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Our ref: WA/2006/000400/OR-
07/IS1-L01
Your ref: -
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Dear Ms Batelaan

Additional Documents for your Minerals and Waste Core Strategy

Thank you for your consultation on the Additional Documents for your Minerals and Waste Core Strategy (M&W CS), which we received on 29 April 2016. We have reviewed the following documents:

- Non-aggregate Minerals (Topic Paper), April 2016
- Restoration of Mineral Workings (Topic Paper), April 2016
- Preliminary Assessment of Waste Site Options (Topic Paper), April 2016
- Preliminary Assessment of Mineral Site Options (Topic Paper), April 2016

For ease of reference we have provided comments on each document separately below and we have underlined where we refer to specific paragraphs within each document.

Non-aggregate Minerals (Topic Paper), April 2016

We have no comments to make regarding this paper.

Restoration of Mineral Workings (Topic Paper), April 2016

We support the presence of this paper as it addresses a number of key issues regarding the long-term restoration of mineral workings. We have the following comments to make:

- In Paragraph 3.2 we welcome the recognition that “all schemes (for the restoration of mineral workings) have the potential to enhance biodiversity”.
- We support the inclusion of Paragraphs 3.36 – 3.38.
- Section 5 attempts to clarify the role of both the planning system and environmental permitting regarding the use of inert fill in the restoration of mineral workings. We welcome the simplification of this section and the distinction drawn between planning and permitting and the requirement regarding both systems for the use of inert fill in mineral workings restoration.

- In Paragraphs 5.12 and 5.13 we welcome the identification of sand and gravel working as ‘water compatible development’ according to the National Planning Policy Framework (NPPF), and support the approach described in paragraph 5.13.
- In Paragraphs 5.16 we welcome that “consideration should always be given to restoration below original land levels to increase flood storage capacity”
- We support Paragraphs 5.18 – 5.20.
- Paragraph 5.21 & 5.22 indicate a possible need to make changes to Policy M10 of the Core Strategy. We support a minor change to Policy M10 to include consideration of the impacts of imported fill material on flood risk and water quality. We would be pleased to discuss any wording with you.

Preliminary Assessment of Waste Site Options (Topic Paper), April 2016

We have the following comments to make:

- We support the approach to identifying sites according to Flood Zone in Section 2.15. We welcome the precautionary approach in referring to the highest flood zone when a site straddles more than 1 flood zone. We welcome the proportionate use of the sequential test methodology at this stage where details regarding Flood Zone 3a and 3b is not available; and confirmation that a comprehensive Flood Risk Sequential Test will be completed for sites for the Part 2 Plan when this information is available. In addition, we welcome the recognition that certain activities and sites will also be subject to the Exception Test.
- In Section 2.16 we acknowledge the lack of detail at this stage regarding the intrinsic hazard to groundwater from landfill operations within Source Protection Zones. It would be useful to indicate that further detailed assessment will be required at a later stage to determine the suitability of a particular site for a particular type of waste.
- In Section 2.17 we welcome the proportionate approach to above ground waste sites and the confirmation that further investigations will be undertaken at a later stage to determine the suitability of a particular site for a particular type of waste.

Preliminary Assessment of Mineral Site Options (Topic Paper), April 2016

We have the following comments to make:

- In Section 2.12 we support the use of evidence from the Habitats Regulations Screening Report to determine the weightings for Special Areas of Conservation (SACs). We welcome recognition that significant effects from mineral workings on SACs includes both dust (the 200m buffer zone) and water quality and quantity (the water catchment area).
- In Section 2.13 we welcome confirmation of further detailed assessment of the harm to Sites of Special Scientific Interest (SSSI) for nominated sites that are identified as being within the Impact Risk Zone of an SSSI.
- In Section 2.16 we recommend that further clarity is given to the role of the Flood Risk Sequential Test in steering development to areas of least flood risk. We

support the outlined methodology and criteria used in this Red-Amber-Green analysis of nominated sites and the confirmation that more detailed assessment will be undertaken during Part 2 of the Local Plan. However, for the sake of clarity we suggest that specific reference is made to the requirement for the Flood Risk Sequential Test in the next stage of the site selection process:

*“Therefore this approach has been taken until more detailed data is available when Part 2 of the Local Plan is undertaken, **it is at this stage that all nominated sites will be subject to the Flood Risk Sequential Test as part of the site allocation process.**”*

- In Section 2.21 we note that this focuses only on the cumulative impacts to communities. We recommend that an assessment is also made of the cumulative impacts of mineral workings to other environmental topics discussed in the earlier sections. In particular, the cumulative impacts on groundwater resources and aquifers.

Yours sincerely

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