



**LINCOLNSHIRE MINERALS AND WASTE LOCAL PLAN  
Site Locations Document (Submission)**

**STATEMENT OF CONSULTATION – February 2017**

**Appendix 4**

**Summary of representations to the Site Locations (Pre-Submission Draft) November 2016, and the County Council's responses**

| Representation No. | Respondent                                    | Part of the Plan to which the representation relates: |        |              |                   | Whether Plan is considered to be: |       |                                      | Details why not legally compliant, unsound or fails DTC/<br>Comments of support   | Modifications proposed by respondent | Request to participate at Oral Examination | The reason given why the respondent considers it necessary to participate at the oral examination | County Council (Officer) Response   |
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|                    |   | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |                                      |  |   |   |
| 1                  | CLH Pipeline System Ltd (Fisher German)       |   |        |              |                   |                                   |       |                                      | We can confirm that our client's apparatus, the CLH Pipeline System – Energy Act 2013 (CLH PS), may be affected by your proposals as indicated on the attached plan(s). The plan(s) supplied are intended for general guidance only and should not be relied upon for excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided and in order to verify the accurate location of the pipeline in conjunction with your proposals you should contact, to arrange a site visit.... To reiterate, you should not undertake any work or activity without first contacting the CLH Pipeline System Operator for advice and, if required, Works Consent. |                                      |  |   | A 'linesearch' exercise is routinely carried out and appropriate consultation undertaken at the planning application stage. Where appropriate, informatives are included with any planning permission granted.<br><br>It is the responsibility of site developers to contact relevant infrastructure operators with regard to consent and easement requirements relating to any infrastructure affecting sites. |
| 2                  | Transport for London                          |   |        |              |                   |                                   |       |                                      | Transport for London (TfL) has no comments to make on the pre submission draft consultation documents.  |                                      |  |   | Noted.  |
| 3                  | Witham Fourth Internal Drainage Board         |   |        |              |                   |                                   |       |                                      | As there are no sites that impact on the Board's District the Board has no comment. If at some point any additional sites are considered, please contact the Board.   |                                      |  |   | Noted.  |
| 4                  | Central Bedfordshire/ Bedford Borough Council |   |        |              |                   |                                   |       |                                      | Thank you for consulting us on the Site Locations (Pre-Submission Draft) Consultation document. Our only previous concern was the ongoing availability for building stone for renovation projects within Bedford Borough and we were satisfied with the way that was dealt with in the Core Strategy. The approach to future consents for building stone adopted in the current consultation document appears to be a sensible approach. On behalf of both Bedford Borough and Central Bedfordshire Councils, therefore, I can confirm that we do not wish to make any further representations at this stage.   |                                      |  |   | Noted.  |
| 5                  | Nettleham Parish Council                      |   |        |              |                   |                                   |       |                                      | No comments to make.  |                                      |  |   | Noted.  |

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| 6                  | MOD Safeguarding |   |        |              | MS13-CL<br>MS05-LT<br>MS26-SL<br>MS27-SL<br>MS28-SL<br>MS04-LT<br>MS29-SL |                                   |       |                                      | <p>The MODs principle concern with respect to development within the county of Lincolnshire is ensuring that structures and in regards to Mineral restoration the creation of open water bodies do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational aids i.e. transmitter/receiver facilities located in the area. The county is covered by the statutory height and birdstrike safeguarding zones for RAF Barkston Heath; RAF Coningsby; RAF Cottesmore; RAF Cranwell; RAF Donna Nook; RAF Scampton; RAF Syerston; RAF Waddington; RAF Wittering; Holbeach Range and Ingham. In these zones the MOD reviews the developments which have the potential to infringe/inhibit aerodrome operations, as well as developments which have the potential to attract large, and, or flocking bird species hazardous to aircraft safety. The MOD previously commented on the Minerals and Waste Core Strategy in December 2015 and August 2016. On reviewing the sites, DIO Safeguarding has already made representation regarding the sites of interest and registered our concerns. However, I note that site MS27-SL has been incorrectly identified as being outside of a statutory Safeguarding zone, however this falls within the statutory 91.4m aerodrome height zone surrounding RAF Wittering. Those sites which fall within a statutory aerodrome birdstrike zone i.e. Kirkby –on –Bain; Norton Bottom Quarry; Urn Farm, Baston Quarry 2 &amp; 3; Swinderby Airfield and West Deeping. In these zones the MOD reviews the development of waste management facilities, quarry restoration, wetland features and other developments that are potentially attractive to large and or flocking birds hazardous to aircraft. The MOD is mainly concerned with how the site will be restored after use by the mineral operator. The use of water bodies within this area leads to an increased amount of bird activity which conflicts with the RAF operations in the county. I note the restoration schemes for the proposed mineral sites include the potential for wetland creation and ponds. DIO Safeguarding would recommend where possible dry restoration, as creating large areas of open water in close proximity to the identified military aerodromes is of great concern due to their potential to attract and support large/flocking bird species hazardous to air traffic safety. Therefore, DIO Safeguarding need to be consulted on the proposed restoration and aftercare schemes for the designated mineral schemes. I trust this adequately explains our position on this matter.</p> |                                      |  |   | <p>Development Briefs for minerals sites have only identified where sites fall within statutory safeguarding zones for birdstrike. It is not considered necessary to identify aerodrome height safeguarding zones given the anticipated development at mineral sites, however at application stage, if the height restrictions are exceeded the MOD would be consulted.</p> <p>The development briefs for all minerals sites within statutory safeguarding areas in relation to bird strike refer to this constraint and the need for discussions with the MOD in relation to restoration.</p> |

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| 7                  | MOD Safeguarding                      |   |        |              | MS27-SL              |                                   |       |                                      | I note that site MS27-SL has been incorrectly identified as being outside of a statutory Safeguarding zone, however this falls within the statutory 91.4m aerodrome height zone surrounding RAF Wittering   |                                      |  |   | Development Briefs for minerals sites have only identified where sites fall within statutory safeguarding zones for birdstrike. It is not considered necessary to identify aerodrome height safeguarding zones given the anticipated development at mineral sites, however at application stage, if the height restrictions are exceeded the MOD would be consulted.<br><br>The development briefs for all minerals sites within statutory safeguarding areas in relation to bird strike refer to this constraint and the need for discussions with the MOD in relation to restoration. |
| 8                  | South Holland Internal Drainage Board |   |        |              | WA26-SH              | Y                                 | Y     | Y                                    | SHIDB own and maintain Clay Lake, which is the drain next to WA26-SH allocated waste area. Having a fence along the boundary of the allocated waste area would prevent any rubbish or debris from entering our drain.   |                                      | N  |   | Issue would be dealt with at planning application stage.  |
| 9                  | National Trust                        |   |        |              | MS15-CL              |                                   |       |                                      | National Trust does not support or object to Minerals site MS15-CL. However, we acknowledge and support the recognition within the Development Brief for this site of the importance of considering direct and indirect impacts on heritage sites – such as Tattershall Castle and its setting – and sites of Nature Conservation Interest. |                                      |  |   | Noted   |
| 10                 | National Trust                        |   | SL1    |              | MS13-CL (Discounted) |                                   |       |                                      | We also acknowledge and support the removal of proposed site MS13-CL (Kirkby-on-Bain Phase 1) which appeared in the Draft Site Locations Document, which would have resulted in further cumulative impacts on the Tattershall/Coningsby area.   |                                      |  |   | Noted   |
| 11                 | Melton Borough Council                |   |        |              |                      |                                   |       |                                      | No objections   |                                      |  |   | Noted   |
| 12                 | Firsby Group Parish Council           |   |        |              |                      |                                   |       |                                      | It was the opinion of the Council that time and money would be saved if all commercial and domestic waste was to be burnt in local incinerators to produce energy. This would save having to transport waste across the countryside to be disposed of and would provide a cheap energy source.  |                                      |  |   | Noted   |

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| 13                 | Boston Borough Council         |   |        |              | WA22-BO            | Y                                 | Y     | Y                                    | (No additional supporting text)  |                                      |  |   | Noted  |
| 14                 | Highways England               |   |        |              |                    |                                   |       |                                      | 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 the role of Highways England to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Lincolnshire MWLP, Highways England's principal interest is safeguarding the operation of the A1 and A46, which route through the county. Given that this consultation relates specially to the 'soundness' and legal compliance of the document, it is considered that Highways England has limited comments to provide. In Highways England's response to the MWLP development briefs in August 2016 it noted that the Council intend to carry out transport assessments in order to better understand trip generation associated with the minerals sites. Highways England acknowledges that this measure is included within the pre-submission draft of the MWLP and considers that this will be helpful in clarifying any potential traffic impacts on the SRN. Highways England has no further comments to provide and trusts the above is useful in the progression of the Lincolnshire Minerals and Waste Local Plan Site Locations document. |                                      |  |   | Noted  |
| 15                 | Leicestershire County Council  |   | SL3    |              |                    | Y                                 | Y     | Y                                    | Support the intent of Policy SL3: Waste site and area allocations and consider the approach a robust and credible way to ensure new waste facilities are provided in appropriate locations.  |                                      | N  |   | Noted  |
| 16                 | Collingham Parish Council      |   |        |              |                    |                                   |       |                                      | Collingham Parish Council would like to restate all the previous comments that have been made with regard to the routing of traffic. It must be ensured that vehicular traffic is not using the main road through the village of Collingham, particularly by HGVs  |                                      |  |   | There are no proposed allocations that would be located near Collingham.                                     |
| 17                 | Nottinghamshire County Council |   |        |              | MS04-LT<br>MS05-LT |                                   |       |                                      | Thank you for your email of 4 November 2016 regarding the above consultation. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make in addition to our comments of the 22 January 2016 (on the Preferred Sites and Areas Consultation). These comments have not been submitted on the response form as they do not specifically relate to the soundness of the Plan; they are requests for elements to be covered at the planning application stage for certain sites.   |                                      |  |   | Issues raised will be considered and appropriate consultation carried out at the planning application stage. |

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|                    |                                |   |        |              |                    |                                   |       |                                      | <p><u>Strategic Highways:</u> There are two mineral allocations with the Lincoln/Trent Valley production area which have the potential to generate significant additional HGV traffic across the county boundary into Nottinghamshire:</p> <ul style="list-style-type: none"> <li>- MS04-LT Swinderby Airfield</li> <li>- MS05-LT Norton Bottoms Quarry, Stapleford</li> </ul> <p>Although the Plan indicates that both these allocations will be extension to existing quarries it is not clear whether the extensions will involve any intensification of existing quarrying activity in relation to extraction rates, and over what periods of time these two quarries will be active. The Development Briefs in Appendix 1 of the Plan identify the need for a Transport Assessment to be supplied to support each subsequent planning application. In view of the potential cross boundary movement of HGV traffic it is respectfully requested that the applicants for the two sites above are requested to consult Nottinghamshire County Council, as local highway authority for Nottinghamshire, with a view to agreeing the scope of the TA, especially to determine any likely increase in HGV trips, the routing of HGVs (to protect rural communities in Nottinghamshire alongside the A46(T)) and the possible cumulative traffic impacts of both quarries operating simultaneously.</p> |                                      |  |   |  |
| 18                 | Nottinghamshire County Council |   |        |              | MS04-LT<br>MS05-LT |                                   |       |                                      | <p>Thank you for your email of 4 November 2016 regarding the above consultation. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make in addition to our comments of the 22 January 2016 (on the Preferred Sites and Areas Consultation). These comments have not been submitted on the response form as they do not specifically relate to the soundness of the Plan; they are requests for elements to be covered at the planning application stage for certain sites.</p> <p><u>Ecology:</u><br/>Consideration should be given, at the planning application stage, to potential indirect impacts on ecological receptors in Nottinghamshire, particularly for the sites MS04-LT (Swinderby Airfield) and MS05-LT (Norton Bottoms Quarry).</p>  |                                      |  |   | Issues raised will be considered and appropriate consultation carried out at the planning application stage. |

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| 19                 | Nottinghamshire County Council |   |        |              | MS04-LT<br>MS05-LT<br>WA01-WL<br>WS17-SK<br>MS01-LT |                                   |       |                                      | <p>Thank you for your email of 4 November 2016 regarding the above consultation. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make in addition to our comments of the 22 January 2016 (on the Preferred Sites and Areas Consultation). These comments have not been submitted on the response form as they do not specifically relate to the soundness of the Plan; they are requests for elements to be covered at the planning application stage for certain sites.</p> <p><u>Landscape and visual impact:</u><br/>The County Council has reviewed the sites that may potentially have a visual impact on Nottinghamshire (MS04-LT, MS05-LT, WA01-WL and WS17-SK) and is satisfied that any impacts in this regard can be dealt with by planning conditions. The site which previously raised concerns (MS01-LT Lea Marsh) has been withdrawn from the Plan.</p>   |                                      |  |  | Noted.  |
| 20                 | West Deeping Parish Council    |   |        |              | MS29-SL   |                                   |       |                                      | <p>In responding to your offer of consultation on the process of implementing the above plan West Deeping Parish Council would observe that the aspects you are prepared to consult on are limited. Paragraphs 1) to 5) below deal with points we believe to be admissible and of importance. We would appreciate both yours &amp; the Inspectors observations on these points. We have copied our MP so he can maintain a watching brief with regard to the overall level of extraction and the degree of cooperation we are accorded. We will participate in the Inspectors examination of the plan and provide oral evidence as appropriate.</p> <p>1) Extensive areas of land in West Deeping Parish have been, or may be in future, subject to mineral extraction. As you will be aware some 50% of the land area of West Deeping Parish has already been approved and largely extracted in the area to the north of the A1175 and east of King St. The current plan provides for a further 15% or so to be extracted from the designated area to the south of the A1175 and east of the village. <b>We have provided a map of the Parish with this letter that outlines its total area together with a map of the village Conservation zone</b> . We request this area data be held as a matter of record for consideration within any plan or planning permission that might emerge now or in the future. This is to help determine an acceptable upper limit to mineral extraction within this Parish.</p> |                                      | Y  | We will participate in the Inspector's examination of the plan and provide oral evidence as appropriate. | <p>Issues raised will be considered at planning application stage.</p> <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>Comprehensive consultation and engagement has been undertaken as detailed in the Consultation Statement and Duty to Cooperate Statement.</p> |

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|                    |            |   |        |              |                   |                                   |       |                                      | <p>2) Human impact;<br/>We find it astonishing that the process documentation of this plan includes a 73 page Habitat Assessment yet there is little evidence that the impact on humans in the Parish has been treated in a similarly thorough manner. We consider a comprehensive Impact Assessment of the effects of implementation on inhabitants of the Parish and those passing through should be undertaken so as to render the plan process sound and compliant with a duty to cooperate.</p> <p>3) Cooperation;<br/>When Anglian Water experienced problems with the foul drainage of the village in 2013/14 their officials attended more than one Parish Council meeting. They explained the problem, discussed intended remedies and answered resident's questions to the best of their ability. Lincolnshire County Council Planning has made no similar contact with regard to this plan process. No visit, no face to face meetings, no discussion of the plan, no meeting with Parish Council or exhibition of plans in Village Hall. This suggests the inhabitants are not deemed relevant to the process. We consider there has been a failure of the duty to cooperate.</p> <p>4) Mitigation &amp; Compensation;<br/>We reference the Core Strategy &amp; Development Management Policies (as adopted June 2016). Para 7.6 'Council seeks to conclude planning agreements.... regarding community gain in mitigation or compensation for the effects of mineral development,' Para 7.12 'material considerations include impacts on local communities.' Policy R1 Restoration &amp; Aftercare 'secure long term maintenance' &amp; 'appropriate aftercare'. Policy R2 After Use 'enhances landscape character and natural historic environment of the area', 'improvements for public access'. The existence of these clauses and policies indicate that there is a moral dimension to a plan process that requires as much as 65% (Para 1) of the land area of a Parish to be dug up for mineral extraction. They also indicate recognition that a local community is indeed impacted (Para 2 &amp; 3).</p> |                                      |  |   | Appropriate consultation will be carried out at planning application stage. |



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|                    |                              |   |        |              |                   |                                   |       |                                      | 5) Mitigation & Compensation;<br>It may well be the case that the MS29-SL extension must proceed in which case we request participation in the pre application process of the planning permission application that Cemex Ltd are expected to make. You have provided this provision for yourselves<br>(Appendix 1, Development Brief. p27 para 2) and we request your cooperation in the inclusion of WD Parish Council as well. The restoration plan agreed for the extension must provide benefit to this community in the nature of the arrangements made and its future ownership determined. The extension area lies very close to the village and a Public RoW runs along the line of the River and old Stamford canal on the south side. We consider a parkland area in which children could play, dogs be walked and the natural habitat enjoyed to be the minimum appropriate. We look forward to your reply regarding the points above and to your subsequent cooperation. |   |  |  |   |
| 21                 | Mineral Products Association | Appendix 1, P28 para 3                                |        |              |                   | y                                 | N     | y                                    | The first sentence of this paragraph states;<br><i>A landscape-scale approach to restoration should be adopted for all minerals sites, taking into account the existing natural, built, historic and cultural landscape character; and existing or proposed restoration of minerals sites adjacent to, or in the vicinity of the allocation.</i><br>Landscape scale restoration can only be provided with large areas of land which may not be under the control of developers. This needs to be borne in mind, otherwise expectations may be created that cannot be effectively delivered, which brings into question of deliverability of the Plan and therefore it is UNSOUND.  | It is suggested that the sentence should be redrafted as follows:<br><del>A landscape-scale approach to restoration</del><br><u>Restoration proposals</u> should be adopted for all minerals sites, <del>taking</del> <u>that take</u> into account the existing natural, built, historic and cultural landscape character; and existing or proposed restoration of minerals sites adjacent to, or in the vicinity of the allocation. | Y  | It is hoped that attendance at the hearing will allow an opportunity to explain why the suggested amendments/additions are considered necessary to make the Plan sound | No amendments considered necessary.<br><br>Promotion of a landscape-scale approach already established in the recently Adopted Core Strategy. |

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| 22                 | Mineral Products Association | Appendix 1, P28 para 3                                |        |              |                   | Y                                 | N     | Y                                    | <p>The final sentence of the above paragraph states;<br/><i>Restoration schemes utilising imported waste will not be acceptable, unless exceptional circumstances can be demonstrated.</i></p> <p>This restriction on the importation of material should be removed as it limits restoration opportunities and will limit the flexibility to deliver the aspirations of Lincolnshire CC to deliver appropriate restoration schemes taking the wider landscape into account, and limits the opportunities for sustainable development. Furthermore Policy R2 (After Use) of the adopted Core Strategy and Development Management Policies document requires amongst other things that;<br/><i>‘...restoration proposals should be designed to ensure that they do not give rise to new or increased hazards to aviation’</i></p> <p>In order to achieve this imported material is the best option to secure appropriate restoration to achieve the above policy objective by enabling agricultural restoration or reed beds, wet woodland and/or grass land. This will also increase the net gain to biodiversity which is another Plan objective.</p> <p>In addition Policy R3 (Restoration of sand and gravel operations within Areas of Search) which has ambitious habitat creation aims must be in doubt if there is a restriction on the importation of material and limit the opportunities for net gain for biodiversity.</p> <p>Therefore, it is considered that the restriction on the importation of materials brings into question the deliverability of the Core Strategy and the effectiveness of the development brief. As such this part of the Plan must be considered UNSOUND. The above comments must also be considered in the context of a Court of Appeal decision (October 2015) concerning the restoring of mineral workings. The decision of the Court, which is attached for ease of reference, was that the importation of material could be considered to be a recovery operation, as opposed to a waste disposal operation, if the planning permissions required material to be imported to facilitate restoration. As a result the Environmental Agency guidance on this topic has recently been changed. This has substantially improved the viability of such operations and the improved the opportunities and flexibility for restoration.</p> | The sentence concerned should be deleted. | Y  | It is hoped that attendance at the hearing will allow an opportunity to explain why the suggested deletion is considered necessary to make the Plan SOUND. | <p>The restriction on importation of material is consistent with the approach established in the recently Adopted Core Strategy whereby no additional provision for landfill is required during the Plan period.</p> <p>If designed appropriately from the outset, it is considered that beneficial restoration, to meet the objectives of the Core Strategy, could be achieved without the importation of waste.</p> <p>Accordingly, no amendments are considered necessary.</p> |

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|                    |            |   |        |              |                   |                                   |       |                                      | Development proposals should be considered on their merits and against the Policies in the Development Plan. It is not sensible to add another unnecessary hurdle in respect of the importation of materials for restoration which acts against the Plans stated ambitions and policies.<br>This proposal exceeds any requirements in NPPF and the PPG on Waste , and goes against the principles of sustainable development set out in the NPPF and is therefore not compliant with National Policy and thereby UNSOUND.<br>(supporting document supplied: Tarmac Aggregates v SSEFRA & Enviro Agency (final) Nov15)   |   |  |   |  |
| 23                 | RSPB       | page 27, paragraph 3)                                 |        |              |                   | Y                                 | N     | Y                                    | The RSPB supports the plan in principle, and is pleased to see that so many of the recommendations put forward by ourselves and other consultees in previous consultation rounds have been incorporated. However, we have one outstanding concern regarding a proposed restriction on the use of imported waste in mineral site restoration which we believe may be in conflict with Core Strategy policies R2 and R3 and therefore be unsound.<br><i>Support for positive site restoration policies</i><br>The RSPB is pleased that so many of the recommendations put forward by the RSPB and other stakeholders in our responses to the previous consultation in January 2016 and in subsequent discussions have been taken on board, including: <ul style="list-style-type: none"> <li>• The requirement for: <ul style="list-style-type: none"> <li>o All applications to comply with the Core Strategy and Development Management Policies, particularly Policy R3 (Restoration of Sand and Gravel Operation Within Areas of Search);</li> <li>o All mineral sites to adopt a landscape scale approach to restoration;</li> <li>o Delivering net-gains in biodiversity at every mineral site.</li> </ul> </li> <li>• Clarification that <i>‘whilst best and most versatile agricultural land should be safeguarded, this will not necessarily require sites to be restored to agriculture’</i>.</li> <li>• A description of the three landscape areas of the Lincoln/Trent Valley, Central Lincolnshire and South Lincolnshire, including the habitats that will be given priority in restoration schemes.</li> </ul> | We recommend that the modifications above should be made to the Appendix text. Positive wording defining the differences between waste recovery and waste disposal should be included, as well as further text on recovery permits. In addition, for the reasons given above, the sentence <i>‘restoration schemes utilising imported waste will not be acceptable, unless exceptional circumstances can be demonstrated’</i> (page 27, paragraph 3) should be removed from the document. | N  |   | Support Noted.<br><br>The restriction on importation of material is consistent with the approach established in the recently Adopted Core Strategy whereby no additional provision for landfill is required during the Plan period.<br><br>If designed appropriately from the outset, it is considered that beneficial restoration, to meet the objectives of the Core Strategy, could be achieved without the importation of waste.<br><br>Accordingly, no amendments are considered necessary. |

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|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |                                   |
|                    |            |   |        |              |                   |                                   |       |                                      | <p><i>Concern regarding restriction on waste materials allowed for mineral site restoration</i></p> <p>The RSPB supports the re-use, recycling and recovery of waste and decreasing the amount of waste being disposed of to landfill, in line with the 'waste hierarchy'. We recognise that the implementation of the waste hierarchy has reduced the amount of waste material available for mineral site restoration schemes, which could result in no waste being available for some mineral restoration schemes. We also recognise that there may be sites where the importation of waste would not be appropriate. However, we do not believe that this is sufficient reason to rule out the utilising of imported waste as part of a mineral site restoration scheme, particularly for biodiversity-led restoration schemes. Without utilising imported waste, many restored mineral sites would either:</p> <ul style="list-style-type: none"> <li>(i) remain as large, deep, steep-sided water bodies; or</li> <li>(ii) require mineral to be left in situ in order to provide acceptable gradients.</li> </ul> <p>Option (i) would provide minimal value for biodiversity and minimal opportunity to deliver additional multi-functional benefits. Option (ii), meanwhile, would not be a sustainable use of mineral resources. Neither option should be acceptable in a modern restoration scheme, unless exceptional circumstances can be demonstrated.</p> <p>Large water bodies may have a relatively high risk of bird strike, compared to mineral sites that have been restored to create shallower, high priority<sup>1</sup> wetland habitats - such as reedbeds, wet woodland and wet grassland. This is because the larger water bodies are more attractive to bird species that pose a higher risk of bird strike, such gulls and large waterfowl like geese and swans. As such, vetoing the utilisation of imported waste has the potential to conflict with Policy R2 (After-Use) of the adopted Core Strategy and Development Management Policies document, which specifies that 'restoration proposals should be designed to ensure that they do not give rise to new or increased hazards to aviation'. Vetoing the utilisation of imported waste would also prejudice the very positive and welcome habitat creation aspirations set out in Policy R3 (Restoration of sand and gravel operations within Areas of Search) in the adopted Core Strategy and Development Management Policies document and in the Site Locations document itself. This is because it could severely limit the scope for creating shallower, high priority wetland habitats at a large enough scale to provide significant gains in biodiversity.</p> |                                      |  |   |                                   |

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|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |                                      |  |   |                                   |
|                    |            |   |        |              |                   |                                   |       |                                      | <p>A key factor in the viability and appropriateness of utilising imported waste in a restoration scheme is whether or not the scheme would be classed as 'waste recovery' or 'waste disposal / landfill'. In October 2015, Tarmac won a landmark case in the Court of Appeal, concerning the backfilling of quarries with waste. This ruling (and subsequent guidance on waste recovery) clarified that the utilisation of imported waste to restore quarries in accordance with planning conditions - such as a requirement to create priority habitat - should be deemed recovery rather than disposal. In such circumstances, <i>'utilising imported waste'</i> should be seen as both necessary and beneficial. The document should clearly distinguish between 'waste recovery' and 'waste disposal' and explain the circumstances in which a 'recovery permit' might be granted. This explanation should be worded positively, for example: <i>'proposals for recovery operations involving the depositing of inert waste to land...will be permitted provided that....'</i>. Stating that <i>'restoration schemes utilising imported waste will not be acceptable'</i> goes well beyond any constraints imposed by the waste-related policies of the adopted Core Strategy and Development Management Policies document. It also goes well beyond any restrictions imposed by National Planning Policy for Waste or by the Waste Management Plan for England. This approach also contradicts other supporting documents which form part of this consultation. For example, page 79 of 'Appendix 3 – Detailed Assessments – Waste Sites', under Sustainability Appraisal Objective 11, recognises that it is a priority to use inert waste material <i>'in restoring the substantial number of sites in the county that are already being worked for mineral'</i>. This is particularly relevant given that the vast majority of new allocations are extensions to existing sites. As such, we believe that it may be 'unsound' to include such a constraint in the Site Locations document. Given the increasing scarcity of suitable waste material, it may be appropriate to target the utilisation of imported waste on those sites that provide the greatest opportunity to deliver significant net-gains in biodiversity in order to fulfil the landscape-scale and biodiversity aspirations of the Site Locations document.</p> |                                      |  |   |                                   |

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|                    |                 | Paragraph   | Policy | Policies Map | Development Brief    | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |   |  |   |   |
| 24                 | Mr M Richardson |   |        |              | MS18-SL (Discounted) | Y                                 | N     | Y                                    | Although this site has been discounted due to its failure to meet Level 1 Criteria, an Appropriate Assessment has not been carried out to determine whether it will have an adverse impact on the SAC. We believe this is premature and it would be possible to mitigate the impact of the extraction. It would also be possible to incorporate significant ecological enhancements in the restoration.<br><br>(Supporting report supplied) | An Appropriate Assessment should be carried out to determine whether this site may meet Level 1 criteria.<br>(Supporting report supplied) | N  |   | All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.<br><br>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.<br><br>Accordingly, no amendments considered necessary to the proposed allocations. |
| 25                 | Mr M Richardson |   |        |              | MS19-SL (Discounted) | Y                                 | N     | Y                                    | Although this site has been discounted due to its failure to meet Level 1 Criteria, an Appropriate Assessment has not been carried out to determine whether it will have an adverse impact on the SAC. We believe this is premature and it would be possible to mitigate the impact of the extraction. It would also be possible to incorporate significant ecological enhancements in the restoration.<br><br>(Supporting report supplied) | An Appropriate Assessment should be carried out to determine whether this site may meet Level 1 criteria.<br>(Supporting report supplied) | N  |   | All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.<br><br>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.<br><br>Accordingly, no amendments considered necessary to the proposed allocations. |

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|                    |                      | Paragraph   | Policy | Policies Map | Development Brief    | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |  |  |   |  |
| 26                 | Mr M Richardson      |   |        |              | MS20-SL (Discounted) | Y                                 | N     | Y                                    | <p>Although this site has been discounted due to its failure to meet Level 1 Criteria, an Appropriate Assessment has not been carried out to determine whether it will have an adverse impact on the SAC. We believe this is premature and it would be possible to mitigate the impact of the extraction. It would also be possible to incorporate significant ecological enhancements in the restoration.</p> <p>(Supporting report supplied)</p>   | An Appropriate Assessment should be carried out to determine whether this site may meet Level 1 criteria. (Supporting report supplied) | N  |   | <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>Accordingly, no amendments considered necessary to the proposed allocations.</p> |
| 27                 | Lincs Wildlife Trust |   | SL1    |              |                      | Y                                 | Y     | Y                                    | <p>The Lincolnshire Wildlife Trust welcomes the requirement within this policy for allocated sites to be developed in accordance with the Development Briefs in Appendix 1 of this plan. This should include the need to accord with the introductory text of Appendix 1 also.</p> <p>The Trust supports the inclusion of Appendix 1 as the introductory text and Development Briefs provide greater clarity on what is required within the three minerals priority areas and individual sites within those areas. We are particularly supportive of the reference to the need within the introductory text for mitigation and compensation, ecological surveys, compliance with policies R1, R2 and R3 of the Core Strategy, a landscape scale approach to restoration and that net gains in biodiversity will be sought in relation to the restoration of every mineral site. The Trust also welcomes the detail given for each of the three priority minerals areas including information on landscape scale projects.</p> <p>The Lincolnshire Wildlife Trust has welcomed the opportunity to work with Lincolnshire County Council and other organisations to develop wording within the introductory text to Appendix 1 and the natural environment and restoration sections of the Development Briefs.</p> |  | N  |   | Support noted  |

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|                    |                      | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |  |  |   |  |
| 28                 | Lincs Wildlife Trust |   | SL3    |              |                   | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust welcomes the requirement within this policy for allocated sites and areas to be developed in accordance with the Development Briefs in Appendix 1 of this plan. We particularly welcome the recognition of the natural environment assets that should be taken into consideration at each of the waste sites and areas.  |  | N  |   | Support noted  |
| 29                 | Lincs Wildlife Trust |   |        |              | MS04-LT           | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site and the restoration objectives and priorities.  |  | N  |   | Noted  |
| 30                 | Lincs Wildlife Trust |   |        |              | MS05-LT           | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site and the restoration objectives and priorities.  |  | N  |   | Noted  |
| 31                 | Lincs Wildlife Trust |   |        |              | MS07/08 CL        | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site, and we support the need to link the restoration scheme to the existing adjacent site which includes nature conservation. However, we would welcome specific reference to priority habitats that the restoration scheme at this site could include as per the majority of the other Development Briefs. In response to earlier consultations we have highlighted that this site falls within an area identified by the Central Lincolnshire Biodiversity Opportunity Mapping Study as an opportunity area for the creation and restoration of heathland and acid grassland habitats. We would therefore recommend that the following should be added to the Restoration Objectives and Priorities section:<br>Priority habitats could include:<br>o Heathland;<br>o Acid Grassland. | We would therefore recommend that the following should be added to the Restoration Objectives and Priorities section:<br>Priority habitats could include:<br>o Heathland;<br>o Acid Grassland. | N  |   | Priority habitats for restoration would be identified at planning application stage. However, the Planning Authority has no objections to the requested addition if deemed appropriate for completeness. |
| 32                 | Lincs Wildlife Trust |   |        |              | MS09-CL           | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site, and we support the need to link the restoration scheme to the existing adjacent site which includes a lake. However, we would welcome specific reference to priority habitats that the restoration scheme at this site could include as per the majority of the other Development Briefs. In response to earlier consultations we have highlighted that this site falls within an area identified by the Central Lincolnshire Biodiversity Opportunity Mapping Study as an opportunity area for the creation and restoration of heathland and acid grassland habitats. We would therefore recommend that the following should be added to the Restoration Objectives and Priorities section:<br>Priority habitats could include:   | We would therefore recommend that the following should be added to the Restoration Objectives and Priorities section:<br>Priority habitats could include:<br>o Heathland;<br>o Acid Grassland. | N  |   | Priority habitats for restoration would be identified at planning application stage. However, the Planning Authority has no objections to the requested addition if deemed appropriate for completeness. |



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|                    |                      | Paragraph   | Policy | Policies Map | Development Brief     | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |   |  |   |  |
|                    |                      |   |        |              |                       |                                   |       |                                      | o Heathland;<br>o Acid Grassland.   |   |  |   |  |
| 33                 | Lincs Wildlife Trust |   |        |              | MS15-CL               | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site and the restoration objectives and priorities. |   | N  |   | Noted  |
| 34                 | Lincs Wildlife Trust |   |        |              | MS25-CL               | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site and the restoration objectives and priorities. |   | N  |   | Noted  |
| 35                 | Lincs Wildlife Trust |   |        |              | MS27-CL               | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site and the restoration objectives and priorities. |   | N  |   | Noted  |
| 36                 | Lincs Wildlife Trust |   |        |              | MS29-SL               | y                                 | y     | y                                    | The Lincolnshire Wildlife Trust supports recognition of the natural environment assets to be taken into consideration at this site and the restoration objectives and priorities. |   | N  |   | Noted  |
| 37                 | Mick George Ltd      |   | SL1    |              | MS03b-LT (Discounted) |                                   |       |                                      | Objection is made to the non-inclusion of Newtons Farm Swinderby in the list of future allocations.<br><br>(Supporting report supplied)   | The need for a replacement to the outgoing Whisby operation, plus the requirements of extra capacity to meet planned growth, plus the suitability of Newtons Farm for mineral working, with no strategic objections to working, all justify the allocation of Newtons farm Swinderby as a site for future sand and gravel working, and accordingly, a request is made that the site be so allotted in the Plan. |  |   | <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>An annual Local Aggregates Assessment will be used to monitor the requirements for mineral development throughout the plan period. The assessment will be used to indicate developing trends in mineral production and the available reserve capacity within the county.</p> <p>Accordingly, no amendments considered necessary to the proposed allocations.</p> |

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|                    |   | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |   |  |   |   |
| 38                 | Upper Witham, Witham First District & Witham Third District IDBs, |   |        |              |                   |                                   |       |                                      | Thank you for the opportunity to comment on the above document. The Boards do not have any specific comments on this document. May of the sites have been subject to pre-application discussions with the Boards to reduce flood risk, increase biodiversity and increase water resource. The three Board's based at Witham House will continue to be involved in ongoing dialog with the developers on the individual sites and through the planning process.  |   |  |   | Noted   |
| 39                 | Cambridge-shire County Council and Peterborough City Council.     | 2.13  | SL3    |              |                   |                                   | N     |                                      | Paragraph 2.13 outlines the Plan's approach with regard to inert landfill; and outlines that no additional provision is being made for inert landfill even though there is an identified shortfall of void space over the Plan period. Instead of allocating sites to meet the shortfall the Plan proposes that this shortfall will be addressed through capacity at non-hazardous landfill sites; increased input rates at existing inert landfill sites; and increased C&D recycling. This is not a sound approach, and has not been adequately justified. If any one of these factors does not come forward there may be an under provision of inert landfill which could displace inert waste arising in the Plan area to adjoining authorities to be landfilled there instead. This goes against the principle of self-sufficiency and the proximate disposal of waste. Allocations for inert landfill to meet the identified shortfall in Lincolnshire should be made through Policy SL3. | Inert landfill allocation, sufficient to meet the identified shortfall over the plan period should be made in the Local Plan. | N  |   | The Plan's approach has already been established by the recently Adopted Core Strategy (June 2016) and therefore has been tested at examination and found to be sound.<br><br>Plan monitoring ensures that any issues with the effectiveness of any Policies/Proposals within the Plan can be identified, and reviews triggered if necessary.<br><br>Accordingly, no amendments are considered necessary. |
| 40                 | Greater Lincolnshire Nature Partnership                           |   |        |              |                   | y                                 | y     | y                                    | The GLNP supports the Site Locations (Pre-Submission Draft). We are particularly supportive of the text in Appendix 1 that refers to:<br>- Mitigation and compensation<br>- The need for ecological surveys and tree surveys<br>- Policies R1, R2 and R3<br>- A landscape scale approach to restoration that includes multi-functional uses<br>- The need to safeguard agricultural land does not necessarily require sites to be restored to agriculture<br>- Net gains in biodiversity being sought for every minerals site<br>- The detail described in each of the three priority areas<br>The GLNP is glad that we could work with the Council in such a proactive and consultative way to develop this wording. This has led to greater understanding between all involved and saved much time. We hope to work with the Council in a similar way on such consultations in the future.  |   | N  |   | Support noted   |

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|                    |                                  | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |   |
| 41                 | National Grid                    |   |        |              |                   |                                   |       |                                      | National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.   |                                      |  |   | Noted   |
| 42                 | Church Commissioners for England |   | SL3    |              | WA03-CL           |                                   |       |                                      | <p>We have reviewed the Lincolnshire Minerals and Waste Local Plan Site Locations Pre-Submission Draft and note that part of WA03-CL Allenby Road Trading Estate is also part of the proposed Lincoln North East Quadrant Sustainable Urban Extension in the Central Lincolnshire Local Plan (Policy LP30) which is currently being examined by the Planning Inspector.</p> <p>WYG act on behalf of the Church Commissioners for England who own the Lincoln North East Quadrant Sustainable Urban Extension which is proposed for mixed use development in the emerging Local Plan. It is important that the Lincolnshire Minerals and Waste Local Plan Site Locations Pre-Submission Draft is consistent with the emerging Central Lincolnshire Local Plan. The Masterplan for the Lincoln North East Quadrant Sustainable Urban Extension (which has been submitted to the Central Lincolnshire Local Plan consultation) shows the area to the south west as employment land (now the eastern part of WA03-CL in the Lincolnshire Minerals and Waste Local Plan Site Locations Pre-Submission Draft). Attached to this email is the Evidence Topic Paper for the Lincoln North East Quadrant Sustainable Urban Extension which provides information and context for the North East Quadrant Sustainable Urban Extension site.</p> <p>It is important that the Lincolnshire Minerals and Waste Local Plan is consistent with the emerging Central Lincolnshire Local Plan and doesn't preclude other employment uses coming forward on this part of the site.</p> <p>The policy in the Minerals and Waste Local Plan is currently not clear as it states "<i>the granting of planning permission for waste uses within the following areas where the applicant can demonstrate that the proposal is in accordance with the development plan</i>". It is unclear whether only waste uses would be allowed on this site or whether waste uses could be</p> |                                      |  |   | <p>Page 22, paragraph 5.3 of the pre-submission SLD already states "areas allocated in policy SL3 as suitable for waste management facilities are not safeguarded solely for this use because they are likely to be suitable for a range of industrial or employment uses and therefore these alternative uses should not be prejudiced".</p> <p>Accordingly, no amendments are considered necessary.</p> |

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| Representation No. | Respondent                             | Part of the Plan to which the representation relates: |        |              |                   | Whether Plan is considered to be: |       |                                      | Details why not legally compliant, unsound or fails DTC/<br>Comments of support  | Modifications proposed by respondent | Request to participate at Oral Examination | The reason given why the respondent considers it necessary to participate at the oral examination | County Council (Officer) Response |
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|                    |  | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |                                   |
|                    |  |   |        |              |                   |                                   |       |                                      | acceptable subject to wider considerations. We suggest that to ensure consistency with the emerging Central Lincolnshire Local Plan that for this part of the site other employment uses as well as waste are allowed.<br><br>The modification to Policy LP30 in the Central Lincolnshire Local Plan (proposed by the Central Lincolnshire authorities) states that “ <i>approximately 5ha of land for employment purposes (any job creating Use Classes) provided on site</i> ”. The intention of this modification is to provide greater flexibility for employment uses to come forward and therefore this should not be restricted by the proposed waste site. I would be grateful if you could acknowledge receipt of this email and I would like to be informed of the next stage of consultation on the Lincolnshire Minerals and Waste Local Plan.<br>(Supporting document: SUE Topic Paper Lincoln North East Quadrant Aug 2016 supplied) |                                      |  |   |                                   |
| 43                 | Lincolnshire Wolds Countryside Service |   |        |              |                   |                                   |       |                                      | We have viewed the proposed sites and can confirm that we will be making no representations on the 'soundness' and legal compliance of the document prior to its submission to the Secretary of State for Communities and Local Government for independent examination in relation to the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB).  |                                      |  |   | Noted                             |
| 44                 | Natural England                        |   | SL1    |              |                   | y                                 | y     | y                                    | SL1: Mineral Site Allocations<br>Natural England welcomes the provision within policy SL1 that the site allocations shall be developed in accordance with Development Briefs set out in Appendix 1 of the plan. The development briefs set out guidance which establishes that for the restoration of every minerals site the landscape scale approach will be followed and uses that provide a net gain in biodiversity will be sought. We consider that this policy therefore follows the guidance set out in paragraph 143 of the National Planning Policy Framework and complies with policies R1, R2 and R3 of the Core Strategy.   |                                      | N  |   | Noted                             |
| 45                 | Natural England                        |   | SL3    |              |                   | y                                 | y     | y                                    | SL3: Waste Site Allocations<br>Natural England welcomes the provision within policy SL3 that the site allocations shall be developed in accordance with Development Briefs set out in Appendix 1 of the plan. The development briefs set out guidance which establishes that for every waste site that direct and indirect impacts on natural environment assets will need to be taken into consideration.   |                                      | N  |   | Noted                             |

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|                    |                 | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |   |  |  |                                   |
| 46                 | Natural England | Introduction-Minerals Sites pages 28 -29              |        |              |                   | y                                 | y     | y                                    | <p>Appendix 1: Development Briefs</p> <p>Natural England welcomes the landscape scale approach that has been incorporated within the Development Briefs to enable the design of the minerals sites to best meet particular characteristics and future aspirations of the wider landscape. We also welcome the acknowledgement that best and most versatile land should be safeguarded but that other uses could be considered to provide a net gain in biodiversity and that this approach will be followed in relation to the restoration of every minerals site.</p> <p>We particularly welcome the acknowledgement in the section for Lincoln/Trent Valley that development in this area should take into account the Witham Valley Country Park Initiative and promotion of green infrastructure, biodiversity enhancements and footpaths links.</p> <p>We also welcome the recognition within the text of the Wildlife Trust's Living Landscape project and the South Lincolnshire Fens Partnership.</p>   |   | N  |  | Noted                             |
| 47                 | Fisher German   |   | SL1    |              | MS25-SL           | y                                 | y     | y                                    | <p>The attached document robustly assesses the proposed allocation of the Manor Farm, Greatford site (MS25-SL) for sand and gravel extraction. This document is submitted as part of the consultation exercise being conducted by Lincolnshire County Council into the Minerals and Waste Local plan- Site Locations (Pre-Submission Draft) November 2016. The representation document focuses on the sustainability and deliverability of the Manor Farm site. By allocating the Manor Farm site as a replacement site the plan is sound and compliant.</p> <p>Supporting documents supplied comprising:</p> <ul style="list-style-type: none"> <li>Mitigation, methodologies and good working practices for Quarry proposal at: Land at Manor Farm, to the immediate west of King Street, Greatford, Lincolnshire, NGR 510402 312679 )</li> <li>Geological Site Investigation (Land at Greatford, Bourne, Site Investigation; September 2016, Report on Geological Exploration )</li> <li>160908 Manor Farm - Greatford Plan</li> <li>Manor Farm Representation - Nov (2016 Final)</li> <li>428 Manor Farm Greatford (Archaeological Desk Based Assessment, Land at Manor farm Greatford Lincolnshire PE6 9NW)</li> </ul> | The Pre-Submission Site Locations document is sound with the allocation of the Manor Farm Greatford site (MS25-SL) as a replacement site. Should the allocation be amended then the soundness of the plan would be compromised. | Y  | We wish to participate at the oral part of the examination to support the allocation of the Manor Farm Greatford site for sand and gravel extraction. We also wish to participate if alternative sites are put forward in order to defend our position and support the soundness of the plan as it currently stands. | Noted                             |

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|                    |   | Paragraph   | Policy | Policies Map | Development Brief                         | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |  |
| 48                 | South Lincolnshire Fenlands partnership |   | SL1    |              | MS15-CL<br>MS25-SL<br>MS27-SL<br>MS-29-SL | y                                 | y     | y                                    | <p>The South Lincolnshire Fenlands Partnership (SLFP) comments are made in relation to mineral sites within the South Lincolnshire production area. The SLFP recognises that Policy SL1 has been developed in accordance with the Core Strategy and Development Management Policies document in relation to policies R1, R2 and R3 of the Core Strategy. SLFP welcomes provision in policy SL1 for sites to be developed and restored in accordance with the introductory text and individual development briefs in Appendix 1 of the plan.</p> <p>In particular, within the introductory text to the development briefs (Appendix 1), we welcome reference to:</p> <ul style="list-style-type: none"> <li>• A landscape scale approach to restoration ,</li> <li>• Opportunity for natural flood risk mitigation, river restoration, tourism or other multi-functional uses</li> <li>• Where safeguarding of Best &amp; Most Versatile Agricultural Land (BMVAL) is considered this will not necessarily require sites to be restored to agriculture. Other uses, or a combination of agriculture and other uses, could be considered to provide for a net-gain in biodiversity.</li> <li>• Net gains in biodiversity will be sought in relation to the restoration of every minerals site.</li> <li>• Care being taken in the design of restoration scheme to ensure habitat packing is avoided</li> <li>• Specific mention of the aims and objectives of the South Lincolnshire Fenlands Partnership and the open south fenland landscape rather than woodland cover</li> <li>• Suggestion of appropriate priority habitats within the restoration objectives and priorities in the individual site development briefs</li> </ul> <p>In relation to sites within the South Lincolnshire Production Area: (MS25-SL, MS27-SL; MS29-SL)<br/>Restoration Objectives and Priorities omit to mention :</p> <ul style="list-style-type: none"> <li>• Opportunities for linking Baston Fen SAC, Baston &amp; Thurlby Fen SSSI, Cross Drain SSSI &amp; Langtoft Gravel Pits SSSI habitats to minerals sites, providing greater ecological connectivity and building ecological resilience in the south Lincolnshire Fenlands. (as in development brief for MS15-CL)</li> </ul> |                                      | N  |   | <p>Support noted.</p> <p>Opportunities for habitat linkages would be identified at planning application stage, with relevant bodies consulted. However, the Planning Authority has no objections to the requested additions if deemed appropriate for completeness, and subject to them according with the framework established by the Adopted Core Strategy.</p> |

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|                    |                    | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |  |  |   |   |
|                    |                    |   |        |              |                   |                                   |       |                                      | <ul style="list-style-type: none"> <li>Reference to potential to restore sites to accessible green space for local communities and visitors, SLFP acknowledges that this is included in Appendix 13 relating to sites MS27-SL; MS29-SL</li> </ul> <p>The site locations document recommends that prior to the submission of any planning application for the allocated minerals sites, the applicant enters into discussions with the County Council. The South Lincolnshire Fenlands Partnership would welcome the opportunity to discuss restoration schemes with applicants, for sites within the South Lincolnshire production area.</p> <p>The South Lincolnshire Fenlands Partnership has welcomed the opportunity to work with Lincolnshire County Council and partner organisations to develop wording within Appendix 1 of the Site Locations (Pre-Submission Draft) and the restoration objectives and priorities for sites within the South Lincolnshire Production area. It was a very positive experience.</p> |  |  |   |   |
| 49                 | Environment Agency |   |        |              | MS25-SL           |                                   |       |                                      | <p>We consider a minor modification of the text of Development Brief as suggested below will provide the developer with a more detailed understanding of specific site constraints.</p>   | <p>For information we are confident that any flood risk issues associated with this site can be managed by a suitably informed flood risk assessment at the planning application stage.</p> <p>Suggested additional text to Development Brief in italics:</p> <p><i>The King Street Drain watercourse passes through the site and an easement of 30 metres from the top of the bank of the river to any mineral excavation should be allowed for, to protect the stability of the river bank and</i></p> | N  |   | <p>Noted.</p> <p>Points raised would be identified during consultation at the planning application stage. However, the Planning Authority has no objections to the requested additions regarding easements to King Street Drain if deemed appropriate for completeness.</p> <p>The Development Brief for this proposed allocation already acknowledges 'Impacts on groundwater need to be assessed'. Accordingly, no amendments are considered necessary in this respect.</p> |

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|                    |            |   |        |              |                   |                                   |       |                                      |   | <p><i>ensure that excavation doesn't increase flood risk. Any proposal to reduce the standoff will need to be supported by evidence that the stability of the main river bank will be maintained.</i></p> <p><i>The surrounding area to this site has been extensively worked for sand and gravel which has caused issues with groundwater dependent features. It is considered that a full Hydrogeological Risk Assessment will be required for any applications pertaining to sand and gravel extraction with particular emphasis on dewatering excavations</i></p> <p><i>A permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency may be required for works impacting this watercourse.</i></p> |  |   |                                   |



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|                    |                    | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |  |  |   |  |
| 50                 | Environment Agency |   |        |              | MS29-SL           |                                   |       |                                      | We consider a minor modification of the text of Development Brief as suggested below will provide the developer with a more detailed understanding of specific site constraints.  | <p>For information we are confident that any flood risk issues associated with this site can be managed by a suitably informed flood risk assessment at the planning application stage.</p> <p>Suggested additional text to Development Brief in italics:</p> <p><i>The new allowances for climate change recommended by the government to developers in respect of flood risk have increased. Given that this site lies adjacent to the River Welland it could be to the advantage of the developer to review flood risks at this site.</i></p> | N  |   | Issues raised will be addressed at planning application stage. Accordingly, no amendments considered necessary.  |
| 51                 | Environment Agency | Appendix 1 Page 30                                    |        |              |                   |                                   |       |                                      | We consider a minor modification of the text of Development Brief as suggested below will provide the developer with a more detailed understanding of specific site constraints to inform and smooth the planning process | The section on “Other Issues” (Page30) in Appendix 1 could usefully highlight the range of activities associated with minerals and waste developments which are likely to need an environmental permit. This might be achieved by adding the following bullet points after the first paragraph.  | N  |   | The section on 'Other Issues' is intended to provide a 'signpost' to the requirements of other regulatory bodies, but not to specifically identify all potential developments that may require particular permits, or identify all possible organisations and infrastructure providers that may have such requirements and responsibilities, as this would lead to unnecessary complication and duplication. |

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|                    |                   | Paragraph   | Policy | Policies Map | Development Brief               | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |   |  |  |  |
|                    |                   |   |        |              |                                 |                                   |       |                                      |   | <p><i>“These include</i></p> <ul style="list-style-type: none"> <li><i>• the management of extractive wastes from quarrying, the use of wastes for reclamation and restoration and the discharge of associated waters to ground- and surface-waters</i></li> <li><i>• proposals to deposit, transfer, store or treat controlled wastes</i></li> <li><i>• abstraction of water for minerals washing, dust suppression and dewatering activities.</i></li> <li><i>• discharges of water from the site</i></li> <li><i>• proposed works or structures close to, in, under or over a Main River”</i></li> </ul> |  |  | <p>It is the responsibility of site developers to contact relevant regulatory bodies and infrastructure operators with regard to permit, consent and easement requirements relating to particular sites and proposals.</p> <p>Accordingly, the requested additions are not considered necessary.</p>   |
| 52                 | Mr Andrew Freeman | 3.4 to 3.11   | SL1    |              | MS26A-SL<br>MS26B-SL<br>MS25-SL |                                   | N     |                                      | <p>It is considered the Pre-Submission Site Locations document is unsound for the reasons set out below which provides evidence to demonstrate where the plan has failed to be positively prepared, justified, effective and consistent with national policy.</p> <p>The Urn Farm site consists of two parts identified by Lincolnshire County Council as MS26A-SL, the area of land to the west of King Street and north of Greatford Road, and MS26B-SL, the area east of King Street and to the south west of Baston. In earlier drafts of the Plan, the site has been considered in two parts and the MS26A-SL area was put forward as preferred area in the Draft Site Locations Document (Preferred Sites and Areas) December 2015. The allocation of the MS26A-SL was supported by the landowner in their response to this plan. The County Council’s conclusions in respect of MS26B-SL have not been challenged and it had been assumed that there would be no further consideration of that area.</p> | MS26A-SL should be allocated instead of MS25-SL as a site which is deliverable, better placed to provide a sustainable restoration consistent with national policy and the establishment of priority habitats following the extraction of mineral, thus the following changes are required: Amend policy SL1 to delete MS25-SL Manor Farm Greatford and add in MS26A-SL Urn Farm, Baston.   | Y  | <p>To ensure that the most up to date information is available to the Inspector to provide an informed decision regarding the potential sites.</p> <p>It is also anticipated that work on the preparation of an Environmental Impact Assessment will continue and thus it will be possible to provide more detailed evidence to support the allocation of site MS26A-SL.</p> | <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>Accordingly, no amendments considered necessary to the proposed allocations.</p> |

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|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |                                      |  |   |                                   |
|                    |            |   |        |              |                   |                                   |       |                                      | <p>In the current Site Locations Document (pre-submission draft) this approach to the Urn Farm site appears to have been partially revised and site has been re-assessed on the basis of both areas. It is on this basis that the Urn Farm allocation has been dropped in favour of Manor Farm, Greatford which is considered by the Authority to be a more suitable site. It is accepted that the inclusion of the MS26B-SL area would affect a greater number of sensitive receptors and for this reason representations have not been pursued in respect of that area.</p> <p>Exclusion of the MS26B-SL part of the site means that the Urn Farm site becomes more remote from sensitive receptors and its removal means the site is further removed from residential areas, a school and listed buildings. Footpath PRoW Bast/2/1 would also not be affected. With the removal of the MS26B-SL area, the remainder of the Urn Farm site is only marginally closer to Baston than the Manor Farm, Greatford site (MS25-SL) and like the MS25-SL site separated from Baston by King Street. The County Council have indicated that the MS26A-SL site would be classified as a Band B without the MS26B-SL area i.e. it would score at least as well on their site performance criteria as other sites that are being promoted.</p> <p>The County Council have assessed the nature conservation potential of the Urn Farm site on the basis it is unknown. However, an ecological report dated February 2016, submitted to the County Council in August 2016, concluded that the habitats within the site are generally considered to be of low ecological value as they comprise almost entirely of arable land. However, some of the other habitats within the site boundary (such as ditches, grassland field margins, trees and tall ruderal habitat) are of higher value and have the potential to support protected species.</p> |                                      |  |   |                                   |

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|                    |            |   |        |              |                   |                                   |       |                                      | <p>The assessment considered there was scope for the habitats on the edge of the arable land the site to support breeding birds, wintering birds, bats, badgers, great crested newts and water voles and need for further survey work was identified so that appropriate mitigation can be incorporated into the proposed development.</p> <p>The ecological assessment report concluded there are significant opportunities for enhancing and promoting biodiversity at the site. This point has been supported by the views expressed by joint recommendation of the nature conservation bodies. To this end the landowner has already suggested that he would be willing to transfer control/ownership of a restored northern half of the site to the Wildlife Trust to support the aims and objectives of the South Lincolnshire Fenlands Project. With an appropriate design and restoration based on achieving ecological objectives this site would complement and enhance the existing habitats that exist along the River Glen, including Baston and Thurlby Fens Nature Reserves &amp; Sites of Special Scientific Interest (SSSI) and the Willow Tree Fen nature reserve.</p> <p>Such an approach would be consistent with the NPPF which in paragraph 109 states that the</p> <p>‘The planning system should contribute to and enhance the natural and local environment by:...</p> <ul style="list-style-type: none"> <li>• minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</li> </ul> <p>The NPPF goes on in paragraph 117 to add that</p> <p>To minimise impacts on biodiversity and geodiversity, planning policies should:....</p> <ul style="list-style-type: none"> <li>• promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;</li> </ul> | Amend Table 6 to delete MS25-SL Manor Farm Greatford and add in MS26A-SL Urn Farm, Baston<br>Delete MS25-SL development brief add in new development brief for MS26A-SL |  |   |                                   |

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|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |   |  |   |                                   |
|                    |            |   |        |              |                   |                                   |       |                                      | <p>In this case the MS26A-SL site offers significant opportunities to make a positive contribution to the objectives of the Lincolnshire Wet Fens Partnership. This project seeks to restore up to 800ha of wetland habitats in the area of Baston, Thurlby and Deeping Fens as part of a major contribution to Local and National Biodiversity Action Plans, helping to maintain and restore lost fenland landscapes and wildlife, promote sustainable development and help reduce the impact of climate change. Part of the objectives of the project is to improve flood protection by providing additional flood storage areas something that can be achieved by a suitable restoration of the MS26A-SL site.</p> <p>In considering the suitability of sites for mineral extraction the County Council have not given sufficient weight to the potential benefits of the restoration of each site considered.</p> <p>Unlike the Manor Farm Greatford Site (MS25-SL) which is wholly within the RAF Wittering Safeguarding Area, only the south western part of the Urn Farm site MS26A-SL is within the safeguarding zone. This means the Urn Farm site is less constrained in terms of creating habitats likely to attract birds and is thus better located to incorporate wetland habitats at least in the northern part of the site, i.e. nearest the River Glen. It is acknowledged that the Urn Farm site is crossed by 2 public rights, however, the location of these rights of way mean they can be easily accommodated within a phased scheme of working and the routes maintained for the duration of any mineral extraction and restoration. In the longer term the public rights of way can be incorporated into, and would provide access to, a site restoration based on ecological and flood mitigation objectives. Restoration of this site offers the opportunity to enhance the existing green infrastructure and provide readily accessible greenspace.</p> <p>Agricultural land preliminary investigation shows that much of the site is likely to be lower grade than assumed by the County Council with much of the site being grades 3a and 3b.</p> <p>In terms of traffic considerations both MS26A-SL and MS25-SL raise virtually identical issues, both rely on King Street for access.</p> | In allocating the site the specific restoration objectives should be identified in the site profile in conjunction with the advice of the nature conservation bodies. It is noted that they are advising restoration should seek to maximise the extent of target habitat(s) and avoid habitat packing – priority should be given to wetland/open habitats. |  |   |                                   |

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|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |                                   |
|                    |            |   |        |              |                   |                                   |       |                                      | <p>The flood risk for the MS26A-SL site is acknowledged however it is also noted that the Environment Agency are confident that any flood risk issues can be managed. Pre-Submission Site Locations Document Flood Risk Sequential Test October 2016. States in the site assessment of Urn Farm that –</p> <p><i>‘Despite the high flood risk in the north east, it is considered that the proposal for the replacement of Baston No.1 Quarry would be appropriate in this Area, and may on restoration benefit the area by providing a facility to accommodate flood water. Furthermore, the EA have confirmed in their comments dated 29th January 2016 that they are confident that any flood risk issues can be managed by a suitably informed flood risk assessment at the planning application stage.’</i></p> <p>It is also noted that the NPPF identifies sand and gravel working as water compatible development. The intended restoration for the site allows for the incorporation of water storage and flood mitigation measures. It is noted that such an approach to restoration for this site is recommended by the nature conservation bodies. Planning Practice Guidance - Flood Risk and Coastal Change (paragraph: 008 Reference ID: 7-008-20140306) states</p> <p><i>‘Waste and mineral planning authorities need to take account of flood risk when allocating land for development. They should prepare their plan policies with regard to any available Strategic Flood Risk Assessments. The location of Mineral Safeguarding Areas and site allocations, in particular in relation to sand and gravel workings which are often located in functional floodplains, need to be identified. It is possible to explore benefits, such as restoring mineral working located in flood risk areas to increase flood water storage, which can also enhance the natural environment....’</i></p> |                                      |  |   |                                   |

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|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |                                   |
|                    |            |   |        |              |                   |                                   |       |                                      | <p>In assessing the Urn Farm Site, Lincolnshire County Council have under 'other constraints' identified that a 33 kv overhead power line crosses the site. As part of the owner's commitment to bringing this site forward, negotiations with Western Power Distribution regarding a relocation of this power line are already well progressed (see attached correspondence). A route for a wayleave involving a relocation of the existing route has been determined and the existing overhead power line will be replaced by an underground cable running along the eastern and northern edges of the site as shown on the attached plan. In terms of deliverability the site is owned by the potential operator, there are no constraints in terms of ownership to the delivery of this site. Andrew Freeman is also the freehold owner of a large part of 2 existing quarries Baston No 1 Quarry and the current working area of Manor Pit Baston (see Policy SL1). Work is already well progressed in terms of relocating overhead power lines and the preparation of an EIA to support a planning application has already started.</p> <p>It is acknowledged that in assessing the site the County Council have concluded that with the removal of MS62B-SL area the site would score better and at least as well as sites that have been put forward in the Site Locations Document (pre-submission draft). However in considering sites, the clear potential this site has in delivering other objectives including flood alleviation and nature conservation have not been given adequate weight.</p> <p>(Supporting documents supplied)</p> |                                      |  |   |                                   |

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|                    |                | Paragraph   | Policy | Policies Map | Development Brief             | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |   |                                      |  |   |  |
| 53                 | Woodland Trust |   |        |              | WS08-NK<br>WA01-WL<br>MS05-LT |                                   |       |                                      | <p>(response preamble applicable to reps 53,54, 55 and 56)</p> <p>As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own and manage over 1000 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have 500,000 members and supporters.</p> <p><b>Ancient woodland</b></p> <p>Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost.</p> <p>As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development. Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas. National Planning Policy Framework (NPPF) paragraph 118 states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."</p> <p>It must be noted that the National Planning Practice Guidance gives equal protection to Plantations on Ancient Woodland Sites (PAWS) as it does to Ancient Semi-Natural Woodland (ASNW) (Paragraph: 021 Reference ID: 8-021-20140306).</p> |                                      |  |   | <p>It is considered that Policy DM8 of the recently adopted Core Strategy (June 2016) provides appropriate safeguards to protect irreplaceable habitats (including Ancient Woodland and veteran trees).</p> <p>Any proposals that come forward on sites within the proposed allocations will be considered on their own merits, on a case by case basis, and all relevant development management policies will be considered.</p> <p>The Development Brief for WS08-NK acknowledges the presence of Sleaford Wood and therefore ensures it is given due consideration. Any required mitigation measures will be assessed at planning application stage.</p> <p>Consultation and advertising of relevant development proposals within the proposed allocations will be carried out at planning application stage.</p> |



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|                    |                |   |        |              |                   |                                   |       |                                      | <b>Sites</b><br>Planning authorities and inspectors increasingly act to prevent the direct destruction of ancient woodland. However, the damage and impacts posed to ancient woods by nearby development are not so widely appreciated. The Trust is concerned that in its current form the plan may be deemed unsound due to its potential impact on ancient woodland. Whilst it is noted that at the presubmission stage it is too late to challenge the designations set out in the Site Locations Document we would like to take the opportunity to note several concerns and to register our interest in a number of sites with regard to forthcoming consultations.<br><b>Sleaford Enterprise Park, Waste treatment Centre, Adjacent to WT Site Sleaford Wood Grid Ref TF 102473</b><br><br>a non-ancient wood, Sleaford Wood is sited next to the proposed waste treatment centre at Sleaford Enterprise Park. This wood belongs to the Woodland Trust, dates from the 18th century and is an important accessible green space for local people. We request that every effort is made to appropriately buffer this woodland and that the Trust is consulted at the earliest opportunity in the event of any future applications on the site. |                                      |  |   |  |
| 54                 | Woodland Trust |   |        |              | WA01-WL           |                                   |       |                                      | <b>(see preamble under rep 53)</b><br><b>Heapham Road, Gainsborough, Waste treatment centre, Adjacent to , Whites Wood ASNW Grid ref SK835895</b><br>Likewise we would like to be notified and fully engaged with any future developments at Gainsborough Waste Treatment Centre so an appropriate buffer can be allocated.   |                                      |  |   | It is considered that Policy DM8 of the recently adopted Core Strategy (June 2016) provides appropriate safeguards to protect irreplaceable habitats (including Ancient Woodland and veteran trees).<br><br>Any proposals that come forward on sites within the proposed allocations will be considered on their own merits, on a case by case basis, and all relevant development management policies will be considered. |

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|                    |                |   |        |              |                   |                                   |       |                                      |  |                                      |  |   | <p>The Development Brief for WA01-WL acknowledges the presence of White's Wood and therefore ensures it is given due consideration. Any required mitigation measures will be assessed at planning application stage.</p> <p>Consultation and advertising of relevant development proposals within the proposed allocations will be carried out at planning application stage.</p>   |
| 55                 | Woodland Trust |   |        |              | MS05-LT           |                                   |       |                                      | <p><b>(see preamble under rep 53)</b><br/> <b>Norton Bottoms Quarry, Stapleford, Minerals Safeguarding Area, Within, Stapleford Wood PAWS Grid Ref SK869573</b></p> <p>The Trust asks that a planted buffer of 50m should be provided between quarrying operations at Norton Bottoms Quarry and Heapham Wood. The Trust would like to be consulted and engaged with any future applications on the site.</p> |                                      |  |   | <p>It is considered that Policy DM8 of the recently adopted Core Strategy (June 2016) provides appropriate safeguards to protect irreplaceable habitats (including Ancient Woodland and veteran trees).</p> <p>Any proposals that come forward on proposed allocations will be considered on their own merits, on a case by case basis, and all relevant development management policies will be considered.</p> <p>The Development Brief for MS05-LT acknowledges the presence of Stapleford Wood and therefore ensures it is given due consideration. Any required mitigation measures will be assessed at planning application stage.</p> <p>Consultation and advertising of relevant development proposals will be carried out at planning application stage.</p> |

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| 56                 | Woodland Trust |   |        |              | WS08-NK<br>WA01-WL<br>MS05-LT |                                   |       |                                      | <p><b>Potential Impacts</b> (also relevant to reps 53, 54, 55)</p> <p>Intensifying land uses adjacent to ancient woodland can have a significant impact upon the woodland in a number of different ways:</p> <p>Waste disposal facilities have the potential to create substantial chemical impacts upon nearby ancient woodland. Chemicals, such as herbicides, pesticides, heavy metals, toxic or nutrient-rich leachates, and sulphur and nitrogen oxides, may reach ancient woodland from nearby development through a range of mechanisms. These include: aerosol or spray drift; contaminated surface and ground water flows; deposition of dust, particulate and gaseous pollution; localised acid-rain events; deliberate dumping of rubbish or garden waste into woodland; and accidental release or spillage of hazardous substances.</p> <p>Proximity to waste facilities may give rise to an increase in the risk of non-native plant species invading woodland on an on-going basis. Chemical effects on nearby ancient woodland include: population-level responses to lethal and sublethal doses of toxic chemicals, or nutrient enrichment, that can significantly alter the composition of the ground flora and lichens, mosses and liverworts growing on trees or rocks; reduced tree health by inhibiting root development and retarding growth, increased drought and frost susceptibility, defoliation, or leaf discoloration, poor crown condition, and the promotion of insect damage; poisoning of animals, leading to mortality, reduced feeding rates, or species avoidance; and loss of soil micro-organisms, including tree mycorrhizae, thereby affecting decomposition and nutrient cycling. Increased activity such as through mineral extraction can result in: modified local hydrological regimes; vibration; noise and light pollution; vehicular collisions with wildlife; external activity visible from within the wood; an increase in wind-blown litter accumulation; and tree surgery or felling along the woodland edge for safety reasons or subsidence prevention.</p> |                                      |  |   | <p>See previous responses in relation to proposed allocations.</p> <p>In order to consult the Woodland Trust on all applications affecting ancient woodland, the Planning Authority would first need to be provided with an appropriate constraints map (in GIS format) identifying all ancient woodland that the Trust wishes to be consulted on, and clarification regarding any distance buffers or exclusionary criteria that may be applied.</p> |

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|                    |                        |   |        |              |                      |                                   |       |                                      | <p>Noise and light pollution interfere with interactions between species, affecting foraging and predation, reducing breeding success and thereby affecting on-going population viability. Disturbance may, therefore, lead to species being eliminated from woods. Vegetation clearance near to ancient woodland may affect woodland hydrology, increasing the likelihood of water-logging or drought and leading to loss of trees and changes in species composition. Soil compaction adjacent to woodland increases water run-off and soil erosion. It can cause severe damage to tree roots, leading to tree defoliation, crown dieback, and death.</p> <p>The Trust asks that ancient woodland is considered as a key constraint in the future development of these sites and that the appropriate planted buffer is put in place. We would also take this opportunity to ask to be consulted on all forthcoming applications affecting ancient woodland.</p>   |                                      |  |   |  |
| 57                 | Canal and Rivers Trust |   |        |              |                      |                                   |       |                                      | Thank you for consulting the Canal & River Trust on the Pre-Submission Draft Site Locations document. Having reviewed the document, we can advise that we do not have any comments to make   |                                      |  |   | Noted  |
| 58                 | Tarmac Ltd             |   | SL1    |              | MS01-LT (Discounted) | Y                                 | N     | Y                                    | <p>(Excerpt from letter of response)</p> <p>Thank you for consulting with us in respect of the above development plan document. Tarmac have instructed Heaton Planning Limited (HPL) to submit comments on their behalf, which are set out below.</p> <p>By way of introduction, our client has promoted, and continues to actively promote “Lea Marsh Farm”, a potential site for future sand and gravel to the south of Gainsborough (within the defined ‘sand and gravel areas of search’ for the ‘Lincoln / Trent Valley Production Area’). The site is considered through the evidence base supporting the consultation document under reference ‘MS01-LT’.</p> <p>Our client maintains that the site could, if required be timetabled for production to commence in the latter stages of the Plan period as a replacement to its ongoing operations at Whisby Quarry. Although Whisby Quarry has reserves to provide production through to circa 2028, market conditions and demand for sand and gravel in the second half of the proposed Plan Period may justify a planning application being brought forward earlier. It is estimated, based on the available</p> | The allocation of Lea Marsh Farm     | Y  | In terms of further participation in the process from hereon, it is important that our client is able to fully participate in the oral examination. It is submitted that the DPD in its current form is unsound and our client proposes changes to policies that it considers could assist with resolving identified issues. Participation is respectfully requested to enable our client to respond to important issues raised as part of the examination and assist the Council and | <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>An annual Local Aggregates Assessment will be used to monitor the requirements for mineral development throughout the plan period.</p> <p>Accordingly, no amendments considered necessary to the</p> |

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|                    |   |   |        |              |   |                                   |       |                                      | sand and gravel resources and the land configuration, that the site could achieve a maximum output of circa 500,000 tonnes per annum. Please note that we have participated through numerous consultation exercises with regard to this site. Most recently this has included submitting information in response to queries by the Council on 16th June 2016 to confirm the position of our client. Some of the content of that letter and our previous representations is revisited as part of these representations. (Further details supplied).   |                                      |  | the appointed Inspector in formulating a sound plan.  | proposed allocations.  |
| 59                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WA01-WL<br>WA02-CL<br>WA03 – CL<br>WA04 – CL<br>WA09-NK<br>WS03-WL<br>WS08 – NK |                                   |       |                                      | (Preamble also applicable to rep numbers 60,61,62,63, 64, 65 and 66)<br>Thank you for consulting the Central Lincolnshire Joint Strategic Planning Committee on the Lincolnshire Minerals and Waste Local Plan – Site Locations.<br>The Central Lincolnshire Joint Strategic Planning Committee have the following comments:<br>Whilst potentially suitable waste facilities are listed for identified areas, it is difficult to judge likely potential impact without a definition of what the potential uses are/ involve e.g. what does a re-use facility, energy recovery or a resource recovery park involve? Are definitions provided in another document or elsewhere? Whilst some employment areas identified are based on existing allocations, others do not appear to be, and the reason for the identification of their boundaries is unclear. It is also noted that for some waste areas, existing and proposed uses on and adjacent to the areas identified have not been acknowledged or referenced and this gives us some concern that potential land use conflicts, particularly with existing and proposed residential uses could arise.<br>Comments on specific sites are provided below: |                                      |  |   | Proposed Waste Area allocations identify a number of potential uses but are not intended to be process/technology specific given the continuously evolving nature of the waste industry. Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses.<br><br>Waste Area allocations do not necessarily need to align with employment allocation boundaries. For example CSDMP Policy W4 identifies other acceptable locations for waste uses such as existing employment and brownfield land. |

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| 60                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WA01-WL           |                                   |       |                                      | (see preamble under rep 59)<br><b>WA01 – WL Heapham Road, Gainsborough:</b><br>The area shown is not the same as that identified as an employment area in the adopted WL Local Plan or the emerging Central Lincs Local Plan. It should be noted that the Gainsborough Southern Neighbourhood SUE lies to the S/S-E of the area with outline planning permission granted in 2010.  |                                      |  |   | Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required.<br><br>Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses. |
| 61                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WA02-CL           |                                   |       |                                      | (see preamble under rep 59)<br><b>WA02 – CL West of Outer Circle Road, Lincoln:</b><br>The area is the same as the employment area shown in the adopted 1998 City of Lincoln Local Plan, but does not reflect what is currently on the ground (including a large supermarket) or the emerging Central Lincs Local Plan and is therefore out dated and no longer relevant.  |                                      |  |   | Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required.  |
| 62                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WA03 – CL         |                                   |       |                                      | (see preamble under rep 59)<br><b>WA03 – CL Allenby Road Trading Estate (North):</b><br>The area is considered to be more accurately referred to as East of Outer Circle Road, Lincoln. The area is the same as the employment area shown in the adopted 1998 City of Lincoln Local Plan, however, it should be noted that part of the area now forms part of the NEQ SUE for which planning permission has recently been granted on part of the site for up to 500 dwellings. |                                      |  |   | The Planning Authority has no objections to WA03-CL being re-named as requested if deemed appropriate for clarity.<br><br>Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required.  |

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| 63                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WA04 – CL         |                                   |       |                                      | (see preamble under rep 59)<br><b>WA04 – CL Allenby Road Industrial Estate (South):</b><br>The area is the same as the employment area shown in the adopted 1998 City of Lincoln Local Plan, but does not reflect what is currently on the ground or the emerging Central Lincs Local Plan. Permission was granted around ten years ago for up to 170 dwelling on part of the site. The houses are referred to as Cherry Bank and many have been completed. This should be acknowledged and the housing element removed from employment area shown in the plan. Reference is made to Lincoln Prison, but this is some distance away. It should be noted that the NEQ SUE is located to the eastern side of the area. |                                      |  |   | Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required.<br><br>Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses. |
| 64                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WA09-NK           |                                   |       |                                      | (see preamble under rep 59)<br><b>WA09 – NK Woodbridge Road Industrial Estate, Sleaford:</b><br>The area shown is not the same as that identified as an employment area in the adopted NK Local Plan or the emerging Central Lincs Local Plan and whilst the area identified in the Minerals and Waste Local Plan appears to be contained within the employment area, the reason for identifying the boundary shown is unclear.  |                                      |  |   | Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required.  |
| 65                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WS03 – WL         |                                   |       |                                      | (see preamble under rep 59)<br><b>WS03 – WL Gallamore Lane, Market Rasen:</b><br>It should be noted that a site to the N-E (ref CL1358) is allocated for housing in the emerging Central Lincs Local Plan.   |                                      |  |   | Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses.  |

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| 66                 | Central Lincolnshire Joint Strategic planning Committee |   |        |              | WS08 – NK         |                                   |       |                                      | (see preamble under rep 59)<br><b>WS08 – NK Land to the south of the A17, Sleaford Enterprise Park, Sleaford:</b><br>It should be noted that sites to the West (ref CL1013 & CL1013a) are allocated for housing in the emerging Central Lincs Local Plan.  |                                      |  |   | Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses.  |
| 67                 | Mrs Linda Seamer  |   | SL1    |              | MS25-SL           |                                   |       |                                      | <p><b>MS25-SL Manor Farm Greatford</b></p> <p>I would like to make the following comments with regard to this site and its inclusion in the Pre-submission Draft for this area.</p> <p>My comments do not relate to the validity of any legal compliance or points of law, or whether the document is unsound, neither do I wish to raise concerns relating to a duty to co-operate. My comments are of a general and overall nature at the proposed creation of a new site at Manor Farm Greatford.</p> <p>The document refers to the site as being 'remote' but it is not, it has three villages quite close by. This whole area has seen a high density of gravel extraction over many years and is dotted with gravel extraction sites in the Baston/Langtoft/West Deeping &amp; Greatford area.</p> <p>Although I am aware that gravel can only be extracted from where it lies, such activity is changing the landscape and the future land use. This is a productive agricultural area and the 'low-level farming' type of restoration creates many problems when this method is adopted. This does not seem to be the preferred or best option now days.</p> <p>Restoration to wetland can be very enhancing and supportive of wildlife, but of course many years of noise, dust and disruption predecease this. The South Lincolnshire Fenlands Partnership are interested in the nature of this area and what, in the future, can be done to improve the landscape, and their suggestions and ideas are awaited.</p> |                                      |  |   | <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>Potential impacts on local amenity and the environment will be addressed at the planning application stage in line with the framework set out by the Core Strategy and Site Locations documents.</p> |



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|                    |   |   |        |              |                   |                                   |       |                                      | <p>By the nature of the landscape, this site in question would be extremely visible particularly from Langtoft, but also from Baston and Greatford. There are some tree lines to the west of the site, but additional planting would need to be undertaken at an early stage if this site was to be worked.</p> <p>I am concerned that this site on King Street, if given permission in the future, would then require a processing plant to be installed, and then extensions to this site would most likely follow, and the site expand even further.</p> <p>I note that the Environment Agency have raised concerns over the density of mineral extraction sites in this area. They also have highlighted the fact that the land towards Greatford is an area of high archaeological potential as it has in the past yielded Iron age and Roman remains.</p> <p>It should be noted, in the light of all the points the Environment Agency have made, and because of the disruption that such extraction causes to local villages, often over a prolonged period of years, this is not an ideal site to consider.</p> |                                      |  |   |   |
| 68                 | Water Management Consortium (Lindsey Marsh & Trent Valley IDBs) |   |        |              | WS12-EL           |                                   |       |                                      | <p><u>WS12-EL A158 Burgh Road West, Skegness</u></p> <p>This site is entirely within the Lindsey Marsh Drainage Board district.</p> <p>Enclosed is a plan to provide an overview of the Board maintained drainage network at this site. The Wedlands Drain to the south is a significant watercourse for the Board. Any works within 8 metres of the Wedlands drain will require prior official consent from the Board.</p> <p>There are also riparian drains to the northern and eastern site boundaries. It is important to allow for suitable access to these drains to facilitate maintenance and to note that the Board's consent is required for any works within a riparian channel.</p> <p>Discharge rates to receiving watercourses must not be increased. The Board recommends that the greenfield runoff rate must be maintained, which is taken as 1.4 litres per second per hectare.</p> <p>The Board would wish to be consulted if the site is further developed.</p> <p>(Accompanying plans, and further information regarding byelaws and consent requirements supplied)</p>                            |                                      |  |   | <p>It is the responsibility of site developers to contact relevant regulatory bodies and infrastructure operators with regard to permit, consent and easement requirements relating to particular sites and proposals.</p> <p>However, if deemed appropriate, to provide a 'signpost' the Planning Authority would have no objections to incorporating a general reference to "other consents" being required from regulatory bodies and infrastructure providers in the 'Other Issues' section (p30) of the introduction to Appendix 1.</p> <p>Appropriate consultation will be carried out at planning application stage, along with consideration of any necessary</p> |

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|                    |   |   |        |              |                   |                                   |       |                                      |  |                                      |  |   | mitigation measures.   |
| 69                 | Water Management Consortium (Lindsey Marsh & Trent Valley IDBs) |   |        |              | WA11-EL           |                                   |       |                                      | <p><u>WA11-EL A16 Grimsby Road, Louth</u></p> <p>This area is outside of the Board's district, therefore any works or structures within a watercourse (outside of a designated main river) will require consent from the Lead Local Flood Authority (LLFA). In this area, Lindsey Marsh Drainage Board acts on behalf of the LLFA, therefore any works within a watercourse will require consent from the Board. It is noted there are watercourses along parts of the proposed waste area boundary.<br/>(Accompanying plans, and further information regarding byelaws and consent requirements supplied)</p>   |                                      |  |   | <p>It is the responsibility of site developers to contact relevant regulatory bodies and infrastructure operators with regard to permit, consent and easement requirements relating to particular sites and proposals.</p> <p>However, if deemed appropriate, to provide a 'signpost' the Planning Authority would have no objections to incorporating a general reference to "other consents" being required from regulatory bodies and infrastructure providers in the 'Other Issues' section (p30) of the introduction to Appendix 1.</p> <p>Appropriate consultation will be carried out at planning application stage, along with consideration of any necessary mitigation measures.</p> |
| 70                 | Water Management Consortium (Lindsey Marsh & Trent Valley IDBs) |   |        |              | MS04-LT           |                                   |       |                                      | <p><u>MS04-LT Swinderby Airfield Quarry</u></p> <p>This site is partially within the Trent Valley Internal Drainage Board district and catchment. Please refer to the enclosed plan which demonstrates the proximity of Board maintained watercourses. This mineral site is served by the Board maintained Morton Hall Feeder watercourse and the Mill Dam watercourse just north of the A46. Please be aware that any works within 9 metres of these watercourses, or any works which may increase flows to these watercourses will require the Board's consent.<br/>The Board recommends that the greenfield runoff rate must be maintained, which is taken as 1.4 litres per second per hectare. The Board would wish to be consulted if the site is further developed.<br/>(Accompanying plans, and further information regarding byelaws and consent requirements supplied)</p> |                                      |  |   | <p>It is the responsibility of site developers to contact relevant regulatory bodies and infrastructure operators with regard to permit, consent and easement requirements relating to particular sites and proposals.</p> <p>However, if deemed appropriate, to provide a 'signpost' the Planning Authority would have no objections to incorporating a general reference to "other consents" being required from regulatory bodies and infrastructure providers in the 'Other Issues' section (p30) of the introduction to Appendix 1.</p>   |

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|                    |                  |   |        |              |                   |                                   |       |                                      |   |   |  |   | Appropriate consultation will be carried out at planning application stage, along with consideration of any necessary mitigation measures.  |
| 71                 | Historic England |   | SL1    |              | MS29-SL           |                                   | N     |                                      | <p>Historic England refers to previous correspondence of 2014 and January and August 2016 in relation to the draft Minerals and Waste Plan and, in particular, our comments on MS29-SL (West Deeping). Whilst the revisions to site assessment methodology are acknowledged, and welcomed, Historic England's concerns about the potential impact of the proposed mineral extraction allocation site MS29-SL (West Deeping) remain. Appendix 13 (November 2016) concludes, for this site, that <i>'the main issues are likely to relate to the impacts on... the setting of nearby listed buildings and the character and appearance of the West Deeping Conservation Area; archaeology...'</i> amongst others.</p> <p>Historic England is concerned that the allocation is being put forward for consideration on the basis that more detailed assessment of the historic environment, heritage assets and setting is essentially being deferred to the planning application stage. In terms of national policy guidance, the Plan allocation MS29-SL (West Deeping) fails to demonstrate that:-</p> <ul style="list-style-type: none"> <li>- The site allocation will deliver a "positive strategy for the historic environment" as is required by NPPF Paragraph 126.</li> <li>- The site allocation will be likely to "contribute to protecting or enhancing the historic environment". Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment [NPPF Paragraph 7].</li> <li>- The site allocation is likely to "conserve heritage assets in a manner appropriate to their significance". Therefore it has not shown that it will be likely to deliver the Government's objectives for the historic environment [NPPF Paragraph 17].</li> <li>- It has complied with the statutory duty under S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas.</li> </ul> | Historic England is of the view that further analysis of the proposal in respect of the historic environment by the Council would assist with informing considerations in respect of the site MS29-SL (West Deeping). We would be pleased to discuss this with you should further assessment work be undertaken ahead of the EIP. | Y  | Should allocation MS29-SL (West Deeping) proceed within the plan without further historic environment assessment, Historic England would wish to have opportunity to set out its concerns in respect of the impact of the allocation on the historic environment, heritage assets and associated setting. | <p>As part of the site assessment process, and in response to concerns previously raised by Historic England, further information was sought and received from the site promoter in relation to potential impacts of the site on the historic environment and its setting. This information was evaluated and discussed with the Councils Historic Environment team, and sent to Historic England for comment. Historic England responded noting that they do not comment on site specifics until planning application stage.</p> <p>Based on the information submitted and comments received the Planning Authority considers that the proposed allocation is acceptable subject to any subsequent planning application complying with the relevant policies in the Core Strategy and the associated Development Brief in the SLD.</p> |

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|                    | Historic England |   |        |              |                   |                                   |       |                                      | <p>At preferred option stage it should be clear whether a potential allocation site impacts on the setting of a heritage asset or not. The absence of any meaningful evaluation must bring into question the deliverability of MS29-SL (West Deeping) as a mineral extraction site, or the amount of extraction which might take place taking into consideration what mitigation might be required if considered to be an appropriate way forward.</p> <p>Historic England would be grateful to be kept informed of any further assessment work which may be undertaken in respect of this site and would be pleased to discuss further ahead of the Plan EIP. We would also wish to be informed of the EIP hearing dates and times in due course and may wish to attend the hearings to discuss the site in relation to the historic environment.</p>  |                                      |  |   |  |
| 72                 | Mr Robert French |   |        |              | MS25-SL           |                                   |       |                                      | <p>May I please express an interest in the above application in the Greatford area where I have been a resident for 30 years. I believe that some of the points of concern that I raise may be premature at this point and may be more relevant to application of 'planning consent' re extraction of minerals. Being a long term resident I am fully aware of the growing impact of HGV vehicular traffic through the centre of Greatford village. I have no objection in principle to the extraction of minerals, which are a national resource, but I have concerns, obviously, regarding the various impacts extraction will have on my and other residents environment during extraction and land restoration issues thereafter.</p> <p>Therefore I ask if consideration can be given to site specific HGV movements regarding this application. Considering the impact such movements will have on the road system leading too and through the village. Myself and other residents are currently fearfull of the HGV traffic that already passes through our village by quarry traffic taking a shortcut on unclassified roads to reach the A1. There is no law that states that contractors/hauliers have to use the main 'A' road systems once they leave sites and if it suits them they will and do use the road through Greatford.</p> |                                      |  |   | Issues raised such as restoration and potential impacts on local amenity and the environment (including traffic) will be addressed at the planning application stage in line with the framework set out by the Core Strategy and Site Locations documents. |

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|                    |                            |   |        |              |                       |                                   |       |                                      | <p>My second concern, at present, is the restoration planned for the site, which to my knowledge will be presented when planning permission is applied for. There are various examples in the immediate area of re instatement post excavations. Personally speaking the worst of these is the deep, low level re instatement of arable area. This low level drop in the landscape is uncharacteristic of the level fen-land and looks alien. The best we can perhaps hope for is a "wetland" type restoration, although over the years I have noticed an increase in mosquitoes in the summer months, which unless you had lived in area for a long while, you might not be aware of, but a large increase there is. A little concerning for all of us in the immediate area of "lakeland" covering the parishes of Baston and Langtoft (soon to be Greatford!) due to the fact of Malaria carrying mosquitoes having moved north across Europe and noted in France, Germany and the Benelux countries, just over the channel.</p> <p>I realise that the matters I raised are possible Planning Permission issues but I would appreciate confirmation that this is the case.</p>   |                                      |  |   |  |
| 73                 | The Sir Thomas White Trust |   |        |              | MS03b-LT (Discounted) | N                                 | N     | Y                                    | <p>The following submission is made on behalf of the Sir Thomas White's Charity in response to the public consultation of the Pre-Submission Draft of the Site Locations document dated November 2016.</p> <p>1.2. We wish to object to the non-allocation of Newton's Farm in this document on the grounds that the Local Minerals Plan (the Plan) is not sound in that it has not been prepared to meet objectively assessed development and infrastructure requirements. The Plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Furthermore the plan is not effective as it is not deliverable over its period and the Plan is not consistent with National Policy and does not enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>Specifically, the Plan has not allocated the site at Newton's Farm, Swinderby which we consider to be necessary to make full provision throughout the plan period and maintain the productive capacity of the Lincoln/Trent Valley Production Area throughout the entire period. In addition the allocation of Newton's Farm would allow the Plan to be flexible in the provision of construction aggregate in the expectation of higher</p> | (Set out in comments)                | Y  | (Set out in comments)   | <p>All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.</p> <p>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.</p> <p>An annual Local Aggregates Assessment will be used to monitor the requirements for mineral development throughout the plan period.</p> <p>Accordingly, no amendments</p> |

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|                    |            |   |        |              |                   |                                   |       |                                      | <p>planned growth whilst also allowing for competition in the marketplace.</p> <p>1.4. In addition we object to the reasons provided for Newton's Farm exclusion from the ongoing Site Locations process.</p> <p><b>Full Provision</b></p> <p>2.1. We maintain the arguments we have previously submitted that the provisions made in the Plan for the supply of aggregates in the County are not sufficient and do not reflect the likely demand.</p> <p>2.2. It should be borne in mind there has been one of the most severe recessions in living memory commencing in 2008 which has seen a substantial decline in construction activity. As recently as the summer of 2015, the output of aggregates was still 25% below pre-recession levels<sup>1</sup>.</p> <p>2.3. We note that the most recent Local Aggregate Assessment for data from 2013 is now out of date, uses a simple 10 year average to assess future demand for aggregates, and does not consider planned economic growth as advised in national planning guidance. The latest data therefore does not reflect the upward trajectory of aggregates supplies that has been seen across the country in recent years.</p> <p>2.4. Notably BDS Marketing, perhaps the pre-eminent source of information and statistics on UK mineral production and in particular of sand and gravel, recently stated that aggregate companies have seen fit to open or reopen 38 pits across the country in the past year<sup>2</sup>. This represents an increase in open pits of approximately 5% and does not readily accord with the county's own assessment of future sand and gravel requirements.</p> <p>2.5. Accordingly the evidence indicates that in order to have a healthy sustainable local economy, additional resources of aggregates will be needed to be provided before the end of the Plan period. We consider the minerals planning authority has an obligation to ensure such resources are provided.</p> <p><b>Productive Capacity</b></p> <p>3.1. The Plan makes consideration of the sand and gravel provision based upon the 10 year average sales figure for the county of the years 2004-2013, a period during which output fell by over 30%. In so doing, the Site Location document sets out in Table 2 sets out an annual provision for the Lincoln /</p> |                                      |  |   | considered necessary to the proposed allocations. |

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|                    |            |   |        |              |                   |                                   |       |                                      | <p>Trent Valley Production Area of 1.0 Mtpa. The permitted reserves at Whisby are likely to run out in or before 2028, several years before the end of the Plan period in 2031.</p> <p>3.2. This shortfall is provided for by the allocation of just two sites which are extensions to Swinderby Airfield and Norton Bottoms Quarry. Given the expected output of the Swinderby and Norton Bottoms sites at up to 550,000 and 300,000 tonnes per annum respectively, once the Whisby site is exhausted these two sites alone will be unable to satisfy the suggested 1.0Mt provision for the Lincoln / Trent Valley area. The NPPF states in paragraph 145 that mineral planning authorities should ensure “the capacity of operations.... is not compromised”. As a result there is a need to allocate a further site in this area to cover the deficit in production capabilities within the period of the Plan.</p> <p><b>Anti-competitiveness</b></p> <p>4.1. In the event that just the two proposed allocated sites are carried forward, there will at the end of the Plan period only be two sites active in the Lincoln / Trent Valley Production Area. As policy M2 stipulates that only extensions or replacement sites shall be allocated, this suggests that there will be a maximum of two mineral operators in the area, in direct contravention to NPPF paragraph 145 which states that mineral planning authorities should:</p> <p>“plan for a steady and adequate supply of aggregates by....ensuring that large landbanks bound up in very few sites do not stifle competition”</p> <p>Reasons proffered for Newton’s Farm to be discounted</p> <p>5.1. The Plan’s Site and Areas Report states that the Newton’s Farm site has been discounted on the basis that it is contrary to Policy M2 in that it is not an extension or replacement site for an existing quarry, and it is in an area where other mineral sites are active which may result in an adverse cumulative impact. However we note the Pre-Submission Site Locations Document Flood Risk Sequential Test document states that “the site is suitable for replacement of Whisby Quarry.” Whisby Quarry is due to be exhausted by 2028 and that no replacement has been allocated and we consider Newtons farm to be the most suitable replacement.</p> |                                      |  |   |                                   |

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|                    |                                 |   |        |              |                    |                                   |       |                                      | With regards to concerns relating to the cumulative impact of the proposed Newton's Farm site, we note that the Plan's assessment has not identified any environmental impacts that are considered unlikely to be overcome with appropriate mitigation. Accordingly it is difficult to see what aspects the mineral planning authority have identified that would constitute discounting the site on this basis.<br>5.3. The Plan states the Newton's Farm site has also not been allocated in relation to the proposed method of restoration using inert fill. We agree with the preferred operator Mick George Ltd that relying on capacity within non-hazardous landfill is a short-sighted and unsustainable policy. This is especially so as the Core Strategy identifies a shortfall of approximately 150,000 tonnes per annum by the end of the Plan period.   |                                      |  |   |   |
| 74                 | North Kesteven District Council |   |        |              | WA09-NK<br>WS09-NK |                                   |       |                                      | WA 09-NK Woodbridge Road Industrial Estate and WA09-NK Bonemill Lane<br>No comments/objections - the site is identified as an 'Existing Employment Area' in the Submitted Draft Central Lincolnshire Local Plan (SCDLLP), assigned site allocation reference E26 'Sleaford Industrial Area'. Emerging Policy LP5 'delivering prosperity and jobs' identifies that B1, B2 and B8 uses will be appropriate in this location, and advises that development would be supported where it is of a scale that respects the character of the area and neighbouring land uses. The policy further notes that non-B use classes would be refused unless they remain ancillary in nature. The potential uses set out in the Development Brief include both B2 and Sui Generis uses and therefore whilst Industrial Areas remain sequentially preferable locations in principle for such uses, any future planning application must be accompanied by a statement assessing compliance against relevant development plan policies including therefore LP5.<br>With reference to WA09-NK please be aware that the Industrial Estate currently has a number of occupiers including food preparation facilities. Therefore, the full suite of proposed site uses as described in the Development Brief may not be appropriate in all areas of the site and each would therefore need to be assessed on its own merits. |                                      |  |   | The proposed Waste Area allocations have been identified through co-operation with District Councils. As such they are considered appropriate in general terms for the specified waste uses.<br><br>Any waste development proposals that come forward within the wider allocations will be assessed on their own merits and appropriate consideration given to potential impacts on local amenity and the environment, in accordance with the Adopted Core Strategy.<br><br>Accordingly, no amendments necessary to proposed allocations. |



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| 75                 | North Kesteven District Council |   |        |              | WS08-NK           |                                   |       |                                      | WS08-NK Sleaford Enterprise Park<br>We OBJECT to this proposed allocation. The site south of the A17, Sleaford Enterprise Park, Sleaford (ref: WS08-NK) is described in the Draft Minerals and Waste Local Plan as having a variety of potential uses relating to the processing of waste. This site is also proposed for allocation in the SDCLLP (emerging policy LP5) as a 'Strategic Employment Site', site reference E7. Only 7 SES's are proposed for allocation in Central Lincolnshire and whilst the site is identified as being acceptable for B1, B2 and B8 uses, emerging policy LP5 identifies that the SES's will be reserved for 'large scale investment that requires significant land take', and that 'small scale and/or piecemeal development that prevents the delivery of large scale development is likely to be refused'. The uses specified in the Development Brief would appear to fall under this definition (relative to the scale of the allocation) and as such piecemeal delivery of these is likely to prejudice the comprehensive delivery of the SES, and which policy LP5 identifies should in either case be guided by a masterplan.   |                                      |  |   | The proposed Waste Area allocations have been identified through co-operation with District Councils. As such they are considered appropriate in general terms for the specified waste uses.<br><br>Furthermore, it cannot be assumed that all proposed waste uses would amount to piecemeal developments. Waste facilities can include large scale and regionally significant developments.<br><br>Accordingly, no amendments necessary to proposed allocations.   |
| 76                 | North Kesteven District Council |   |        |              | MS04-LT           |                                   |       |                                      | MS04-LT Swinderby Airfield<br>We OBJECT to this proposed allocation. As previously advised through our email of 26th June 2015, the Council has serious concerns about the potential impact of the proposed extension of the Allocated Minerals Site at Witham St Hughs. As previously identified in that email, land to the east of the proposed designation is allocated in the SDCLLP for residential development (site reference CL1100) and further to this an outline planning permission on this site for 1,100 dwellings and 150 care/retirement units has been approved subject to the completion of a S106 agreement (application reference - 15/1347/OUT).<br><br>The Site Specific Safeguarding Area of MS04-LT encroaches significantly into this important strategic residential development site, including areas outlined for residential development as set out on the indicative site masterplan, a copy of which is enclosed. This site forms a significant proportion of the identified housing supply within the District and is the largest site allocation behind the Strategic Urban Extensions. The Council would therefore wish to resist any allocation which could undermine the comprehensive development of Phase 3 of Witham St Hughs including the delivery of the reserved matters permissions. To avoid such |                                      |  |   | All sites submitted during the production of the Site Locations document have been subject to a comprehensive and detailed site assessment process, as set out in the accompanying Sites and Areas Report.<br><br>As a result, the Planning Authority has selected the most appropriate sites to deliver the requirements of the Adopted Core Strategy for the Plan period.<br><br>Any proposals that come forward on allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on local amenity, the environment, and adjacent land uses. |

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|                    |                                 |   |        |              |                   |                                   |       |                                      | <p>conflict we would recommend that the proposed minerals site allocation is revised to ensure that no part of the site specific safeguarding area falls within the red line application boundary of the Phase 3 development. Similarly, we note that the site specific safeguarding area also encompasses a number of occupied dwellings within Witham St Hughs and which therefore may be subject to adverse amenity impacts associated with minerals working from the proposed extension</p> <p>Further to this, land immediately to the east of the proposed Minerals site is also proposed for designation as an SES (Network 46) for B1, B2 and B8 uses, similarly identified as being reserved for large scale investment that requires significant land take. Whilst we have no objection to the impact of the proposed allocated minerals site on the operation of the SES, any future planning application seeking extension towards the boundary of the SES should take account of the nature of any uses within any safeguarding area at the time of application submission.</p> |                                      |  |   |  |
| 77                 | North Kesteven District Council |   |        |              | MS05-LT           |                                   |       |                                      | <p>MS05-LT Norton Bottoms Quarry</p> <p>We have no objection to the proposed allocation however as stated in our previous correspondence the site specific safeguarding area appears to extend over a number of residential properties in Stapleford village, which does raise some amenity concerns that would need to be examined and mitigated for as necessary through any future planning application.</p>  |                                      |  |   | Any proposals that come forward on allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on local amenity, the environment, and adjacent land uses.   |
| 78                 | Anglian Water Services Limited  |   |        |              | General           |                                   |       |                                      | <p>The site development briefs for the allocated minerals sites include reference to Anglian Water's assets.</p> <p>Generally, in relation to water and wastewater assets within the boundary of the sites, Anglian Water would require the standard protected easement widths for these assets and for any requests for alteration or removal to be conducted in accordance with the Water Industry Act 1991. Within the easement strips there should be no building over or restriction of access (required for routine maintenance and emergency repair).</p> <p>Set out below is the standard easement width requirements:</p> <p>Standard protected strips are the strip of land falling the</p>  |                                      |  |   | <p>It is the responsibility of site developers to contact relevant regulatory bodies and infrastructure operators with regard to permit, consent and easement requirements relating to particular sites and proposals.</p> <p>However, if deemed appropriate, to provide a 'signpost' the Planning Authority would have no objections to incorporating a general reference to assett easements/safeguarding requirements of other regulatory</p> |

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|                    |            |   |        |              |                   |                                   |       |                                      | <p>following distances to either side of the medial line of any relevant pipe; 2.25 metres where the diameter of the pipe is less than 150 millimetres, 3 metres where the diameter of the Pipe is between 150 and 450 millimetres, 4.5 metres where the diameter of the Pipe is between 450 and 750 millimetres, 6 metres where the diameter of the Pipe exceeds 750 millimetres.</p> <p>In addition, where there are water supply pipes located within or close to the site special protection measures may be required if the land use is likely to cause contamination.</p> <p>We have no objections to the proposed minerals and waste allocation sites assuming that our assets are safeguarded as set above.</p> |                                      |  |   | <p>bodies and infrastructure providers in the 'Other Issues' section (p30) of the introduction to Appendix 1.</p> <p>Appropriate consultation will be carried out at planning application stage, along with consideration of any necessary mitigation measures.</p> |

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| 79                 | City of Lincoln Council |   | SL3    |              | WA02<br>WA03<br>WA04 |                                   |       |                                      | <p>Generally the City of Lincoln Council is supportive of the Allocations Plan proposed policies with the following exceptions:</p> <p>Clarification of the Policy application to Waste Area allocations. The introduction of Waste 'Area' allocations are not referenced in the adopted Core Strategy which refers only to sites. As such it is unclear which Core Strategy Policies will apply to Waste Area sites;</p> <p>It is presumed that Core Strategy Policy W8 Safeguarding Waste Management <u>Sites</u> is not applicable to allocated Waste Areas. The City Council support this approach as clearly such areas cannot be safeguarded for waste uses. For clarity the City Council request that the supporting text in the allocations document clarifies such.</p> <p>Some employment sites in the City have been subject to a Waste Area Impact Assessment and found to be unsuitable for potential waste uses and designation as a Waste Area in the Allocations Plan e.g. Doddington Road employment area. The City Council support this approach and request that the supporting text in the allocations document clarifies that where such assessment has been undertaken, and recommends an employment area as unsuitable for waste facility uses, then the existing industrial/employment land and buildings criteria outlined in Policy W4 is negated.</p> <p>The City Council would recommend that all Employment allocations within the City, as identified in the Central Lincolnshire Local Plan, be subject to a Waste Area Impact Assessment (WAIA) and documented in the WAIA Report accordingly, to provide clarity in respect of the employment use criteria outlined in Core Policy W4. Further consultation with the City Council in this respect is requested.</p> <p>Waste Area allocations WA02, WA03, WA04 do not align with the Employment Area boundaries of the Submission draft of the Central Lincolnshire Local Plan. The City Council recommend that amendments are made accordingly.</p> |                                      |  |   | <p>All relevant Core Strategy policies apply to allocated Waste Areas.</p> <p>Para 5.3. of the pre-submission SLD already clarifies that waste 'areas' are not safeguarded solely for this use and that alternative uses should not be prejudiced.</p> <p>Any proposals for waste use that come forward on sites/areas not allocated for waste use will be considered on a case by case basis and assessed against all relevant policies in the Plan.</p> <p>Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required.</p> |

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| 80                 | City of Lincoln Council | 2.14  |        |              |                   |                                   |       |                                      | In the interest of clarity it is recommended that Para 2.14 (pg. 3) amended as follows; after criteria add 'and development management policy to be complied with '   | In the interest of clarity it is recommended that Para 2.14 (pg. 3) amended as follows; after criteria add 'and development management policy to be complied with ' |  |   | Whilst not considered necessary, the Planning Authority would have no objection to the proposed addition.  |
| 81                 | City of Lincoln Council |   |        |              | WA05-CL           |                                   |       |                                      | WA05- Great Northern Terrace; No objection  |   |  |   | Noted  |
| 82                 | City of Lincoln Council |   |        |              | WA04-CL           |                                   |       |                                      | WA04-Allenby Road Trading Estate (south); The City Council recommends removal of the '(South)' reference. The City Council objects to the Waste Area Impact Assessment (pg. 19) making no reference to the proximity of the planned Sustainable Extension immediately adjacent to the area along the eastern boundary, as identified in the Central Lincolnshire Local Plan submission draft. Given no assessment of planned development to the east has been included, the Council object to the inclusion of C and D Recycling as a potential waste use in the development brief. The Council also object to the development brief making no reference to the direct and indirect impacts of a waste use in the context of this strategic housing and employment allocation.  |   |  |   | <p>The Planning Authority would have no objection to the proposed amendment to the site name.</p> <p>Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses.</p> <p>No changes necessary to proposed uses.</p> |
| 83                 | City of Lincoln Council |   |        |              | WA03-CL           |                                   |       |                                      | A03-Allenby Road Trading Estate (North). The City Council object to the title of this Waste Area. This area is not generally referenced as Allenby. A more suitable title would be 'East of Outer Circle Road Lincoln'. The City Council objects to the Waste Area Impact Assessment (pg. 12) making no reference to the proximity of the planned Sustainable Extension immediately adjacent to the area along the eastern boundary as identified in the Central Lincolnshire Local Plan submission draft. Given no assessment of planned development to the east has been included the Council object to the inclusion of Household Waste Recycling Centre, metal recycling/end of life vehicles and C and D Recycling as a potential waste uses in the development brief. The Council also object to the development brief making no reference to the direct and indirect impacts of a waste use in |   |  |   | <p>The Planning Authority would have no objection to the proposed amendment to the site name.</p> <p>Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on adjacent land uses.</p>   |

| Representation No. | Respondent               | Part of the Plan to which the representation relates: |        |              |                          | Whether Plan is considered to be: |       |                                      | Details why not legally compliant, unsound or fails DTC/<br>Comments of support  | Modifications proposed by respondent | Request to participate at Oral Examination | The reason given why the respondent considers it necessary to participate at the oral examination | County Council (Officer) Response  |
|--------------------|--------------------------|---|--------|--------------|--------------------------|-----------------------------------|-------|--------------------------------------|--|--------------------------------------|--|---|--|
|                    |                          | Paragraph   | Policy | Policies Map | Development Brief        | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |  |
|                    |                          |   |        |              |                          |                                   |       |                                      | the context of this strategic housing and employment allocation  |                                      |  |   |  |
| 84                 | City of Lincoln Council  |   |        |              | WA02-CL                  |                                   |       |                                      | WA02 CL West of Outer Circle Road Lincoln. The boundary currently includes areas of retail development, the City recommends the boundary is aligned with that of the Central Lincolnshire Local Plan (Submission Draft). The Council objects to Greetwell manged workspace being included in the area. The Council objects to inclusion of waste transfer as a potential use on the basis that the Waste Area Impact Assessment summary (page 12) recommends such is unsuitable. |                                      |  |   | <p>Waste Area allocations do not necessarily need to align with employment allocation boundaries. However, proposed allocation boundaries will be assessed on a case by case basis to determine if any adjustments are required .</p> <p>No change necessary to proposed uses, which are consistent with those set out in the site assessment contained in Appendix 17 of the Sites and Areas report.</p> <p>Relevant proposals that come forward on specific sites within the wider allocations will be determined on a case by case basis in line with all relevant Policies in the Plan, which will include consideration of potential impacts on traffic as identified in the Sustainability Appraisal .</p> |
| 85                 | Gladman Developments Ltd |   | SL2    | 85           | Gladman Developments Ltd |                                   |       |                                      | <p>(Excerpt from letter of response.)</p> <p>Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the LMWLP identifies land for minerals extraction and new waste facilities to meet identified capacity gaps.</p>   |                                      |  |   | Policy SL2 is consistent with the approach already established in the recently Adopted Core Strategy (June 2016), and extends the safeguarding provisions for existing mineral sites (set out in CSDMP Policy M12) so that they apply to all allocated sites.  |

| Representation No. | Respondent | Part of the Plan to which the representation relates: |        |              |                   | Whether Plan is considered to be: |       |                                      | Details why not legally compliant, unsound or fails DTC/<br>Comments of support  | Modifications proposed by respondent | Request to participate at Oral Examination | The reason given why the respondent considers it necessary to participate at the oral examination | County Council (Officer) Response  |
|--------------------|------------|---|--------|--------------|-------------------|-----------------------------------|-------|--------------------------------------|--|--------------------------------------|--|---|--|
|                    |            | Paragraph   | Policy | Policies Map | Development Brief | Legally Compliant                 | Sound | Compliant with the Duty to Cooperate |  |                                      |  |   |  |
|                    |            |   |        |              |                   |                                   |       |                                      | <p><u>Policy SL2: Safeguarding Mineral Allocations</u></p> <p>This policy states that “allocated sites, as set out in Policy SL1, including an area of 250 metres surrounding each site, will be safeguarded against development that would unnecessarily sterilise the sites or prejudice or jeopardise their use by creating incompatible land uses nearby”.</p> <p>Gladman object to Policy SL2 as it is too onerous and not in accordance with the requirements set out in the Framework. Paragraph 143 of the Framework states that in preparing Local Plans, Local Planning Authorities should set out policies to encourage the prior extraction of minerals, where practicable and feasible, if it is necessary for non-mineral development to take place.</p> <p>Whilst it is noted that the policy contains exceptions to the above these only relate to householder developments, alterations, applications for reserved matters after outline consent has been granted etc. It does not allow for a new development proposal to be brought forward which may be located in the vicinity of the buffer zone. A blanket policy that seeks to prevent the delivery of sustainable growth opportunities, where it is demonstrated that minerals will be sterilised, is therefore contrary to this guidance as an exercise should be carried out to assess whether it is practical and feasible to extract the mineral before a decision can be made on a development proposal.</p> <p>Gladman therefore question how LCC has come to the conclusion that a 250m buffer zone around all allocated and safeguarded sites is considered to be appropriate. Gladman consider that a more effective policy response would be to implement buffer zones around mineral sites and the nearest sensitive properties to be determined on a case by case basis, rather than on a more prescriptive ‘one size fits all’ approach.</p> |                                      |  |   | <p>The wider safeguarding of Mineral Resources is covered by Policy M11 of the CSDMP.</p> <p>Mineral Safeguarding provisions in the Core Strategy and Site Locations document do not imply a presumption against new development. They ensure, in line with national guidance, that due consideration is given to the need to safeguard mineral resources, and existing/allocated mineral sites.</p> <p>Accordingly, no amendments considered necessary.</p> |

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