also be increasingly used due to the bricklayer shortage. This was highlighted in the recent Independent Review of Build out: Final Report by Sir Oliver Letwin, in which this will be <i>'would be a binding constraint in the immediate future if there was not either a substantial move away from brick-built homes or a significant import of more skilled bricklayers from abroad'</i> (Independent review of build out: final report, October 2018, Paragraph 1.11, https://www.gov.uk/government/publications/independent-review-of-build-out-final-report). With the uncertainty over migration from Brexit this may impact bricklaying construction.</p>	
G027-1957 Worcestershire County Council	<p>Policy MLP 9: Contribution of Substitute, Secondary and Recycled Materials and Mineral Waste to Overall Minerals Supply: We [the Development Management team] welcome this policy, which encourages substitute, secondary and recycled materials where they also accord with the policies of the Waste Core Strategy.</p>	Support noted.

Table 45. Overview, showing consultees who responded to Question 9 in relation to policy MLP 10 (Steady and Adequate Supply of Sand and Gravel)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G033-2450 Heaton Planning on behalf of Tarmac

Table 46. Detailed comments on Question 9 in relation to policy MLP 10 (Steady and Adequate Supply of Sand and Gravel)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	What safeguards does the Authority undertake to ensure that the developers of sites have appropriate qualifications and business experience and the contractors they employ to execute controlled extraction work and procedures? Desk top studies are not always accurate or meaningful in all situations.	<p>The reasoned justification sets out that the technical assessments required by the policies should be undertaken by an appropriate and competent expert. When the technical assessment is provided as part of a planning application, it will be scrutinised by officers, and consultation undertaken with stakeholders. If there are any concerns about the quality or competence of the assessments, further information can be requested, or the planning application refused on the grounds of insufficient evidence.</p> <p>Whilst it is beyond the remit of the planning system to control the qualifications and experience of any individuals employed at a mineral site, the use and monitoring of planning conditions should ensure that development is carried out as permitted. It is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions, and that these can be monitored and enforced. We agree that this is a key part of the effective</p>

Consultee	Consultee comments	Initial officer response
		<p>operation of the planning system, and consultation has been undertaken on an Enforcement Plan in Spring 2019.</p> <p>Other regulatory regimes, such as Environmental Permitting, may also have a role to play.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>As referred to above, the Plan should not provide a limit – either total quantity of sand and gravel to be provided nor production capacity – but be flexible to respond to demand. Tarmac support the objectives of Policy MLP10 but suggest that criteria (b) is qualified in light of the above to: b) enabling Worcestershire’s productive capacity for sand and gravel supply to be maintained or enhanced <i>to meet identified and assessed need</i>. This would also reflect and ensure that productive capacity is maintained year on year as well as ensuring that there is sufficient sand and gravel permitted to meet anticipated demand over the Plan period.</p>	<p>The Minerals Local Plan does not set a limit on either landbanks or productive capacity. For example, Policy MLP 10 seeks mineral development which contributes to maintaining a landbank of <u>at least</u> 7 years, and paragraph 5.11 refers to the need for the provision of <u>at least</u> a further 11.53 million tonnes of sand and gravel. Figures for annual production and lifetime provision using baseline data have been referred to in the reasoned justification but have purposefully not been included in the policies themselves because the annual production guideline figure in the Local Aggregate Assessment will inevitably vary from year to year, as referenced in paragraph 5.12.</p> <p>Whilst adding the text "<i>to meet identified and assessed need</i>" to part b) of policy MLP 10 could be helpful in some instances, it could be more limiting in other circumstances, such as if there already appears to be sufficient productive capacity in the county. This could hinder new entrants to the market or prevent increased flexibility for existing operators. It is therefore not considered appropriate to include the suggested change.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Paragraph 5.10 refers to the production guideline identified in the LAA. This is 0.607 million tonnes – the same as the 10 year average sales. Whilst this is a useful starting point for considering sand and gravel requirements over the Plan period, it is reiterated that sales are not necessarily an accurate reflection of demand and are influenced by active working. As per paragraph 207(a) the MPA must use other sources and relevant local</p>	<p>The baseline Local Aggregate Assessment (using data up to 31st December 2016) was prepared in line with National Planning Policy Framework and Planning Practice Guidance requirements, and the Planning Officers Society and Mineral Products Association's Practice Guidance on the Production and Use of Local Aggregate Assessments (April 2015). The average of the past 10 years sales was used as a starting point, and</p>

Consultee	Consultee comments	Initial officer response
	information to forecast future demand.	<p>then other relevant local information considered to determine whether deviation from that figure was warranted. In the baseline Local Aggregate Assessment, no deviation was required, but that does not mean that it may not be required in future, depending on the information and data available at the time.</p> <p>The need to understand demand factors is recognised by the Mineral Planning Authority and is addressed as fully as possible in the baseline Local Aggregate Assessment, but the lack of available data makes it extremely difficult to do this with a high level of certainty at present. Should further data become available, it will be taken into account in future Local Aggregate Assessments. The likelihood of changes in the balance of demand and supply over the life of the plan is recognised in paragraph 5.12.</p>

Table 47. Overview, showing consultees who responded to Question 9 in relation to policy MLP 11 (Steady and Adequate Supply of Crushed Rock)

Consultees who answered "Yes": 0	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
	<p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	<p>G001-232 Worcestershire Acute Hospitals NHS Trust</p> <p>G011-2505 Bright & Associates</p> <p>G012-2459 Wildmoor Residents Association</p>	<p>G033-2450 Heaton Planning on behalf of Tarmac</p>

Table 48. Detailed comments on Question 9 in relation to policy MLP 11 (Steady and Adequate Supply of Crushed Rock)

Consultee	Consultee comments	Initial officer response
G033-2450 Heaton	There are no active crushed rock sites within Worcestershire with no sites put	Policy MLP 11 is intended to enabling crushed rock development to come

Consultee	Consultee comments	Initial officer response
Planning on behalf of Tarmac	forward as part of the call for sites or pending applications. As a result, the LAA is advocating an annual requirement of 0 tonnes to be provided within the County. However, the requirement for crushed rock imports is twice as high in 2014 as 2009 (2018 LAA paragraph 6.32). In light of this, and to encourage supply, it is not considered necessary that there is a requirement to enable crushed rock productive capacity or the landbank to be 'maintained'. Policy should be supportive of creating any landbank of permitted reserve and increasing indigenous crushed rock supply to meet need.	forward. The wording used in part a) of policy MLP 11 reflects the National Planning Policy Framework's requirement in paragraph 207 (f) that mineral planning authorities should plan for a steady and adequate supply of aggregates by maintaining landbanks of at least 10 years for crushed rock. However, it is recognised that this could cause some ambiguity and be read as seeking to maintain a landbank of 0 years. A change will be made to policy MLP 10 to address this.

Table 49. Overview, showing consultees who responded to Question 9 in relation to policy MLP 12 (Steady and Adequate Supply of Brick Clay and Clay Products)

Consultees who answered "Yes": 0	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
None	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	None

Table 50. Overview, showing consultees who responded to Question 9 in relation to policy MLP 13 (Steady and Adequate Supply of Silica Sand)

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates	G010-2412 Central Bedfordshire Council G012-2459 Wildmoor Residents Association G018-2460 Mineral Products Association

Table 51. Detailed comments on Question 9 in relation to policy MLP 13 (Steady and Adequate Supply of Silica Sand)

Consultee	Consultee comments	Initial officer response
G010-2412 Central Bedfordshire Council	We are pleased to note the policies in the Plan for maintaining supplies of aggregates in accordance with national guidelines. However, our main interest relates to the production of Silica Sand, a nationally important mineral, which is also quarried within our own area. We note that Worcestershire currently supplies less than 1% of the national production due to the particular grade of silica sand found in the County and the lack of demand for it. However, we welcome policy MLP13, which provides a commitment to achieving a steady and adequate supply of silica sand for industrial uses and, if appropriate, enhancing existing capacity. We therefore support the Draft Plan.	Support noted.
G012-2459 Wildmoor Residents Association	It would seem from the document that there is little demand for silica sand.	The National Planning Policy Framework is clear that mineral planning authorities need to "provide for the extraction of mineral resources of local and national importance", and it defines these as minerals which are necessary to meet society's needs, including silica sand. The Minerals Local Plan therefore plans for the "naturally bonded moulding

Consultee	Consultee comments	Initial officer response
		sands" which is the type of silica sand found in the county. Although in recent years sales of this material have been relatively small (2,000 tonnes for foundry uses in 2013), we understand from the mineral operator that this small amount of material supplies multiple small foundries around the UK, and therefore demand for the material cannot be discounted.
G018-2460 Mineral Products Association	<p>We support the principle of the policy but consider it unsound as it does not reflect properly NPPF at para 208, and is also not effective as it does not identify the quantum of landbank required by national policy at footnote 68 of the NPPF. The policy needs adjusting as follows;</p> <p>Proposed Changes (deletions in strike through; new text in bold)</p> <p><i>Planning permission will be granted for minerals development proposals that will contribute to achieving a steady and adequate supply of silica sand for industrial uses.</i></p> <p><i>A level of technical assessment appropriate to the proposed development will be required to demonstrate the contribution the proposed development will make towards:</i></p> <p><i>a) maintaining reserves of at least 10 years for individual silica sand sites, and at least 15 years for silica sand sites where significant new capital is required Supporting investment in developing, maintaining or improving new or existing plant and equipment; and/or</i></p> <p><i>b) Enabling Worcestershire's productive capacity for silica sand for industrial uses to be maintained or enhanced.</i></p>	<p>Your concerns and suggested changes regarding policy MLP 13 are noted. Whilst the changes you suggest closely reflect the wording of footnote 68 of the National Planning Policy Framework, it is considered that this loses the links to the requirements of paragraph 208 (c) "to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment". Changes will be made to ensure both elements are reflected in policy MLP 13 (and as brick clay is also referred to under the same National Planning Policy Framework paragraph, similar changes will be made to policy MLP 12).</p>

Table 52. Overview, showing consultees who responded to Question 9 in relation to policy MLP 14 (Adequate and Diverse Supply of Building Stone)

Consultees who answered "Yes": 0	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments (see below)
None	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G016-857 National Farmers Union

Table 53. Detailed comments on Question 9 in relation to policy MLP 14 (Adequate and Diverse Supply of Building Stone)

Consultee	Consultee comments	Initial officer response
G016-857 National Farmers Union	Building stone - A supply of building stone for historic buildings and stone walling will be required from time to time by farm businesses. It may be appropriate to extract small supplies of building stone for local and farm based projects and the plan should enable this	Noted. Policy MLP 14 would enable this type of development. Paragraph 5.32 notes that it is anticipated that demand may arise for building stone for the repair and maintenance of historic buildings and structures.

Table 54. Overview, showing consultees who responded to Question 9 in relation to policy MLP 15 (Supply of Other Locally and Nationally Important Industrial Minerals)

Consultees who answered "Yes": 0	Consultees who answered "No": 2	Consultees who answered "Don't know": 3	Consultees who provided written comments
None	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	None

Table 55. Overview, showing consultees who responded to Question 9 in relation to policy MLP 16 (Supply of Energy Minerals)

Consultees who answered "Yes": 1	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates	G012-2459 Wildmoor Residents Association G016-857 National Farmers Union

Table 56. Detailed comments on Question 9 in relation to policy MLP 16 (Supply of Energy Minerals)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	To be for the benefits of residents across Worcestershire as well as the production and supply of minerals.	It is beyond the remit of the Minerals Local Plan to direct that energy minerals must benefit Worcestershire residents specifically.
G016-857 National Farmers Union	We note that there are no known energy mineral resources in the county. However this is an emerging field and our members are watching the development of these industries and technologies with interest, particularly shale gas extraction. If such projects were proposed for Worcestershire there would need to be a further phase of public consultation and an assessment of the potential impacts upon land based industries. e.g through impacts on water supply and availability, subsidence and disruption to drainage systems.	Despite there being no known energy mineral resources in the county, Policy MLP 16 is included to ensure that the plan is not silent should resources be discovered and planning applications come forward. Should any planning applications for energy mineral development come forward, the development management policies in Chapter 6 will ensure that issues such as the water environment and land stability are considered.

Question 10. Are any wording changes needed to any of the policies or reasoned justification in **CHAPTER 6: Development Management** to improve clarity, or to reflect any other issues?

Table 57. Overview, showing consultees who responded to Question 10 in relation to policy MLP 17 (Prudent Use of Resources)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G027-1957 Worcestershire County Council

Table 58. Detailed comments on Question 10 in relation to policy MLP 17 (Prudent Use of Resources)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	The photograph of Wildmoor quarry on page 121 shows a background sand cliff which has resulted from the seemingly uncontrolled extraction of sand, undercutting in parts and never likely to see proper restoration! Looks pretty but the background story is far from!	The images used throughout the plan are intended to show examples of mineral working and processing in Worcestershire. The image on page 121 shows an example of processing the solid sands in the north of the county, and an example of processing terrace sand and gravel is shown on page 163.
G027-1957 Worcestershire County Council	Paragraph 6.11: This paragraph states that "The Mineral Planning Authority will expect energy and water efficiency measures to be considered and incorporated in plant, buildings, operations and transport". "Operations" are not referenced in the policy box text. Consideration should be given to including this in the policy wording, or to removing the word "operations" from the Reasoned Justification.	Noted, a change will be made to address this.

Table 59. Overview, showing consultees who responded to Question 10 in relation to policy MLP 18 (Green Belt)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
None	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G013-1971 Wyre Forest District Council G018-2460 Mineral Products Association G033-2450 Heaton Planning on behalf of Tarmac

Table 60. Detailed comments on Question 10 in relation to policy MLP 18 (Green Belt)

Consultee	Consultee comments	Initial officer response
G013-1971 Wyre Forest District Council	4 Further to this paragraph 6.26 of the Minerals Plan <i>notes that 'very special circumstances may need to be demonstrated for mineral developments (in the Green Belt) or elements of them, if they are to be considered acceptable'</i> . Indeed this was the basis that the case of <i>R (Samuel Smith Old Brewery (Tadcaster) and Oxton Farm) v North Yorkshire County Council and Darrington Quarries Ltd</i> was successfully appealed on (https://www.publiclawtoday.co.uk/property/313-property-features/37603-mineral-extraction-in-the-green-belt).	Noted.
G018-2460 Mineral Products Association	It is suggested that under para 6.26 (Reasoned Justification) that the temporary nature of mineral operations is also added as follows in the last sentence; Proposed Changes (deletions in striketrough ; new text in bold) <i>The presence of minerals - which can only be developed where they exist - and the contribution they can make to maintaining a steady and</i>	There is no basis in national policy or guidance for referring to the acceptability of temporary harm to the Green Belt to the reasoned justification supporting policy MLP 18. Impacts on the green belt will depend on the circumstances of each case. We recognise that the temporary nature of mineral development may, in certain circumstances be capable of being a material consideration, but it is unlikely

Consultee	Consultee comments	Initial officer response
	<p><i>adequate supply, and the temporary nature of mineral operations, may be capable of being relevant considerations, depending on the circumstances at the time of any application.</i></p> <p>The proposed changes will make the plan effective and is positive planning.</p>	<p>that this would be sufficient to demonstrate very special circumstances in every case.</p> <p>It is also possible that in some circumstance, mineral development could lead to irreversible harm to the Green Belt, even after working has ceased and the site has been restored. In these circumstances the temporary nature of mineral extraction will not prevent such harm.</p> <p>It is considered that the change proposed would not accord with the National Planning Policy Framework, and therefore no change will be made to the Minerals Local Plan. However, this will not prevent this being a material consideration in the determination of specific planning applications as they come forward.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>The last paragraph of policy MLP18 is not in accordance with paragraph 144 of the NPPF. It should be amended to include reference to 'other considerations' which could outweigh inappropriateness of harm to the Green Belt.</p>	<p>Noted. Whilst the policy as drafted in the Fourth Stage Consultation is considered to be sound, as "other considerations" are captured within the meaning of "very special circumstances", a change will be made to policy MLP 18 to more closely reflect the wording used in paragraph 144 of the National Planning Policy Framework.</p>

Table 61. Overview, showing consultees who responded to Question 10 in relation to policy MLP 19 (Amenity)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G007-1700 Worcestershire Regulatory Services (air quality, contamination) G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G018-2460 Mineral Products Association

Table 62. Detailed comments on Question 10 in relation to policy MLP 19 (Amenity)

Consultee	Consultee comments	Initial officer response
G007-1700 Worcestershire Regulatory Services (air quality, contamination)	We welcome the inclusion of requirements for technical assessment of any proposals in relation to local air quality management in Policy MLP19: Amenity, linked to MO4.	Support noted.
G007-1700 Worcestershire Regulatory Services (air quality, contamination)	In relation to paragraph 6.35 and potential mitigation measures relating to local air quality management please be aware that whilst planting can, in some cases, help to contain particulates within the boundary of a site there is little evidence to demonstrate that vegetation can absorb pollutants.	Noted, a change will be made to reflect this.
G007-1700 Worcestershire Regulatory Services (air quality, contamination)	We welcome the inclusion of requirements for technical assessment of any proposals in relation to contaminated land in Policy MLP19: Amenity, linked to MO4.	Support noted.
G012-2459 Wildmoor	Under 6.33 Air Quality – air blown sand and dust is a considerable problem for	Wheel washing can be required by attaching a condition to a planning

Consultee	Consultee comments	Initial officer response
Residents Association	neighbourhoods near to sand extraction quarries depending on the amount of dust being produced and transport driven on dirt tracks. Wheel washing never happens so the photo on page 124 is purely aspirational!	application, although these have not always been required at all the sites in the county to date. Policy MLP 19 should help to identify when this is a necessary and appropriate mitigation measure. The photo on page 124 is at Clifton Quarry in the south of the county.
G017-1081 Worcestershire Wildlife Trust	We are pleased to support the commentary regarding avoidance of harm to wildlife (including in the reasoned justification sections on noise and vibration and light). It is essential that these 'indirect' effects are taken into account and mitigated effectively during the operation of minerals sites so that impacts on wildlife are appropriately limited.	Support noted.
G018-2460 Mineral Products Association	<p>We believe the reference to Health Impact Assessment (HIA) in para 6.3 exceeds national policy and is unsound.</p> <p>Paragraph 04 Reference ID: 53-004-201400306 of the Planning Practice Guidance states that; <i>A health impact assessment may be a useful tool to use where there are expected to be significant impacts (my emphasis).</i></p> <p>It is important to note also that the above is guidance only and not National Policy.</p> <p>Health should form part of the scope and screening for an EIA to support an Environmental Statement.</p> <p>Reference to HIA should be deleted.</p>	<p>Your comment refers to paragraph 6.30, rather than 6.3.</p> <p>Paragraph 6.30 does not make the distinction set out in the Planning Practice Guidance about significant impacts, a change will be made to address this and refer to screening for potential significant impacts.</p> <p>Policy MLP 30 does not require a standalone Health Impact Assessment for every mineral development, and where potential impacts are addressed through an Environmental Impact Assessment, this is likely to be sufficient. However, it is possible that some mineral development may fall outside the scope of the Environmental Impact Assessment Regulations, or may need to be screened for the likelihood of significant effects, and therefore the potential value of Health Impact Assessments in helping to avoid or minimise negative impacts and to enhance the positive aspects of a proposal has been highlighted in paragraph 6.30.</p>

Table 63. Overview, showing consultees who responded to Question 10 in relation to policy MLP 20 (Access and Recreation)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments
None	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	None

Table 64. Overview, showing consultees who responded to Question 10 in relation to policy MLP 21 (Biodiversity)

Consultees who answered "Yes": 2	Consultees who answered "No": 2	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust	G012-2459 Wildmoor Residents Association G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G018-2460 Mineral Products Association G027-1957 Worcestershire County Council G028-719 Environment Agency G029-717 Natural England G033-2450 Heaton Planning on behalf of Tarmac

Table 65. Detailed comments on Question 10 in relation to policy MLP 21 (Biodiversity)

Consultee	Consultee comments	Initial officer response
G011-2505 Bright & Associates	Replace technical study with technical assessment	Noted, this change will be made.
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this important policy but we consider that it may aid clarity to add wording detailing the need for appropriate mitigation and compensation in cases where the benefits of development do allow for some harm to biodiversity under parts d), f) and g). This could simply be the addition of a sentence requiring mitigation or compensation similar to that used in part e) or it may be more appropriate to add an additional bullet to the effect that 'Where the policy requirements set out in parts d) - g) have been met and	Support noted. Changes will be made to policy MLP 21 to reflect the need for appropriate mitigation and compensation measures in cases where some harm to biodiversity is allowed. The mitigation hierarchy is already embedded within the second bullet point of paragraph 6.76.

Consultee	Consultee comments	Initial officer response
	<p>development is allowed to proceed, appropriate mitigation and compensation for harm caused will be required'. For clarity it would also be helpful to add the wording 'unless the need for, and benefits of, development in that location would clearly outweigh the harm' to part g). Wording relating to the mitigation hierarchy could usefully be added to para 6.76 of the reasoned justification for the policy.</p>	
<p>G018-2460 Mineral Products Association</p>	<p>Policy MLP 21: Biodiversity The policy as currently drafted does not properly reflect National Policy and is unsound. Para 171 of the NPPF states; <i>Plans should: distinguish between the hierarchy of international and locally designated sites;</i> Policy 21 makes no such distinction and needs to be totally redrafted to properly reflect the requirements of national policy and make it sound.</p>	<p>It is unclear why the Mineral Products Association considers that policy MLP 21 does not do reflect and distinguish between the hierarchy of international and locally designated sites, as required by the National Planning Policy Framework.</p> <p>The policy sets different tests for international sites (part c), national sites (parts d, e, and f) and local sites (part g), reflecting the tests set out in national policy and guidance.</p>
<p>G027-1957 Worcestershire County Council</p>	<p>Policy MLP 21: Biodiversity: Note that parts e) and f) of the policy require slightly different tests for veteran trees when inside ancient woodland and when outside ancient woodland. Whilst we do not object to this pragmatic approach, it should be noted that NPPF (paragraph 175) does not appear to distinguish between 'within' and 'outside' ancient woodland for veteran trees.</p>	<p>Noted, a change will be made to remove part f) relating to aged or veteran trees outside ancient woodland to better reflect the National Planning Policy Framework.</p>
<p>G027-1957 Worcestershire County Council</p>	<p>In the absence of detailed government guidance on biodiversity net gain, and until such guidance is put into place, I recommend that reference to 'net gains for biodiversity' includes the term 'measurable' net gain.</p> <p>The DEFRA/MHCLG consultation on net gain proposes a revised biodiversity metric (an iteration beyond the version referenced at paragraph 6.79/footnote 436 of the</p>	<p>The need for net gains to be measurable is referred to in paragraph 6.73. Changes will be made to strengthen this. As there is still significant uncertainty about emerging biodiversity metrics or biodiversity "units" it is considered most appropriate to ensure reference is included in the reasoned justification to the need for technical assessments to demonstrate how the proposed net gains will be measured and monitored, but for any specific metrics to be explored at the time of each planning application.</p>

Consultee	Consultee comments	Initial officer response
	<p>MLP). We might therefore consider making explicit reference to this (or 'the emerging') DEFRA metric? I suggest that we reference this within additional text establishing biodiversity consideration "as a minimum", as already been set out at Para 6.76, so as to ensure each minerals development is capable of demonstrating (quantitatively) that biodiversity net gain has been achieved.</p> <p>The DEFRA/MHCLG consultation on biodiversity net gain also proposes a threshold of 10% uplift in biodiversity units to be considered as 'net gain'. However, it's recognised that this figure may be subject to change prior to finalisation. An agreeable degree of biodiversity gain could, until such guidance is put into place, remain at the discretion of the CPA. This figure could then be determined on a case-by-case basis as each site and scheme will have its own merits and capacities for biodiversity gains.</p>	
G027-1957 Worcestershire County Council	<p>Paragraph 6.73: suggest wording is included to establish a specific expectation for realising biodiversity opportunities during operational phases of mineral developments. While guidance is cited at Para 6.75, currently much more textual weight is given to the protection of existing assets and securing opportunities on restoration, which is entirely commendable. There will be scenarios in which phased working could (and should) deliver valuable measures for biodiversity even if in some cases these are designed to be temporary in nature. Examples may include invertebrate banks,</p>	<p>The need for biodiversity enhancement to be provided throughout the life of the site is referred to in paragraph 6.74. A change will be made to strengthen this and to refer to the early delivery of features for biodiversity.</p>

Consultee	Consultee comments	Initial officer response
	<p>wildflower areas, set-asides for sand martins or other breeding birds etc. It would be good to highlight this as an expectation within Policy or RJ text. Similarly, for phased restoration the early installation of biodiversity features (and positive management of retained features) will bring greater overall biodiversity benefits and so I'd recommend we establish this as an explicit expectation.</p>	
<p>G027-1957 Worcestershire County Council</p>	<p>With regards to "providing stepping stones between existing sites to help reduce habitat fragmentation" could I encourage specific reference to the Worcestershire Habitat Inventory: www.worcestershire.gov.uk/info/20302/worcestershire_habitat_inventory as a tool to identify habitat network fragmentation/resilience.</p>	<p>Noted, change to be made to strengthen references to the Worcestershire Habitat Inventory.</p>
<p>G027-1957 Worcestershire County Council</p>	<p>Paragraph 6.79: I recommend offsite habitat offsetting is considered only in 'wholly' exceptional circumstances and I would encourage inclusion of this text within the policy so that MLP21 is explicit the mitigation hierarchy must be applied prior to any 'offsite' offsetting scheme being explored. In these wholly exceptional circumstances I suggest that offsetting is only acceptable for habitats (not species) impacts and should only be acceptable where a high multiplier of biodiversity units (i.e. degree of gain >10% biodiversity units) is achieved. This biodiversity gain should include a considerable measure towards strategic defragmentation of priority habitat networks in the locality of the scheme. My preference is to avoid habitat 'trading' (i.e. habitat compensation</p>	<p>Noted, changes will be made to strengthen and clarify the circumstances when biodiversity offsetting may be acceptable.</p>

Consultee	Consultee comments	Initial officer response
	<p>would be like-for-like) however, the plan might also propose that habitat uptrading might, in certain circumstances, be acceptable (i.e. a greater area of priority/BAP habitat is provided in lieu of semi-natural habitats lost). Any offset should be local to the habitats lost and, as the MLP is built upon a landscape character framework, the plan lends itself well to specifying no offset should be deployed outside the strategic minerals corridor where impact arises. Further assurance that any offsetting scheme manages risk, both financial and temporal, should be submitted to the satisfaction of the CPA and this should include some security for ongoing monitoring and habitat management at the applicant's expense. The detailed nature of these measures will of course be site and scheme specific, however, the expectation that these considerations apply in local offsetting schemes should ideally accompany the text which facilitates the option of offsetting for future mineral development in Worcestershire.</p>	
<p>G027-1957 Worcestershire County Council</p>	<p>Paragraph 6.80: in its current wording this implies that where overall benefits from working close to sensitive features are proposed by a scheme, operations might be permitted which would cause otherwise unacceptable adverse impacts to biodiversity. This sets up an internal conflict within the plan, including possible HRA implications. Enhancement of connectivity through restoration of habitats is cited as an example but is not a mandatory criterion for this approach. I recommend that we</p>	<p>Noted, changes will be made to remove this ambiguity.</p>

Consultee	Consultee comments	Initial officer response
	<p>revise wording so that, in such scenarios, the CPA expects schemes to robustly demonstrate both overall benefit and specific benefit to biodiversity which includes the enhancement of connectivity between priority habitats. This should be acceptably demonstrated prior to permitting closer working to such sensitive features.</p>	
<p>G028-719 Environment Agency</p>	<p>Policy MLP 21: Biodiversity- We commend this ambitious policy. Again, we would suggest greater reference to river corridor enhancement and habitat creation as a priority of this policy. We would also recommend reference to the Water Framework Directive (WFD) and its aims within the reasoned justification. Given the riparian location of most of the sites being brought forward greater emphasis should be placed on the need to protect and enhance river corridors and embed this more explicitly within the policy wording.</p>	<p>Support noted. Changes will be made to refer to river corridors and the Water Framework Directive.</p>
<p>G029-717 Natural England</p>	<p>Natural England welcomes MLP 21 Biodiversity. We draw attention to our comments on the Habitat Regulation Assessment below.</p>	<p>Support noted. Changes will be made to the text supporting the Lower Severn Strategic Corridor and Avon and Carrant Brook Strategic Corridor to refer specifically to the potential for enhancing functional links with the Severn Estuary SPA. This is considered to be too specific for explicit reference in the text supporting policy MLP 21, as it will not apply to all parts of Worcestershire. However, the policy requires ecological networks to be conserved, restored and enhanced and net gains for biodiversity to be delivered, and the reasoned justification will be strengthened to ensure that developments will support coherent and resilient networks to help reduce habitat fragmentation.</p>
<p>G033-2450 Heaton Planning on behalf of</p>	<p>Policy MLP 21 is not in accordance with the NPPF (paragraph 175 (c). Part (f) of the policy should be deleted. Veteran and ‘ancient’ trees are covered by the</p>	<p>Noted. Changes will be made to remove part f) relating to aged or veteran trees outside ancient woodland, and to better enable</p>

Consultee	Consultee comments	Initial officer response
Tarmac	<p>criteria at part (e) of the policy.</p> <p>Part (g) of the policy is not in accordance with the NPPF (paragraph 175 (a) as it does not allow for compensation for harm to biodiversity assets.</p>	mitigation and compensation to be addressed under part g).

Table 66. Overview, showing consultees who responded to Question 10 in relation to policy MLP 22 (Historic Environment)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G011-2505 Bright & Associates	<p>G012-2459 Wildmoor Residents Association</p> <p>G017-1081 Worcestershire Wildlife Trust</p> <p>G029-717 Natural England</p>	G001-232 Worcestershire Acute Hospitals NHS Trust	<p>G011-2505 Bright & Associates</p> <p>G018-2460 Mineral Products Association</p> <p>G021-1942 Historic England</p> <p>G027-1957 Worcestershire County Council</p> <p>G033-2450 Heaton Planning on behalf of Tarmac</p>

Table 67. Detailed comments on Question 10 in relation to policy MLP 22 (Historic Environment)

Consultee	Consultee comments	Initial officer response
G011-2505 Bright & Associates	Replace technical study with technical assessment	Noted, this change will be made.
G018-2460 Mineral Products Association	<p>This policy is not consistent with national policy and is therefore unsound.</p> <p>Para 189 of NPPF states in part; <i>In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the</i></p>	<p>Policy MLP 22 differentiates between designated assets in part b) and non-designated assets in part c). This reflects the requirements of paragraphs 195-197 of the National Planning Policy Framework.</p> <p>Policy MLP 22 also states that the level of technical assessment undertaken should be "appropriate to the proposed development and its potential impact</p>

Consultee	Consultee comments	Initial officer response
	<p><i>assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.</i></p> <p>As drafted the policy fails to make the distinction between the importance of different types of heritage and needs redrafting accordingly.</p>	<p>on the historic environment". This accords with paragraph 189 of the National Planning Policy Framework and is supported by the reasoned justification, particularly paragraph 6.87 which sets out that the assessments should "identify the presence and describe the significance of any designated and non-designated heritage assets likely to be affected at any stage of the proposed development" (first bullet point), as well as that they should "set out how the design of the site's working and restoration proposals takes account of the presence and significance of heritage assets and their setting" (third bullet point), and that in identifying whether the proposal would cause harm or loss "should clearly distinguish between designated and non-designated assets and the scale of harm or loss which would be caused" (fourth bullet point). This is considered to accord with paragraph 189 of the National Planning Policy Framework.</p>
<p>G018-2460 Mineral Products Association</p>	<p>Furthermore, the policy uses the word <i>harm</i> throughout the policy. This word should have the word <i>permanent</i> preceding it to properly reflect the temporary nature of minerals and that any impacts are often temporary.</p>	<p>There is no basis in national policy or guidance for adding the word "permanent" to policy MLP 22. The National Planning Policy Framework repeatedly mentions "harm" without any qualification of whether this is permanent or temporary, and in paragraph 193 states that great weight should be given to an asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. It is considered that introducing the concept of "temporary harm" in policy MLP 22 would not accord with this requirement.</p> <p>The historic environment is a finite resource, and the impacts on it will depend on the circumstances of each case. The temporary nature of mineral development may be capable of being material in a particular circumstance, but where a development would lead to</p>

Consultee	Consultee comments	Initial officer response
		irreversible harm or loss, the temporary nature of the development is unlikely to ameliorate such harm or loss. For example, any loss of an archaeological asset through extraction would be permanent and would not be rectified by the mineral development coming to an end. This type of loss may or may not be acceptable when considered against the tests set out in policy MLP 22.
G021-1942 Historic England	It is noted that the policy is supported by substantive text, particularly points contained in Paras 6.87, 6.88 and 6.89 and this is welcomed. However, it is recommended that the Plan position in relation to non-designated heritage assets that are demonstrably of equivalent significance to SM's, currently set out in Para 6.89, should be stated in Policy MLP22 itself for the avoidance of doubt and in relation to soundness for this policy and the Strategic Corridor policies.	Part c of policy MLP 22 relates to non-designated assets, with paragraph 6.89 highlighting that there is significant potential for mineral development to impact on heritage assets with known or unknown archaeological interest. A change will be made as suggested to clarify within policy MLP that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.
G021-1942 Historic England	In addition, it is not clear why restoration proposal requirements are included in the supporting text rather than appearing as a specific criterion. At present the criteria relate to development lifetime only and not aftercare which raises concern in relation to soundness of the Plan. Restoration linking to enhancement opportunities including the better revealing of assets should be included within Policy MLP22 to ensure a complete approach to the conservation of heritage assets and their setting.	Policy MLP 22 requires the technical assessment to demonstrate how the policy criteria will be met throughout the lifetime of the development. This includes site preparation, operation (extraction and/or processing), reclamation and restoration, and aftercare. A change will be made to the definition of mineral development in the glossary to make this clear. A change will be made to draw out the requirement for enhancing the condition, legibility and understanding of heritage assets and their setting. It is appropriate for these opportunities to be considered in relation to all phases of a site's life, not only through restoration.
G027-1957 Worcestershire County Council	Paragraph 6.87: Recommend adding the following sentence to the end of the first bullet: <i><u>"Where the site has potential to impact Palaeolithic archaeology or deposits containing significant</u></i>	Noted, a change will be made to refer to these documents.

Consultee	Consultee comments	Initial officer response
	<p><u><i>geological or environmental remains that could advance our understanding of the Palaeolithic, then the technical assessment should make reference to the Research Framework for the Palaeolithic in Worcestershire [REF 1] and the information provided in supporting documents [REF 2, 3]"</i></u></p> <p>References [REF 1] Hedge, R. et al. 2019 A Research Framework for the Palaeolithic in Worcestershire. WAAS internal report. [REF 2] Russell O, Daffern, N. 2014 Putting the Palaeolithic in Worcestershire's HER: Creating an evidence base and toolkit. WAAS internal report. [REF 3] Fairchild, I. Hedge, R and Bryant, R. 2018 Lost Landscapes of Worcestershire. The story of the Ice Age in Worcestershire. ISBN978-1-9998288-1-3</p>	
G027-1957 Worcestershire County Council	Paragraph 6.84: There is an additional word in the last sentence ("... the any..."), which should be removed.	Noted, this will be amended.
G027-1957 Worcestershire County Council	Title above paragraph 6.90: This would read better as " <i>Recording of lost heritage assets prior to loss</i> ".	Noted, this change will be made as suggested.
G033-2450 Heaton Planning on behalf of Tarmac	Policy MLP22 is currently contrary to the guidance contained within section 16 of the NPPF. Whilst it is correct that heritage assets are an irreplaceable resource, these should be conserved in a manner appropriate to their significance (paragraph 184). Part (b) currently seeks to ensure that development will, 'not cause any harm to, or loss of significance of, any designated heritage assets or their setting'. Whilst, 'great weight' should be given to a designated assets conservation (paragraph 193), the NPPF is not advocating that any impact is unacceptable. As a result, the sentence at the start of policy MLP22	Part b) of policy MLP 22 does seek to ensure that mineral development will not cause any harm to, or loss of significance of, any designated heritage assets or their setting, but it also includes tests to establish whether any harm or loss might be acceptable by also including "or where the proposed development would lead to: <ul style="list-style-type: none"> i. substantial harm to, or total loss of significance of, any designated heritage assets or their setting, the development will not be permitted unless it is demonstrated that it is necessary to achieve substantial public benefits that

Consultee	Consultee comments	Initial officer response
	<p>(part b) should be removed. The following sections which seek to assess the harm on the level of significance is in accordance with the NPPF.</p>	<p>outweigh that harm or loss; ii. less than substantial harm to the significance of any designated heritage asset or their setting, the development will only be permitted where it is demonstrated that the harm would be outweighed by the public benefits of the development;"</p> <p>This is considered to be in accordance with the National Planning Policy Framework.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Section (c) of policy MLP 22 seeks to ensure that development will, 'not cause unacceptable harm to, or loss of significance of any non-designated heritage assets or their setting'. Paragraph 197 of the NPPF advocates a 'balanced judgement' to be made having regard to the scale of any harm or loss and the significance of the heritage asset. It is considered that as written the policy wording is over and above the requirements of the NPPF and does not allow consideration of the significance of the impact balanced/weighed against the significance of the asset. As per comments above, the NPPF is not advocating that all development must preserve/conserves assets in all circumstances. As a result, the policy should be reworded.</p>	<p>Noted, a change will be made to better reflect the requirements of paragraph 197 of the National Planning Policy Framework.</p>

Table 68. Overview, showing consultees who responded to Question 10 in relation to policy MLP 23 (Landscape)

Consultees who answered "Yes": 0	Consultees who answered "No": 1	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
None	G005-2392 Charlton Parish Council	G001-232 Worcestershire Acute Hospitals NHS Trust	G005-2392 Charlton Parish Council G027-1957 Worcestershire County Council G029-717 Natural England

Table 69. Detailed comments on Question 10 in relation to policy MLP 23 (Landscape)

Consultee	Consultee comments	Initial officer response
G005-2392 Charlton Parish Council	As Parish Councillors in a potentially affected area we feel that we should at least have been formally notified about the plans at an earlier stage. We would hope and expect to be kept fully informed as the plan progresses	<p>Charlton Parish Council has been consulted at every stage of the development of the Minerals Local Plan (by letter for the First Stage and Second Stage Consultations, and by email for the Third Stage and Fourth Stage Consultations).</p> <p>The Parish Council was also informed by email when the responses received to the 4th Call for Sites, which included a site put forward in Charlton parish, were published in August 2018. No decisions have yet been made about which of the sites proposed should be allocated as specific sites or preferred areas. This will be considered through the development of the separate Mineral Site Allocations Development Plan Document.</p> <p>The Parish Council is a "specific consultation body" under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and your details are registered on our planning consultation database. You will continue to be informed about the progress of the Minerals Local Plan, and about the</p>

Consultee	Consultee comments	Initial officer response
		separate Mineral Site Allocations Development Plan Document as it is developed.
G027-1957 Worcestershire County Council	<p>Paragraph 6.95: There should probably be a reference to the Guidelines for Landscape and Visual Impact Assessment (GLVIA) in this section. It is not the only method of assessment and will likely be revised during the lifetime of the Plan, however, it is a standard assessment that should be a requirement of technical assessment. Suggest amending the second sentence as follows:</p> <p><i>"Such assessments should be undertaken by an appropriate and competent expert, <u>prepared in line with methods set out in the Guidelines for Landscape and Visual Impact Assessment (as amended), and will need to take account of...</u>"</i></p>	Noted, a change will be made to refer to these guidelines.
G029-717 Natural England	<p>Yes, Natural England suggests a change in wording to strengthen the landscape policy. In paragraph C. To add in the word special qualities..to the sentence, 'not have an unacceptable adverse effect on the special qualities of an Area of Outstanding Natural Beauty' AONB Management Plans include an assessment of the special qualities of the AONB that gives an understanding of the term Natural Beauty and the factors and sub-factors that contribute to Natural Beauty for that particular area.</p>	<p>Noted. It is considered that adding the term "special qualities" in the way suggested could weaken the policy's protection of the Areas of Outstanding Natural Beauty. However, part c) of policy MLP 23 will be amended to read:</p> <p>"not have an unacceptable adverse effect on an Area of Outstanding Natural Beauty, taking into account <u>its special qualities</u> and the provisions of the relevant Management Plan".</p>

Table 70. Overview, showing consultees who responded to Question 10 in relation to policy MLP 24 (Soils)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments
None	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	None

Table 71. Overview, showing consultees who responded to Question 10 in relation to policy MLP 25 (Best and Most Versatile Agricultural Land)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association

Table 72. Detailed comments on Question 10 in relation to policy MLP 25 (Best and Most Versatile Agricultural Land)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	Land that is used for quarrying which includes Best and Most Versatile Agricultural Land has rarely if ever been restored to its original quality.	Noted. The proposed policy framework seeks to ensure full account is taken of agricultural land quality, by including safeguards for how soil is stripped and stored (in policy MLP 24, Soils) and to prioritise the development of poorer land in preference to high-quality land in Policy MLP 25. It also seeks the longer-term capability of land for agricultural use to be safeguarded, even where restoration to agriculture is not proposed. This is considered to be in accordance with the requirements of the National Planning Policy Framework.

Table 73. Overview, showing consultees who responded to Question 10 in relation to policy MLP 26 (Geodiversity)

Consultees who answered "Yes": 2	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates

Table 74. Detailed comments on Question 10 in relation to policy MLP 26 (Geodiversity)

Consultee	Consultee comments	Initial officer response
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	augment para b) iii) where the proposed development is likely to expose features of geological conservation interest, for example within the internationally important river terrace systems, the benefits... (as before) p144, para 6.115, extend as follows Mineral sites offer opportunities to enhance scientific and cultural understanding of geodiversity by revealing, recording or retaining features of geological conservation interest. Sand and gravel deposits cannot be preserved except by leaving parts of the site untouched, but features of interest, such as changes in lithology, discovery of conspicuous vertebrate remains or organic-rich fossil beds can be recognised and exploited as extraction progresses. Planned investigations of lithology throughout the process might include collecting samples for dating purposes as well as material for education boards.	Noted. It is not considered necessary or appropriate to amend part b) iii. of policy MLP 26 as suggested, but changes will be made to the reasoned justification to refer to the issues raised.
G011-2505 Bright & Associates	Replace technical study with technical assessment	Noted, this change will be made.

Table 75. Overview, showing consultees who responded to Question 10 in relation to policy MLP 27 (Water Quality and Quantity)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G028-719 Environment Agency

Table 76. Detailed comments on Question 10 in relation to policy MLP 27 (Water Quality and Quantity)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	As previously described.	Noted under the relevant questions above.
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this important policy and the associated reasoned justification. Adverse impacts on the water environment are highly likely to lead to harm to biodiversity and so the strong policy guidance here is essential in our view.	Support noted.
G028-719 Environment Agency	We welcome this policy and the inclusion of recommendations from our letter dated 08 March 2017. We particularly welcome the commentary on the need for HIAs as this will be imperative to demonstrate the risk to controlled waters is acceptable and will likely shape the form of any resultant workings. We appreciate the added emphasis and reference to the WFD that now permeates the MLP. It is important that the WFD and the Severn River Basin Management Plan (SRBMP) form part of the wider evidence base for the plan and we are satisfied that this is now the case. We would recommend that the MLP	Support noted. A change will be made to provide a link to the catchment data explorer.

Consultee	Consultee comments	Initial officer response
	<p>sign posts our 'Catchment Data Explorer' (CDE) tool. This is a web application designed to enable our customers to explore information about catchments and the water bodies in them. The data it uses is published as linked data, an open format designed for reuse by anyone. Users can view the data in the application and download it in CSV format. Most of the data is sourced from our Catchment Planning System and the text summaries and photos are extracts taken from Catchment Summaries. CDE can be accessed here: http://environment.data.gov.uk/catchment-planning/</p> <p>Local level actions and decision making can help secure improvements to the water environment. This is widely known as the 'catchment-based approach' and has been adopted to deliver requirements under the WFD. It seeks to:</p> <ul style="list-style-type: none"> - deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and - encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment. 	

Table 77. Overview, showing consultees who responded to Question 10 in relation to policy MLP 28 (Flooding)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G028-719 Environment Agency

Table 78. Detailed comments on Question 10 in relation to policy MLP 28 (Flooding)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	The impact of flooding in none flood zone designated areas, due to inert land filling being foreign to the original material quarried, is not considered sufficiently.	Policy MLP 28 is intended to ensure that mineral development will avoid increasing flood risk to people and property, from all forms of flooding. Paragraph 6.130 states that "Flooding can occur from watercourses, surface water, ground water or sewers. It is not simply the result of rainfall but is influenced by landform and land management" and paragraph 6.134 sets out that the technical assessment required by policy MLP 28 should establish current and future level of flood risk from all sources where flooding could affect or be affected by the development. A change will be made to include greater reference to controlling and attenuate run-off.
G017-1081 Worcestershire Wildlife Trust	We are pleased to support this policy and its associated reasoned justification. In particular, we welcome the commentary on use of appropriate SUDS techniques and the integration of other GI components. The guidance on optimising flood betterment and especially reinstating natural floodplain processes (set out in para. 6.132) is	Support noted.

Consultee	Consultee comments	Initial officer response
	very helpful and would be expected to lead to biodiversity benefits. Accordingly, this is especially welcome.	
G028-719 Environment Agency	We support this policy and the ambition to provide for net flood risk betterment when bringing sites forward. Given the location and scale of some of the sites that will be brought forward, the scope for innovative and exemplar post restoration flood risk betterment is encouraging.	Support noted.

Table 79. Overview, showing consultees who responded to Question 10 in relation to policy MLP 29 (Transport)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G006-2372 Highways England G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G020-2436 Commercial Boat Operators Association G033-2450 Heaton Planning on behalf of Tarmac

Table 80. Detailed comments on Question 10 in relation to policy MLP 29 (Transport)

Consultee	Consultee comments	Initial officer response
G006-2372 Highways England	We welcome the opportunity to comment on the Worcestershire Minerals Local Plan (MLP), Mineral Site Allocations Development Plan and associated documents. We note that the new MLP will cover the	Support noted.

Consultee	Consultee comments	Initial officer response
	<p>period to 2035. Once adopted it will replace the existing minerals policies in the adopted Minerals Local Plan (1997) and will be part of the Development Plan for Worcestershire, to be used to make decisions about planning applications for mineral extraction, processing and restoration in the county.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Worcestershire area, our principal interest is in safeguarding the operation of the M5, M50, M42 and A46 which all route through the Local Plan area.</p> <p>We have reviewed the Fourth Stage Consultation, Mineral Site Allocations Development Plan and relevant background evidence documents. We would reiterate our previous comments made during the Third Stage Consultation, in January 2018, that we do not consider that any of the mineral sites will have a severe impact on the operation and functionality of the SRN.</p> <p>We acknowledge that minerals are a finite resource and the scale and distribution of these resources in Worcestershire inevitably influence where they can be worked.</p> <p>Furthermore, we welcome the Council's vision for mineral development in five strategic corridors where there is the greatest concentration of locally and nationally important mineral</p>	

Consultee	Consultee comments	Initial officer response
	<p>resources. We consider that this strategy will serve planned housing and infrastructure development, while helping to reduce the amount of freight traffic on the SRN across Worcestershire. Nonetheless, we recognise that there is likely to be a cumulative impact of traffic associated with developments considered within the Local Plan processes.</p> <p>We note that the document describes “mineral workings in Worcestershire to be small scale in comparison to other parts of the country” and that “multiple sites are likely to be required over the life of the plan”. Consequently it is considered that Transport Assessments and Environmental Impact Assessments should take place for new sites and, where appropriate, on a cumulative basis to assess the impact of HGV movements on the operation of the SRN. Any infrastructure needs arising from these assessments should be discussed and agreed with Highways England prior to planning permission being granted. In our previous response, in January 2018, we suggested that the need for such assessments be identified within the Worcestershire Minerals Local Plan. We are pleased to see this detailed in ‘Policy MLP 29: Transport’ within the document. This will be key when new mineral sites are identified in the area.</p> <p>We trust that the above is useful in the progression of the Minerals Local Plan for Worcestershire County Council and have no further comments to provide at this stage.</p>	
G012-2459 Wildmoor Residents Association	Worcestershire County Council has only one site enforcement officer. Despite his best efforts quarry owners need to take a greater responsibility for the damage and debris which these	Noted. It is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions, and that these can be

Consultee	Consultee comments	Initial officer response
	<p>concentrations of lorry movements create on the local highways. Over a period of years the A491 highway from Junction 4 of the M5 to Fairfield has had its gutters and kerbs covered and clogged in sand and mud. This has produced an unacceptable and adverse effect on other road users, safety and congestion.</p>	<p>monitored and enforced. We agree that this is a key part of the effective operation of the planning system, and consultation has been undertaken on an Enforcement Plan in Spring 2019.</p>
<p>G017-1081 Worcestershire Wildlife Trust</p>	<p>We are pleased to support the commentary regarding the delivery of GI enhancements found in part e) of the policy and para. 6.144 of the reasoned justification.</p>	<p>Support noted.</p>
<p>G020-2436 Commercial Boat Operators Association</p>	<p>The Commercial Boat Operators Association (CBOA) represents water freight carriage by barge on the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body.</p> <p>CBOA notes that some of these proposed sites for mineral extraction exist within the River Severn valley. The River Severn is classified as a Commercial Waterway and currently supports carriage of bulk aggregate in the Ryall area. The Severn is capable of large scale bulk transport by barge offering the benefits of removing much of this heavy freight from both the busy local road network and perhaps also the railways, the latter often running near to or at capacity.</p> <p>We would very much hope that the water transport option would be considered with a bias in favour for the sites relevant, where mineral extraction sites lie close to or along the river and water transport would offer the distinct advantages as mentioned above.</p> <p>Economies of scale may mean that water transport by barge is in fact cheaper than the road alternative in addition to being 'environmentally friendly', if a full cost analysis is carried out over a specified time.</p>	<p>The Minerals Local Plan recognises these opportunities, and Policy MLP 29 requires the use of the most sustainable transport option, requiring development to prioritise the use of alternatives to road transport for the movement of minerals and materials.</p> <p>The presence of navigable waterways is also highlighted in relation to the relevant strategic corridors in paragraphs 4.54, 4.82 (which also highlights that the River Severn is already used for transporting minerals), 4.111, 4.141 and 4.177.</p> <p>The Minerals Local Plan has been informed by the background document "Water Transport", which is available at www.worcestershire.gov.uk/mineralsbackground.</p>

Consultee	Consultee comments	Initial officer response
	<p>A summary of the water transport benefits, can be listed as follows:- Significant reduction of road congestion, where HGVs in built up areas are a major issue Lower risk of road accidents/fatalities Lower noise on highways Reduced highway wear and tear from HGVs, meaning lower long term highway maintenance costs Lower fuel consumption meaning reduction of the carbon footprint Lower exhaust emissions, meaning less air pollution in the district Each barge can carry 10 or more lorry loads.</p>	
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Part (b) of Policy MLP 29 is not considered justified and is therefore unsound. This requirement is considered to be overly onerous on operators given the often remote/rural nature of mineral development. This requirement should be removed.</p>	<p>Providing safe and convenient access for employees and visitors is considered to be a fundamental necessity, alongside appropriate access for the movement of minerals and materials. Part b) of policy MLP 29 requires "the use of public transport, walking and cycling" to be <u>optimised</u>. The term "optimised" has been included to recognise that there may be circumstances where this is not practicable, and the technical assessment required by Policy MLP 29 will be able to demonstrate whether this is the case. However, where opportunities do exist, the technical assessment should demonstrate how delivering them will be optimised. This is considered to accord with part c) of paragraph 102, parts a) and b) of paragraph 108, and part a) of paragraph 110 of the National Planning Policy Framework.</p>

Table 81. Overview, showing consultees who responded to Question 10 in relation to policy MLP 30 (Planning Obligations)

Consultees who answered "Yes": 1	Consultees who answered "No": 3	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G033-2450 Heaton Planning on behalf of Tarmac

Table 82. Detailed comments on Question 10 in relation to policy MLP 30 (Planning Obligations)

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	Should include a requirement to prevent the effects described above and or require the developer concerned to clean / wash lorries before exiting the quarry. Will the monitoring framework proposed be adequately linked to enforcement?	Policy MLP 30 will be used if a planning obligation is required to secure any mitigation or compensation measures identified as being necessary against the requirements of the other policies in the Minerals Local Plan. This policy provides additional strength to the new policy framework to enable strong and clear conditions to be attached to any planning permissions, or for planning obligations to be required where conditions are not sufficient. These can then be monitored and enforced. We agree that this is a key part of the effective operation of the planning system, and consultation has been undertaken on an Enforcement Plan in Spring 2019.
G017-1081 Worcestershire Wildlife Trust	We are pleased to note the commentary set out in para. 6.148. Monitoring and management of restored or created habitats will be essential in delivering the plan vision and so this long term approach must be integral to relevant obligations (and conditions) where they are required.	Support noted.
G033-2450 Heaton Planning on	Policy MLP30 states that, 'planning obligations may commit the developer to either delivering the agreed	Noted. A change will be made to more closely reflect the requirements of the National Planning Policy Framework.

Consultee	Consultee comments	Initial officer response
behalf of Tarmac	<p>provision directly or to making suitable financial contributions to its delivery'. This is contrary to Paragraph 205 (e) of the NPPF which states that, 'bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances'. It is considered that the policy should be reworded to emphasise that financial contributions will only be sought in exceptional circumstances.</p>	

Question 11. Are any wording changes needed to any of the policies or reasoned justification in **CHAPTER 7: Safeguarding mineral resources and supporting infrastructure** to improve clarity, or to reflect any other issues which should be considered?

Table 83. Overview, showing consultees who responded to Question 11 in relation to policy MLP 31 (Safeguarding Locally and Nationally Important Mineral Resources)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
None	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G014-680 Bromsgrove District Council G015-682 Redditch Borough Council G024-2455 Gladman Developments G027-1957 Worcestershire County Council

Table 84. Detailed comments on Question 11 in relation to policy MLP 31 (Safeguarding Locally and Nationally Important Mineral Resources)

Consultee	Consultee comments	Initial officer response
G014-680 Bromsgrove District Council	BDC questions whether there is a pool of consultants ready to prepare these Technical Assessments.	The Mineral Planning Authority understands that there are a number of consultancies with planning and geological expertise which may be able to undertake these assessments.
G014-680 Bromsgrove District Council	How will the LPA decide if the economic value of the mineral resource is more significant than the merits of the development? BDC presume WCC will be happy to defend at Appeal and Inquiry?	As a normal part of the development management process, this will need to be taken into account in weighing up the planning balance alongside any other planning matters. The Mineral Planning Authority should be consulted and its advice should be taken into account in making this balanced judgement. Paragraph 206 of the National Planning Policy Framework states that "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working", with planning practice guidance further

Consultee	Consultee comments	Initial officer response
		<p>elaborating that district councils have an important role to play in safeguarding minerals by having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans, by consulting the mineral planning authority and taking account of the minerals local plan before determining a planning application for non-minerals development within Mineral Consultation Areas, and by determining planning applications in accordance with development policy on minerals safeguarding and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction (Paragraph: 005 Reference ID: 27-005-20140306 Revision date: 06 03 2014).</p>
<p>G014-680 Bromsgrove District Council</p>	<p>Figure 7.1 Mineral Safeguarding Areas and Mineral Consultation Areas</p> <p>BDC welcome the changes from the third consultation, as urban areas have now been excluded from the Mineral Consultation Areas which will allow for urban regeneration and infill in these urban areas without the need for a technical assessment.</p> <p>There are a small number of anomalies in Barnt Green where some areas along Hewell Road are covered by the Mineral Consultation Area but are within the village envelope. BDC recommends these be removed from the Mineral Consultation Area as they are currently nonsensical and are assumed erroneous.</p>	<p>Support noted.</p> <p>These anomalies appear to relate to town/district centres which were not included within the settlement boundaries which had been excluded. Changes will be made to address this.</p>
<p>G014-680 Bromsgrove District Council</p>	<p>7.13 pg. 161 and 7.31 pg. 168</p> <p>BDC request clarification as to whether WCC will offer some sort of pre-application advice to applicants who need to understand if they are likely to be able to satisfy policy MLP 31 and MLP 32.</p> <p>These paragraphs state that <i>“The Local</i></p>	<p>The Mineral Planning Authority will offer pre-application advice to applicants. It is noted that Bromsgrove District Council does not intend to adopt a validation list.</p>

Consultee	Consultee comments	Initial officer response
	<p><i>and County Planning Authorities in Worcestershire should include this [technical assessment] requirement in their list of validation requirements".</i></p> <p>BDC does not have a local validation list and only request applicants meet the national mandatory requirements for a planning application. This is to ensure that applications can be validated, processed and assessed without undue ambiguity and cost to applicants as well as providing timely decisions. BDC does not intend to adopt a validation list. Once the MLP is adopted BDC will ensure officers are mindful of this proposed requirement and may add this to their websites for applicants to view.</p>	
<p>G014-680 Bromsgrove District Council</p>	<p>7.23 pg. 163</p> <p>BDC understand the reference to 'considerable weight' comes from a specific appeal case, but can it be clarified whether all comments on minerals safeguarding areas from WCC will carry this amount of weight?</p>	<p>As a normal part of the development management process, the weight attached to a particular consideration is for the decision maker to determine and justify as part of the planning balance. This will need to take account of the requirements of National Planning Policy Framework and planning practice guidance referred to above.</p> <p>The case referred to in footnote 500 on paragraph 7.23 states that a "decision-maker should give the views of statutory consultees ... 'great' or 'considerable' weight. A departure from those views requires 'cogent and compelling reasons'". Changes will be made to better reflect this.</p>
<p>G015-682 Redditch Borough Council</p>	<p>The interactive map shows the boundaries of the safeguarded areas as being circular in many cases and not following defined features on the ground. This isn't particularly helpful and means some sites may be partially included resulting in pressure to ignore the requirements of Policy MLP 31.</p>	<p>Mineral Safeguarding Areas follow the shape of mapped mineral resources, other than for building stone where point data for former building stone quarries identified by Herefordshire and Worcestershire Earth Heritage Trust's project "A Thousand Years of Building with Stone" (http://www.buildingstones.org.uk/) has been used.</p> <p>The Mineral Consultation Areas then cover an additional 250m around the</p>

Consultee	Consultee comments	Initial officer response
		<p>Mineral Safeguarding Areas to ensure that the implications of any development in the vicinity of the mineral resource are also considered, as set out in paragraph 7.10-7.11. This means that their boundaries are relatively rounded and do not follow defined features on the ground, but as policy MLP 31 will form part of the statutory Development Plan, its requirements cannot simply be ignored. Policy MLP 31 is clear that technical assessments will be required for all non-exempt development either within <u>or partially within</u> the identified Mineral Consultation Areas.</p>
G015-682 Redditch Borough Council	RBC questions whether there is a pool of consultants ready to prepare these Technical Assessments.	The Mineral Planning Authority understands that there are a number of consultancies with planning and geological expertise which may be able to undertake these assessments.
G015-682 Redditch Borough Council	How will the LPA decide if the economic value of the mineral resource is more significant than the merits of the development? RBC presumes WCC will be happy to defend at Appeal and Inquiry?	<p>As a normal part of the development management process, this will need to be taken into account in weighing up the planning balance alongside any other planning matters. The Mineral Planning Authority should be consulted and its advice should be taken into account in making this balanced judgement.</p> <p>Paragraph 206 of the National Planning Policy Framework states that "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working", with planning practice guidance further elaborating that district councils have an important role to play in safeguarding minerals by having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans, by consulting the mineral planning authority and taking account of the minerals local plan before determining a planning application for non-minerals development within</p>

Consultee	Consultee comments	Initial officer response
		Mineral Consultation Areas, and by determining planning applications in accordance with development policy on minerals safeguarding and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction (Paragraph: 005 Reference ID: 27-005-20140306 Revision date: 06 03 2014).
G015-682 Redditch Borough Council	<p>7.13 pg. 161 and 7.31 pg. 168</p> <p>RBC request clarification as to whether WCC will offer some sort of pre-application advice to applicants who need to understand if they are likely to be able to satisfy policy MLP 31 and MLP 32.</p> <p>These paragraphs state that <i>“The Local and County Planning Authorities in Worcestershire should include this [technical assessment] requirement in their list of validation requirements”</i>. RBC does not have a local validation list and only request applicants meet the national mandatory requirements for a planning application. This is to ensure that applications can be validated, processed and assessed without undue ambiguity and cost to applicants as well as providing timely decisions. RBC does not intend to adopt a validation list. Once the MLP is adopted RBC will ensure officers are mindful of this proposed requirement and may add this to their websites for applicants to view.</p>	The Mineral Planning Authority will offer pre-application advice to applicants. It is noted that Redditch Borough Council does not intend to adopt a validation list.
G015-682 Redditch Borough Council	<p>7.23 pg. 163</p> <p>RBC understand the reference to ‘considerable weight’ comes from a specific appeal case, but can it be clarified whether all comments on minerals safeguarding areas from WCC will carry this amount of weight?</p>	<p>As a normal part of the development management process, the weight attached to a particular consideration is for the decision maker to determine and justify as part of the planning balance. This will need to take account of the requirements of National Planning Policy Framework and planning practice guidance referred to above.</p> <p>The case referred to in footnote 500 on paragraph 7.23 states that a "decision-</p>

Consultee	Consultee comments	Initial officer response
		maker should give the views of statutory consultees ... 'great' or 'considerable' weight. A departure from those views requires 'cogent and compelling reasons'". Changes will be made to better reflect this.
G024-2455 Gladman Developments	<p>Gladman acknowledges the need for some level of protection of mineral assets, but is of the view that local policy framework that relates to this must clearly set out that this will be suitably balanced against competing development needs. A positively framed mineral safeguarding policy will therefore be required that enables local planning authorities to make suitably balanced judgements on the positive or negative effects of a non-minerals development proposal as part of their wider plan making and decision taking.</p> <p>It is noted that there is an intention to safeguard proven mineral deposits considered to be of local and nationally important mineral resources identified in the Mineral Safeguarding Areas (MSAs) to avoid sterilisation by non-mineral development. These include:</p> <ul style="list-style-type: none"> - Terrace and glacial sand and gravel resources; - Solid sand resources; - Crushed rock resources; - An area of Mercia Mudstone Group brick clay close to the Hartlebury and Waresley brickworks; and - Former building stone quarries. <p>Paragraph 204 of the National Planning Policy Framework (2018) states that planning policies should safeguard mineral resources by defining MSAs; and adopt appropriate policies so that known locations of specific mineral resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources will be worked). It also indicates that planning policies should encourage the prior extraction of minerals, where practicable and feasible, if it is necessary for non-mineral development to take place. National policy does not therefore advocate an approach that seeks to steer non-mineral development away from MSAs.</p>	<p>As a normal part of the development management process, mineral safeguarding will need to be taken into account in weighing up the planning balance alongside any other planning matters. Policy MLP 31 allows an LPA to reach an informed decision, based on clear evidence provided by the technical assessment it requires, and the Mineral Planning Authority should be consulted and its advice should be taken into account in making this balanced judgement.</p> <p>Policy MLP 31 makes provision for "the merits of the proposed non-mineral development" to be weighed against the value of the mineral resource.</p> <p>Paragraph 206 of the National Planning Policy Framework states that "Local planning authorities <u>should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working</u>", with planning practice guidance further elaborating that district councils have an important role to play in safeguarding minerals by having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans, by consulting the mineral planning authority and taking account of the minerals local plan before determining a planning application for non-minerals development within Mineral Consultation Areas, and by determining planning applications in accordance with development policy on minerals safeguarding and taking account of the views of the mineral planning authority on the risk of</p>

Consultee	Consultee comments	Initial officer response
	<p>It is important to keep in mind the fact that safeguarding areas does not prevent development from occurring and that the Local Plan recognises that there will be circumstances where the need for development outweighs the benefits of protecting the mineral resource and that there may be opportunities to accommodate both through the use of prior extraction. Indeed, paragraph 7.4 of the Local Plan states:</p> <p>"Mineral safeguarding is not about preventing development, but about planning ahead. It allows for the effective consideration of potential impacts and helps to ensure that non-minerals developments are appropriately located and designed. It can also help to reduce the need for new quarries through prudent use of resources. <u>However, safeguarding mineral resources does not create a presumption that the resources defined will be worked during the lifetime of the Minerals Local Plan.</u>" (Emphasis added)</p> <p>Whilst Policy MLP31 outlines the approach in which development within or partially within the identified MCAs is required to demonstrate and what forms of development are considered acceptable as outlined in table 7.3, Gladman are of the view that a separate criterion is required which sets out a positive approach to be taken in allowing nonmineral development not identified in table 7.3 to be permitted if the benefits of the non-mineral developed as a whole clearly outweighs the need for the mineral resource as there may be circumstances in which the local planning authorities strategic policies are failing to deliver housing and economic development to meet the authorities needs and alternative proposals located in MSAs may be required.</p>	<p>preventing minerals extraction (Paragraph: 005 Reference ID: 27-005-20140306 Revision date: 06 03 2014).</p> <p>Requirements of policy MLP 31 are considered to reflect the requirements of national policy and guidance, and any more "positive approach" towards development that could compromise finite mineral resources could risk undermining the effective application of mineral safeguarding.</p>
G027-1957 Worcestershire County Council	It would be prudent to include a note about large-scale earthworks/landscaping engineering operations which could sterilise or impact on the ability to work a mineral.	As large-scale earthworks or landscaping engineering operations are not listed as being exempt in table 7.1, they would be covered by the requirements of policies MLP 31 and MLP 32.

Table 85. Overview, showing consultees who responded to Question 11 in relation to policy MLP 32 (Safeguarding Mineral Sites and Supporting Infrastructure)

Consultees who answered "Yes": 0	Consultees who answered "No": 4	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
None	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust	G014-680 Bromsgrove District Council G015-682 Redditch Borough Council G017-1081 Worcestershire Wildlife Trust G018-2460 Mineral Products Association G024-2455 Gladman Developments G027-1957 Worcestershire County Council

Table 86. Detailed comments on Question 11 in relation to policy MLP 32 (Safeguarding Mineral Sites and Supporting Infrastructure)

Consultee	Consultee comments	Initial officer response
G014-680 Bromsgrove District Council	7.13 pg. 161 and 7.31 pg. 168 BDC request clarification as to whether WCC will offer some sort of pre-application advice to applicants who need to understand if they are likely to be able to satisfy policy MLP 31 and MLP 32. These paragraphs state that <i>"The Local and County Planning Authorities in Worcestershire should include this [technical assessment] requirement in their list of validation requirements"</i> . BDC does not have a local validation list and only request applicants meet	The Mineral Planning Authority will offer pre-application advice to applicants. It is noted that Bromsgrove District Council does not intend to adopt a validation list.

Consultee	Consultee comments	Initial officer response
	<p>the national mandatory requirements for a planning application. This is to ensure that applications can be validated, processed and assessed without undue ambiguity and cost to applicants as well as providing timely decisions. BDC does not intend to adopt a validation list. Once the MLP is adopted BDC will ensure officers are mindful of this proposed requirement and may add this to their websites for applicants to view.</p>	
<p>G014-680 Bromsgrove District Council</p>	<p>MLP 32: Safeguarding Mineral Sites and Supporting Infrastructure</p> <p>BDC support the need for a policy to safeguard Mineral Sites; however there appear to be some inconsistencies with supporting infrastructure. There are a number of cement works within the County which are located within industrial estates and therefore applications for change of use within 250 metres of the cement works needing planning permission, or other applications which are not exempt, are likely to occur. BDC would therefore request that these either be sense-checked to remove the requirement for a technical assessment from specific existing cement works on industrial estates or within urban areas. BDC understand that it would be necessary to require a technical assessment within 250 metres of infrastructure sites outside of urban areas or for new forms of infrastructure, to ensure they are safeguarded.</p> <p>As BDC contains only supporting infrastructure of cement works, only this type has been looked at in detail.</p>	<p>It is recognised that a number of the county's existing batching plants are located on industrial estates and that there are likely to be various land uses which could be developed in the vicinity without having a significant impact on their operation. However, these types of infrastructure facilities can be critical to enabling the steady and adequate supply of mineral products to their end markets and therefore enabling housing and other forms of development, and they could be vulnerable to pressure for redevelopment of the sites for other uses, or to any impacts from the introduction of particularly sensitive land uses nearby. It is therefore considered appropriate that safeguarding considerations should apply to these sites.</p> <p>The fact that a facility is on an industrial estate could inform the technical assessment and may mean that no specific action or mitigation measures are required, depending on the type of land use proposed. Policy MLP 32 sets out that the level of technical assessment required will be appropriate to the proposed development and its potential impacts, and therefore should not be overly onerous where no significant impacts are likely to occur. Developers should be encouraged to undertake pre-application discussions to explore the level of assessment which is likely to be</p>

Consultee	Consultee comments	Initial officer response
G015-682 Redditch Borough Council	<p>7.13 pg. 161 and 7.31 pg. 168</p> <p>RBC request clarification as to whether WCC will offer some sort of pre-application advice to applicants who need to understand if they are likely to be able to satisfy policy MLP 31 and MLP 32.</p> <p>These paragraphs state that <i>“The Local and County Planning Authorities in Worcestershire should include this [technical assessment] requirement in their list of validation requirements”</i>. RBC does not have a local validation list and only request applicants meet the national mandatory requirements for a planning application. This is to ensure that applications can be validated, processed and assessed without undue ambiguity and cost to applicants as well as providing timely decisions. RBC does not intend to adopt a validation list. Once the MLP is adopted RBC will ensure officers are mindful of this proposed requirement and may add this to their websites for applicants to view.</p>	<p>required.</p> <p>The Mineral Planning Authority will offer pre-application advice to applicants. It is noted that Redditch Borough Council does not intend to adopt a validation list.</p>
G015-682 Redditch Borough Council	<p>RBC support the need for a policy to safeguard Mineral Sites, however there appear to be some inconsistencies with supporting infrastructure. There are a number of cement works within the County which are located within industrial estates and therefore applications for change of use within 250 metres of the cement works needing planning permission, or other applications which are not exempt, are likely to occur. RBC would therefore request that these either be sense-checked to remove the requirement for a technical assessment from specific existing cement works on industrial estates or within urban areas. RBC understand that it would be necessary to require a technical assessment within 250 metres of infrastructure sites outside of urban</p>	<p>It is recognised that a number of the county's existing batching plants are located on industrial estates and that there are likely to be various land uses which could be developed in the vicinity without having a significant impact on their operation. However, these types of infrastructure facilities can be critical to enabling the steady and adequate supply of mineral products to their end markets and therefore enabling housing and other forms of development, and they could be vulnerable to pressure for redevelopment of the sites for other uses, or to any impacts from the introduction of particularly sensitive land uses nearby. It is therefore considered appropriate that safeguarding considerations should apply to these sites.</p>

Consultee	Consultee comments	Initial officer response
	<p>areas or for new forms of infrastructure to ensure they are safeguarded.</p> <p>As RBC contains only supporting infrastructure of cement works, only this type has been looked at in detail.</p>	<p>The fact that a facility is on an industrial estate could inform the technical assessment and may mean that no specific action or mitigation measures are required, depending on the type of land use proposed. Policy MLP 32 sets out that the level of technical assessment required will be appropriate to the proposed development and its potential impacts, and therefore should not be overly onerous where no significant impacts are likely to occur. Developers should be encouraged to undertake pre-application discussions to explore the level of assessment which is likely to be required.</p>
<p>G017-1081 Worcestershire Wildlife Trust</p>	<p>We are pleased to support part b) of the policy. Minerals site restoration has considerable scope to provide biodiversity net gain in line with governmental aspirations and wider biodiversity drivers and we therefore welcome and support the inclusion of policy wording designed to ensure that future development does not undermine enhancements secured through the minerals planning process.</p>	<p>Support noted.</p>
<p>G018-2460 Mineral Products Association</p>	<p>Policy MLP32: Safeguarding Mineral Sites and Supporting Infrastructure The principle of this policy is supported but it is believed is not in full accordance with the NPPF and is unsound and not effective as it does not deal with the agent of change principle. Para 182 of NPPF states that; <i>Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the</i></p>	<p>The 'agent of change' principle was referred to in paragraph 7.33 of the Fourth Stage Consultation. However, we note that it would aid clarity for this principle to be included within policy MLP 32 itself and changes will be made accordingly.</p>

Consultee	Consultee comments	Initial officer response
	<p><i>operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.</i></p> <p>It is considered that an additional paragraph is required to the end of this policy to reflect the agent of change principle to ensure it is clear where the mitigation responsibility lies and make the policy consistent with national policy as follows; <i>In respect of mitigation, where development is proposed within or partially within an identified buffer zone, the 'Agent of Change Principle' will be applied in that the responsibility, and cost for mitigating impacts from existing noise-generating activities or uses will be placed on the proposed new noise- sensitive development and any such measures will not add to the costs and administrative burdens on existing noise generating uses.</i></p>	
G027-1957 Worcestershire County Council	Policy MLP 32: Safeguarding Mineral Sites and Supporting Infrastructure: It is noted that the Tower Hill brine pump house in Droitwich Spa is an existing operational facility which does not appear to be listed on Figure 7.3 'Permitted mineral sites and supporting infrastructure sites'. It is considered that Tower Hill should be safeguarded against sterilisation.	Noted, this will be amended on Figure 7.3 and the interactive minerals mapping tool.
G027-1957 Worcestershire County Council	Excavation of agricultural reservoirs and similar ponds for fishing or other uses may involve the excavation of mineral resources. Where such developments are proposed, districts should be advised to seek advice from the MPA about the possible impact of the proposal on minerals deposits.	Noted. Local Planning Authorities will be required to consult the Mineral Planning Authority regarding any non-exempt development within Mineral Consultation Areas, and this provides a mechanism for mineral safeguarding issues to be raised. Continued cross-boundary liaison, such as the Development Managers Forum, will

Consultee	Consultee comments	Initial officer response
		also enable these types of issues to be discussed. It is not considered to be necessary to make explicit reference to reservoirs of fishing lakes within the Minerals Local Plan.

Question 12. Do you agree that the types of development listed in **CHAPTER 7: Safeguarding mineral resources and supporting infrastructure** are the right ones to be exempt from the requirements of Policy MLP 31 and Policy MLP 32?

Table 87. Overview, showing consultees who responded to Question 12

Consultees who answered "Yes": 2	Consultees who answered "No": 0	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	None	G001-232 Worcestershire Acute Hospitals NHS Trust G017-1081 Worcestershire Wildlife Trust	G014-680 Bromsgrove District Council G015-682 Redditch Borough Council

Table 88. Detailed comments on Question 12

Consultee	Consultee comments	Initial officer response
G014-680 Bromsgrove District Council	BDC does not feel that this table captures all of the types of development which should be exempt from mineral safeguarding requirements, and as such would be unduly onerous on applicants for some types of development. There is a risk with any list of application types that a new 'type' will be created and it won't be on the list. This will create either confusion or loss of control over that type of development. There may be merit in some form of generic statement saying what sort of development types they are trying to encapsulate in order to mop up those other types or guide logic.	Should a new 'type' of development emerge, it would appear to be appropriate for the implications of that type of development to be considered against policies MLP 31 and MLP 32, as they will not have been considered prior to the adoption of the Minerals Local Plan. However, they could inform any future review and revision of the plan.
G014-680 Bromsgrove District Council	There is no provision for small scale developments which would exceed Permitted Development Rights (PD) and therefore would need a planning application. For example a barn conversion which could not be achieved under Class Q; new stable buildings; new agricultural buildings over a certain size; certain telecommunications; rural exception sites or new dwellings outside of an existing curtilage but adjacent to an	It is not considered appropriate to make these types of "small scale" developments exempt from mineral safeguarding requirements. In response to the Third Stage Consultation, Bromsgrove District Council suggested that rural exception sites should be exempt from mineral safeguarding requirements. This was considered during the development of the Fourth Stage version of the

Consultee	Consultee comments	Initial officer response
	<p>urban area (i.e. infill). Should these types of applications not be included as exempt, then Worcestershire County Council would likely be inundated with technical assessments relating to these types of applications. This would also cause undue onus on applicants of small scale development and potentially impact on their viability.</p>	<p>Minerals Local Plan, but was not considered appropriate as it could have a significant effect on sterilising mineral resources or supporting infrastructure. This is also true for the other types of development you refer to.</p> <p>It is considered that the implications of these types of development will need to be considered on a case-by-case basis. Decision makers will then be able to weigh the benefits of the proposed non-mineral development against the impacts on mineral resources and/or supporting infrastructure. Policies MLP 31 and MLP 32 set out that the level of technical assessment required will be appropriate to the proposed development and its potential impacts. Developers should be encouraged to undertake pre-application discussions to explore the level of assessment which is likely to be required.</p>
<p>G014-680 Bromsgrove District Council</p>	<p>The term 'minor' could be removed from c) to ensure it covers all development within the curtilage of existing buildings. 'Minor development' could be interpreted as relating to or being defined as a minor planning application; a householder application or indeed only small scale development within the curtilage of an existing building. It is therefore suggested that this is clarified to capture all development within the curtilage of existing buildings.</p> <p>Alternatively Worcestershire County Council (WCC) could seek to consider the implications of what are defined as Major applications and understand they won't be able to control smaller developments.</p>	<p>It is noted that including "such as" under part c) of Table 7.1 is unhelpful as it creates uncertainty for local planning authorities and developers. Changes will be made ensure that Table 7.1 provides an absolute list of the types of development which would be considered exempt.</p>
<p>G014-680 Bromsgrove District Council</p>	<p>If urban areas are specifically excluded from safeguarding requirements should it say this somewhere on this table for completeness?</p>	<p>It is not considered necessary or appropriate to do this.</p> <p>In relation to policy MLP 31, the requirements only apply to developments within the defined</p>

Consultee	Consultee comments	Initial officer response
		<p>Mineral Consultation Areas, and these have been defined to exclude the settlement boundaries and adopted site allocations as provided by the City, Borough and District Councils.</p> <p>In relation to policy MLP 32, any development within 250m of mineral sites, allocations, and supporting infrastructure will need to address the requirements of the policy. It is recognised that a number of the county's existing batching plants are located on industrial estates or in urban areas. These types of infrastructure facilities can be critical to enabling the steady and adequate supply of mineral products to their end markets and therefore enabling housing and other forms of development, and they could be vulnerable to pressure for redevelopment of the sites for other uses, or to any impacts from the introduction of particularly sensitive land uses nearby. It is therefore considered appropriate that safeguarding considerations should apply to these sites.</p>
G015-682 Redditch Borough Council	RBC does not feel that this table captures all of the types of development which should be exempt from mineral safeguarding requirements, and as such would be unduly onerous on applicants for some types of development.	Noted, your concerns are addressed individually below.
G015-682 Redditch Borough Council	There is no provision for small scale developments which would exceed Permitted Development Rights (PD) and therefore would need a planning application. For example a barn conversion which could not be achieved under Class Q; new stable buildings; new agricultural buildings over a certain size; certain telecommunications; rural exception sites or new dwellings outside of an existing curtilage but adjacent to an urban area (i.e. infill). Should these types of applications not be included as	<p>It is not considered appropriate to make these types of "small scale" developments exempt from mineral safeguarding requirements.</p> <p>In response to the Third Stage Consultation, Bromsgrove District Council suggested that rural exception sites should be exempt from mineral safeguarding requirements. This was considered during the development of the Fourth Stage version of the Minerals Local Plan, but was not considered appropriate as it could have</p>

Consultee	Consultee comments	Initial officer response
	<p>exempt, then Worcestershire County Council would likely be inundated with technical assessments relating to these types of applications. This would also cause undue onus on applicants of small scale development and potentially impact on their viability.</p>	<p>a significant effect on sterilising mineral resources or supporting infrastructure. This is also true for the other types of development you refer to.</p> <p>It is considered that the implications of these types of development will need to be considered on a case-by-case basis. Decision makers will then be able to weigh the benefits of the proposed non-mineral development against the impacts on mineral resources and/or supporting infrastructure. Policies MLP 31 and MLP 32 set out that the level of technical assessment required will be appropriate to the proposed development and its potential impacts. Developers should be encouraged to undertake pre-application discussions to explore the level of assessment which is likely to be required.</p>
<p>G015-682 Redditch Borough Council</p>	<p>The term ‘minor’ could be removed from c) to ensure it covers all development within the curtilage of existing buildings. ‘Minor development’ could be interpreted as relating to or being defined as a minor planning application; a householder application or indeed only small scale development within the curtilage of an existing building. It is therefore suggested that this is clarified to capture all development within the curtilage of existing buildings.</p> <p>Alternatively Worcestershire County Council (WCC) could seek to consider the implications of what are defined as Major applications and understand they won’t be able to control smaller developments.</p>	<p>It is noted that including "such as" under part c) of Table 7.1 is unhelpful as it creates uncertainty for local planning authorities and developers. Changes will be made ensure that Table 7.1 provides an absolute list of the types of development which would be considered exempt.</p>
<p>G015-682 Redditch Borough Council</p>	<p>If urban areas are specifically excluded from safeguarding requirements should it say this somewhere on this table for completeness?</p>	<p>It is not considered necessary or appropriate to do this.</p> <p>In relation to policy MLP 31, the requirements only apply to developments within the defined Mineral Consultation Areas, and these have been defined to exclude the</p>

Consultee	Consultee comments	Initial officer response
		<p>settlement boundaries and adopted site allocations as provided by the City, Borough and District Councils.</p> <p>In relation to policy MLP 32, any development within 250m of mineral sites, allocations, and supporting infrastructure will need to address the requirements of the policy. It is recognised that a number of the county's existing batching plants are located on industrial estates or in urban areas. These types of infrastructure facilities can be critical to enabling the steady and adequate supply of mineral products to their end markets and therefore enabling housing and other forms of development, and they could be vulnerable to pressure for redevelopment of the sites for other uses, or to any impacts from the introduction of particularly sensitive land uses nearby. It is therefore considered appropriate that safeguarding considerations should apply to these sites.</p>

Question 13. Do you agree that the risk assessment in **CHAPTER 8: Implementation and Monitoring Framework** adequately assesses the issues that may affect the delivery of the objectives of the Worcestershire Minerals Local Plan?

Table 89. Overview, showing consultees who responded to Question 13

Consultees who answered "Yes": 4	Consultees who answered "No": 0	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	None	G001-232 Worcestershire Acute Hospitals NHS Trust	G017-1081 Worcestershire Wildlife Trust

Table 90. Detailed comments on Question 13

Consultee	Consultee comments	Initial officer response
G017-1081 Worcestershire Wildlife Trust	We note the commentary presented in relation to objectives MO2 and MO3. This seems reasonable to us and we consider that it addresses the associated issues effectively.	Support noted.

Question 14. Please note: there was no Question 14 included on the consultation questionnaire.

Question 15. Does CHAPTER 8: Implementation and Monitoring Framework set out appropriate indicators to monitor the delivery of the objectives of the Worcestershire Minerals Local Plan?

Table 91. Overview, showing consultees who responded to Question 15

Consultees who answered "Yes": 4	Consultees who answered "No": 0	Consultees who answered "Don't know": 1	Consultees who provided written comments (see below)
G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	None	G001-232 Worcestershire Acute Hospitals NHS Trust	G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G027-1957 Worcestershire County Council

Table 92. Detailed comments on Question 15

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	[Answered "Yes"] However there is a large variation between large companies and smaller scale operators. Performance standards for the operation of sites and transportation (permitted routes etc.,) should be specifically established as requirements of the permission. It is appreciated that there is a wide range of Health and Safety legislation plus the Quarries Regulations 1999 which applies to the site and the site owners, however the monitoring and site inspection procedures on the part of the County Council should be increased and should also be commensurate to the scale of the development. In Wildmoor there has been illegal burying of waste, overfilling of excavated land and illegal storage of materials – all of this within a Zone 2 level area of water protection.	Noted. Chapter 8 relates to indicators which will be used to monitor whether the plan is being delivered as anticipated and the objectives achieved. It does not set indicators to monitor individual sites (although this will inform whether the plan is being delivered). In relation to monitoring individual sites, it is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions, and that these can be monitored and enforced. We agree that this is a key part of the effective operation of the planning system, and consultation has been undertaken on an Enforcement Plan in Spring 2019.
G017-1081 Worcestershire Wildlife Trust	We consider that the indicators pertaining to MO2 and MO3 (both of which are critical to our area of interest) are acceptable. However, they	Noted. A change will be made to this indicator to refer to net gain, and the requirement for net gains for biodiversity will also be strengthened

Consultee	Consultee comments	Initial officer response
	<p>could be helpfully improved by making explicit reference to net gain in biodiversity (in line with policy expectations and governmental aspirations). This could be quantified by site using the emerging biodiversity net gain guidance and then totalled by each of the strategic corridors to give a meaningful indication of policy success. This is already captured neatly in indicator 30 but could be added to indicator 46 to improve clarity. Presenting this information accurately and with a reasonable degree of detail in the AMR may need further consideration and we would welcome the opportunity to discuss this further with the council in due course.</p>	<p>in the first paragraph of policy MLP 21.</p> <p>We would welcome further discussion with Worcestershire Wildlife Trust as a member of the Minerals Green Infrastructure Steering Group to ensure the Authority Monitoring Report is able to accurately reflect the delivery of the strategic corridor priorities (indicators 38-42).</p>
<p>G027-1957 Worcestershire County Council</p>	<p>Chapter 8: Implementation and Monitoring Framework: It is noted there are a substantial number of indicators, many of which are similar. Could these be reduced in number to reduce the officer time required to collate this information?</p>	<p>Whilst there are a substantial number of indicators in Chapter 8, it is considered that this will help the Mineral Planning Authority to fully understand whether the Minerals Local Plan is effective, whether the policies are being delivered as expected, and whether the objectives are being achieved, and what action might be required to address any issues. Some indicators appear similar, but actually address slightly different things, such as:</p> <p>Indicator 34: All permitted mineral developments <u>adequately demonstrate that site-specific opportunities to improve the condition, legibility and understanding of geodiversity <u>have influenced the design</u> of the development</u></p> <p>versus</p> <p>Indicator 49: All permitted mineral developments adequately demonstrate that they <u>will protect, conserve and enhance geodiversity</u></p> <p>Indicator 34 measures whether site specific opportunities for geodiversity have clearly influenced the design of a</p>

Consultee	Consultee comments	Initial officer response
		<p>site, whereas Indicator 49 covers a slightly wider remit to measure whether the development will (in totality) protect, conserve and enhance geodiversity.</p> <p>However, the monitoring schedule will be sense-checked and any superfluous indicators will be removed.</p>
G027-1957 Worcestershire County Council	Figure 8.1: There is a typo in the top left box ("Authoriy" should be "Authority").	Noted, this will be amended.
G027-1957 Worcestershire County Council	<p>Page 191, Indicator 71: It would be prudent to include some more information on the wider value to the economy of mineral extraction, such as a useful quote from the Mineral Product Association. Consideration should be given to using the diagram on page 11 of the <i>UK Minerals Strategy</i> or similar to illustrate this value to the wider economy and how the entire economy of the UK depends on minerals:</p> <p>https://mineralproducts.org/documents/UK_Minerals_Strategy.pdf</p>	<p>Indicator 71 measures changes in Worcestershire's Gross Value Added (GVA) from mineral development. This is data which can be measured at the local level to inform whether the Minerals Local Plan is performing as expected. Whilst the information you refer to clearly demonstrates how important minerals are to the UK economy as a whole, this cannot currently be broken down to county level, and therefore will not provide any indication of the performance of the Minerals Local Plan.</p> <p>However, if this national data is updated regularly, then it may provide a useful comparison in the Authority Monitoring Report for whether changes in the GVA from mineral development in Worcestershire are significantly different to any changes in GVA from minerals across the UK.</p>
G027-1957 Worcestershire County Council	<p><u>Chapter 8: Implementation and monitoring framework – objectives MO2 and MO3</u></p> <p>I [Worcestershire County Council ecologist] would like to recommend that we include within any assessment of policy and plan effectiveness some ability to measure net gain for biodiversity secured by the plan. This might take the form of inclusion within the AMR of a simple metric, for example: net biodiversity units secured through planning</p>	<p>Noted. A change will be made to indicator 46 to refer to net gain, and the requirement for net gains for biodiversity will also be strengthened in the first paragraph of policy MLP 21. Changes will also be made the Reasoned Justification supporting policy MLP 21 to refer to the need for gains to be measurable. As there is still significant uncertainty about emerging biodiversity metrics or biodiversity "units" it is considered appropriate for specific metrics to be explored at the time of each planning application.</p>

Consultee	Consultee comments	Initial officer response
	<p>permissions granted that year. By nature this will be a coarse aggregation of many variables but would include both the retained and positively managed biodiversity units (which should still demonstrate a gain over baseline unit value if management has been moved to a more positive treatment for biodiversity). This will hopefully reflect an overall annual net gain where temporary losses of biodiversity units are permitted for mineral workings but would require some small caveat to the effect that we recognise final unit calculations won't be possible until some point within the aftercare monitoring, and that these metrics reflect the effectiveness of permissions issued and commitments for biodiversity secured.</p>	<p>We would welcome further discussion with the council's ecologist on this as metrics become established, and, as a member of the Minerals Green Infrastructure Steering Group, to ensure the Authority Monitoring Report is able to accurately reflect the delivery of the strategic corridor priorities (indicators 38-42).</p>

Question 16. Do you have any other comments to make in relation to the Fourth Stage Consultation version of the Worcestershire Minerals Local Plan?

Table 93. Overview, showing consultees who responded to Question 16

Consultees who provided written comments (see below)
G001-232 Worcestershire Acute Hospitals NHS Trust G004-2433 Mr & Mrs Bickerton G005-2392 Charlton Parish Council G012-2459 Wildmoor Residents Association G013-1971 Wyre Forest District Council G014-680 Bromsgrove District Council G015-682 Redditch Borough Council G016-857 National Farmers Union G018-2460 Mineral Products Association G021-1942 Historic England G024-2455 Gladman Developments G026-2521 Mr Bob Bowley G027-1957 Worcestershire County Council G029-717 Natural England G030-2185 Gloucestershire County Council G031-2190 Marine Management Organisation G033-2450 Heaton Planning on behalf of Tarmac

Table 94. Detailed comments on Question 16

Consultee	Consultee comments	Initial officer response
G001-232 Worcestershire Acute Hospitals NHS Trust	No	Noted.
G004-2433 Mr & Mrs Bickerton	<p>Following on from our meeting on Monday 21st January 2019 at the Hive in Worcester, regarding the Worcestershire Minerals Consultation Plan, please find below my objections to the plan and the adverse impact this will have on those living in Kerswell Green.</p> <p>Firstly as I pointed out in the meeting there will already be a detrimental impact/blight on property prices in Kerswell Green due to the consultation owing to the fact that if anyone wishing to sell their property will find</p>	<p>Thank you for attending the open day on Monday 21st January to ask questions about the Minerals Local Plan and discuss your concerns.</p> <p>The Fourth Stage Consultation proposes to allocate areas of search within five strategic corridors. Areas of search are defined in Planning Practice Guidance⁸ as "areas where knowledge of mineral resources may be less certain [than specific site or preferred area designations] but within which planning permission may be granted, particularly if there is a potential</p>

⁸ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

Consultee	Consultee comments	Initial officer response
	<p>that this threat of mineral extraction will be highlighted in any property searches leading up to a sale. Let alone the further detrimental impact, if given the go ahead with the potential of mining taking place and a full scale quarry operation at our boundary fence on land immediately at the rear of Rosemary Cottage presently owned by Teal Turf.</p>	<p>shortfall in supply". The areas of search and strategic corridors are intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan (as required by national polic), to facilitate the minerals industry to find and put forward sites, and to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>We recognise that some dispersed development exists within the proposed areas of search. This has been taken into account when considering the likely importance of mineral deposits in the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground), as the method accounts for some remaining land being overlain by more dispersed development and that not all of the deposit may be available for development. Only those deposits which were still considered "key" or "significant" after adjusting for this have been taken forward for allocation as areas of search, as set out in the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground).</p> <p>The presence of an area of search does not mean that all minerals within that area will be worked, but it does indicate that viable resources may exist. Any proposals for minerals extraction must apply for planning permission and demonstrate how the policies in the Minerals Local Plan - including those protecting residential amenity – would be met.</p> <p>A separate Mineral Site Allocations Development Plan Document is also being prepared which will allocate</p>

Consultee	Consultee comments	Initial officer response
		<p>"specific sites" and "preferred areas" to provide greater certainty to both the minerals industry and Worcestershire's residents about where minerals development is most likely to be acceptable. The sites which have been put forward to date can be viewed at http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1, but no decisions have yet been made about which of these should be allocated. However, there are currently no specific proposals from mineral operators or landowners for mineral development adjacent to Kerswell Green. The closest site proposal is the site to the east of the A38 at Clifton, which has already gained planning permission as part of Clifton Quarry.</p> <p>Changes will be made to Chapter 4 to highlight that the level of certainty of mineral development taking place is lower in areas of search than will be the case for any specific sites and preferred areas which will be allocated in the separate Mineral Site Allocations Development Plan Document, and that the policy preference for mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p> <p>It should be noted that "blighted land" has a specific meaning under schedule 13 of the Town and Country Planning Act 1990, and the allocations within the Minerals Local Plan and forthcoming Mineral Site Allocations Development Plan Document do not fall within this definition.</p>
G004-2433 Mr & Mrs Bickerton	You did mention that the council would have a say in mitigating the impact but I bought Rosemary cottage 30 years ago due to its peaceful rural location and the stunning view of the Malvern hills over which was then farmland.	Any proposals for mineral development have to apply for planning permission, even if the site is allocated in the Minerals Local Plan or Mineral Site Allocations Development Plan Document. The Minerals Local

Consultee	Consultee comments	Initial officer response
	<p>I understand that under the law we don't have a 'right to view' but the addition of trees or a bund which has been your solution in other locations would be unacceptable and devastate the value of my property. This would be a completely unacceptable solution to me and I suspect to many of my neighbours.</p>	<p>Plan sets out the policy framework against which proposals will be assessed (once it is adopted).</p> <p>Trees and bunds have been used in the past to provide visual screening. However this has not always been sympathetic to the local landscape character. The Fourth Stage Consultation version of the Minerals Local Plan seeks to address this. Policy MLP 19 (Amenity) requires consideration to be given to visual amenity and visual intrusion (amongst other things) to ensure there will not be unacceptable harm to sensitive receptors including people in their homes. Paragraph 6.50 which supports this policy states that "Care should be taken to ensure that screening measures are appropriate and are not, in themselves, a source of visual intrusion. It is likely that, as part of site restoration, there will be a requirement to remove incongruous features such as bunds or security fencing." Policy MLP 23 (Landscape) also requires proposals for mineral development to demonstrate that they will not have an unacceptable adverse effect on the inherent landscape character. Paragraph 6.95 sets out that the technical assessment required by the policy should "Set out how the design of the site's working and restoration proposals takes account of the key characteristics of the surrounding landscape type, and the measures proposed to ensure the site will fit comfortably with that landscape in keeping with existing features and habitats."</p>
<p>G004-2433 Mr & Mrs Bickerton</p>	<p>Secondly the 'loss of enjoyment' of our property when surrounded by a mining operation of this scale and the associated noise, dust and impact on local lanes and roads due the heavy goods vehicles i.e. cement mixers transporting the raw materials away from the area. We already see the</p>	<p>Policy MLP 19 (Amenity) requires consideration to be given to issues of air quality, dust, odour, noise and vibration, light, visual amenity and visual intrusion, land instability, and contamination to ensure there will not be unacceptable harm to sensitive receptors, including people in their</p>

Consultee	Consultee comments	Initial officer response
	<p>impact of this type of activity from the minerals extraction at Cemex Uk Quarry at Ryall on the A38.</p> <p>I therefore respectfully ask that you consider my objection and take this on-board in you consultation process and ask that you come back to me in writing with a satisfactory solution to this problem.</p>	<p>homes.</p> <p>Policy MLP 29 (Transport) requires mineral development to use the most sustainable transport options and for proposals to demonstrate that there will not be an unacceptable adverse effect on transport safety or congestion. A change to Policy MLP 29 will be made to ensure it is clear that impacts on the local road network must be considered, as well as the strategic transport network.</p> <p>It is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which should be implemented and are able to be enforced.</p>
<p>G005-2392 Charlton Parish Council</p>	<p>Several of the sites selected for potential development are situated in places where any extraction will lead to disruption to existing settlements and where there is not a suitable road infrastructure even when minerals are being transported by another means, eg rail or river.</p>	<p>In developing the strategic corridors, consideration has been given to whether there are links to the strategic transport network, as set out in paragraphs 4.54, 4.82, 4.111, 4.141 and 4.177 of the Fourth Stage Consultation. Transport linkages to each of the individual areas of search have not been considered in further detail, as this will need to be addressed as site proposals are considered for potential allocation as specific sites or preferred areas in the separate Mineral Site Allocations Development Plan Document, and/or as sites come forward as planning applications, when sufficient detail is known about how a site might be worked and what the transport implications are likely to be.</p> <p>Policy MLP 29 requires mineral development to use the most sustainable transport options and for proposals to demonstrate that there will not be an unacceptable adverse effect on transport safety or congestion. A change to Policy MLP 29 will be made to ensure it is clear that impacts on the local road network must be considered, as well as the</p>

Consultee	Consultee comments	Initial officer response
		strategic transport network.
G012-2459 Wildmoor Residents Association	It is a very detailed and wide ranging publication and we hope that its aspirations can be achieved.	Support noted.
G013-1971 Wyre Forest District Council	16 Wyre Forest District Council welcomes the opportunity for further ongoing discussion with Worcestershire County Council. Consequently, Wyre Forest wishes to continue to be consulted on subsequent stages of the Worcestershire Minerals Local Plan review.	Noted. Wyre Forest District Council is a "specific consultation body" under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and your details are registered on our planning consultation database. You will continue to be informed about the progress of the Minerals Local Plan, and about the separate Mineral Site Allocations Development Plan Document as it is developed.
G014-680 Bromsgrove District Council	BDC looks forward to working with WCC on the Statement of Common Ground prior to submission. BDC would like to work closely with WCC throughout the Bromsgrove Local Plan Review process, specifically the Site Selection process. This would ensure that an appropriate level of assessment and consideration is undertaken on potential development sites in the Mineral Safeguarding Areas so that they are not unnecessarily discarded through the process.	Noted. The Mineral Planning Authority is committed to developing a Statement of Common Ground in relation to mineral safeguarding, and to supporting the Local Planning Authorities in Worcestershire in taking mineral safeguarding requirements into account in developing their local plans and selecting sites for allocation. We agree that this cooperation will help to ensure an appropriate level of assessment and consideration is undertaken which both enables the City, Borough and District Councils to plan for non-mineral development whilst also protecting finite mineral resources and essential supporting infrastructure.
G015-682 Redditch Borough Council	RBC looks forward to working with WCC on the Statement of Common group prior to submission	Noted. The Mineral Planning Authority is committed to developing a Statement of Common Ground in relation to mineral safeguarding.
G016-857 National Farmers Union	The NFU is a professional body which represents the interests of 75% of all farmers and growers. In Worcestershire we represent a wide range of farmers, growers and rural businesses. The future provision minerals in the county is a key concern for our members as many of them are located within areas that may potentially be identified for minerals	Noted. The importance of agri-tech, horticulture and food production to Worcestershire's economy is recognised in paragraph 2.106 of the Portrait of Worcestershire (Chapter 2). The green infrastructure priorities for the strategic corridors identified in policies MLP 4 to MLP 8 reflect locally distinctive types of agriculture and

Consultee	Consultee comments	Initial officer response
	<p>extraction.</p> <p>Restoration - Agriculture, horticulture and food production should be considered as potential restoration options. We do agree that opportunities for flood alleviation and water storage should be considered. Water storage will be importance to safeguard water resources and this may help the local economy if linked to clusters of horticultural and food production businesses.</p>	<p>opportunities for enhancing the water environment. Policy MLP 24 protects soil resources, and Policy MLP 25 requires mineral development to safeguard the long-term potential of best and most versatile agricultural land.</p>
G018-2460 Mineral Products Association	The MPA wish to be kept informed of the progress of the mineral plan and would wish to appear at the Examination in Public.	Noted. Your details are registered on our planning consultation database and you will be notified of the next stage of the development of the Minerals Local Plan. This will be the pre-submission Publication consultation (Regulation 19), and the representations form will provide the opportunity for you to indicate whether you would wish to participate at any examination hearings.
G021-1942 Historic England	Thank you for the opportunity to engage with the above. We note the associated addendum in relation to Scheduled Monuments, amongst others. We also note that specific site allocations will be considered in due course through a separate Development Plan Document and we look forward to working with you on that as it progresses.	Noted.
G021-1942 Historic England	A general comment about policy wording throughout the document, including the historic environment policy MLP22, is that policies begin with 'Planning permission will be granted...' We maintain that, particularly with reference to the historic environment, other matters such as Scheduled Monument Consent and Listed Building Consent could be relevant to development proposals - whilst the Plan has at present essentially excluded designated assets from its strategic corridors that does not stop site promoters submitting schemes outwith those areas. As such,	<p>National Planning Policy makes it clear that plans should contain policies that are clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals. It is considered that the positive policy wording of "Planning permission will be granted..." provides certainty to decision makers that if the tests of the policy are met, this should weigh in favour of the grant of planning permission.</p> <p>The Minerals Local Plan should be read as a whole and alongside other parts of the Development Plan as relevant to</p>

Consultee	Consultee comments	Initial officer response
	<p>it is considered it would be more appropriate to replace all references to 'Planning permission will be granted...' with 'All mineral development proposals will be supported...' or a similar alternative. If the Council is not agreeable to replacing all references we would strongly recommend this be revised in relation to the current wording of MLP22.</p>	<p>the site, as well as taking into account any other material considerations. This is a normal part of the Development Management and decision making process, and where there are reasons to indicate planning permission should be refused, these will be weighed in decision making as part of the planning balance.</p> <p>It is considered that the policy wording should be consistent throughout the plan.</p>
<p>G024-2455 Gladman Developments</p>	<p>Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the intention of the Plan is to provide new minerals policies for the period to 2035 for the following local authorities:</p> <ul style="list-style-type: none"> - Bromsgrove; - Malvern Hills; - Redditch; - Worcester City; - Wychavon; and - Wyre Forest <p>The National Planning Policy Framework (the Framework) sets out four tests that Local Plans must meet to be considered sound at Examination. These tests should be considered throughout each stage of the preparation to help refine the policies that are being considered so that they are in accordance with national planning policy and guidance. The four tests of soundness are outlined as follows:</p> <ul style="list-style-type: none"> - Positively prepared; - Justified; - Effective; and - Consistent with national policy 	<p>Noted.</p>
<p>G026-2521 Mr Bob Bowley</p>	<p>Thank you for your helpful advice and information re the Minerals Local Plan.</p> <p>My area of concern is Kempsey in general and more specifically Kerswell Green where the entire Hamlet is incorporated into your Plan and as far</p>	<p>Thank you for attending the open day on Monday 21st January and your subsequent telephone calls to ask questions about the Minerals Local Plan and discuss your concerns.</p> <p>The Fourth Stage Consultation</p>

Consultee	Consultee comments	Initial officer response
	<p>as can be ascertained from the maps provided is classed as KEY. Any formal suggestion, e.g your Plan, of possible new mineral extraction east of Ashmoor Common as far as the M5 does cause considerable concern:-</p> <p>A] Immediately on publication of your plan the saleability of domestic dwellings will be severely compromised as the searches made when a sale/purchase is contemplated will reveal the potential for quarrying all round Kerswell Green.</p> <p>B] Any quarrying activity east of Ashmoor Common up to the Hamlet itself will adversely affect all Residents as the prevailing winds will carry any noise and dust directly over it</p> <p>C] All material extracted would almost certainly be moved off site by road.</p> <p>Direct access from the area under here reference to the A38 is limited to two small possibilities, one in the middle of the Baynall S-bend and the other immediately opposite Edward's Garage, both locations where access by slow moving trucks would be highly dangerous. Access could be obtained onto the C2056 thence to the A38 but this is a minor but well used road and would require extensive redevelopment to make it viable and safe.</p> <p>A] above can be deferred by non publication of your Plan until there is an application for mineral extraction but can only be properly overcome by an acceptable compensation scheme</p> <p>B] cannot be overcome</p> <p>C] could be overcome but only at major expense.</p>	<p>proposes to allocate areas of search within five strategic corridors. Areas of search are defined in Planning Practice Guidance⁹ as "areas where knowledge of mineral resources may be less certain [than specific site or preferred area designations] but within which planning permission may be granted, particularly if there is a potential shortfall in supply". The areas of search and strategic corridors are intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan (as required by national policy), to facilitate the minerals industry to find and put forward sites, and to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>We recognise that some dispersed development exists within the proposed areas of search. This has been taken into account when considering the likely importance of mineral deposits in the Analysis of Mineral Resources background document (available at www.worcestershire.gov.uk/mineralsbackground), as the method accounts for some remaining land being overlain by more dispersed development and that not all of the deposit may be available for development. Only those deposits which were still considered "key" or "significant" after adjusting for this have been taken forward for allocation as areas of search, as set out in the background document Location of development: screening and site selection methodology (available at www.worcestershire.gov.uk/mineralsbackground).</p> <p>The presence of an area of search does not mean that all minerals within that area will be worked, but it does</p>

⁹ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

Consultee	Consultee comments	Initial officer response
		<p>indicate that viable resources may exist. Any proposals for minerals extraction must apply for planning permission and demonstrate how the policies in the Minerals Local Plan - including those protecting residential amenity – would be met.</p> <p>A separate Mineral Site Allocations Development Plan Document is also being prepared which will allocate "specific sites" and "preferred areas" to provide greater certainty to both the minerals industry and Worcestershire's residents about where minerals development is most likely to be acceptable. The sites which have been put forward to date can be viewed at http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1, but no decisions have yet been made about which of these should be allocated. However, there are currently no specific proposals from mineral operators or landowners for mineral development adjacent to Kerswell Green. The closest site proposal is the site to the east of the A38 at Clifton, which has already gained planning permission as part of Clifton Quarry.</p> <p>Changes will be made to Chapter 4 to highlight that the level of certainty of mineral development taking place is lower in areas of search than will be the case for any specific sites and preferred areas which will be allocated in the separate Mineral Site Allocations Development Plan Document, and that the policy preference for mineral development within extant and allocated sites is subject to other parts of the Development Plan being properly addressed, and will not override the need to ensure that the development proposed is sustainable.</p> <p>Any proposals for mineral development have to apply for planning permission, even if the site is</p>

Consultee	Consultee comments	Initial officer response
		<p>allocated in the Minerals Local Plan or Mineral Site Allocations Development Plan Document. The Minerals Local Plan sets out the policy framework against which proposals will be assessed (once it is adopted). It is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions which should be implemented and are able to be enforced. Policy MLP 19 (Amenity) requires consideration to be given to issues of air quality, dust, odour, noise and vibration, light, visual amenity and visual intrusion, land instability, and contamination to ensure there will not be unacceptable harm to sensitive receptors, including people in their homes. Policy MLP 29 (Transport) requires mineral development to use the most sustainable transport options and for proposals to demonstrate that there will not be an unacceptable adverse effect on transport safety or congestion. A change to Policy MLP 29 will be made to ensure it is clear that impacts on the local road network must be considered, as well as the strategic transport network.</p> <p>It should be noted that "blighted land" for which compensation would be payable has a specific meaning under schedule 13 of the Town and Country Planning Act 1990, and the allocations within the Minerals Local Plan and forthcoming Mineral Site Allocations Development Plan Document do not fall within this definition.</p>
G027-1957 Worcestershire County Council	Worcestershire County Council (WCC) welcomes the opportunity to comment on the above consultation, and provides the following officer-only comments.	We note and welcome the comments from officers in other parts of Worcestershire County Council relating to landscape and green infrastructure, Worcestershire Archive and Archaeology Service, public rights of way, development management, and ecology.
G027-1957 Worcestershire	It may be beneficial if the map extracts of the county could include	Noted. This has been considered, but at the scale that the maps can be

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County Council	main rivers, canals, motorways, selected A-roads and railway lines, for the reader to be able to orientate themselves. This would be particularly useful for A3 maps (such as Figure 7.1 Mineral Safeguarding Areas and Mineral Consultation Areas, and Figure 7.3 Permitted mineral sites and supporting infrastructure sites). This would show potential transport links for the minerals to be taken to markets.	included in the Minerals Local Plan, they quickly become confusing with the addition of extra data. The interactive minerals mapping tool is available at www.worcestershire.gov.uk/minerals and this allows users to zoom to their area of interest and for the data to be viewed against ordnance survey basemaps.
G027-1957 Worcestershire County Council	Page 204 – Green Belt: Reference should be made to the revised NPPF, paragraph 146, which states " <i>Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are: ... a) mineral extraction</i> "	<p>The definition of Green Belt in the Glossary at page 204 matches the National Planning Policy Framework's definition of the purposes of Green Belt in paragraph 134 and the circumstances in which Green Belt designations might be amended as set out in paragraph 135.</p> <p>The implications of Green Belt in relation to minerals, including the fact that minerals extraction is not inappropriate provided that it preserves its openness and does not conflict with the purposes of including land within it, are addressed in Policy MLP 18 and the reasoned justification in paragraphs 6.23-6.27.</p>
G027-1957 Worcestershire County Council	<p><u>Implications arising from the Habitats Regulation Assessment</u></p> <p>The pre-submission MLP should ensure that recommendations from our HRA peer review are adequately considered, these include:</p> <ul style="list-style-type: none"> • That the site allocation development planning document must comply with HRA regulations prior to adoption. This is required as a matter of law, however, a recommendation from the HRA peer reviewer is to ensure this becomes directly constraining upon 	<p>A note will be added to the Reasoned Justification supporting policy MLP 1 stating that the Mineral Site Allocations Development Plan Document will be subjected to a series of assessments during its development, separately from those undertaken on the Minerals Local Plan. This will include assessment under the Habitat Regulations, Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment Regulations, Strategic Flood Risk Assessment, and Equality Impact Assessment.</p> <p>As you have noted, Policy MLP 21 part c) and paragraph 6.78 ensures protection for European Sites and that the requirements of the Habitat</p>

Consultee	Consultee comments	Initial officer response
	<p>the higher plan thus demonstrating compliance with the Habitats Regulations, by inclusion of intentional reference within MLP4 wording.</p> <ul style="list-style-type: none"> • Policy MLP21 must also ensure risks of non-compliance with Habitat Regulations are identified and should commit to addressing these at subsequent project-level HRA where appropriate to do so (I believe this is currently set out at Policy MLP21.c. and also paragraph 6.78). 	<p>Regulations will need to be addressed for any relevant proposals.</p>
<p>G029-717 Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England welcomes the proposed amendments to the plan as requested in our initial response to the 3rd stage consultation and the subsequent conversations during 2018 and 2019. We particularly commend this plan for its landscape character led and green infrastructure approach that is woven throughout the plan and its policies. We draw your attention to our comments on the Habitats Regulation Assessment in Q19 below.</p>	<p>Support noted.</p>
<p>G030-2185 Gloucestershire County Council</p>	<p>On this occasion we do not have any comments to make on the two documents. However we note, that under Duty to Co-operate engagement, regular dialogue has occurred between the two authorities during the preparation stage of the two documents.</p>	<p>Noted.</p>
<p>G031-2190 Marine Management Organisation</p>	<p>Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a</p>	<p>Noted. Marine aggregates are considered as part of Worcestershire's Local Aggregate Assessments, available at www.worcestershire.gov.uk/amr.</p>

Consultee	Consultee comments	Initial officer response
	<p>bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p>Marine Licensing Activities taking place below the mean high water mark may require a marine licence [https://www.gov.uk/topic/planning-development/marine-licences] in accordance with the Marine and Coastal Access Act (MCAA) 2009 [http://www.legislation.gov.uk/ukpga/2009/23/contents]. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our marine licensing guide for local planning authorities [https://www.gov.uk/government/publications/marine-licensing-an-guide-for-local-planning-authorities-lpas] for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting</p>	

Consultee	Consultee comments	Initial officer response
	<p>consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p>Marine Planning As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/ for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act http://www.legislation.gov.uk/ukpga/2009/23/contents] and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance https://www.gov.uk/government/pub</p>	

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	<p>lications/marine-planning-a-guide-for-local-authority-planners] and the Planning Advisory Service soundness self-assessment checklist [https://www.local.gov.uk/pas/pas-topics/local-plans/local-plan-checklist]. If you wish to contact your local marine planning officer you can find their details on our gov.uk page [https://www.gov.uk/government/publications/contact-the-marine-planning-team-at-the-mmo/marine-planning-officers-contact-details].</p> <p>The East Inshore and Offshore marine plans [http://www.marinemanagement.org.uk/marineplanning/areas/east_plans.htm] were published on the 2nd April 2014, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East and Inshore and Offshore Plans please visit our Marine Information System [http://mis.marinemanagement.org.uk].</p> <p>The South Inshore and Offshore marine plans [https://www.gov.uk/government/collections/south-marine-plans] were published on the 17th July 2018, becoming a material consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon. For further information on how to apply the South Inshore and South Offshore Marine Plans please visit our Marine Information System [http://mis.marinemanagement.org.uk].</p> <p>The MMO is currently in the process of</p>	

Consultee	Consultee comments	Initial officer response
	<p>developing marine plans for the remaining 7 marine plan areas by 2021. These are the North East [https://www.gov.uk/government/collections/north-east-marine-plan] Marine Plans, the North West [https://www.gov.uk/government/collections/north-west-marine-plan] Marine Plans, the South East [https://www.gov.uk/government/collections/south-east-marine-plan] Marine Plan and the South West [https://www.gov.uk/government/collections/south-west-marine-plan] Marine Plans.</p> <p><u>Minerals and waste plans and local aggregate assessments</u></p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <p>The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.</p> <p>The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.</p> <p>The NPPF Minerals Planning Practice guidance [https://www.gov.uk/guidance/minerals] which includes specific references to the role of marine aggregates in the wider portfolio of supply.</p> <p>The National and regional guidelines for aggregates provision in England 2005-2020 [https://www.gov.uk/government/publications/national-and-regional-guidelines-for-aggregates-provision-in-england-2005-to-2020] predict likely aggregate demand over this period</p>	

Consultee	Consultee comments	Initial officer response
	<p>including marine supply.</p> <p>The NPPF informed Minerals Planning Practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>	
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>Thank you for allowing us opportunity to comment on the above consultation document. We are making representations to the consultation on behalf of our client Tarmac Trading Ltd (Tarmac). Tarmac have existing sand and gravel mineral interests within the Plan area in the form of Clifton Quarry. In addition, they promoted two further sand and gravel sites to the Worcestershire Fourth Call for Sites Consultation in January 2018. These sites are located at Charlton near Evesham and Churchill near Kidderminster. To confirm the site at Charlton has now been drilled and contains proven reserves of 3.5 million tonnes. Tarmac also operate an asphalt plant at Pershore.</p> <p>I trust that the above comments are helpful. Tarmac would welcome the opportunity to discuss any of the above points and the sites submitted for consideration as part of the Call for Sites process in more detail.</p>	<p>Noted. The sites which have been proposed by Tarmac will be considered during the development of the Mineral Site Allocations Development Plan Document.</p>

4. Responses to questions about Minerals Local Plan background documents

Question 17. Do you have any comments on any of the **background documents** available at

www.worcestershire.gov.uk/mineralsbackground?

Table 95. Overview, showing consultees who responded to Question 17

Consultees who answered "Yes": 2	Consultees who answered "No": 3	Consultees who provided written comments (see below)
G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association	G001-232 Worcestershire Acute Hospitals NHS Trust G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G028-719 Environment Agency G033-2450 Heaton Planning on behalf of Tarmac

Table 96. Detailed comments on Question 17

Consultee	Consultee comments	Initial officer response
G011-2505 Bright & Associates	(1) Analysis of Mineral Resources in Worcestershire Re paragraph 3.3 and 3.4 Paragraph 3.3. 'To filter out deposits which are unlikely to contain significant amounts of mineral resources or be unviable to work, we have applied a minimum size threshold to the deposits which have been taken forward for further consideration'. Paragraph 3.4. 'Where the mapped aggregate deposits are less than 10ha in size or less than 200m wide, we have excluded them from further consideration. This might prevent some potentially significant resources from being revealed through further analysis; however we think that the risk of this is low and applying a minimum size threshold will enable analysis to focus on the deposits which were most likely to contain significant resources'. The text should be clarified to make it clear to the reader that it concerns deposits within the resource	Paragraph 2.4 of the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground) refers to the first step in analysing the mineral resources in the county for whether they were likely to be suitable and commercially attractive for exploitation during the lifetime of the plan. This is as set out in paragraphs 3.3-3.4 of the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground). It is noted that it could be clearer in both documents that this initial filtering applies to analysing deposits, and is not a step in the selection of specific sites or preferred areas.

Consultee	Consultee comments	Initial officer response
	<p>areas and not specific sites which have been submitted under the Call for Sites process.</p> <p>(2) Also see comment made in Q22 re: Paragraph 2.4 in the Location of development: screening and site selection methodology (August 2018) which also refers to deposits equal to or greater than 10ha in size/equal to or greater than 200m wide.</p>	
G012-2459 Wildmoor Residents Association	*The mapping tool is very useful, however when trying to print out a specific aspect it includes the list of items on the left hand side of the page instead of just the area of the map wanted, is this just my system or is this the way it is programmed?	At this stage, the interactive minerals mapping tool is intended to be viewed online and has not been set up for printing extracts.
G012-2459 Wildmoor Residents Association	*The steps in the Site Allocation Assessment Stages are generally a positive summary as to how sites will be considered before planning permission is sought.	Support noted.
G012-2459 Wildmoor Residents Association	* In MLP Background Document August 2018, Appendix B - Source Protection Zone 3, reference is made to Planning Practice Guidance on water supply and water quality and saying that plan making may need to consider steering 'potentially polluting development away from the most sensitive areas, particularly those in the vicinity of potable water supplies (designated source protection zones or near surface water drinking abstractions)'. From this we consider that sand extraction in a Zone 1 or a Zone 2 of water abstraction should be avoided in line with the EU Water Framework Directive.	<p>Planning Practice Guidance on Water supply, wastewater and water quality¹⁰ states "Plan-making may need to consider:</p> <ul style="list-style-type: none"> • How to help protect and enhance local surface water and groundwater in ways that allow new development to proceed and avoids costly assessment at the planning application stage. For example, can the plan steer potentially polluting development away from the most sensitive areas, particularly those in the vicinity of potable water supplies (designated source protection zones or near surface water drinking water abstractions)? • The type or location of new development where an assessment of the potential impacts on water bodies may be required. • Where particular types of

¹⁰ PPG Water supply, wastewater and water quality: Paragraph: 006 Reference ID: 34-006-20161116 <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>.

Consultee	Consultee comments	Initial officer response
		<p>sustainable drainage systems may not be practicable."</p> <p>Source Protection Zones are defined by the Environment Agency for groundwater sources such as wells, boreholes and springs used for public drinking water supply, and the different zones reflect the level of risk of contamination from activities in the area. The closer the activity, the greater the risk.</p> <p>To provide a reasonable and proportionate approach to addressing this issue:</p> <ul style="list-style-type: none"> • Source Protection Zones 1 and 2 have been included in Appendix A of the <i>Location of development: screening and site selection methodology</i> (August 2018), meaning that either the boundaries of any sites which overlap with Source Protection Zones 1 or 2 will be amended to remove the designated area if practical to do so, or otherwise the site will not be allocated as a specific site or preferred area. • Source Protection Zone 3 has been included in Appendix B, meaning that those sites which overlap Source Protection Zone 3 will only be able to be allocated as Preferred Areas, not as Specific Sites. The need to consider the presence of the Source Protection Zone at application stage will be highlighted. <p>This distinction between which sites will be allocated as Specific Sites and those which will be allocated as Preferred Areas reflects the level of certainty in these sites being able to be delivered and being acceptable in planning terms, with sites containing one or more of these criterion being allocated as Preferred Areas due to less</p>

Consultee	Consultee comments	Initial officer response
		certainty over their acceptability in comparison to those allocated as Specific Sites.
G012-2459 Wildmoor Residents Association	* The background document relating to flood analysis seems very desk top orientated e.g. all low grade category flood zones are all coloured green, therefore admissible as land for extraction within the category.	<p>The <i>Review and update of the Surface and Ground Water Protection Issues, including a Flood Risk Assessment of the Areas of Search</i> is a desktop analysis. It has been prepared to ensure that the Minerals Local Plan meets the requirements of national and international regulations (e.g. The Flood Directive 2007, transposed in the UK into the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010) and of national planning policy that Planning Authorities must take account of flood risk and protect water quality when allocating land for development and in developing their policies and plans and must pay due regard to a wide range of policies in assessing what the issues and risks to them are.</p> <p>It is unclear which part of the document your comment refers to. However, Appendix 6 sets out the sequential test conducted for the Areas of Search proposed in the Fourth Stage Consultation, with the categories for the "RAG" rating set out on pages 213-214.</p>
G012-2459 Wildmoor Residents Association	* The document does not allow me to respond outside a 'box inset' say as in a response to question 9, which is just a blank page with its question at the top. When I try to type in a sentence it just jumps to the next page with a 'box'?	The consultation questionnaire form allowed responses to be inserted against each question or part question. For Question 9, this included a box to type answers in relation to each of the policies in Chapter 5.
G028-719 Environment Agency	We welcome the: <i>Minerals Local Plan Background Document. September 2018. Minerals and Climate Change</i> . However, please note that UKCP18 projections were published in November 2018 and replace the UKCP09 projections. Research that is due to be published in 2019 may result in changes to climate change allowances moving forwards. Please find attached a briefing note to this end	Noted, the <i>Minerals and Climate Change</i> background document will be updated to reflect this.

Consultee	Consultee comments	Initial officer response
	<p>[Attachment added as APPENDIX A: Environment Agency (G028-719) attachment "Using 'Flood risk assessments: climate change allowances' following publication of new climate projections in UKCP18"]</p>	
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>The Worcestershire Local Aggregate Assessment (July 2018 – data covering the period up to 31/12/2016):</p> <p>The NPPF (paragraph 207a) requires that MPA's, 'plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment, either individually or jointly to forecast future demand, based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options'. Currently there are concerns that the LAA places too great a weight on monitoring historic trends and does not forecast future needs as required by the NPPF.</p> <p>The LAA identifies that there are insufficient reasons to justify a deviation from the 10 year sales average (circa 600,000tpa). However, the 3 years sales data suggests that the productive capacity of active operations able to meet the current 10 year sales average is reduced (indicative by the 3 year sales being significantly lower - likely as a result of sites closing – paragraph 5.11). Tarmac support the MPA in seeking to maintain higher sales/production figure and this needs to be reflective within the emerging Plan strategy. The future forecast for housing completions and future development indicates a likely sustained period of high demand for resource (paragraph 5.18). Worcestershire resource is also likely to be in increased demand from adjacent Counties who are likely to</p>	<p>The need to understand demand factors is recognised by the Mineral Planning Authority and is addressed as fully as possible in the baseline Local Aggregate Assessment, but the lack of available data makes it extremely difficult to do this with a high level of certainty.</p> <p>Support noted.</p> <p>The Minerals Local Plan has been developed to be flexible enough to enable the required quantum of mineral production as the "production guideline" in the Local Aggregate Assessment alters over the life of the plan. This is recognised in Chapter 5 (supply of mineral resources).</p> <p>A Local Aggregate Assessment will be produced annually and considered by the West Midlands Aggregate Working Party. It will consider these issues and the potential impact of HS2 as data becomes available.</p> <p>Some consideration is given to productive capacity in the baseline Local Aggregate Assessment (paragraphs 5.31, 6.25, 7.8), but it is</p>

Consultee	Consultee comments	Initial officer response
	<p>have to make a significant contribution to aggregate supply for major infrastructure projects including HS2. When monitoring sales as part of the LAA, consideration should be given to the number of active sites and their productive capacity. It is not the case that sales data is solely a reflection of demand, it also indicates the ability of active sites to produce/supply enough aggregate. The LAA should consider productive capacity and a need for additional sites alongside sales when forecasting anticipated demand.</p> <p>Tarmac have reviewed the Draft Worcestershire LAA published January 2019 (containing sales data covering the period up to December 2017), presented to the West Midlands Aggregate Working Party in January 2019. This draft is indicating that average 10 year sales have reduced (circa 570,000 tpa). This latest LAA is therefore recommending that production guidelines for the County are further reduced to 570,000tpa. However, as above, this reduction is a result of the closure of sites (6 sites reduced to 4). There are concerns with this approach and basing an annual production requirement on historic activity.</p> <p>Although the permitted landbank is shown at 6.99-7.07 years (this is reduced to under 7 years in the 2019 draft), this leaves the County vulnerable to maintaining a sufficient landbank in accordance with the NPPF requirements (paragraph 207(f)) when all allocations from the adopted Minerals Plan have now been brought forward - it is understood that the planning application for the final allocation from the extant Plan at</p>	<p>recognised that there may be scope for further analysis to be given to this in future Local Aggregate Assessments. However, the "supply" policies in Chapter 5 of the Fourth Stage Consultation version of the Minerals Local Plan recognise the importance of maintaining and enhancing productive capacity.</p> <p>Members of the West Midlands and surrounding Aggregate Working Parties have been consulted on a draft of the next iteration of the Local Aggregate Assessment (using data up to 31/12/2017), and comments received are being considered in finalising it for publication. Tarmac did not comment on this through the Aggregate Working Party mechanism.</p> <p>The concerns relating to the reliance on historic sales data are noted, and the need to understand demand factors is recognised by the Mineral Planning Authority, although the lack of robust data makes it extremely difficult to forecast future demand a high level of certainty. Consideration will be given to whether greater weight should be attached to recent site closures.</p> <p>The Minerals Local Plan includes sufficient flexibility to adapt to changes in the production guideline. For example, paragraph 5.11 refers to the need for the provision of "at least a further 11.53 million tonnes of sand and gravel", and figures for annual production and lifetime provision have purposefully not been included in the policies themselves because the annual production guideline figure in the Local Aggregate Assessment will inevitably</p>

Consultee	Consultee comments	Initial officer response
	<p>Strensham has now been withdrawn. Paragraph 5.34 indicates permitted reserves within the County of 4.294 million tonnes. Using the average sales of 600,000tpa this would provide a landbank of just over 7 years (7.2 years). Inactive operations count for upto 5.8% which then reduces the landbank to under 7 years (6.8 years). As a result the Plan needs to be providing sufficient flexibility and assurances/confidence to encourage minerals development to come forward to meet anticipated demand.</p> <p>It is indicated that the Minerals Industry have identified that there are likely to be significant constraints on finding sites of sufficient size and quality in the County (paragraph 1.3). However, the site assessment methodology document is indicating that over 30 sites have been put forward during the various call for sites stages. There are also a number of Screening and Scoping requests for mineral development submitted within the past year. It is more likely that the economic uncertainty coupled with an adopted Minerals Plan which has progressed beyond its expected implementation period and containing a limited number of preferred areas and saved policies has made operators reluctant to commit to progressing planning applications. In addition, sites that were previously considered more constrained by industry will become more economical and therefore viable to operate once sites without such constraint have been exhausted.</p> <p>Table 4 illustrates the sand and gravel sites with permitted reserves. It would be helpful for this table to indicate which sites were active and their</p>	<p>vary from year to year. Policy MLP 10 supports mineral development which will contribute to maintaining a landbank for sand and gravel of <u>at least</u> 7 years, whilst being flexible enough to accommodate changes to the balance of demand and supply identified in the Local Aggregate Assessment annually.</p> <p>The Minerals Local Plan recognises that existing permitted sites are unlikely to be sufficient over the life of the plan, which is why areas of search are identified in Chapter 4, and specific sites and preferred areas will be allocated in the separate Mineral Site Allocations Development Plan Document.</p> <p>Noted.</p> <p>The Local Aggregate Assessment does not set out the operational capacity or annual sales from each site due to reasons of commercial confidentiality.</p>

Consultee	Consultee comments	Initial officer response
	<p>operational capacity/annual sales. Of the 5 sites identified, there are no long term permitted reserves (i.e active sites that will continue operating until the end of the Plan period). It is therefore essential that the Plan ensures that that sites can meet at least the production requirements each year (just over 600,000tpa) as well as the long term provision over the whole Plan period.</p> <p>Tarmac firmly believe that the LAA and the Minerals Plan need to reflect anticipated/forecasted demand. Worcestershire’s contribution to aggregate supply is likely to increase to meet demand for reserve from adjacent Counties – primarily those in Staffordshire and the West Midlands who will be making major aggregate supply contributions to infrastructure projects including HS2. This should be considered as part of the LAA and the overall forecast/demand for aggregate within the County.</p>	<p>The "supply" policies in Chapter 5 of the Fourth Stage Consultation version of the Minerals Local Plan recognise the importance of maintaining and enhancing productive capacity, as well as the importance of maintaining a landbank of permitted reserves.</p> <p>A Local Aggregate Assessment will be produced annually and considered by the West Midlands Aggregate Working Party. It will consider these issues, including the potential impact of supplying HS2, as data becomes available.</p>

5. Responses to questions about statutory assessments of the Fourth Stage Consultation on the Minerals Local Plan

Question 18. Do you have any comments on the **Sustainability Appraisal** available at www.worcestershire.gov.uk/mineralsbackground?

Table 97. Overview, showing consultees who responded to Question 18

Consultees who answered "Yes": 2	Consultees who answered "No": 3	Consultees who provided written comments (see below)
G017-1081 Worcestershire Wildlife Trust	G001-232 Worcestershire Acute Hospitals NHS Trust	G017-1081 Worcestershire Wildlife Trust
G029-717 Natural England	G011-2505 Bright & Associates	G021-1942 Historic England
	G012-2459 Wildmoor Residents Association	G024-2455 Gladman Developments
		G029-717 Natural England

Table 98. Detailed comments on Question 18

Consultee	Consultee comments	Initial officer response
G017-1081 Worcestershire Wildlife Trust	We note the findings set out in the SA and broadly agree with the overall conclusions. However, we consider that the monitoring indicators set out in the Minerals Plan are more appropriate than those proposed in Table 11 of the SA (which may not be sufficient to track progress against the plan Vision or Objectives) and that the approach set out in policies MLP3 and MLP21 have potential to lead to more significant positive outcomes than the SA anticipates.	Noted. Additional comment from LUC (the consultancy appointed to carry out the Sustainability Appraisal of the emerging Minerals Local Plan): The two sets of indicators have different purposes. The indicators in the MLP are intended to monitor achievement of the MLP's objectives, whereas the indicators set out in the SA are intended to monitor the effects of the MLP against the sustainability objectives, taking into account potential negative effects that were identified in the SA process. The monitoring indicators set out in the SA are not intended to replace those set out in the MLP. The SA considers effects based on the SA framework and associated assumptions which provide a common basis for assessment to ensure consistency throughout. It is not clear

Consultee	Consultee comments	Initial officer response
		<p>why, or against which SA objectives the consultee considers that Policies MLP3 and MLP21 could have more significant positive outcomes. In general (and subject to professional judgement), indirect effects are assessed as being minor, rather than significant. In addition, the SA does not generally assign significant scores as a result of protection of a feature, only enhancement.</p>
<p>G021-1942 Historic England</p>	<p><u>Draft Local Plan Objectives and the SA</u></p> <p>In relation to the Objectives of the Plan, Objective MO3 addresses the built, historic, natural, and water environments in the round which could potentially be of concern since impacts for certain elements could be diluted through any generalised assessment. However, we note that the SA addresses these elements individually. This approach of the SA is supported since, whilst Plan Objective MO3 refers to all the matters, the SA approach provides opportunity for full consideration as separate elements and highlighting synergy where relevant. As such, Historic England has no concerns that Objective MO3 refers to the historic environment with other environmental elements in the round.</p>	<p>Support noted.</p>
<p>G024-2455 Gladman Developments</p>	<p>In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).</p> <p>The SA/SEA is a systematic process that should be undertaken at each stage of the Plans preparation, assessing the effects of the emerging Minerals Local Plan proposals on sustainable development when judged against all reasonable alternatives. The County Council should ensure that the results of the SA clearly justify any policy</p>	<p>Noted.</p> <p>Additional comment from LUC (the consultancy appointed to carry out the Sustainability Appraisal of the emerging Minerals Local Plan): The SA is one of many factors the Council considers when deciding on the preferred approach for the MLP. The SA provides an objective record of the likely sustainability implications of each option, which is used by the Council to inform their decision making. As such, it is not for the SA to justify the Council's policy choices per se. Nevertheless, the SA includes information on how the reasonable alternatives were identified, why the</p>

Consultee	Consultee comments	Initial officer response
	<p>choices.</p> <p>It should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for the chosen and rejected alternatives. The Council's decision making and scoring should be robust, justified and transparent.</p>	<p>preferred options were taken forward and why others were not, in line with the PPG.</p>
<p>G029-717 Natural England</p>	<p>We have reviewed the updated Sustainability Appraisal and propose the adoption of the potential monitoring indicators.</p>	<p>Support noted.</p>

Question 19. Do you have any comments on the **Habitats Regulations Assessment Record of Assessment** available at www.worcestershire.gov.uk/mineralsbackground?

Table 99. Overview, showing consultees who responded to Question 19

Consultees who answered "Yes": 1	Consultees who answered "No": 4	Consultees who provided written comments (see below)
G029-717 Natural England	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust	G029-717 Natural England

Table 100. Detailed comments on Question 19

Consultee	Consultee comments	Initial officer response
G029-717 Natural England	Natural England would like to draw your attention to the emerging evidence base in relation to the Severn Estuary SPA. The final 'High tide roost report' for the estuary was completed last year and is now available online http://publications.naturalengland.org.uk/publication/5655612985180160 We are now at a very early stage of evidence gathering in relation to the wintering bird populations and the location of their key roosting sites at times of, for example flooding and other extreme weather, when they search much further afield for food and shelter. We are aware that SPA birds can travel across and up the Vale to the Cotswolds Scarp and as far north as Longdon Marsh. Such land is likely to form 'functionally linked land' (FLL) and as such influences planning with respect to the Habitat Regulations. Natural England wishes to continue the dialogue with Worcestershire County Council to ensure that you have access to (and contribute where relevant) to gathering relevant Mineral Local Plan evidence base data.	As noted above, changes will be made to the Minerals Local Plan to refer to this in the text about the Lower Severn Strategic Corridor and the Avon and Carrant Brook Strategic Corridor. The Habitats Regulations Assessment will also be amended to refer to this.

Consultee	Consultee comments	Initial officer response
G029-717 Natural England	We have reviewed the updated Habitats Regulations Assessment and agree with the conclusions provided. Notwithstanding the above, your authority should be aware of a Ruling made recently by the Court of Justice of the European Union (the CJEU) on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (ref: C-323/17). The case relates to the treatment of mitigation measures at the screening stage of a HRA when deciding whether an appropriate assessment of a plan/project is required. Competent authorities currently making HRAs should be mindful of this case and should seek their own legal advice on any implications of this recent ruling for their decisions.	Noted. The implications of this case have been discussed with Natural England and the County Council's legal services team.

Question 20. Do you have any comments on the **Strategic Flood Risk Assessment** available at www.worcestershire.gov.uk/mineralsbackground?

Table 101. Overview, showing consultees who responded to Question 20

Consultees who answered "Yes": 1	Consultees who answered "No": 4	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	G012-2459 Wildmoor Residents Association

Table 102. Detailed comments on Question 20

Consultee	Consultee comments	Initial officer response
G012-2459 Wildmoor Residents Association	Whilst very detailed it seemed to lack illustrations or visualisations of its material and appears very much a desk top study compared to say the Fourth Stage Consultation document.	The <i>Review and update of the Surface and Ground Water Protection Issues, including a Flood Risk Assessment of the Areas of Search</i> (the Strategic Flood Risk Assessment) is a desktop analysis. It has been prepared to ensure that the Minerals Local Plan meets the requirements of national and international regulations (e.g. The Flood Directive 2007, transposed in the UK into the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010) and of national planning policy that Planning Authorities must take account of flood risk and protect water quality when allocating land for development and in developing their policies and plans and must pay due regard to a wide range of policies in assessing what the issues and risks to them are.

Question 21. Do you have any comments on the **Equality Impact Assessment Relevance Screening** available at www.worcestershire.gov.uk/mineralsbackground?

Table 103. Overview, showing consultees who responded to Question 21

Consultees who answered "Yes": 0	Consultees who answered "No": 5	Consultees who provided written comments
None	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G017-1081 Worcestershire Wildlife Trust G029-717 Natural England	None

6. Responses to questions about the Mineral Site Allocations Development Plan Document (DPD) - Proposed Methodology

Specific sites and preferred areas were not identified in the main Fourth Stage Consultation on the Minerals Local Plan, but will be set out in a separate Mineral Site Allocations DPD. The proposed methodology for selecting sites is set out in Chapter 5 of Worcestershire County Council's background document *Location of development: screening and site selection methodology* (August 2018) but should be read in the context of the whole document. This document is available on the Mineral Site Allocations DPD web page at www.worcestershire.gov.uk/minerals.

Question 22. Do you agree with the proposed methodology for identifying specific sites and preferred areas?

Table 104. Overview, showing consultees who responded to Question 22

Consultees who answered "Yes": 2	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
G012-2459 Wildmoor Residents Association G029-717 Natural England	G011-2505 Bright & Associates G017-1081 Worcestershire Wildlife Trust	G001-232 Worcestershire Acute Hospitals NHS Trust G011-2505 Bright & Associates	G006-2372 Highways England G007-1700 Worcestershire Regulatory Services (air quality, contamination) G009-800 Herefordshire & Worcestershire Earth Heritage Trust G011-2505 Bright & Associates G012-2459 Wildmoor Residents Association G013-1971 Wyre Forest District Council G017-1081 Worcestershire Wildlife Trust G019-2424 Belbroughton & Fairfield Parish Council

Consultees who answered "Yes": 2	Consultees who answered "No": 2	Consultees who answered "Don't know": 2	Consultees who provided written comments (see below)
			<p>G020-2436 Commercial Boat Operators Association</p> <p>G021-1942 Historic England</p> <p>G023-1793a Cemex</p> <p>G023-1793b Cemex</p> <p>G027-1957 Worcestershire County Council</p> <p>G028-719 Environment Agency</p> <p>G030-2185 Gloucestershire County Council</p> <p>G032-1700 Worcestershire Regulatory Services (noise, dust)</p> <p>G033-2450 Heaton Planning on behalf of Tarmac</p>

Table 105. Detailed comments on Question 22

Consultee	Consultee comments	Initial officer response
G006-2372 Highways England	We have reviewed the Fourth Stage Consultation, Mineral Site Allocations Development Plan and relevant background evidence documents. We would reiterate our previous comments made during the Third Stage Consultation, in January 2018, that we do not consider that any of the mineral sites will have a severe impact on the operation and functionality of the SRN.	Noted.
G007-1700 Worcestershire	Air Quality With reference to Appendix B we	

Consultee	Consultee comments	Initial officer response
<p>Regulatory Services (air quality, contamination)</p>	<p>welcome the inclusion of local air quality management in screening criteria. We would like make two comments in relation to this:</p> <ul style="list-style-type: none"> - The current screening criteria only consider existing AQMAs, we suggest that this should be extended to include existing areas of concern using WRS's Air Quality Consultation Areas as detailed in Figure 2.18 of the draft Minerals Extraction Local Plan. We can provide up to date GIS files for both AQMAs and our Air Quality Consultation Areas. - Increased numbers of HGVs associated with quarrying activities have the potential to impact local air quality. We therefore recommend that screening criteria to consider this are developed. A significant increase in HGV movements is of particular concern for areas of existing poor air quality (AQMAs) and areas recording concentrations of pollutants just below legal limits. We suggest that any screening criteria relating to vehicle movements is developed in accordance with IAQM/EPUK Land-Use Planning & Development Control: Planning for Air Quality (January 2017) <p>We note that screening criteria relating to dust emissions and relevant exposures within 200m of site (pg. 26) makes reference to Local Air Quality Management Technical</p>	<p>Noted. A change will be made to the methodology to ensure existing areas of concern are addressed.</p> <p>It is difficult to accurately assess any likely impacts on local air quality from HGV movements without the detailed information about site working methods and proposals which would be provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p> <p>Air Quality Management Areas (AQMA) are included in Appendix B of the <i>Location of development: screening and site selection methodology</i>. As noted above, a change will be made to the methodology to ensure existing areas of concern are also addressed. The need to consider the presence of both AQMAs and existing areas of concern at application stage will be highlighted, and all sites which are allocated will still be required to submit a planning application and address the policy requirements set out in the Minerals Local Plan.</p> <p>Noted, a change will be made to ensure the latest relevant information is referred to and used in site selection.</p>

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	Guidance 2009. Please be aware that LAQM.TG(09) has been replaced by Local Air Quality Management Technical Guidance 2016 (LAQM.TG(16)). We recommend that this is updated.	
G007-1700 Worcestershire Regulatory Services (air quality, contamination)	Contaminated Land We welcome the inclusion of screening criteria relating to proximity of sites to registered landfill sites. Please can you advise how the 50m distance has been established?	The 50m distance was informed by Worcestershire Regulatory Services response to earlier consultation on the submitted sites (dated 19 February 2015) which highlighted the presence of historic landfill sites within 50m.
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	The river terraces systems should perhaps be mentioned in Appendix C, since they are “likely to expose features of geological conservation interest” (Policy MLP26 in the plan) and hence although it is not considered that this should prevent allocation of a site, there could be impacts and mitigation factors that need to be managed satisfactorily at the application stage.	The criteria set out in the <i>Location of development: screening and site selection methodology</i> have been selected to reflect the National Planning Policy Framework's requirement that plans should allocate land with the least environmental or amenity value, and that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status. Whilst the potential importance of the river terraces highlighted above by the Earth Heritage Trust is noted and changes will be made to the Minerals Local Plan to draw out the potential for mineral working in these areas to reveal and increase understanding of these, they are not currently given either local or national designation.
G011-2505 Bright & Associates	(1) In the opening paragraphs of Chapter 2. Analysis of resources, the text needs to be clarified. Paragraph 2.4 currently reads ‘Firstly, the deposits were filtered based upon size, only deposits equal to or greater than 10ha in size and equal to or greater than 200m wide were taken forward for further analysis’. Clarification is required regarding the above paragraph that the text does not refer to specific mineral sites which may have been put forward during the Call for Sites process, rather the resource area deposits. Given the technical nature of the document, a glossary of	Paragraph 2.4 of the background document <i>Location of development: screening and site selection methodology</i> (available at www.worcestershire.gov.uk/mineralsbackground) refers to the first step in analysing the mineral resources in the county for whether they were likely to be suitable and commercially attractive for exploitation during the lifetime of the plan. This is as set out in paragraphs 3.3-3.4 of the <i>Analysis of Mineral Resources</i> background document (available at www.worcestershire.gov.uk/mineralsbackground).

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	<p>terms would help explain resource areas etc. but is not included.</p> <p>(2) See comment in Q17 re: Analysis of Mineral Resources (2018) which also makes reference to deposits.</p>	<p>It is noted that it could be clearer in both documents that this initial filtering applies to analysing deposits, and is not a step in the selection of specific sites or preferred areas.</p>
G011-2505 Bright & Associates	(3) In Chapter 4. Identifying areas of search, query whether footnote 6 on page 16 should refer to 10ha rather than 1ha.	Footnote 6 correctly refers to 1ha rather than 10ha. This was used in sense-checking the areas of search at the edges of the strategic corridors.
G011-2505 Bright & Associates	(4) In Chapter 5. Proposed method for the assessment of submitted sites, information is provided how the submitted sites to date will be assessed. However, this does not state whether additional information regarding previous site submissions will be allowed? In the interim period, important changes may have occurred which will affect how sites may be assessed using the new methodology, for example, mineral operators now confirming interest.	Noted. The proposers of each of the sites will be contacted prior to screening the sites to ensure that they still wish for the sites to be considered and that the latest information is available.
G011-2505 Bright & Associates	(5) with reference to the Appendix A Screening Criteria, can it be made clear that it is the EA information which will be used rather than the Water Environment layer from WCC interactive mapping which may show older data/incorrect data	The latest available data will be obtained prior to screening the sites.
G011-2505 Bright & Associates	(6) with reference to Appendix B Screening Criteria. Judgements being made at this important stage differentiate between what is categorised as a 'Specific Site' and a 'Preferred Area'. However, each aspect of the screening criteria is given equal weight and it might be that many of the sites being put forward through the Call for Sites process are for example, within SPZ III and/or an Impact Risk Zone given that both criteria cover a wide area.	Paragraph 5.12 states that "Those sites which do not overlap with any of the criteria in Appendix B will be allocated as Specific Sites, and those sites which overlap with <u>one or more</u> of the criteria in Appendix B will be allocated as Preferred Areas" (emphasis added).
G012-2459 Wildmoor Residents Association	Location of Development: screening and site selection - Does Appendix B deter applications from going forward or does it just mean that issues will be addressed at the application stage?	Those sites which do not overlap with any of the criteria in Appendix B will be allocated as Specific Sites, and those sites which overlap with one or more of the criteria in Appendix B will be allocated as Preferred Areas, and planning applications can be expected

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		to come forward for both of these types of allocation. The distinction between which sites will be allocated as Specific Sites and those which will be allocated as Preferred Areas reflects the level of certainty in these sites being able to be delivered and being acceptable in planning terms, as sites containing one or more of the criteria in Appendix B will have more issues which need to be addressed and overcome through the detailed design of the development proposal at planning application stage.
G013-1971 Wyre Forest District Council	<p>6 Wyre Forest District Council is at the final stages of its Local Plan. The Pre-Submission Plan went out to consultation from the 1st November to the 17th December 2018, with the plan expected to be sent to the Planning Inspectorate in late 2019 with adoption taking place in 2020.</p> <p>7 Wyre Forest District Council is aware of the potential application for mineral extraction near the proposed Lea Castle development at Lea Castle Farm of up to three million tons of sand and gravel over a 10 year period. The Lea Castle development is a key development site of 1,400 houses, employment, and land allocated for a primary school and a 3G football pitch. The Eastern Extension site of 1,440 houses in Kidderminster will also be within the North West Worcestershire strategic corridor.</p> <p>8 Any mineral extraction north and south of Wolverley Road could have a detrimental impact by virtue of dust, noise and disturbance for the duration of the period of extraction on residents in the Lea Castle area and which could have a negative impact on the development of the site. The proposed site would be near part of the Staffordshire and Worcestershire Canal Conservation Area. The noise, dust and general pollution that could</p>	<p>Noted. If either or both of the potential sites to the north and south of Wolverley Road are allocated as specific sites or preferred areas, developers will still be required to submit a planning application and address the policy requirements set out in the Minerals Local Plan, including those relating to green infrastructure, amenity, Green Belt, and the historic environment.</p> <p>Parish Councils are "specific consultation bodies" under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and their details are registered on our planning consultation database. They will continue to be informed about the progress of the Minerals Local Plan and about the separate Mineral Site Allocations Development Plan Document as it is developed. The relevant local Parish Council will be consulted at the time of any planning application in accordance with the adopted Statement of Community Involvement (available at www.worcestershire.gov.uk/SCI).</p>

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	<p>arise from such an operation could harm the character of the Canal Conservation Area.</p> <p>9 It must also be noted that the north lodges at Wolverley Road are Grade II listed and the council would not be supportive of an application for partial demolition to provide vehicular access to a minerals extraction site.</p> <p>10 The Kidderminster North Green Infrastructure Concept Statement document will also need to be considered in regards to any mineral extraction in this area. The document is seeking an overall net gain for biodiversity and to increase linkage to the Kidderminster East area.</p> <p>11 The site will be within parcel N7 of Wyre Forest's green belt. This has been categorised as to contribute in preventing the <i>'incremental encroachment of development into open countryside and sprawl of Kidderminster along the A449'</i>. (Green Belt Review Strategic Analysis, Amec Foster 2016, p22)</p> <p>12 Any extraction in this area will require therefore sensitive co-ordination and forward planning to reduce further disruption to the nearby villages of Cookley and Wolverley as highlighted in Policy MLP 19: Amenity, whilst maintaining the Green Belt openness and prompting green infrastructure as part of its legacy. If development is to be permitted a site restoration scheme will be required, with the potential sterilisation of mineral resources not to be 'considered adequate justification for schemes which would result in unacceptable impacts of unacceptable final landforms' (Worcestershire Minerals Local Plan-Fourth Stage Consultation 2018, Paragraph 6.22, p120).</p>	

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	<p>13 Cookley and Caunsall are developing their Neighbourhood Plan, and would require to be consulted on any proposed mineral extraction application at Lea Castle Farm. The Churchill and Blakedown Neighbourhood plan also resides within the North West Worcestershire Strategic Corridor.</p>	
<p>G017-1081 Worcestershire Wildlife Trust</p>	<p>We agree with the broad approach taken in this document and for the most part accept that the methodology is appropriate. However, we note that Local Wildlife Sites and Veteran Trees fall into Appendix B of the document and therefore carry somewhat limited weight in site allocation. Given the high value of these sites and the direction of travel set out in the 25-year Environment Plan it would be very helpful if both could be elevated to Appendix A. At the very least it is clear that veteran trees should be in Appendix A as they are referenced as 'irreplaceable' in the NPPF.</p>	<p>Support noted.</p> <p>The criteria set out in the <i>Location of development: screening and site selection methodology</i> have been selected to reflect the National Planning Policy Framework's requirement that plans should allocate land with the least environmental or amenity value, and that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status.</p> <p>It is noted that the protection afforded to veteran trees by paragraph 175(c) of the National Planning Policy Framework is that of an "irreplaceable habitat" and therefore this should be included in Appendix A, rather than Appendix B.</p> <p>However, including Local Wildlife Sites within Appendix B is considered to reflect the hierarchy of international, national and local designations.</p>
<p>G019-2424 Belbroughton & Fairfield Parish Council</p>	<p>The Belbroughton and Fairfield Parish Council emphasises its concerns that must be addressed of the cumulative impact on an area of many existing quarries and potential further applications. Such cumulative impacts on the Wildmoor / Stoneybridge area for example relate to risks to water quality, being in a flood water protection No.2 zone, and, traffic movements. Also, importance should be given to ensuring adequate terms exist relating to enforcement on</p>	<p>The Minerals Local Plan states that the technical assessments required by the development management policies should take account of any cumulative effects from other existing or proposed development.</p> <p>It is intended that, once adopted, the new policy framework will enable strong and clear conditions to be attached to any planning permissions, and that these can be monitored and enforced. We agree that this is a key</p>

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	possible restoration and traffic violations.	part of the effective operation of the planning system, and consultation has been undertaken on an Enforcement Plan in Spring 2019.
G020-2436 Commercial Boat Operators Association	<p>The Commercial Boat Operators Association (CBOA) represents water freight carriage by barge on the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body.</p> <p>CBOA notes that some of these proposed sites for mineral extraction exist within the River Severn valley. The River Severn is classified as a Commercial Waterway and currently supports carriage of bulk aggregate in the Ryall area. The Severn is capable of large scale bulk transport by barge offering the benefits of removing much of this heavy freight from both the busy local road network and perhaps also the railways, the latter often running near to or at capacity.</p> <p>We would very much hope that the water transport option would be considered with a bias in favour for the sites relevant, where mineral extraction sites lie close to or along the river and water transport would offer the distinct advantages as mentioned above.</p> <p>Economies of scale may mean that water transport by barge is in fact cheaper than the road alternative in addition to being 'environmentally friendly', if a full cost analysis is carried out over a specified time.</p> <p>A summary of the water transport benefits, can be listed as follows:- Significant reduction of road congestion, where HGVs in built up areas are a major issue Lower risk of road accidents/fatalities Lower noise on highways Reduced highway wear and tear from HGVs, meaning lower long term</p>	<p>The Minerals Local Plan recognises these opportunities, and Policy MLP 29 requires the use of the most sustainable transport option, requiring development to prioritise the use of alternatives to road transport for the movement of minerals and materials.</p> <p>The presence of navigable waterways is also highlighted in relation to the relevant strategic corridors in paragraphs 4.54, 4.82 (which also highlights that the River Severn is already used for transporting minerals), 4.111, 4.141 and 4.177.</p> <p>Detailed information about site access and transport methods will need to be provided at application stage, where detailed Environmental Impact Assessments inform the design of the development.</p>

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	<p>highway maintenance costs Lower fuel consumption meaning reduction of the carbon footprint Lower exhaust emissions, meaning less air pollution in the district Each barge can carry 10 or more lorry loads.</p>	
<p>G021-1942 Historic England</p>	<p>Screening and site selection methodology - I refer to our previous comments dated 16 March 2018 sent by email. We maintain concerns in relation to the omission of non-designated heritage assets, including locally listed assets and unknown archaeology of potential national significance, in the screening criteria. Even if it is not feasible to consider these in relation to the proposed Strategic Corridors they will need to be considered at the site allocation stage so provision should be made in the screening and site selection methodology.</p> <p>As previously advised we recommend that the site assessment methodology set out in our Advice Note on Site allocations in Local Plans be used as a basis for the consideration of the historic environment as part of the Site Allocation DPD process: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<p>Noted. Consideration will be given to how non-designated heritage assets and the advice set out in the Historic England advice note should be integrated in to the site selection methodology.</p>
<p>G023-1793a Cemex</p>	<p>Further to the above, and on behalf of CEMEX UK Materials Ltd., the Company wishes to promote a further site, Ripple East, as a specific site for the winning and working of sand and gravel. I attach a resource assessment in support of the site's promotion.</p> <p>The site is estimated to contain approximately 400 000t of sand and gravel suitable to be processed into a range of sand and gravel products. 'As raised' sand and gravel would be transported by barge to the Company's existing Ryall House Farm processing</p>	<p>Site proposal near Ripple, as shown in Appendix B, is noted. This will be added to the interactive map at http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1 and will be considered alongside other site proposals in developing the Mineral Site Allocations Development Plan Document.</p>

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	<p>facility via the existing Ripple wharf and would maintain current production for a further two years. The site would be likely restored to a waterbody to compliment the adjacent Ripple Lakes. It is a CEMEX freehold site.</p> <p>[The submitted site plans and resource assessment are included in Appendix B]</p>	
<p>G023-1793b Cemex</p>	<p>I've also been asked, on behalf of CEMEX UK Materials Ltd., to propose the Strensham site as a specific area of the winning and working of sand and gravel. The extent of the site proposed and a indicative working scheme are illustrated by drawing no. STN_02/03, attached. Drawing no. STN_02/14 illustrates a potential site restoration post extraction.</p> <p>The site is estimated to contain approximately 450 000t of sand and gravel net of processing losses. It is proposed that this material will be transported by road to the existing Ryall House Farm processing facility. It represents approximately 2 years of production for the Ryall facility, and would allow a full range of sand and gravel products to be produced. The landowner has indicated to the Company that he happy for this land to be worked for sand and gravel, although he may confirm this directly with the Mineral Planning Authority.</p> <p>[The submitted site plans are included in Appendix C. The submitted report on geological investigations is a large document and therefore has not been included in Appendix C, but the submitted information is available to view on request by contacting the Minerals and Waste Planning Policy team at minerals@worcestershire.gov.uk or 01905 766374.]</p>	<p>The site proposal at Strensham, as shown in Appendix C, is noted. This has previously been submitted and is already shown on the interactive map at http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1. It will be considered alongside other site proposals in developing the Mineral Site Allocations Development Plan Document.</p>
<p>G027-1957 Worcestershire</p>	<p>Revised Methodology: It is considered that reference should be</p>	<p>Noted. Consideration will be given to how transport issues can be taken into</p>

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County Council	<p>made to transportation within the site selection criteria, as it is noted that NPPF Paragraph 102 states that <i>"Transport issues should be considered from the earliest stages of plan-making"</i> and Paragraph 108 states that <i>"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</i></p> <p><i>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;</i></p> <p><i>b) safe and suitable access to the site can be achieved for all users; and</i></p> <p><i>c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree".</i></p> <p>Paragraph 109 of the NPPF also states that <i>"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"</i>.</p>	<p>account in the selection of sites for allocation, and work is being undertaken with Worcestershire County Council's highways officers to consider the potential transport opportunities and constraints at each site.</p> <p>It may be difficult to accurately assess likely transport movements without the detailed information about site working methods and proposals which would be provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage, but at application stage detailed information about site access and transport methods will need to be provided to meet the tests set out in Policy MLP 29 of the Minerals Local Plan which requires the use of the most sustainable transport option, requiring development to prioritise the use of alternatives to road transport for the movement of minerals and materials.</p>
G027-1957 Worcestershire County Council	We would query whether locally listed/registered parks and gardens and/or their settings should also form part of the site selection criteria.	Noted, however there is no data set available for local-level parks and gardens and therefore these cannot be used as part of the screening criteria.
G028-719 Environment Agency	<p>We acknowledge the proposed new methodology for site selection that is being consulted on alongside the Fourth Stage Consultation of the Minerals Local Plan.</p> <p>We have reviewed the methodology and consider it to be a robust screening and site selection tool. We welcome the acknowledgement that only 'water compatible' development should be brought forward in Flood Zone 3b, the 'functional flood plain'.</p>	Support noted.

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<p>G028-719 Environment Agency</p>	<p>We have looked at each of the 'sites submitted for consideration' on the Mineral Site Allocation DPD GIS Mapping system and provide comments below with regards the protection of controlled waters for your information:</p> <p>Near Clifton Quarry (near Severn Stoke). Parcels of land to the south: Clifton East, Reference Number B050-1504</p> <p>This area would encroach on the Clifton brook at Sandford and the lake to South adjacent to the A38. Dewatering the quarry in this area could remove baseflow from the watercourse and lake. A Hydrogeological Impact Assessment (HIA) would be required to determine an appropriate stand-off zone from the water features to reduce effects of drawdown (if this is possible in a sand and gravel aquifer). Reducing the size of the area to account for the above might not make this parcel feasible.</p> <p>The role of the HIA is to identify any water features within a designated radius of the development site (via a water features survey) and then assess the full potential of any quantitative impacts and risks on the water environment which could take place from the activity of quarrying, notably from any dewatering pumping activities within excavations which has a zone of influence within the aquifer environment. We would recommend that an appropriately qualified hydrogeological consultant undertakes this specialist HIA assessment work which is provided in a lines of evidence approach to demonstrate any risks from the development proposal including the significance of the risk and whether it can be mitigated against to enable development. Quarrying is an activity which physically removes the aquifer and the</p>	<p>Noted. These comments will be taken into account in developing the Mineral Site Allocations Development Plan Document.</p>

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	<p>usable groundwater resources contained within aquifers. This process may lead to impacts on the water environment as groundwater flows can alter, especially if watercourses derive base flows from this same source of groundwater or wetlands rely on this water for their existence. The natural baseline conditions can change significantly from quarrying activities, so assessments (e.g. quantitative hydrogeological risk assessments (HIA)) will need to be robust and avoidance measures and where appropriate mitigation applied to reduce any risks to the water environment; to allow the development to take place (at the site specific stage). Only until HIAs are undertaken will the risk and indeed the appropriateness of development be clear, this will also impact on the quantum of won material.</p> <p>The Environment Agency's summary guidance on assessing the impact of dewatering on water resources (in this case from quarry dewatering) can be found at this link and we would expect to see this methodology used in any HIA assessment: http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/scho0407bmaf-e-e.pdf</p> <p>Our main detailed report entitled: Hydrogeological impact appraisal for dewatering abstractions, PDF 204 pages, can be found at: https://www.gov.uk/government/publications/hydrogeological-impact-appraisal-for-dewatering-abstractions</p> <p>The lake and watercourse both have water abstraction licences on 18/54/08/0552 (surface water impoundment) 18/54/08/0416 (surface water stretch) and the use of these will need to be protected from derogation from any activity i.e. dewatering in this case.</p> <p>Severn Stoke, Sandford, Reference</p>	

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	<p>Number C015-1157 Severn Stoke The above comments for Clifton East apply here too. The Northern part of this area are close to these sensitive water features. This parcel of land also encompasses many watercourse/ water ditches where dewatering in the quarry could remove baseflow component from the surface water.</p> <p>Near Ryall Court Quarry (near Upton) Land at Ryall North, Reference Number B043-126 The proposed area is very close to a large meander bend in the River Severn. This causes concern as dewatering operations could impact on the baseflows in the River Severn and pump water out of the river. A Hydrogeological Impact Assessment (HIA) would be required to determine an appropriate stand-off zone from the Severn. In addition, several surface water abstraction licences are present along this stretch of river and protection from derogation from any activity is a requirement i.e. from quarry dewatering in this case as these licences have protected rights to abstract.</p> <p>Near Land near Saxons Lode Quarry / Ryall House Farm Quarry Land opposite Ryall Quarry entrance, Reference Number D025-2444 Ryall East, Reference Number C015-1157 Ripple, D015-1157, D020-1793 Land North East of Uckinghall Lane, Reference Number F010-1793 These sites are all in close proximity to the River Severn. This has the potential to cause concern as dewatering operations could impact on the baseflows in the River Severn and pump water out of the river. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. The Ripple Brook runs 200m to the</p>	

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	<p>south-eastern corner of Land North East of Uckinghall Lane, Reference Number F010-1793 and we have concerns over dewatering operations affecting baseflows in with this watercourse.</p> <p>Near Ripple Quarry Bow Farm, Reference Number F009-2438</p> <p>The proposed area is adjacent to the River Severn. As above, dewatering operations could impact on the baseflows in the River Severn and pump water out of the river. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. Also there are fish ponds within Ripple Lakes onsite within the proposed parcel and dewatering operations could drawdown the shallow groundwater table within the sand and gravels and impact upon these features.</p> <p>This area also has the Ripple and Mythe Brooks flowing directly through it and many tributaries which could be lost to future quarrying operations. These surface water features will need to be adequately protected from quarrying operations and dewatering must not influence the baseflows to these watercourses. Again, a HIA should be undertaken to understand any risks to the water environment from future quarrying operations.</p> <p>Several surface water abstraction licences are along this stretch of river and protection from derogation from any activity is a requirement i.e. from quarry dewatering in this case as these licences have protected rights to abstract. There is also a licence at Puckrup Hall (18/54/08/0461) which is on a tributary of the Ripple Brook and the parcel of land proposed to the East abuts the tributary. Adequate</p>	

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	<p>protection will need to be put in place to effectively protect these water features and licences.</p> <p>Land at Strensham, Reference Number F010-1793</p> <p>The proposed area is in close proximity to the River Avon, within 100m. Dewatering operations could impact on the baseflows in the River and pump water out of the river. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations.</p> <p>A surface water abstraction licence is located right along this stretch of the River Avon (MD/054/0017/015) and protection from derogation from any activity is a requirement i.e. from quarry dewatering in this case as this licence has protected rights to abstract.</p> <p>A number of small tributary streams are located along the boundary of the site to the south and east of the parcel and it will be a requirement to protect base flows to these water features.</p> <p>Land at Charlton, Reference Number F013-2450</p> <p>This parcel of land dissects the River Avon in two and is located in a large meander bend right up to the river. This concerns us as dewatering operations could impact on the base flows in the River Severn and pump water out of the river. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations.</p> <p>Several surface water abstraction licences are along this stretch of river and protection from derogation from any activity is a requirement i.e. from</p>	

Consultee	Consultee comments	Initial officer response
	<p>quarry dewatering in this case as these licences have protected rights to abstract. Licences include 18/54/17/0372, 18/54/17/0381 (point) and 18/54/17/0381 (stretch A-B). Adequate protection will need to be put in place to effectively protect these water features and licences.</p> <p>Land at Harvington North, Reference Number C015-1157 Harvington Several groundwater borehole licences are located within or close to this parcel of land, notably 18/54/17/0209, 18/54/17/0716/R01 and protection from derogation from any activity is a requirement i.e. from quarry dewatering in this case as this licence has protected rights to abstract. Adequate protection will need to be put in place to effectively protect these water features and licences. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations.</p> <p>Land at Harvington West, Reference Number C015-1157 Harvington A groundwater borehole licence is located close to this parcel of land, 18/54/17/0694 and protection from derogation from any activity is a requirement i.e. from quarry dewatering in this case as this licence has protected rights to abstract. Adequate protection will need to be put in place to effectively protect these water features and licences. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations.</p>	

Consultee	Consultee comments	Initial officer response
	<p>Land at Church Farm, Claines, Reference Number D022-2441 Several licences are located within or close to this parcel of land, notably groundwater borehole licence 18/54/08/0537/1/R01 and surface water reservoir licence 18/54/08/0338 so protection from derogation from any activity is a requirement i.e. from quarry dewatering in this case as this licence has protected rights to abstract.</p> <p>A large lake is located within this parcel of land. We are unsure if this is groundwater or surface water fed. Adequate protection will need to be put in place to effectively protect these water features and licences. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations.</p> <p>Land at Ombersley, West of Boreley Lane, Reference Number C015-1157 Ombersley This proposal is located on principal Permo-Triassic aquifer used for strategic drinking water supplies. Several water features are found within this parcel including a watercourse with surrounding marshland and groundwater spring emergence from the side of the hill to the east. It will be a requirement to protect baseflows to these water features. Adequate protection will need to be put in place to effectively protect these water features and licences from the effects of any dewatering operations. A HIA should be undertaken to understand any risks to the water environment from future quarrying operations. A HIA should be undertaken to understand any risks to</p>	

Consultee	Consultee comments	Initial officer response
	<p>the water environment from future quarrying operations.</p> <p>Land at Greenfields Farm, Upton Warren, Reference Number C011-2411, D012-2411</p> <p>This parcel of land is located adjacent to a Nature Reserve at Upton Warren Pools SSSI with the River Salwarpe towards the southern boundary within 5m.</p> <p>This could cause concern as dewatering operations could impact on the baseflows in the River Salwarpe and pump water out of the river. A HIA should be undertaken to understand any risks and any potential impacts upon the water environment from future quarrying operations.</p> <p>It is also understood that the Nature Reserve at Upton Warren Pools SSSI are groundwater fed and quarry dewatering operations must not impact upon groundwater which feeds this important designated site.</p> <p>Land at West of Fairfield, Reference Number F008-2502</p> <p>This proposal is located on principal Permo-Triassic aquifer used for strategic drinking water supplies. The parcel is also located within groundwater Source Protection Zone 3 (total catchment).</p> <p>The western boundary is a tributary of the Honey Brook with surrounding marshland. This concerns us as the quarry could impact upon this brook at removing it completely or severely affect baseflows to the brook. Any dewatering operations could impact on the baseflows to this tributary and pump water out of the watercourse. Again a HIA should be undertaken to understand any risks and any potential impacts upon the water environment from future quarrying operations.</p> <p>Land south of Wolverley Road, Reference Number F012-1793</p>	

Consultee	Consultee comments	Initial officer response
	<p>These two parcels of land are located on principal Permo-Triassic aquifer used for strategic drinking water supplies and also within sand and gravel deposits being in the Stour River valley. The parcel is also located within groundwater Source Protection Zone 3.</p> <p>Adjacent to the parcels to the west is the River Stour/ Staffordshire & Worcestershire Canal. Stourvale and Puxton Marshes SSSI are found to the South-West of the bottom parcel of land and these are highly sensitive wetland features fed from surface and groundwater sources. The close proximity of all of these sensitive water features concerns us as dewatering operations could impact upon them. A HIA should be undertaken to understand any risks and any potential impacts upon the water environment from future quarrying operations.</p> <p>Land north of Wolverley Road, Reference Number F011-1793 This large parcel of land is located on principal Permo-Triassic aquifer used for strategic drinking water supplies and also located within groundwater Source Protection Zone 3. Located adjacent to the North-West of the parcel corner is the River Stour (135m)/ Staffordshire & Worcestershire Canal (c.75m). The effects of drawdown should quarry dewatering be required will need to be considered. A HIA should be undertaken to understand any risks and any potential impacts upon the water environment from future quarrying operations.</p> <p>Land at Wolverley Glebe, Reference Number C015-1157 Wolverley This large parcel of land is located on principal Permo-Triassic aquifer used for strategic drinking water supplies and also located within groundwater</p>	

Consultee	Consultee comments	Initial officer response
	<p>Source Protection Zone 1, 2 and 3. This parcel of land intersects two major Severn Trent Water public drinking water supply groundwater pumping stations at Beechtree boreholes 1 & 2, licence no.18/54/06/028 on the northern boundary line. 125m to the south is another cluster of public drinking water supply boreholes at Churchill (18/54/06/0140) owned by South Staffordshire Water. Also 320 to the West is another groundwater licence at 18/54/06/0245 called Island Pool borehole and is used for augmentation of river flows. 695m to the west is Sleepy Mill borehole licence 18/54/06/0243 and is also used for augmentation of river flows. This area therefore represents a high and significant risk to groundwater resources. We would consider this area inappropriate for quarry development as the risks to groundwater could be significant and unable to be mitigated for.</p> <p>Land at Churchill, Reference Number F013-2450 This smaller parcel of land is located on principal Permo-Triassic aquifer used for strategic drinking water supplies and also located within groundwater Source Protection Zone 2 and 3. This parcel of land intersects the groundwater Source Protection Zones for the public drinking water supply boreholes at Churchill (18/54/06/0140) owned by South Staffordshire Water. The boreholes themselves are approx. only 250m to the west. This application area therefore represents a high and significant risk to groundwater resources. We would consider this area inappropriate for quarry development as the risks to groundwater could be significant.</p> <p>Land at Wildmoor Quarry extension, Reference Number B052-2397 This parcel of land is located on</p>	

Consultee	Consultee comments	Initial officer response
	<p>principal Permo-Triassic aquifer used for strategic drinking water supplies and also located within groundwater Source Protection Zone 3.</p> <p>This parcel of land intersects the groundwater Source Protection Zones for the Severn Trent Water public drinking water supply boreholes at Wildmoor (18/54/07/0134). The boreholes themselves are approx. only 550m to the south-east.</p> <p>This area therefore represents a high risk to groundwater resources. We would consider this area potentially inappropriate for quarry development as the risks to groundwater could be significant the closer to the quarry extension gets to the source of groundwater.</p> <p>Land at Wildmoor quarry extension – East, Reference Number F014-2465</p> <p>This parcel of land is located on principal Permo-Triassic aquifer used for strategic drinking water supplies and also located within groundwater Source Protection Zone 2 and 3.</p> <p>This parcel of land intersects the groundwater Source Protection Zones for the Severn Trent Water public drinking water supply boreholes at Wildmoor (18/54/07/0134). The boreholes themselves are approximately only 200m to the south-east.</p> <p>An historic landfill is located adjacent to this area to the north/north-west and leachate/ gas migration is a possibility into the void space of any new quarry development. We also have concerns over the restoration of land after quarrying has ceased. This cumulative activity puts the public water supply boreholes at increased risk as more and more quarrying with post restoration landfilling occurs within the SPZ for Wildmoor drinking water supply boreholes.</p>	

Consultee	Consultee comments	Initial officer response
	<p>This area therefore represents a high and significant risk to groundwater resources. We would consider this area inappropriate for quarry development as the risks to groundwater could be significant.</p> <p>Land at Chadwich Lane deepening, Reference Number B053-2397</p> <p>This parcel of land is located on principal Permo-Triassic aquifer used for strategic drinking water supplies and also located within groundwater Source Protection Zone 3.</p> <p>An historic landfill is located adjacent to this area to the east and leachate/gas migration is a possibility into the void space of any new quarry development. We also have concerns over the restoration of land after quarrying has ceased being in a strategic principal aquifer used for drinking water supplies. This cumulative activity puts the public water supply boreholes and the groundwater within the principal aquifer at increased risk as more and more quarrying with post restoration landfilling occurs.</p> <p>220m to the north is a groundwater licence MD/054/0006/016 for Beechcroft Nurseries, Belbroughton. Any dewatering activity if required from the deepening of the quarry could result in local drawdown within the aquifer and could impact this abstraction which has protected rights. Should dewatering be proposed we would recommend that a HIA should be undertaken to understand any risks and any potential impacts upon the water environment from future quarrying operations.</p> <p>Land at Pinches 4, Reference Number F007-2505</p> <p>This parcel of land is located on principal Permo-Triassic aquifer used for strategic drinking water supplies</p>	

Consultee	Consultee comments	Initial officer response
	<p>and also located within groundwater Source Protection Zone 3.</p> <p>An historic landfill is located adjacent to this area to the west and leachate / gas migration is a possibility into the void space of any new quarry development. We also have concerns over the restoration of land after quarrying has ceased being in a strategic principal aquifer used for drinking water supplies. This cumulative activity puts the public water supply boreholes and the groundwater within the principal aquifer at increased risk as more and more quarrying with post restoration landfilling occurs.</p> <p>Should dewatering be proposed we would recommend that a HIA should be undertaken to understand any risks and any potential impacts upon the water environment from future quarrying operations.</p>	
G028-719 Environment Agency	<p>Flood Risk</p> <p>We would expect sites that are being brought forward to be assessed as they were in the Flood Risk Assessment of Submitted Sites consultation report of June 2016. This evidence base was produced to identify flood risk constraints at a strategic level and to inform the WMLP with regards flood risk policy. We support further site specific baseline evidence to this end. We would be happy to discuss this further with you.</p> <p>The NPPG sets out that MLPs should ‘take account’ of flood risk when allocating land having regard to available SFRA data. For information, with reference to flood risk vulnerability and your policy making; Minerals working and processing (except for sand and gravel working) are “less vulnerable” and sand and gravel are “water compatible”.</p> <p>When sites are being brought forward at later stages we would seek to recommend site specific policy wording</p>	Noted. Further discussion with the Environment Agency on these points will be pursued to inform the development of the Mineral Site Allocations Development Plan Document.

Consultee	Consultee comments	Initial officer response
	<p>in the Allocations DPD for each mineral site. We would seek for this wording to include explicit flood risk betterment expectations. Betterment options will be site specific and including them in the DPD will be key to secure these moving forwards. Again, we would be happy to discuss this further with you.</p>	
<p>G030-2185 Gloucestershire County Council</p>	<p>On this occasion we do not have any comments to make on the two documents. However we note, that under Duty to Co-operate engagement, regular dialogue has occurred between the two authorities during the preparation stage of the two documents.</p>	<p>Noted.</p>
<p>G032-1700 Worcestershire Regulatory Services (noise, dust)</p>	<p>Thank you for extending the deadline slightly to enable me to review the fourth stage consultation document.</p> <p>I have reviewed the document 'Screening and Site Selection Methodology' dated August 2018 and agree with the document in the whole, I just have a few comments:</p> <p>With regard to site selection, these are designed to be a tool for screening planning applications that WRS would like to be consulted on with regard to noise and dust control.</p> <p>Depending on specific locations, increased numbers of HGVs associated with quarrying activities have the potential to impact local communities mainly through noise. It is therefore recommended that screening criteria is applied in consideration of areas to be developed and WRS are consulted.</p>	<p>Consideration will be given to how transport issues can be taken into account in the selection of sites for allocation, and work is being undertaken with Worcestershire County Council's highways officers to consider the potential transport opportunities and constraints at each site. However, it is difficult to accurately assess any likely noise impacts from HGV movements without the detailed information about site working methods and proposals which would be provided at application stage, where detailed Environmental Impact Assessments inform the design of the development. It would be unreasonable to expect this level of assessment at a plan-making stage.</p> <p>At application stage, detailed information about site access and transport methods will need to be provided to meet the tests set out in Policy MLP 29 of the Minerals Local Plan which requires the use of the most sustainable transport option, requiring development to prioritise the use of alternatives to road transport for the movement of minerals and materials, and Policy MLP 19 which is designed to ensure unacceptable adverse effects on sensitive receptors from issues such as noise and dust.</p>

Consultee	Consultee comments	Initial officer response
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>We are making representations to the consultation on behalf of our client Tarmac Trading Ltd (Tarmac). Tarmac have existing sand and gravel mineral interests within the Plan area in the form of Clifton Quarry. In addition, they promoted two further sand and gravel sites to the Worcestershire Fourth Call for Sites Consultation in January 2018. These sites are located at Charlton near Evesham and Churchill near Kidderminster. To confirm the site at Charlton has now been drilled and contains proven reserves of 3.5 million tonnes. Tarmac also operate an asphalt plant at Pershore.</p> <p>Tarmac would welcome the opportunity to discuss any of the above points and the sites submitted for consideration as part of the Call for Sites process in more detail.</p>	<p>Noted. The sites which have been proposed by Tarmac are shown on the interactive map at http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1 and will be considered during the development of the Mineral Site Allocations Development Plan Document.</p>
<p>G033-2450 Heaton Planning on behalf of Tarmac</p>	<p>The document identifies that concerns have previously been raised as part of the third stage consultation over the site selection methodology. The number of sites put forward for consideration as allocations and the limited number of sites that would be deemed suitable for potential allocation under the methodology criteria indicates that it is far too restrictive.</p> <p>Whilst it is right to consider the deliverability of sites and the involvement of an operator and support from the landowner as a first stage. The focus on the environmental filter/assessment provides significant constraints to the suitability of sites without them having gone through due process for assessment – usually as part of a Planning Application. It does not appear that the concerns have been addressed and that the environmental assessment stages identified in this document would still preclude almost all sites put forward for consideration. Even though minerals development by their scale</p>	<p>The concerns you note were raised in response to the Third Stage Consultation and the "Deliverability Assessment" methodology proposed at that stage which resulted in only three specific sites and two preferred areas being proposed for allocation in the Third Stage version of the Mineral Local Plan, but without these having been robustly assessed against environmental and amenity constraints.</p> <p>The revised methodology set out in the <i>Location of development: screening and site selection methodology</i> is intended to address those concerns by ensuring that potential environmental and amenity constraints are taken into account, whilst enabling suitable sites to be allocated. Taking these constraints into account will ensure that mineral operators, landowners and members of the public are given as much certainty as possible over where and how mineral development might take place, and will highlight issues which need to be addressed at</p>

Consultee	Consultee comments	Initial officer response
	<p>and nature in most circumstances will impact upon some form of environmental designation. There is concern regarding the overlaying approach/filter system proposed by the MPA in assessing sites. All of the environmental/technical filters which currently preclude development from further consideration as allocations are overly onerous and unnecessary. The focus on environmental constraints places undue emphasis on environmental protection and does not factor in the need/weight to be given to the provision of a steady and adequate aggregate supply. This is particularly important when there are significant quantities of mineral resource that will need to be planned for and provided for during the Plan period. There are a number of matters raised within all of the Appendices which can be adequately and satisfactorily addressed as part of scheme design/iteration as part of a Planning Application. Overly restricting sites from coming forward will lead to uncertainty for developers/operators and therefore delays and uncertainty over delivery.</p>	<p>application stage.</p> <p>To provide a reasonable and proportionate approach to addressing these issues and reflect the National Planning Policy Framework's requirement that plans should allocate land with the least environmental or amenity value, and that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status:</p> <ul style="list-style-type: none"> • Any overlap of a potential site with any of the criteria in Appendix A of the <i>Location of development: screening and site selection methodology</i> would mean that either the boundaries of those sites will be amended to remove the designated area if practical to do so (this will be undertaken in discussion with the proposers of the site, as set out in paragraph 5.10), or otherwise the site will not be allocated as a specific site or preferred area. • Any overlap of a potential site with any of the criteria in Appendix B would mean that the site will only be able to be allocated as a Preferred Area, not a Specific Site, and the need to consider the presence of the relevant issue at application stage will be highlighted. <p>We agree that the criteria set out in Appendix B and Appendix C could be adequately assessed through appropriate design and working methods proposed at application stage, and this is why they will not prevent a site being allocated as a Preferred Area. However, the distinction between Specific Sites and Preferred Areas reflects the level of certainty in these sites being able to be</p>

Consultee	Consultee comments	Initial officer response
		<p>delivered and being acceptable in planning terms. This is considered to accord with the definitions set out in Planning Practice Guidance.¹¹</p> <p>The Fourth Stage Consultation version of the Minerals Local Plan also includes areas of search and strategic corridors which are intended to provide a positive framework to ensure that a sufficient supply of minerals can be delivered over the life of the plan, to facilitate the minerals industry to find and put forward sites, and to provide as much certainty as possible to communities over where and how mineral development might take place.</p> <p>A fourth call for sites was also undertaken following the Third Stage Consultation, and additional site proposals were put forward. All sites which have been proposed to date are shown on the interactive map at http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/?l=1 and will be considered in the development of the Mineral Site Allocations Development Plan Document.</p>

¹¹ Ministry of Housing, Communities and Local Government, *Planning Practice Guidance, Minerals*, paragraph: 008 Reference ID: 27-008-20140306 Revision date: 06 03 2014.

7. Responses to questions about satisfaction with the consultation process

Question 23. Are you satisfied with the consultation process for the Fourth Stage Consultation on the Worcestershire Minerals Local Plan and the proposed methodology for the Mineral Site Allocations Development Plan Document?

Table 106. Overview, showing consultees who responded to Question 23

Consultees who answered "Yes": 5	Consultees who answered "No": 2	Consultees who provided written comments (see below)
G009-800 Herefordshire & Worcestershire Earth Heritage Trust	G001-232 Worcestershire Acute Hospitals NHS Trust	G005-2392 Charlton Parish Council
G011-2505 Bright & Associates	G005-2392 Charlton Parish Council	G012-2459 Wildmoor Residents Association
G012-2459 Wildmoor Residents Association		
G017-1081 Worcestershire Wildlife Trust		
G029-717 Natural England		

Table 107. Detailed comments on Question 23

Consultee	Consultee comments	Initial officer response
G005-2392 Charlton Parish Council	<p>One of the suggestions we made when we met you at the Hive Q&A session was an A4 flyer detailing the Minerals Plan process so they we could advise our local population. I have since learnt that Wychavon District Council in the March edition of "The Wychavon Magazine", which is delivered to all households, are planning an explanatory article on the latest SWDP review. We understand that this will explain the basis behind the review, the present position and the ongoing timescale for various actions so that people know what to expect.</p> <p>This sounds the same type of information we were referring to regarding the minerals plan. Rather</p>	<p>Noted, we have considered your suggestion and discussed it with our communications team. Worcestershire County Council does not produce its own newsletter. It may be possible to request for information to be included in each of the district councils' magazines or newsletters, but as these are not within Worcestershire County Council's control, we could not require the information to be included. It is also likely that production timescales for each magazine may vary across the county and may not align with appropriate timescales for disseminating information about the Minerals Local Plan or Mineral Site Allocations Development Plan Document.</p>

Consultee	Consultee comments	Initial officer response
	<p>than considering the A4 flyer could you consider arranging a suitable article for inclusion in The Wychavon Magazine. I appreciate that if you can do this it will be necessary to liaise with WDC asap as they may be up against printing deadlines.</p>	<p>However, Parish Councils are "specific consultation bodies" under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and their details are registered on our planning consultation database. This means that they have been, and will continue to be, contacted directly with information about Worcestershire County Council's planning policy consultations.</p>
<p>G012-2459 Wildmoor Residents Association</p>	<p>[Responded "Yes"] However, we would ask that the above comments made be taken into account as far as possible.</p>	<p>Noted.</p>

**APPENDIX A: Environment Agency (G028-719)
attachment "Using 'Flood risk assessments: climate
change allowances' following publication of new
climate projections in UKCP18"**

Using 'Flood risk assessments: climate change allowances' following publication of new climate projections in UKCP18

Who are these messages for?

These messages are for local planning authorities and developers preparing Strategic Flood Risk Assessments (SFRAs) and site specific flood risk assessments (FRAs).

How to use these messages

These messages advise developers who need to prepare site specific flood risk assessments and all local planning authorities how to use '[Flood risk assessments: climate change allowances](#)' (published 2016) to account for the impact of climate change on flood risk now UKCP18 has been published.

Main messages

- [UKCP18](#) was published on 26th November 2018.
- UKCP18 is the official source of information on how the climate of the UK may change over the rest of this century. The UKCP18 projections replace the UKCP09 projections.
- The allowances in '[Flood risk assessments: climate change allowances](#)' (published Feb 2016) are still the best national representation of how climate change is likely to affect flood risk for:
 - peak river flow
 - peak rainfall intensity
- Research that is due to be published in 2019 may result in changes to these allowances¹. We will provide customers with more information regarding the need to update peak river flow and peak rainfall intensity allowances in due course.
- The climate change allowances for sea level rise in '[Flood risk assessments: climate change allowances](#)' will be updated and published as early as possible in 2019. Until then, it is reasonable to continue to use the sea level rise allowances in 'Flood risk assessments: climate change allowances' (published in 2016) for planning decision making, because the allowances that have been used to date represent the high end of the range of sea level rise projected by UKCP18.

¹ High resolution mapping providing peak river flow allowances at 1km grid resolution due to be published Spring 2019. We do not expect the peak river flow allowances provided at a regional scale in 'Flood risk assessments: climate change allowances' to change as a result of this information, however, planners and developers may need to take account of this information where it shows a significant difference to the regional allowances. High resolution (daily and sub daily) rainfall projections is due to be published in the second half of 2019. These are used to understand the impact of climate change on peak rainfall. Following this, the peak rainfall allowances in 'Flood risk assessments: climate change allowances' may need to be updated, but this will not be until late 2019 at the earliest.

- However, in exceptional cases where developments are very sensitive to flood risk and have a lifetime of at least 100 years², we recommend you assess the impact of both the current allowance in '[Flood risk assessments: climate change allowances](#)' and the 95th percentile of UKCP18 'RCP 8.5' scenario (high emissions scenario) **standard method** sea level rise projections of UKCP18, and plan according to this assessed risk. You will need to calculate sea level rise allowances beyond 2100 by extrapolating the UKCP18 dataset. The Environment Agency will check your extrapolation methodology and provide advice.
- UKCP18 provides sea level rise projections for 2100 – 2300. The update of '[Flood risk assessments: climate change allowances](#)' will include advice on using these projections. In the meantime, for development with a longer than 100 year lifetime e.g. large urban extensions, new settlements, major infrastructure, you should contact your local the Environment Agency office for advice on how to calculate such allowances.
- Where it is appropriate to use the sea level rise information in UKCP18 as described in this briefing note, planning decisions should do so from now onwards, in order to ensure planning decisions are in line with policies in the National Planning Policy Framework. However, where local plans or development proposals and associated flood risk assessments are well advanced, it will usually be acceptable make decisions based on the allowances and advice in '[Flood risk assessments: climate change allowances](#)' (published Feb 2016) in the following circumstances:
 - local plan has been submitted for examination (before or on the day UKCP18 is published); or
 - development proposals are well advanced or where a valid planning application has already been submitted to the local planning authority (before or on the day UKCP18 is published).
- When the climate change allowances are updated, the supporting guidance will be updated at the same time to address user feedback collated since Feb 2016.
- Once '[Flood risk assessments: climate change allowances](#)' has been updated, over time we will update our flood risk modelling to reflect the revised climate change projections. This modelling work is principally done to inform our flood risk management activities, but we will continue to share this work with planners (for SFRAs) and developers (for site-specific FRAs) when it becomes available. Where the modelling needed by planners and developers has not yet been undertaken, we may be able to work together to do this work more quickly and to share the costs. Where this is not possible, the onus will be on planners and developers to undertake the necessary work at their own cost. Contact your local Environment Agency office to find out when they plan to update their flood risk modelling and to discuss working together.

² Such as infrastructure projects or developments that significantly change existing settlement patterns including urban extensions and new settlements

**APPENDIX B: Cemex (G023-1793a) site proposal to
the east of the former Ripple Quarry**



To: Peter Smeaton
From: Rob Yates
CC: Steve Hopkins
Business Area: National Reserves Department
Date: 17/10/2018
Address: CEMEX House, Evreux Way, Rugby,
Warwickshire, CV21 2DT

Re: Ripple East . Resource Assessment

Dear Peter,

Please see below the summary of the resource assessment work, that has been completed to assess the potential resource present at land East of the former Ripple Quarry, Gloucestershire.

Methodology

Information from a series of 13 boreholes drilled in 1985 covering the land immediately to the East of the former Ripple Quarry has been reviewed and used to determine the following:-

- Presence and amount of waste material (overburden).
- Presence and amount of potential economic mineral.
- Thickness of potential economic mineral.
- Draft resource pit design, considering potential standoffs from land boundaries and neighbouring properties.

In addition to this, background mapping and geographical lidar data has also been purchased to allow for a more accurate modelling of the potential resource.

Conclusion

The borehole information shows the presence of potential economic mineral within the land area of interest.

Total thickness ranges from 0 . 0.5m to 4.5 . 5.0m. A mineral isopachyte contour plan (attached) has been generated to assess how the mineral sits across the area of land, with the mineral being thinnest to the extreme North West and South East of the site respectively. These areas have been coloured grey and discounted from the draft pit design resource area, due to the mineral being too shallow to extract economically and practically.

The draft pit design area (plan attached) yields a potential measured resource of **402,635 Net Tonnes** (assuming a 10% wastage loss, from extraction, handling and processing). This is overlain by approximately **90,358m³ of Overburden** . consisting mostly of soils and a sandy/silty clay.

The draft pit design has been generated using a standoff of 25m to neighbouring boundaries, and 100m standoff to neighbouring properties. Cut slopes are modelled in at 1v:2h (26.57 degrees) which would allow for a good factor of safety from a geotechnical stability viewpoint.

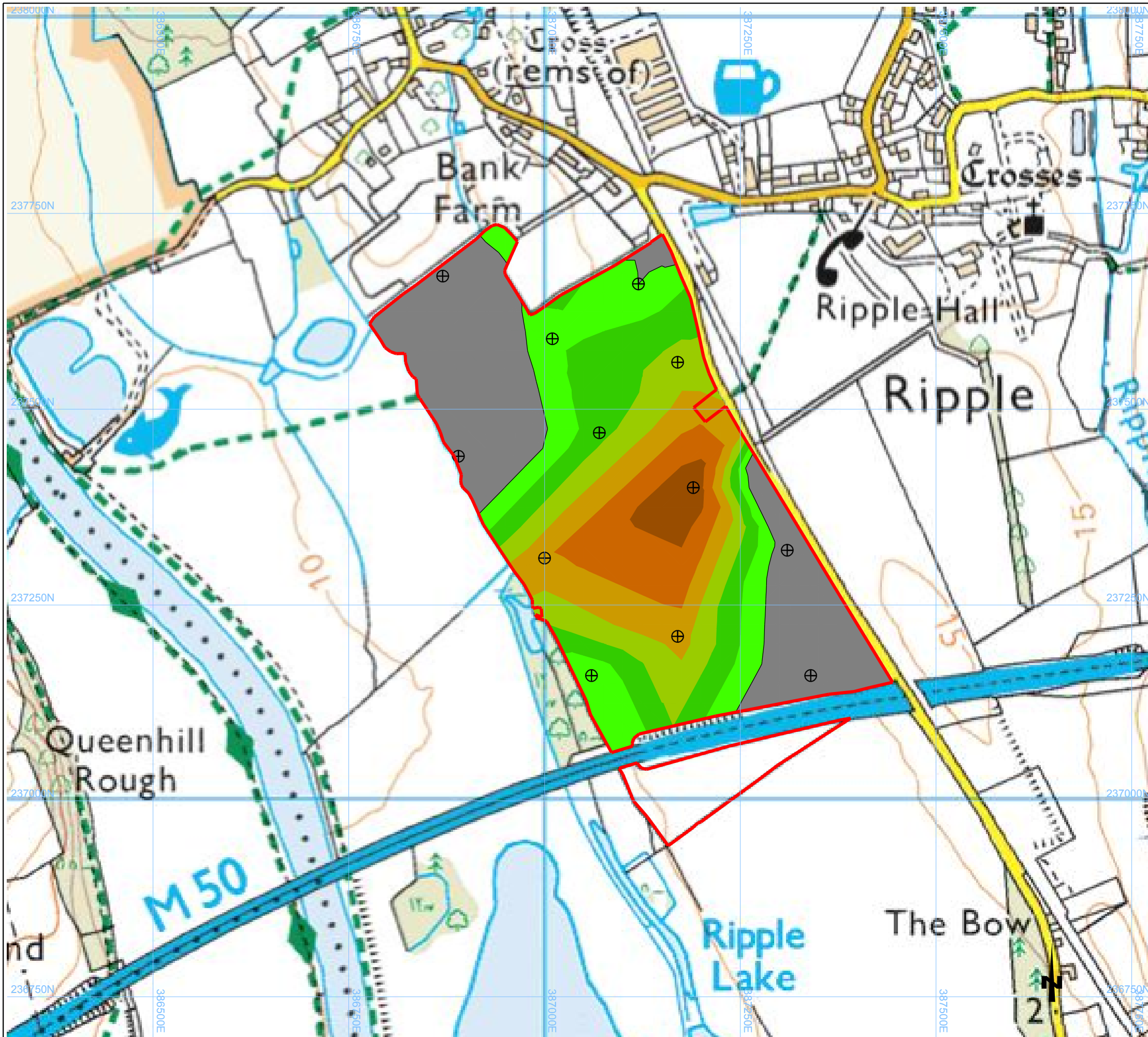
No assessments have been made from a quality point of view, and no calculations have been made with respect to potential restoration scenarios.

Should you require any further information or require further work to progress this project, please contact myself and Steve Hopkins.

Yours sincerely,

Rob Yates (Senior Area Geologist)

For CEMEX UK Materials Limited (National Reserves Development Department)



Legend and Notes

Area of Interest

Mineral Isopachyte (m)

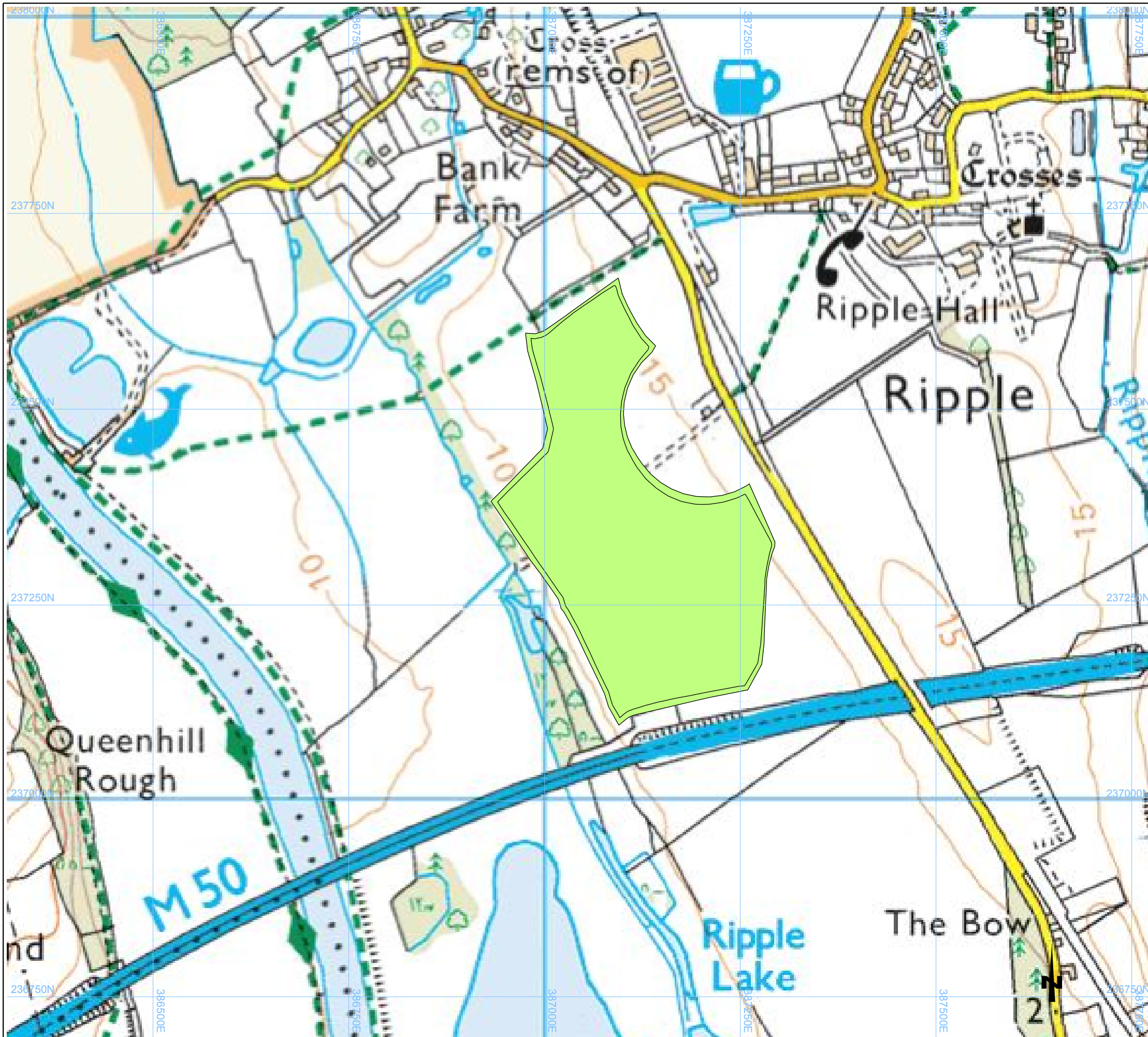
- Less than 5.0
- Less than 4.5
- Less than 4.0
- Less than 3.5
- Less than 3.0
- Less than 2.5
- Less than 2.0
- Less than 1.5
- Less than 1.0
- Less than 0.5
- Less than 0.0

Models	Plotted from: 1810-R355 MINERAL ISOPACHYTES.LSS
	Overlay 1: 1:25,000 OS Explorer
	Overlay 2:
	Overlay 3:

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National Reserves Department
 CEMEX UK Operations Limited
 Rugby House, Evreux Way
 Rugby, Warwickshire
 CV21 2DT
 Telephone 01788 517000
 Facsimile N/A

Drawn By Rob Yates	Company CEMEX UK Materials Limited
Date 12.October.2018	Site Fields to East of Ripple Quarry
Scale(S) 1:5000 (A3)	Project Geological Appraisal of Historic Data
Checked / Approved by: INTERNAL DRAFT	Title Mineral Isopachyte Plan
OS Ref. SO8636	Drawing No. 1810-R355-RIP-D-00#



Legend and Notes

Notes

Draft Design based on excavating mineral greater than 1.5m thickness, and incorporating standoffs from nearby properties and motorway embankment.

Design contains approximately 402,635 Net Tonnes of Measured Resource (271,135m³).

Models

Plotted from:	1810-R355 DRAFT ISO PIT DESIGN.LSS
Overlay 1:	1:25,000 OS Explorer
Overlay 2:	
Overlay 3:	

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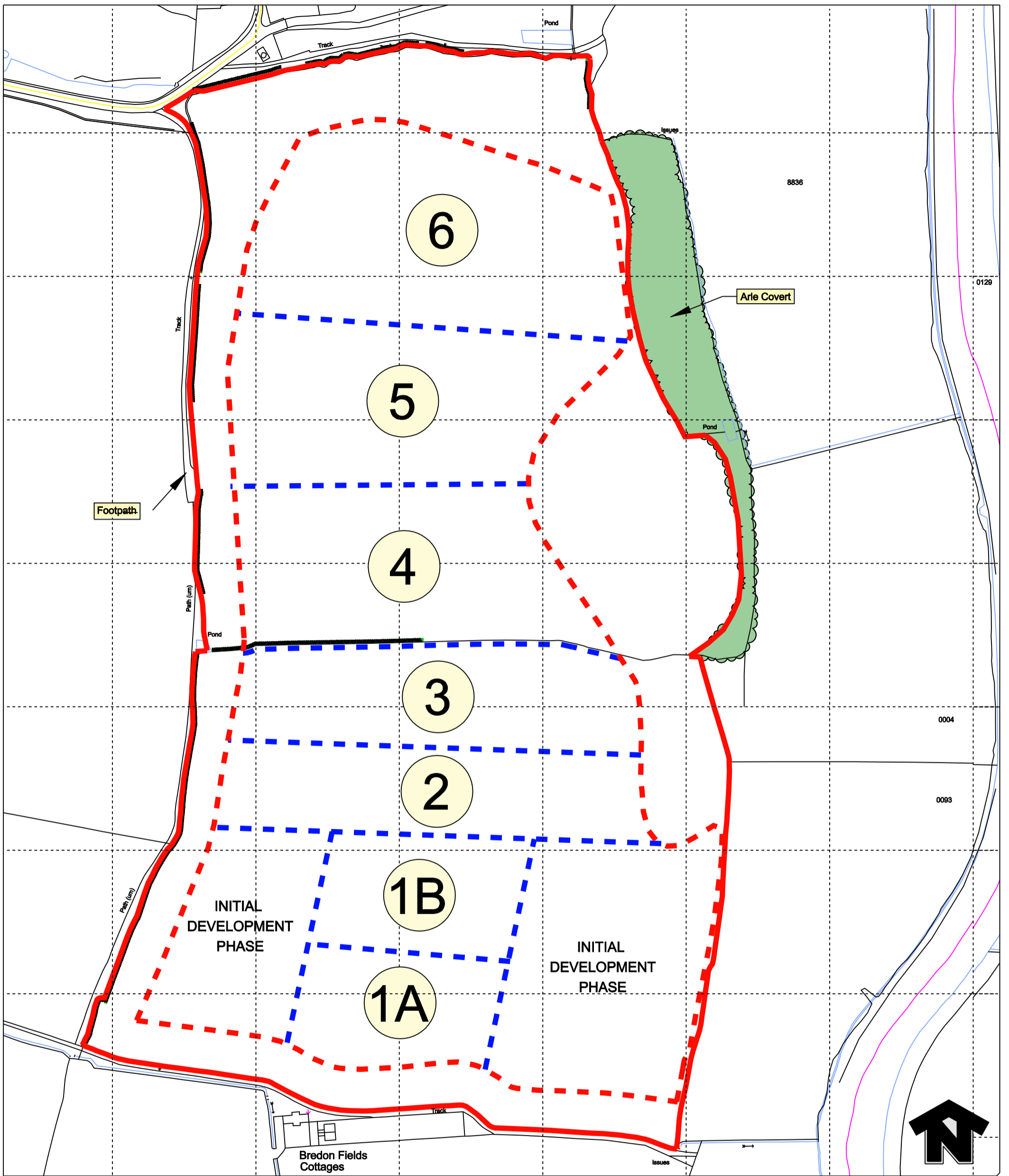
National Reserves Department

CEMEX UK Operations Limited
Rugby House, Evreux Way
Rugby, Warwickshire
CV21 2DT




Telephone 01788 517000
Facsimile N/A

Drawn By Rob Yates	Company CEMEX UK Materials Limited
Date 12.October.2018	Site Fields to East of Ripple Quarry
Scale(S) 1:5000 (A3)	Project Geological Appraisal of Historic Data
Checked / Approved by: INTERNAL DRAFT	Title ####
OS Ref. SO8636	Drawing No. 1810-R355-RIP-D-00#

APPENDIX C: Cemex (G023-1793b) site proposal near Strensham



LEGEND

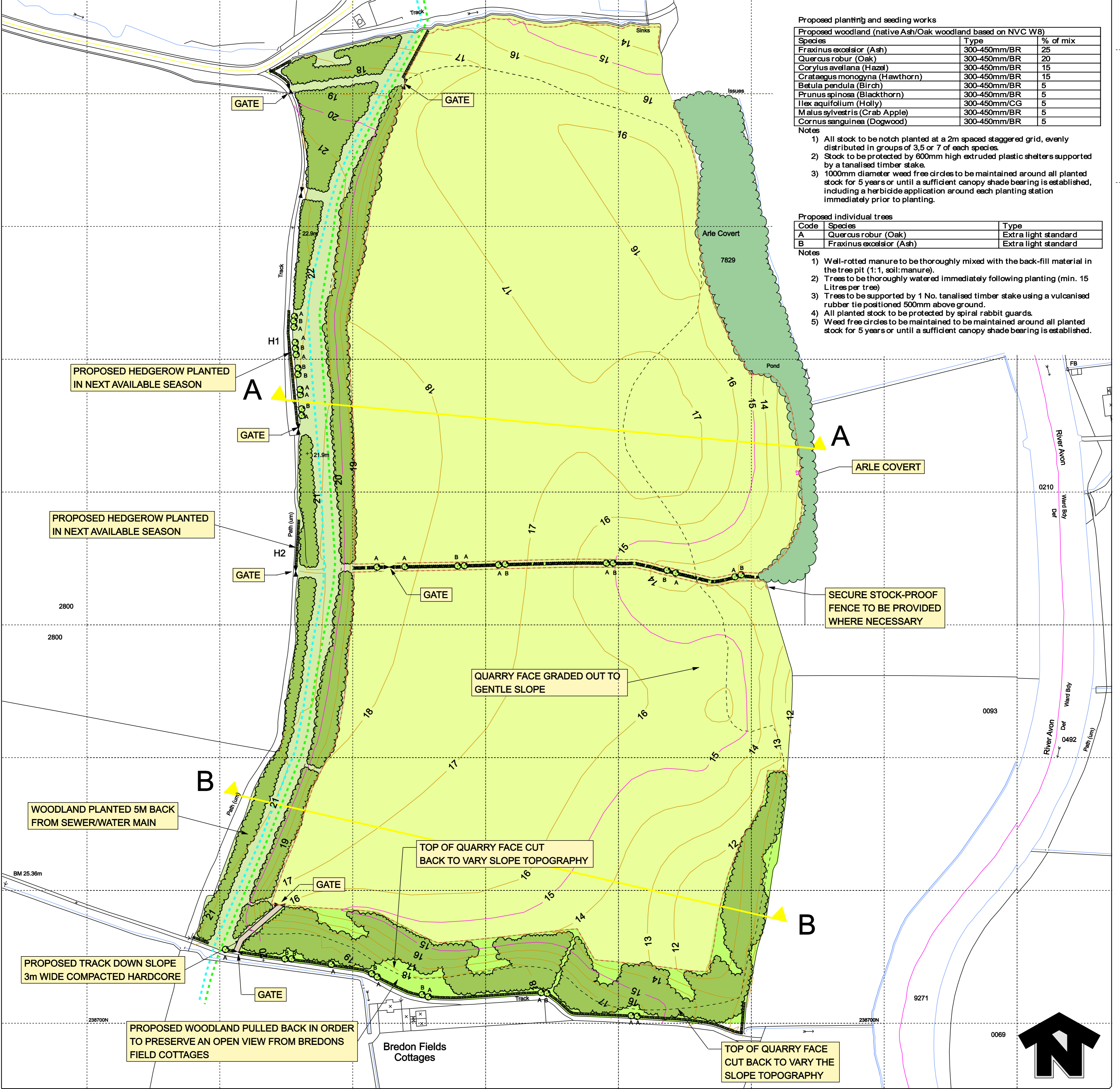
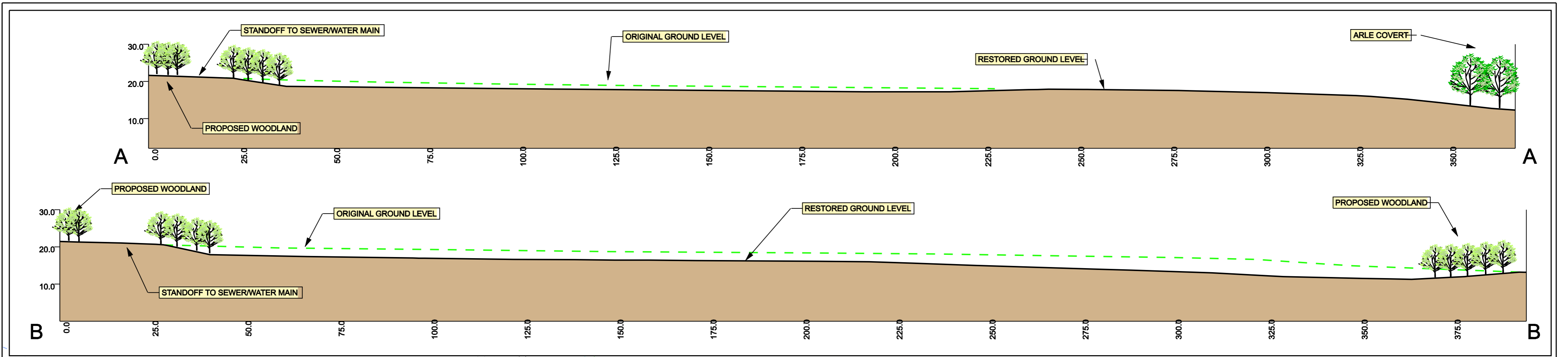
-  APPLICATION SITE
-  EXTRACTION BOUNDARY
-  EXTENT OF PHASES

REVISIONS	F	E	D	C	B	A

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 Geological Services Department
 CEMEX UK Operations Limited
 Wolverhampton Road, Oldbury,
 Warley, West Midlands
 B69 4RJ

Drawn By: SDD/CAW	Company: CEMEX UK Materials Limited
Date: March 2005	Site: Strensham Quarry
Scale: 1 : 2 500	Project: Working Scheme
Original Size: A3	Title: Extent of Phases
File Reference: 4901	Drawing Number: STN 02 / 03



Proposed planting and seeding works

Proposed woodland (native Ash/Oak woodland based on NVC W8)		
Species	Type	% of mix
Fraxinus excelsior (Ash)	300-450mm/BR	25
Quercus robur (Oak)	300-450mm/BR	20
Corylus avellana (Hazel)	300-450mm/BR	15
Crataegus monogyna (Hawthorn)	300-450mm/BR	15
Betula pendula (Birch)	300-450mm/BR	5
Prunus spinosa (Blackthorn)	300-450mm/BR	5
Ilex aquifolium (Holly)	300-450mm/CG	5
Malus sylvestris (Crab Apple)	300-450mm/BR	5
Cornus sanguinea (Dogwood)	300-450mm/BR	5

Notes

- 1) All stock to be notch planted at a 2m spaced staggered grid, evenly distributed in groups of 3,5 or 7 of each species.
- 2) Stock to be protected by 600mm high extruded plastic shelters supported by a tanalised timber stake.
- 3) 1000mm diameter weed free circles to be maintained around all planted stock for 5 years or until a sufficient canopy shade bearing is established, including a herbicide application around each planting station immediately prior to planting.

Proposed individual trees

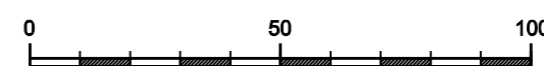
Code	Species	Type
A	Quercus robur (Oak)	Extra light standard
B	Fraxinus excelsior (Ash)	Extra light standard

Notes

- 1) Well-rotted manure to be thoroughly mixed with the back-fill material in the tree pit (1:1, soil:manure).
- 2) Trees to be thoroughly watered immediately following planting (min. 15 Litres per tree).
- 3) Trees to be supported by 1 No. tanalised timber stake using a vulcanised rubber tie positioned 500mm above ground.
- 4) All planted stock to be protected by spiral rabbit guards.
- 5) Weed free circles to be maintained around all planted stock for 5 years or until a sufficient canopy shade bearing is established.

LEGEND

	EXISTING WOODLAND		PROPOSED AREAS OF NATURAL REGENERATION
	EXISTING HEDGEROW		PROPOSED AGRICULTURAL PASTURE
	PROPOSED HEDGEROW		SEWER
	PROPOSED INDIVIDUAL TREES		WATER MAIN
	PROPOSED WOODLAND		PROPOSED NON-AGRICULTURAL GRASS SEEDING



REVISIONS		
F		
E		
D		
C		
B		
A		

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 Geological Services Department
 CEMEX UK Operations Limited
 Wolverhampton Road, Oldbury,
 Warley, West Midlands
 B69 4RU

Drawn By	JH/SD/CW	Company	CEMEX UK Materials Limited
Date	February 2005	Site	Strensham Quarry
Scale	1 : 1 500	Project	Proposed Extraction of Sand and Gravel
Original Size	A1	Title	Proposed Restoration Scheme
File Reference	1901	Drawing Number	STN 2 / 14