

DEVELOPMENT OF THE PREFERRED OPTIONS FOLLOWING CONSULTATION ON THE ISSUES AND OPTIONS PAPER.

INTRODUCTION

Warwickshire County Council consulted on the Issues and Options between 28th July and 8th September 2006. 64 responses have been received; the comments have been listed in full in Appendix A. WCC have considered all the comments from the completed questionnaires and made our own comments where necessary alongside each response. In addition comments recorded from the Workshops, Forums and meetings with members of the public and operators have been assessed and incorporated where necessary. This analysis has enabled the County Council to reconsider the initial options and has guided the preparation of the Preferred Options.

NB Each section summarises the responses and pulls out the main thrust of the respondent's comments to explain how each preferred option was reached before setting out the preferred option.

The Vision (Q2)

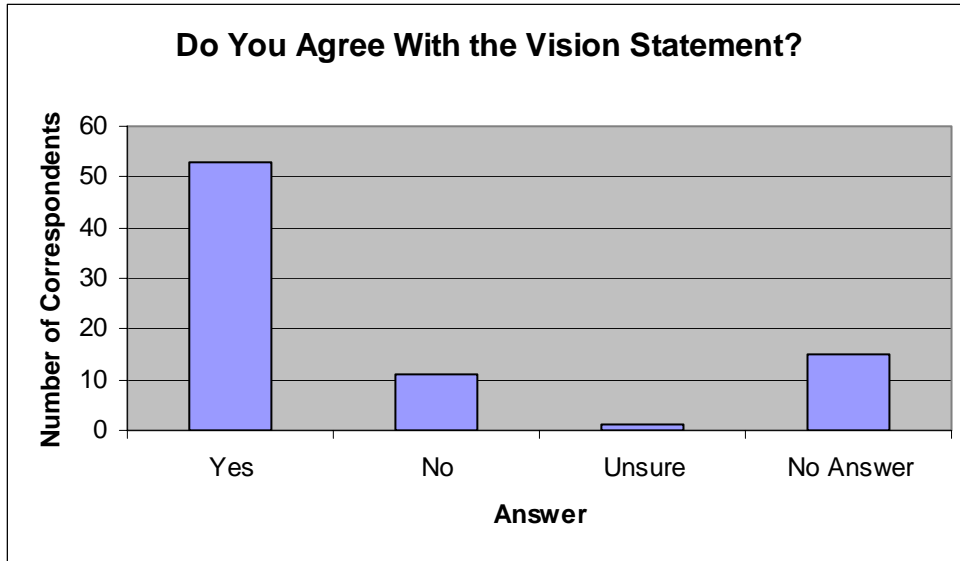
The comments can be summarised as being generally supportive of the vision. However, there was concern that more emphasis should be placed on "local" need rather than "national" need. In addition there were comments that "regional" need should be added. It was felt that the statement could be more positive in a number of areas including adding words such as "securing minerals" rather than just managing the supply; and promoting economic benefits while stressing the importance of environmental protection.

The Vision for the Minerals Development Framework at the Issues and Options stage was as follows;

"To maintain and manage the long term supply of minerals extracted from Warwickshire which serve local and national needs whilst aiming to protect and enhance the environment and promote long term community benefits"

From the questionnaire responses summarised above which have been received and the results of the SA, we have amended the Vision to;

"To secure and manage the long term sustainable supply of mineral both primary and secondary whilst serving local regional and national needs whilst conserving and enhancing the environment and promoting long term community and economic benefits."



Option	Number of Correspondents
Yes	53
No	11
Unsure	1
No Answer	15

Objectives of the Minerals LDF (Q4)

There were numerous requests to alter parts of the individual bullet points although there were not many requests to add new objectives. In terms of additional objectives requested to be added – specific issues include geology, promoting rail and other sustainable forms of transport, more encouragement to recycle materials and sterilisation by incompatible development. It is considered that recycled materials are now covered in new bullet point 2 and that alternative forms of transport are covered in new bullet point 6. Geological issues we consider to be covered under the natural and historic environment and should not be included under a separate bullet point. It was felt that we would have to include many more objectives if we looked too closely at specific issues at this stage. The sterilisation issue and safeguarding of minerals is extremely important should be included in the objectives and it has been possible to incorporate these in objective 1. It was considered that recycling should be moved up the order to number 2 to reflect the increased importance Government places on the issue.

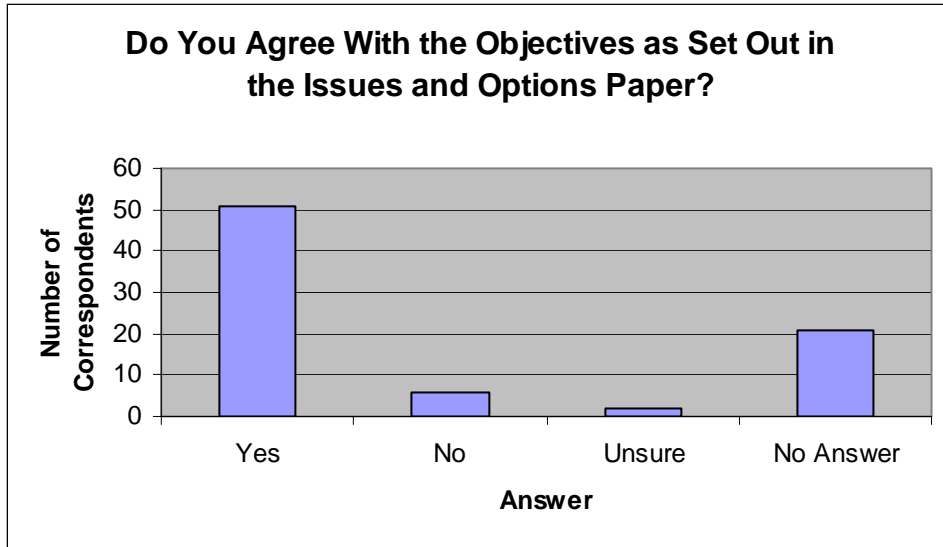
The original objectives set out in the Issues and Options were as follows:

1. To help deliver sustainable mineral extraction by promoting the prudent use and conservation of Warwickshire's natural resources.

2. *To maintain the supply of minerals required to support economic growth at the national, regional and local level.*
3. *To protect the natural and historic environment and mitigate potential adverse effects associated with mineral developments.*
4. *To have regard for the concerns and interests of local communities and protect them from unacceptable environmental effects resulting from mineral developments;*
5. *To minimise the impact of the movement of bulk materials by road on local communities and where possible encourage the use of alternative modes of transport.*
6. *To ensure mineral sites are restored to a high environmental standard once extraction has ceased.*
7. *To promote the use of secondary and alternative materials which will reduce the overall demand for primary mineral extraction.*

Following the consultation process and full consideration of the responses, the objectives have been amended to the following:

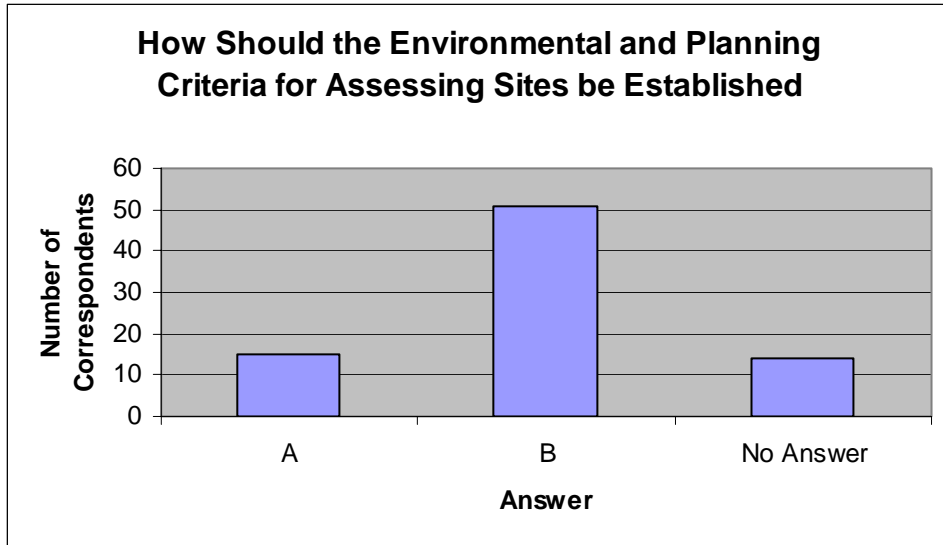
1. *To help deliver sustainable mineral **development** by promoting the prudent use and **safeguarding** of Warwickshire's mineral **resources to help prevent sterilisation.***
2. *To promote the use of secondary and alternative materials **to** reduce the overall demand for primary mineral extraction.*
3. *To **secure** the supply of minerals required to support **sustainable** economic growth at the national, **regional** and local level.*
4. *To **conserve and enhance** the natural and historic environment and mitigate potential adverse effects associated with mineral developments.*
5. *To have **full** regard for the concerns and interests of local communities and protect them from unacceptable environmental effects resulting from mineral developments;*
6. *To minimise the impact of the movement of bulk materials by road on local communities and where possible encourage the use of alternative modes of transport.*
7. *To ensure mineral sites are restored to a high **environmental** standard once extraction has ceased.*
8. ***To promote the local use of extracted or recycled materials to aid local distinctiveness and reduce transportation.***
9. ***To encourage theclimate change***



Option	Number of Correspondents
Yes	51
No	6
Unsure	2
No Answer	21

Key Issue 1: Criteria for Assessing Sites (Q5b)

The feedback from the questionnaire was that Option B was more relevant to continuing public involvement and consideration of specific issues. In addition it was more comprehensive and allowed further consultation and consideration than Option A. The Preferred Option should be rephrased. It is clear that the industry favours clear definitive policy, legislation and codes of practice ie. Option A whereas they may be possibly concerned regarding the exact nature of the consultation outlined in Option B which could make decision making more uncertain.



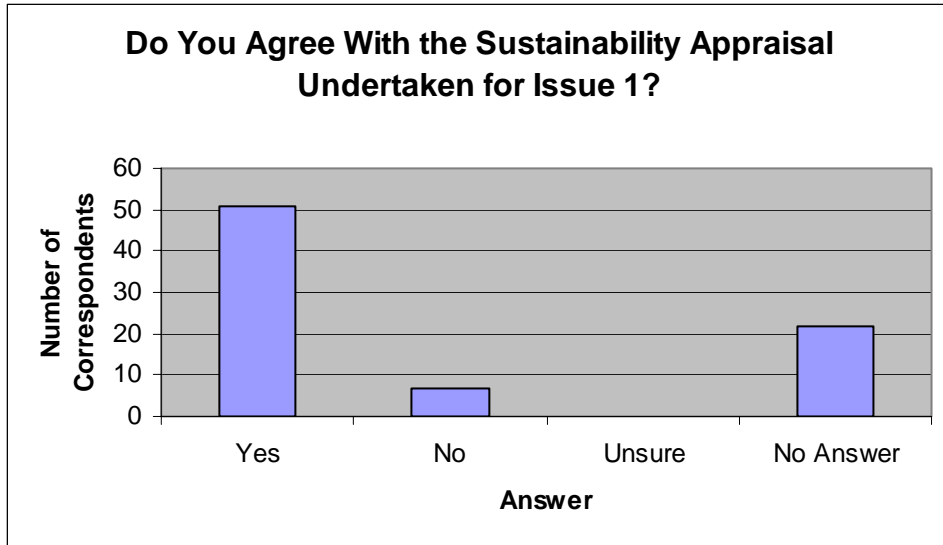
Option	Number of Correspondents
A	15
B	51
No Answer	14

Option B – Additional Considerations Policies and Constraints (Q6)

Question 6 asks for comments on what additional considerations policies and constraints could be identified. The question generated a list of issues that would be expected to be drawn out of a standard minerals planning application and indeed will be included in the new MPS1 when it is available. Certain specialists who responded obviously tend to concentrate on their particular subject area eg geology or nature conservation. However, one or two issues were consistently highlighted; impact on the transport network, community consultation, and carbon emission levels.

Sustainability Appraisal for Key Issue 1 (Q7b)

Generally comments supported the Sustainability Appraisal results and said that it was fair and accurate assessment. Some of the respondents concluded that the process was quite a crude appraisal because there are so many different assumptions and development scenarios that it is quite possible to generate a variety of SA outcomes. The SA therefore should be robust enough to embrace a variety of scenarios. **The Highways Agency has requested that a new criterion is added for transport impact...**One area where the SA has been criticised is the relationship between minerals and waste which has not been brought out fully. This is one area where the appraisal method should be reassessed.

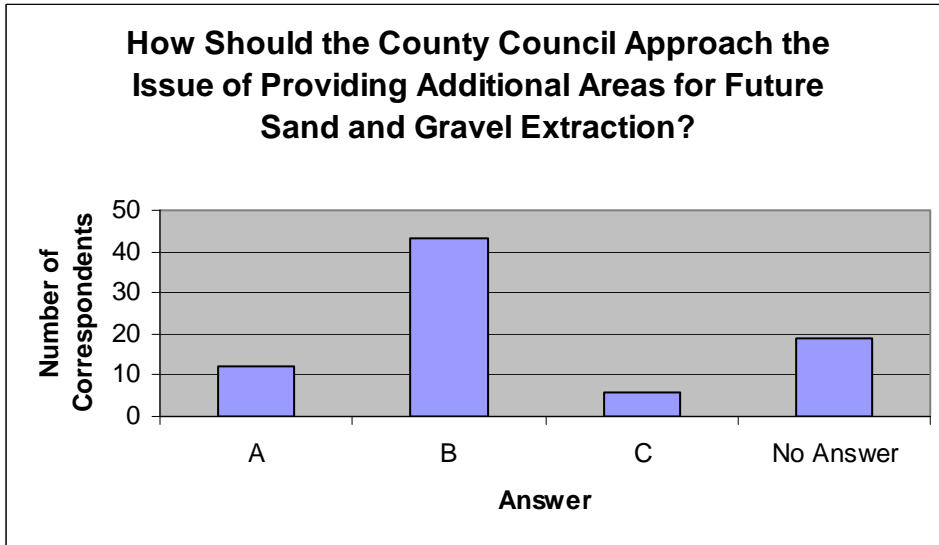


Option	Number of Correspondents
Yes	51
No	7
Unsure	0
No Answer	22

Key Issue 2: Sand and Gravel Extraction (Q8b)

It was considered important that minerals deposits were not sterilised by other forms of development and for this reason Option B would allow greater protection than just putting forward Areas of Search. If Option C were chosen, given the likely future development pressures based on the household projection figures outlined in the Regional Spatial Strategy, many deposits could be left without protection and lost for the future. In addition given the future likely growth pressures as identified in the RSS, this is exactly the time that we should be safeguarding deposits to cater for increased demand for aggregates above the RAWP figures if necessary. This approach would also allow flexibility for when developments are approved but would enable minerals to be worked prior to the developments taking place. This approach is also the one which is advocated in MPG1 Annex A as some respondents have stated.

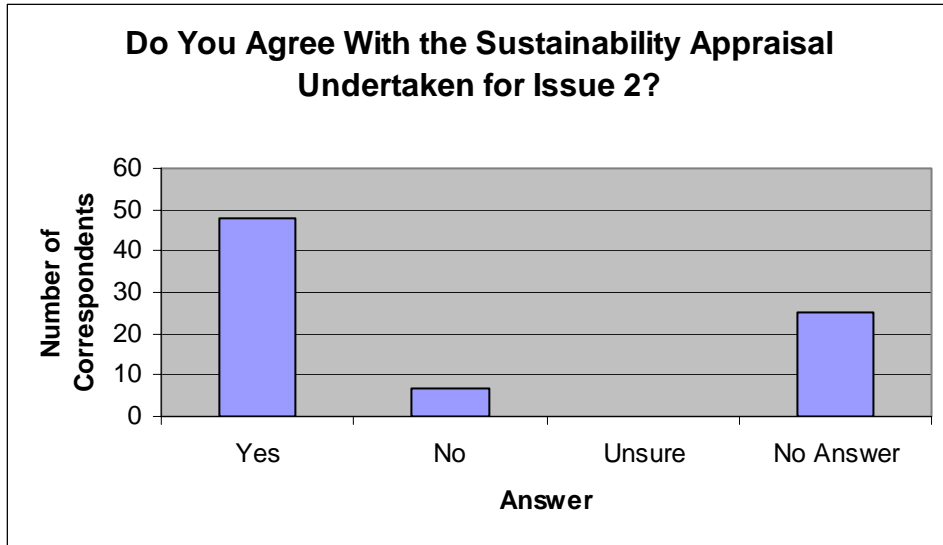
It was felt that in Areas of Search, it should be stressed there was no presumption for development unless a rigorous assessment had been made for a particular site and that the application complied fully with all relevant local and national policy and that it accorded with all material considerations.



Option	Number of Correspondents
A	12
B	43
C	6
No Answer	19

Sustainability Appraisal for Key Issue 2 (Q9b)

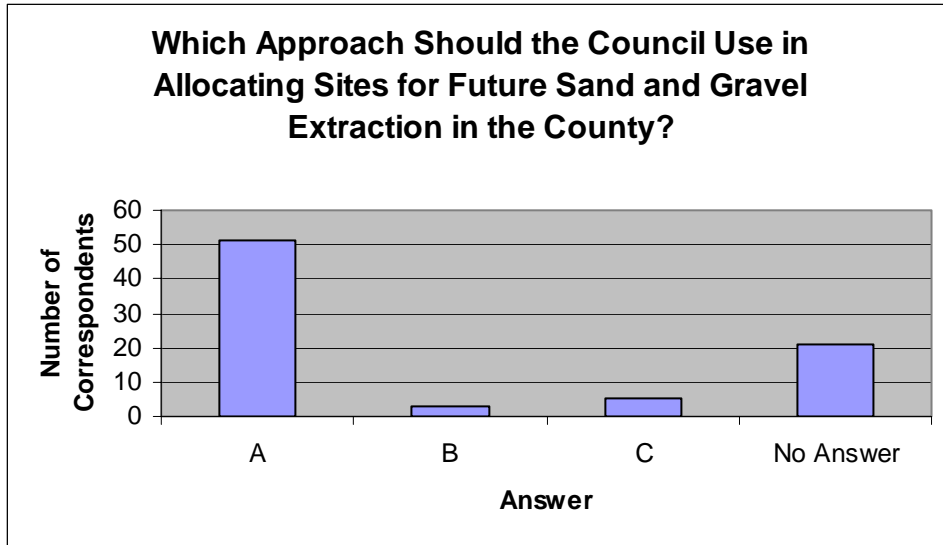
The SA appears to have been well received for this issue. General comments on the SA are generally the same as for other issues and need not be repeated. The consensus was that Options A and B were plan led; non-industry responses were happy with this approach stating that Option C was perhaps too developer led but more flexible. More analysis of the short term effects on biodiversity and the historic environment was raised as a concern.



Option	Number of Correspondents
Yes	48
No	7
Unsure	0
No Answer	25

Key Issue 3: Planning Location for sand and Gravel Extraction in Warwickshire (10b)

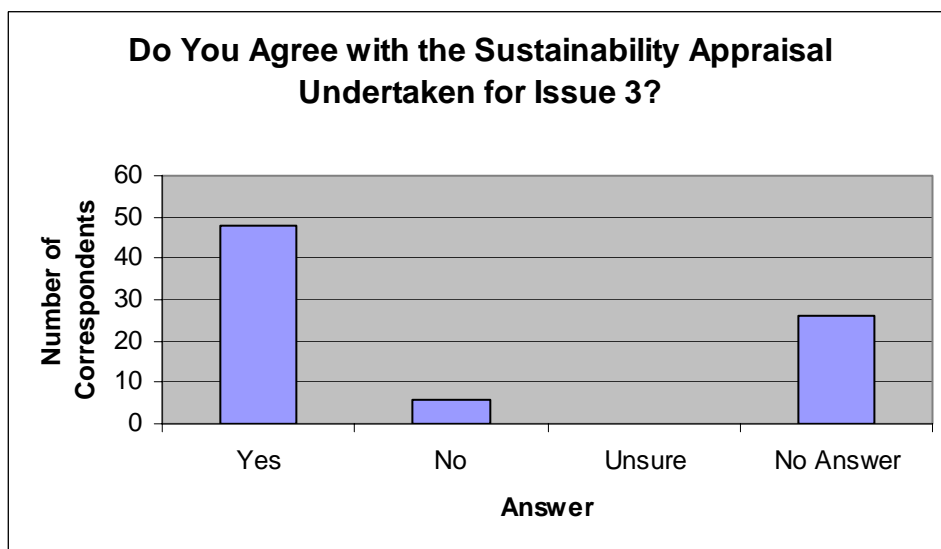
Option A was generally considered to be the best option but if demand could not be met then Option B could be used. Option A assumes that there are enough reserves available in existing operations; but at the same time they might not have been through such a rigorous site selection as would be required for new operations. Option A would probably have less environmental impact on the countryside and would not blight other communities with the threat of development but there are obvious concerns that some local communities close to existing sites would be accepting any adverse impacts for a longer period of time. There is concern about the companies leaving sites dormant; it has been suggested that these companies are penalised by refusing future planning applications. However in practice this is unworkable providing the company is not in breach of its conditions. Whichever option is chosen best available practice should be used to maximise mineral recovery.



Option	Number of Correspondents
A	51
B	3
C	5
No Answer	21

Sustainability Appraisal for Key Issue 3 (Q11b)

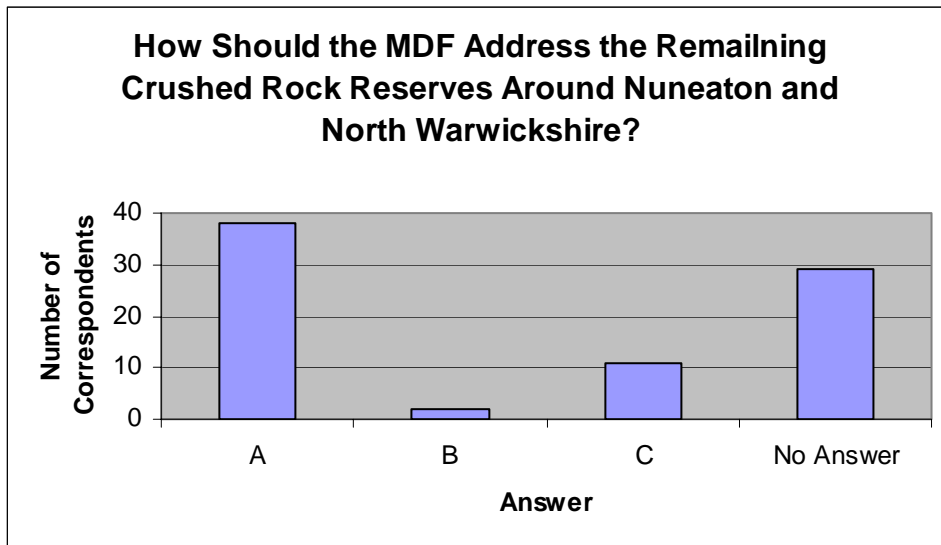
The respondents generally appeared to suggest that Option A appears to be the most sustainable option. The relationship of waste and minerals is again questioned, and recycling, if part of the minerals operation, could be a more sustainable option than a site without a recycling element. Option A would be likely to be able to make use of existing infrastructure and therefore would be more sustainable in most, but not all, cases.



Option	Number of Correspondents
Yes	48
No	6
Unsure	0
No Answer	26

Key Issue 4: Crushed Rock Production (Q12b)

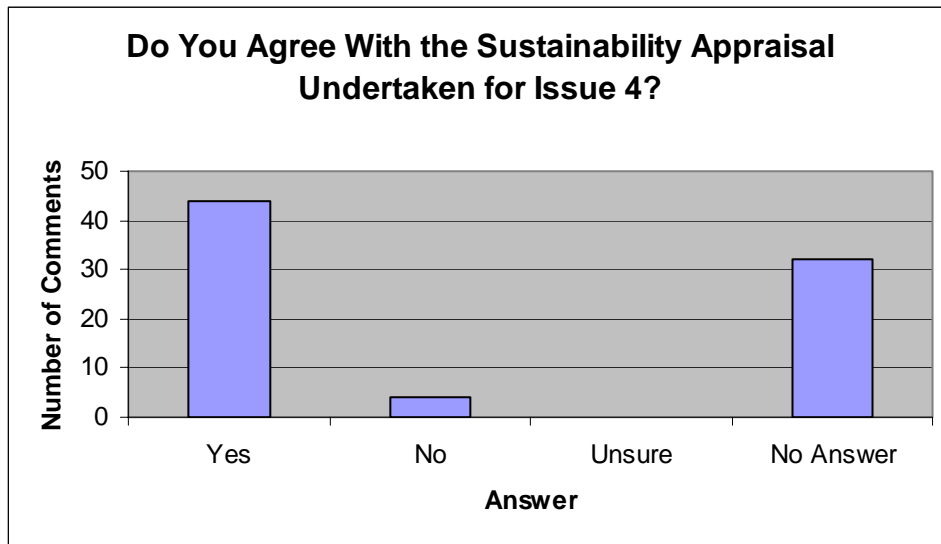
A broad analysis of the responses reveals that a combination of Option A (to allocate) and Option B to safeguard would be the most appropriate way to proceed to the Preferred Option. At the same time some benefits have been identified with Option C which it is considered would allow for a wider consideration of the alternatives. The benefits of allocation of sites include greater certainty of development for both the industry and local communities. In what are relatively small areas where deposits are found; mainly in the north of the county. It was also felt that if new geological information comes forward in respect of crushed rock that deposits should be safeguarded from sterilisation. The importance of further consultation prior to site allocation is considered important by several respondents and that there should be a presumption against development in safeguarded areas where there has not been full site assessment.



Option	Number of Correspondents
A	38
B	2
C	11
No Answer	29

Sustainability Appraisal for Key Issue 4

The majority of the respondents agree with the results of the SA which favoured Option A but also saw benefits within both Options B and C. The Sa supports the delivery of certainty and for this reason Option A performs slightly better than the other options.

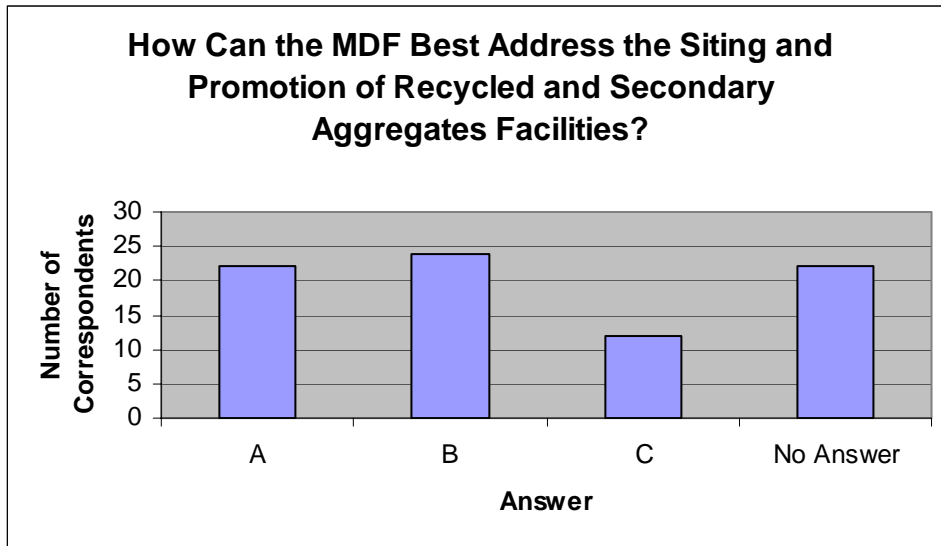


Option	Number of Correspondents
Yes	44
No	4
Unsure	0
No Answer	32

Key Issue 5: Secondary and Recycled Aggregates (Q14a)

The main conclusion to be drawn out of the responses is that steering development to existing quarries (Option A) may have less environmental impact on the ground, but may be less sustainable in terms of transportation of materials through rural areas. It was noted that existing quarries have greater experience and know how of how to deal with secondary aggregate waste. Similarly Option B might be more sustainable because recycled waste could be dealt with close to where it is produced (mainly demolition sites in the urban areas) but could create problems in urban areas through the production of dust, noise and loss of other amenity to local communities. There is also support for Option C as well as the other options. Although less structured in terms of location, than the other options, provides more flexibility; it has been pointed out that there is no particular stereotype for recycled waste sites from the construction industry and that sources of material arising from recycling are rarely controlled by

primary aggregate producers. Therefore, what has been brought out the consultation is a consensus that there should be variety of locations for waste recycling which depend locational factors and individual site characteristics are more important than specifying a particular type of site. These should be close to centres of population where they will have least environmental impact.



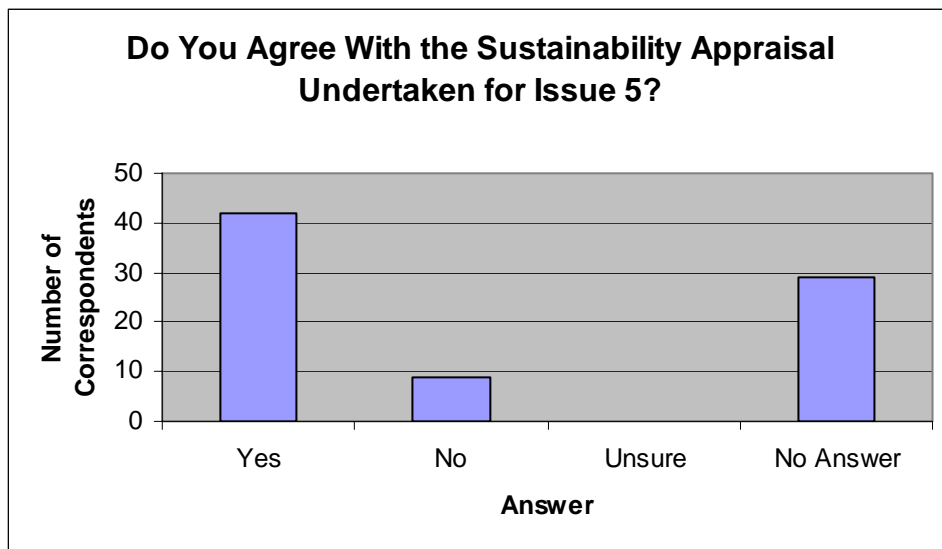
Option	Number of Correspondents
A	22
B	24
C	12
No Answer	22

Sustainability Appraisal for Key Issue 5

There is general agreement with the outcome of the SA with a few exceptions. This supports a mixture of Option A and Option B.

In respect of Issue 16 there was a query as to why Option B would allow more time to recycle aggregates? It was assumed that Options A and B would form the basis of allocated sites as they specify types of location, whereas Option C would rely be more developer led. In overall timescales the developer led approach could leave much less time to assess a site so that it would leave little time to plan for innovative environmental technologies than the other options. Given the timescale of plan production and approval of site allocations prior to applications coming forward this could leave a lot longer for new technologies to come forward.

There was also a query regarding why Option A would protect the environment and historic environment better than Option B. Admittedly, this would be easier to assess at site allocation stage. However it is assumed that a recycling operation would be built on an existing quarry. In which case the environmental safeguards would be up and running and the operation would be built on previously disturbed land. A site in an urban area could have issues regarding the environment and the historic environment that may have not been assessed as well as a quarry application. This issue may be one instance where the SA requires more site specific information to be able to make an adequate assessment.

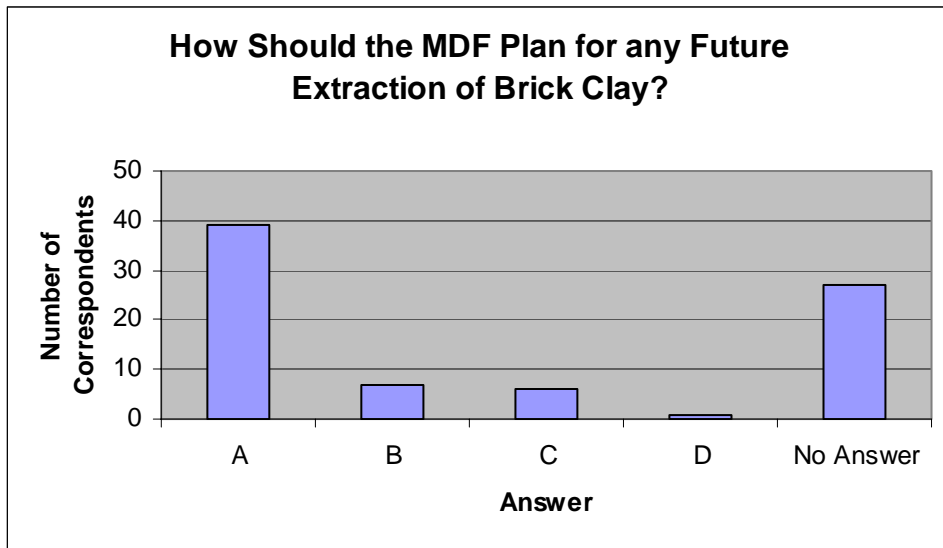


Option	Number of Correspondents
Yes	42
No	9
Unsure	0
No Answer	29

Key Issue 6: Brick Clay (Q16a)

As with other issues the allocation of sites (Option A) and a plan led approach rather than developer led, would guarantee greater certainty and prevent areas being blighted. Respondents saw merit in Options A, B, and C with a view that a mixture of all three options could make up the Preferred Option although Option C was seen by some as being too broad brush with some respondents saying that it was necessary to protect large areas because no-one is sure where all the deposits are, whereas another response suggested that only allocated sites should be used, which are economically viable. If Option A was chosen as the preferred option, respondents were concerned that full consultation was carried out and that full assessment of the impacts are considered prior to any applications

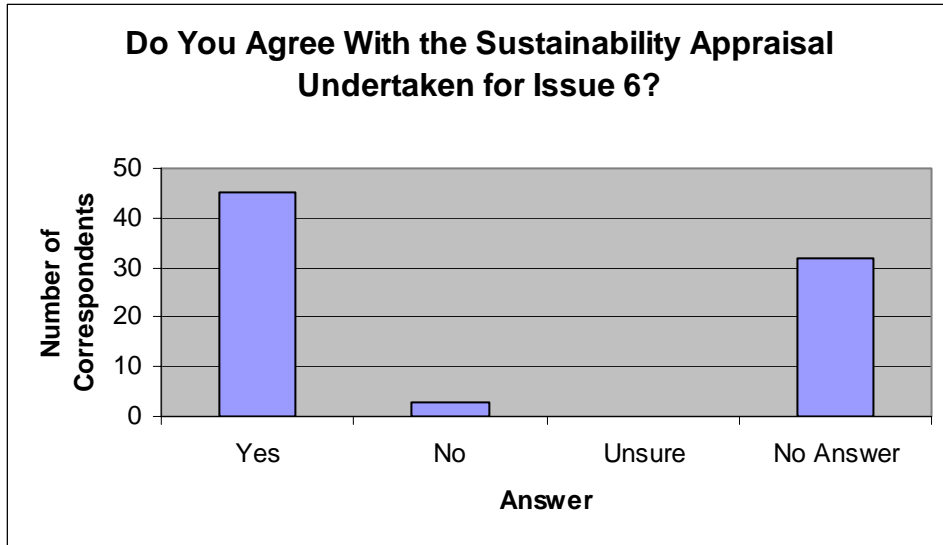
being submitted. In addition there should be some provision for new sites not identified in any of the areas at present.



Option	Number of Correspondents
A	39
B	7
C	6
D	1
No Answer	27

Sustainability Appraisal for Key Issue 6

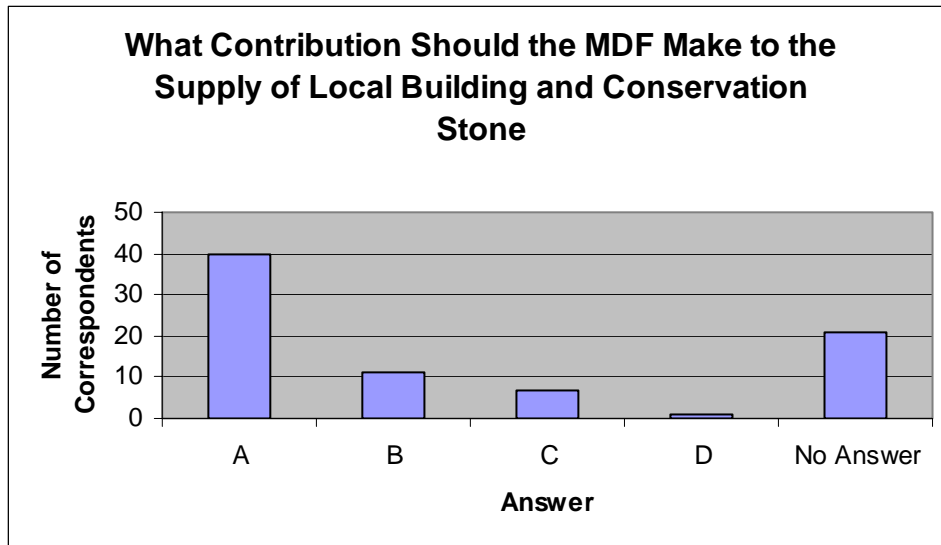
Again the results of the SA showed it to be quite well supported; again with a few minor queries. One response queried whether Option A would be the best option in terms of safeguarding reserves and another suggested that Options B or C should be identified as having a greater effect on enfranchising the community. Many of the comments on the SA are repeated or are just general comments on the whole procedure.



Option	Number of Correspondents
Yes	45
No	3
Unsure	0
No Answer	32

Key Issue 7: Building Stone (Q18a)

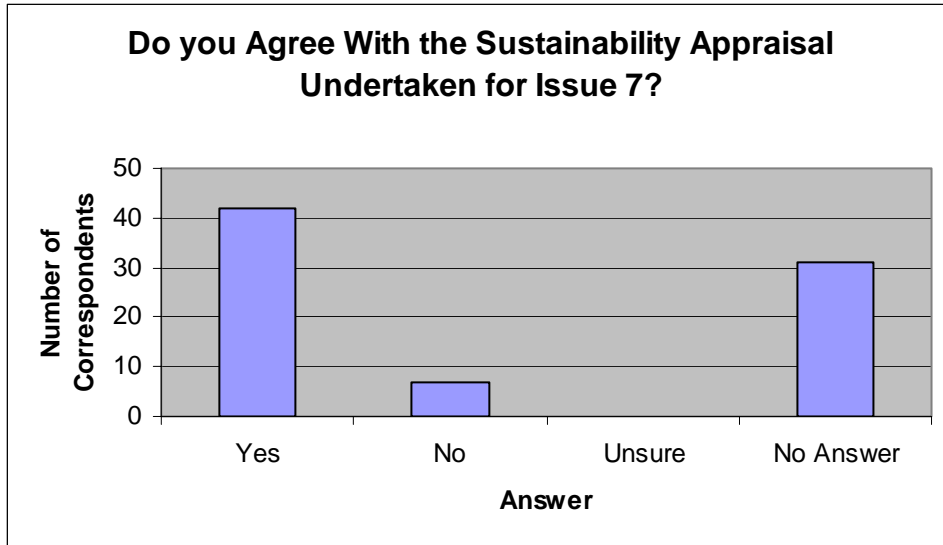
It is recognised in the responses that local building stone is important for the conservation and restoration of our built heritage and therefore Option D is discounted. It is recognised that the types of quarry operation connected with building stone is likely to be small scale and may often be for shorter periods such as for the period of a building restoration project. Similar issues were raised as with other minerals; ie that generally respondents liked the idea of allocating preferred areas because it provided greater certainty, while at the same time it was considered important to safeguard wider areas from sterilisation without at the same time blighting areas from any future development. A mixture of some of the options was considered feasible with Option A gaining most support and Option C being well supported for its protective function. There is a concern that quarrying of local stone is more likely to take place in some of the more picturesque areas such as the Cotswolds AONB and that such development should be resisted unless it is small scale and there is strong control to protect the character and appearance of the area.



Option	Number of Correspondents
A	40
B	11
C	7
D	1
No Answer	21

Sustainability Appraisal for Key Issue 7

The SA is generally supported. Particular issues or concerns arising from the building stone SA is that consideration should be given to the amount of overburden that has to be removed in order to reach the stone. There were comments that the SA gives insufficient information and that the SA is irrelevant because there are so few differences between the different options. This approach has however been taken with all the individual minerals and appears to have been well supported in the majority of responses. In addition one respondent said that the waste hierarchy is relevant in this instance in terms of recycling and re-use opportunities. Also the short term effects upon biodiversity and the historic environment need further consideration.

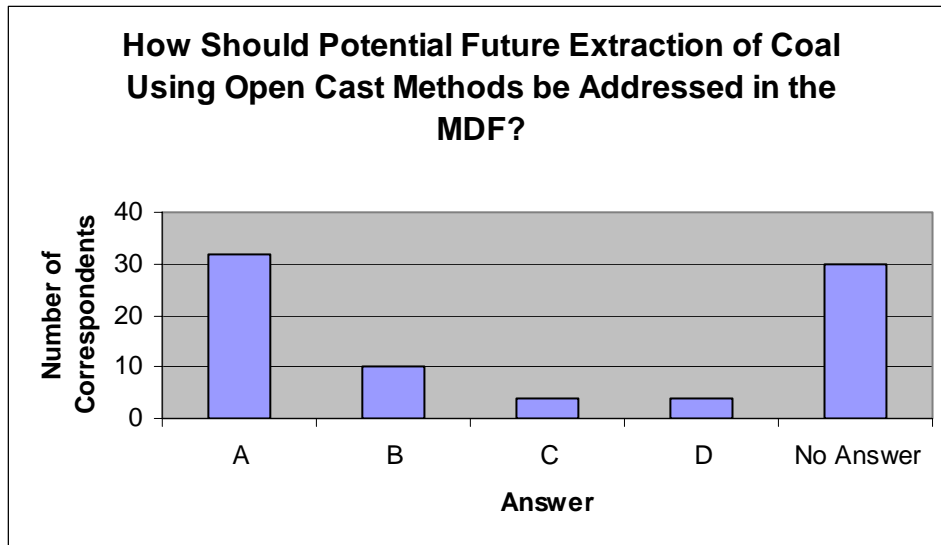


Option	Number of Correspondents
Yes	42
No	7
Unsure	0
No Answer	31

Key Issue 8: Opencast Coal (Q20)

Responses to this issue were fairly divided along several lines. Some responses stated that areas of preferred extraction as outlined in Option A would provide the mechanism to allow for areas to be prioritised while at the same time allowing time for further survey and technical work which would benefit biodiversity and geology and the historic environment. In one case Option D was chosen on the basis that the Options seemed to be pushing open cast to the north of the county rather than the south. However the coal in the south of the county can only be extracted by deep mining and therefore these comments would be more relevant to Issue 9 (Deep mining).

Several responses stated that open cast mining should not take place in any form in the county as the production of energy from fossil fuels will lead to the increase in greenhouse gas emissions and at the same time would have an adverse environmental impact especially on sensitive landscapes. There was some support for safeguarding coal reserves for the future.



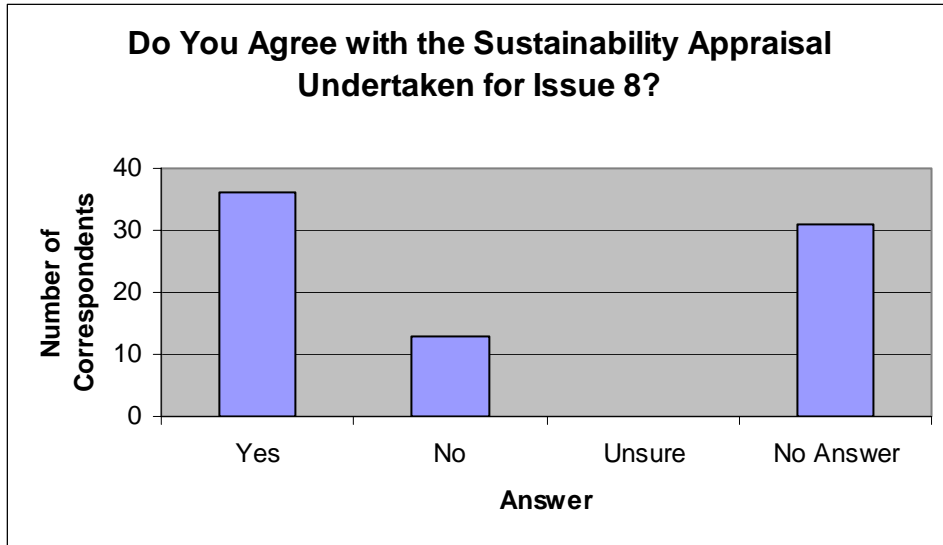
Option	Number of Correspondents
A	32
B	10
C	4
D	4
No Answer	30

Sustainability Appraisal for Key Issue 8

Again the SA was generally accepted. Respondents in some cases were concerned that the SA was possibly too biased towards the certainty of development. A comment was made that there was no reference to carbon emissions and that coal utilisation for energy production could not be considered sustainable in the first place.

Concern was expressed that coal deposits are thin in many areas and may not be cost effective to extract. However it is considered that this would be for the industry to decide and the County Council's function is to put the framework in place for developers to use if they consider a scheme cost effective, subject to environmental assessment.

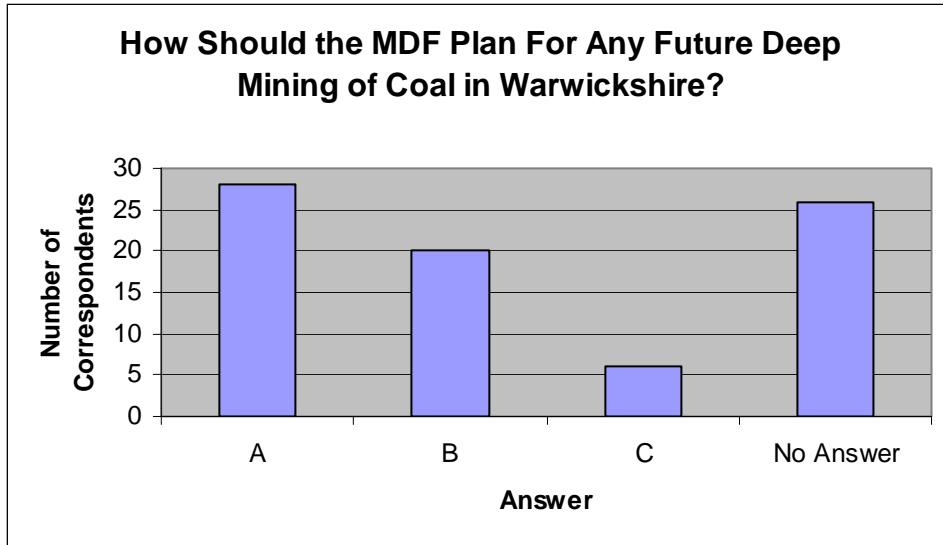
The outcome of Option D is criticised for stating that it would allow less time for focussing on new objectives. It was assumed that Options A, B and C would form the basis of identified areas in the plan as they are specific locations, whereas Option D would rely be more developer led. In overall timescales the developer led approach could leave much less time to assess a site so that it would leave little time to plan for innovative environmental technologies than the other options. Given the timescale of plan production and approval of site allocations prior to applications coming forward this could leave a lot longer for new technologies to come forward.



Option	Number of Correspondents
Yes	36
No	13
Unsure	0
No Answer	31

Key Issue 9: Deep Mining of Coal (Q22)

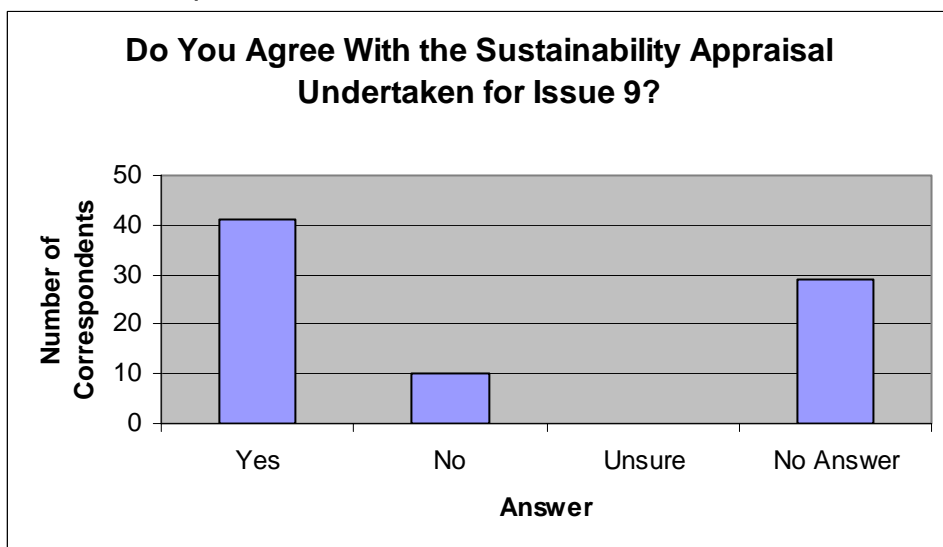
Several responses refer specifically to Daw Mill and any possible extensions connected to that site. In one case the response suggests that Daw Mill should form the basis of a separate development option. This approach might not be appropriate at the core strategy stage. Again some respondents have raised the concern that fossil fuels should not be used for energy production. There was not a great deal of support for Option C as a developer led approach was not considered to be satisfactory. Options A by examining sites through the plan process was considered to ensure that all sectors of the community and the development industry would be able to engage better and longer with the local community.



Option	Number of Correspondents
A	28
B	20
C	6
No Answer	26

Sustainability Appraisal for Key Issue 9

There are not many issues which have been disputed in the SA which again is considered to be satisfactory overall. There is agreement that the assessment ratings have been carried out correctly, but the summary does not reflect that Option A has been assessed as more sustainable than Option B. The relationship with waste must be properly explored in this issue for the preferred options stage. In addition there is a comment that states Option A offers no more certainty than specific policies following selection of Option B.

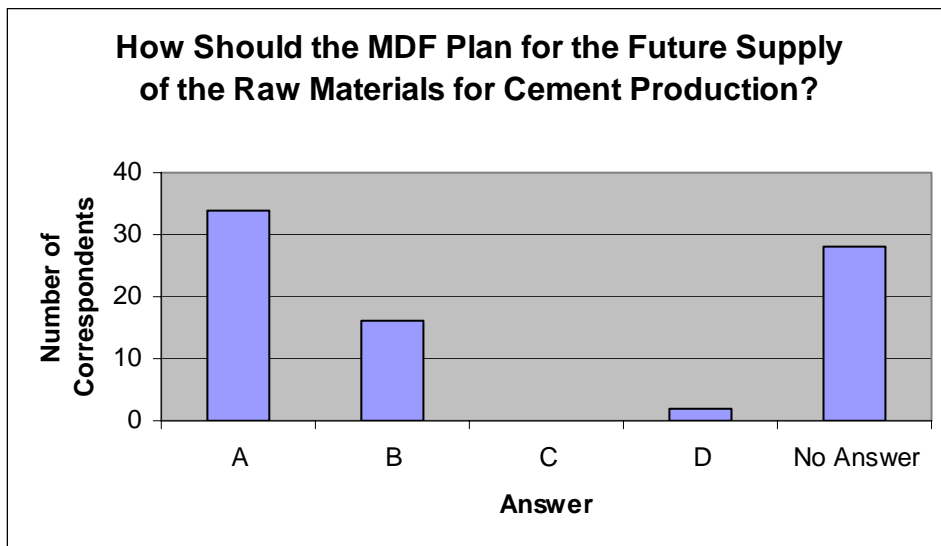


Option	Number of Correspondents
Yes	41
No	10
Unsure	0
No Answer	29

Key Issue 10 – Future Supply of Raw Materials for Cement (Q24)

In general a plan led approach and in particular Option A was well supported but it was considered that Option B also had some value to be used in conjunction with option A, as the two were not mutually exclusive. Safeguarding resources was considered the most vital component and hence the knock on implications of safeguarding employment. Also it had greater clarity on the location of development. Some respondents requested that Areas of Potential Extractions were included as that sounded more positive than safeguarding. Longer timescales in the plan process were considered to be more beneficial to the consideration of biodiversity, geology and the historic environment. However the short term effects of these issues require greater consideration.

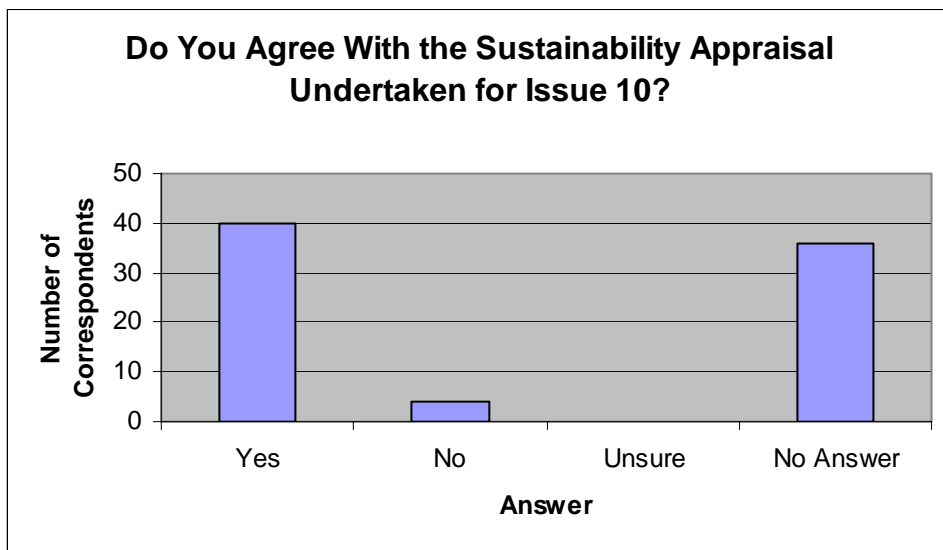
Other specific points included that fact that there is no reference to the chalk component in terms of its long term supply. Biodiversity should be a key issue in the Southam area as the Lias quarries support a unique habitat and fossil sites.



Option	Number of Correspondents
A	34
B	16
C	0
D	2
No Answer	28

Sustainability Appraisal for Key Issue 10

Option A appeared to offer greater benefits than the other options in terms of the Sustainability Appraisal. The comments were broadly in agreement with the SA assessment. Option A offered greater certainty of development and as such would enable achieve greater protection of the environment. Concerns were raised about the possibility that safeguarding could condemn areas to permanent dereliction if no development took place and obviously the land was in a poor condition initially. In addition one respondent requested that existing quarries which have not been adequately restored were restored fully to recreational uses.



Option	Number of Correspondents
Yes	40
No	4
Unsure	0
No Answer	36

Development of the Preferred Option

The issue needs to be considered in the light of the situation that there is a high landbank in the county of the raw materials for cement production. For this reason allocation of sites is not necessary as further allocation would

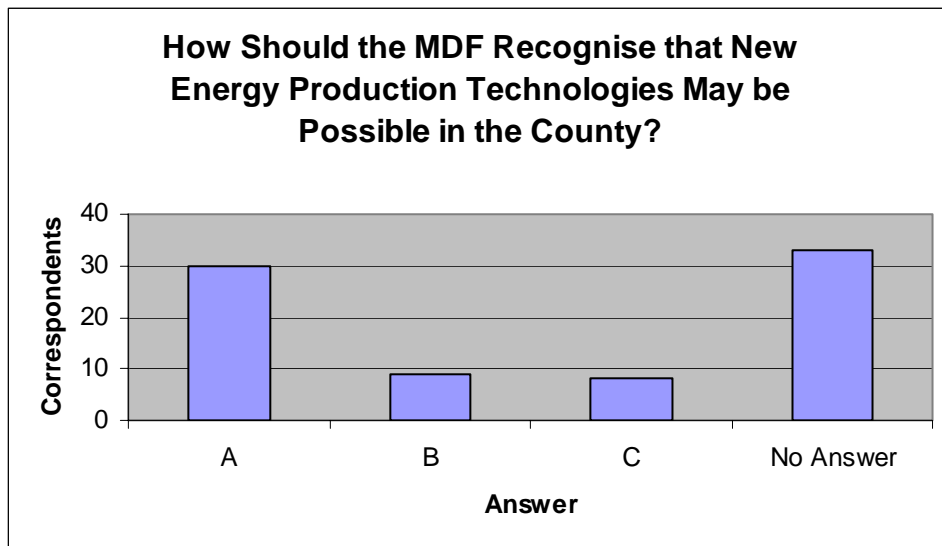
only cause disruption and uncertainty for more communities and could lead to blighting over a long period of time. Therefore we are moving towards a preferred option which seeks to designate minerals safeguard areas where there are known deposits and where sites are likely to come forward.

Nb – if there is a massive landbank – how will sites come forward?

Key Issue 11: Onshore Oil, Gas Geothermal Potential

The responses tended to agree that full consultation on new proposals was essential, especially in respect of this issue because the future technologies were difficult to predict and, therefore, comment on in this instance. For this reason and because of the nature of the type of developmental respondents understood that it would be difficult to define particular areas or sites (as in Option A) but that by producing policies only, would allow flexibility. Therefore Option C was considered to be possibly the most practical in the short term while further research was carried out in to this area. Some comments also preferred option B as being more realistic than option A and the route for unknown technology.

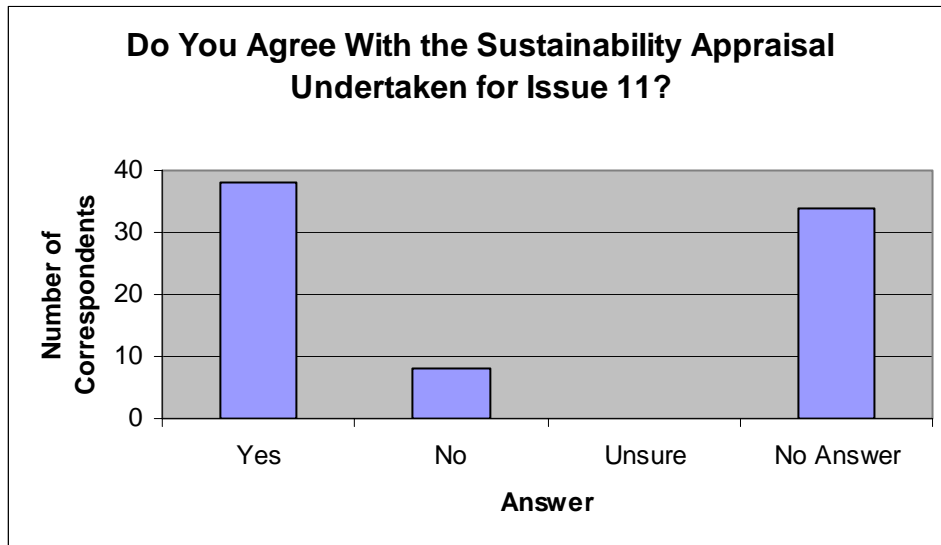
Respondents said that in practice gas and oil are probably not commercially viable but geothermal energy in particular would be a sustainable form of energy and the MDF should seek to create the conditions whereby such areas could be identified. Some respondents pointed were concerned that fossil fuels were not a sustainable form of energy and that perhaps the geothermal element of the issue could have been dealt with separately.



Option	Number of Correspondents
A	30
B	9
C	8
No Answer	33

Sustainability Appraisal for Key Issue 11

The SA was considered satisfactory as far as it went, because there is so much uncertainty in this subject area. Option A came out top in the original assessment just ahead of Option B. From the responses in one case option C was seen as possibly the most practical in the short term while further research was carried out in to this area. However, option B had support too because it could allow for innovation in rapidly advancing low carbon technologies.

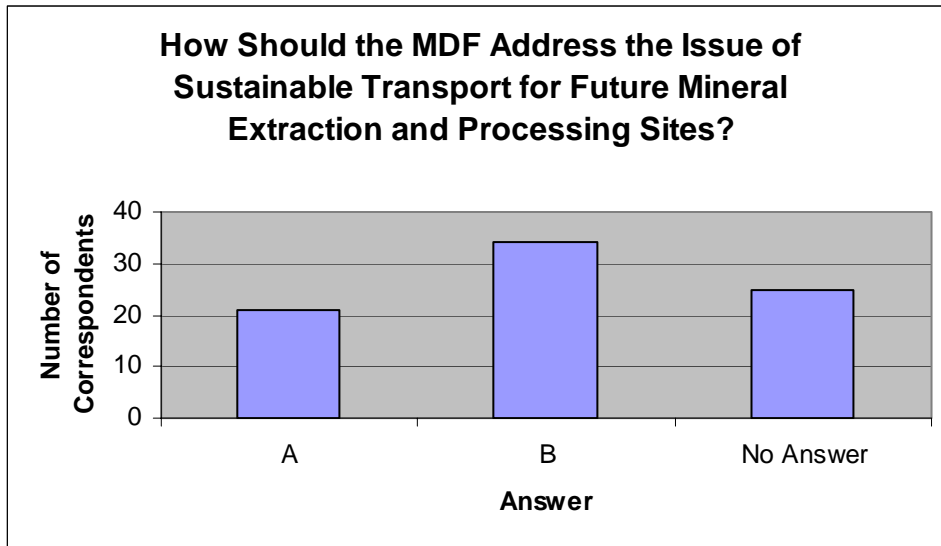


Option	Number of Correspondents
Yes	38
No	8
Unsure	0
No Answer	34

Key Issue 12 Transport (Q28b)

A broad consensus saw that there was merit both in Option A and Option B. Therefore many respondents felt that there should be a third option which is a mixture of Option A and B. Option A (concentration of mineral developments close to the principal road network) was considered to be the most pragmatic option while Option B was inevitably more sustainable in terms of reducing carbon emissions but in real terms difficult to implement on the ground unless a site was close to existing facilities. Underground pipelines were also mentioned as another way of transporting certain minerals which would have little environmental impact. Respondents have also differentiated between canals and waterways from rail which is seen as more realistic for implementation purposes.

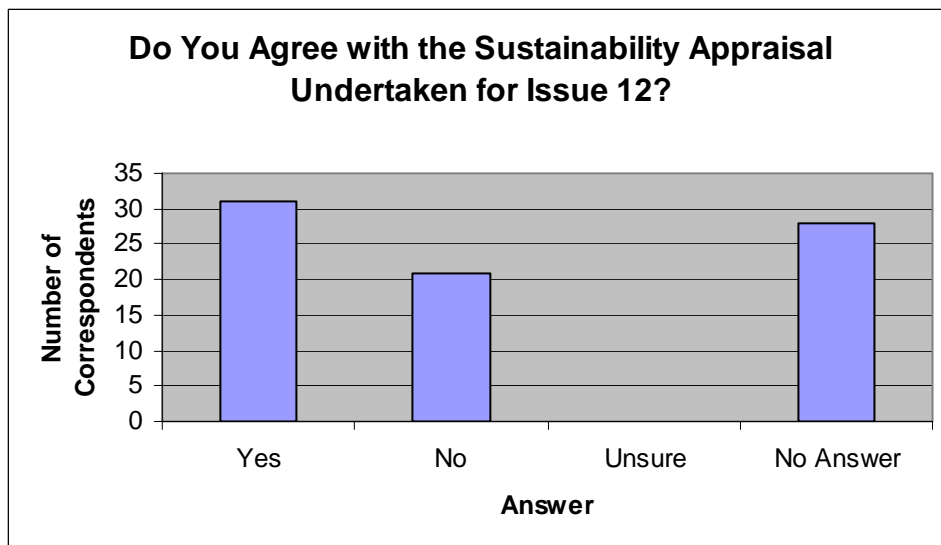
Specific concerns include the fact that by reopening disused railways there can be a loss of biodiversity in the long term. Comments were made about traffic and especially HGV's on country roads which was obviously not desirable and which both options could help to alleviate. Finally there were some comments that stated that functions should be combined on the same site, but although good in principle, products would still have to be transported at the end of the day.



Option	Number of Correspondents
A	21
B	34
No Answer	25

Sustainability Appraisal for Key Issue 12

One comment said that they did not agree with the SA for objective 5 as it identifies the short term impact of new infrastructure under Option A but not the long term impact on the natural and built environment of increased road traffic and reduced tranquillity. Option A came out on top in terms of the initial SA work although Option B was also positive. Many of the particular assessments had a neutral score because there were a lot of variables which could be better assessed at the site allocation stage.

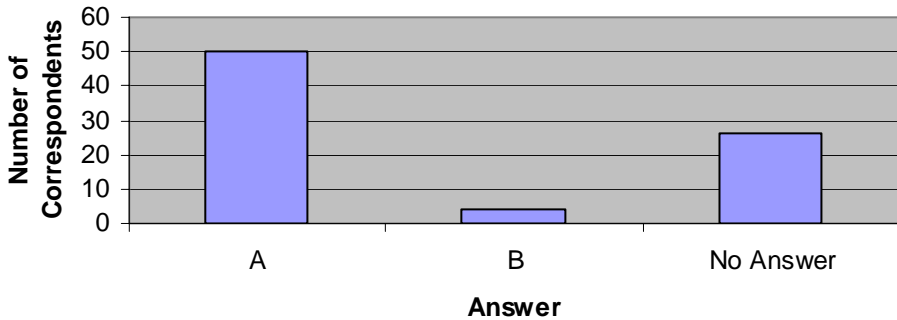


Option	Number of Correspondents
Yes	31
No	21
Unsure	0
No Answer	28

Key Issue 13 Safeguard of Railheads (Q30b)

Option A would appear to have the most support of the two options because rail transport is seen as being more environmentally friendly than road and can help the reduction of carbon emissions by ensuring vehicles don't have to use the road system. It has been pointed out that the safeguarding of railheads is the most flexible option and is also in line with MPS1. Certain comments go further suggesting that not just the rail lines are preserved from development but that the whole routes or corridors of former lines are saved for the future. It was considered by some respondents that there could be associated benefits for future regeneration of the wider rail network for waste heavy goods and public transport as well as minerals. One suggestion was also to include the safeguarding of waterway wharves. Finally it was also stated that the option should have been expanded to include existing railheads as well as potential ones and that the safeguarding of railheads is the function of the county council not the district councils. The actual location of possible railheads should have been identified and set out or at least described.

How Should WCC Deal with the Issue of Safeguarding Railheads for the Transportation of Minerals?

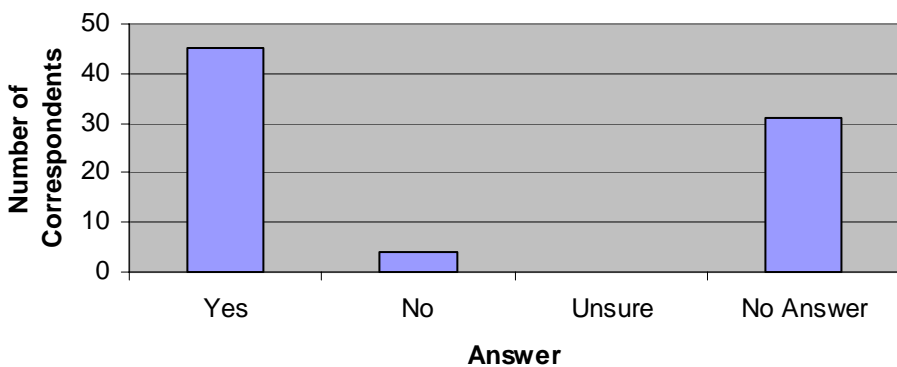


Option	Number of Correspondents
A	50
B	4
No Answer	26

Sustainability Appraisal for Key Issue 13

There is general support for the analysis which points to Option A as scoring slightly better than Option B. One or two respondents felt that the SA should have brought out in more fully that Option A was much more sustainable than Option B eg it could have scored more highly for heritage by showing that taking heavy lorries off the road would benefit the historic character of towns. The SA confirms people's general attitude that more needs to be done to encourage use of alternative means of transport to the road transport in whatever form.

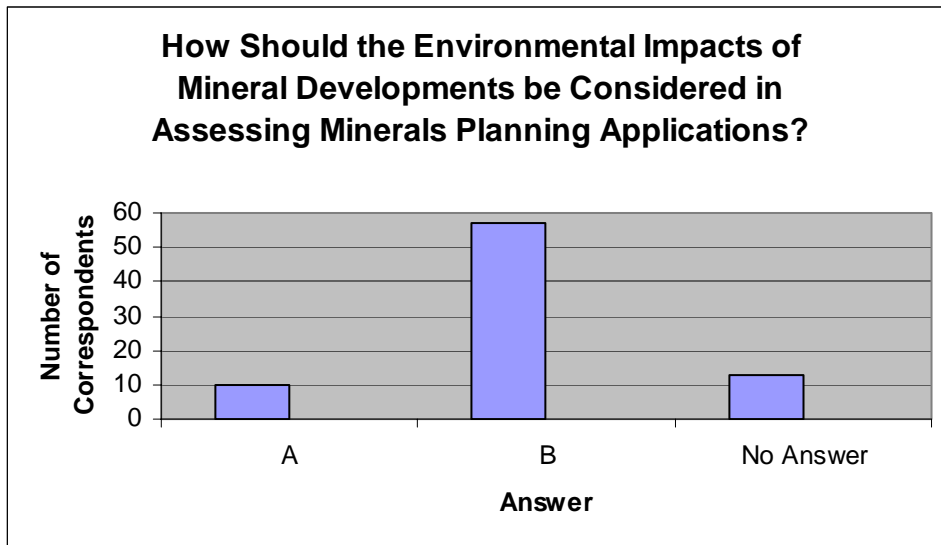
Do You Agree With the Sustainability Appraisal Undertaken for Issue 13?



Option	Number of Correspondents
Yes	45
No	4
Unsure	0
No Answer	31

Key Issue 14 Mitigation (Q32a)

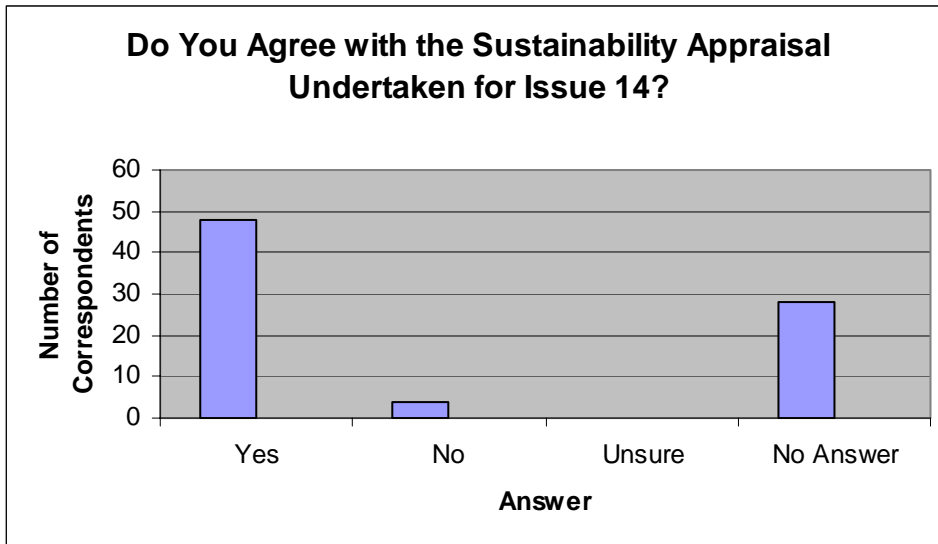
Option B was considered to have covered both the local and national perspective in terms of environmental assessment of sites in accordance with national policy and policies in respect of locally identified issues which would provide flexibility which are more specific than (Option A- the guidance in Minerals planning statements). It was considered that each minerals site has different issues and different mitigation factors would be necessary for them and therefore Option B provided that flexibility. As such a detailed policy could be more enforceable. At the same time one respondent has pointed out that local requirements should not go over and above national planning guidance eg in terms of the County Council setting its own limits on noise dust and blasting. However this was not For this reason in one or two instances option A was chosen above option B. From a biodiversity standpoint there was concern that mitigation should be used only as a last resort because it usually meant that a habitat had been lost in that instance. Mitigation therefore should not be seen as a means by developers of despoiling an area without first seeing if there are other options other than mitigation. The overall conclusion, despite some concerns about over protection by the industry, was that local environmental issues such as biodiversity, landscape character and geological issues would be better assessed under option B.



Option	Number of Correspondents
A	10
B	57
No Answer	13

Sustainability Appraisal for Key Issue 14

Because of a printing error on the questionnaire, there was only one space for the key issue comment and the answer the SA comment. Most respondents therefore used the space to comment on the issue rather than the SA. However most respondents broadly agreed with the SA results. Option B scored more highly than Option A. This reinforced people's opinions that national policy should form the basis of the plan but that consideration of local environmental impact issues should be at the forefront of any assessment of minerals planning applications.

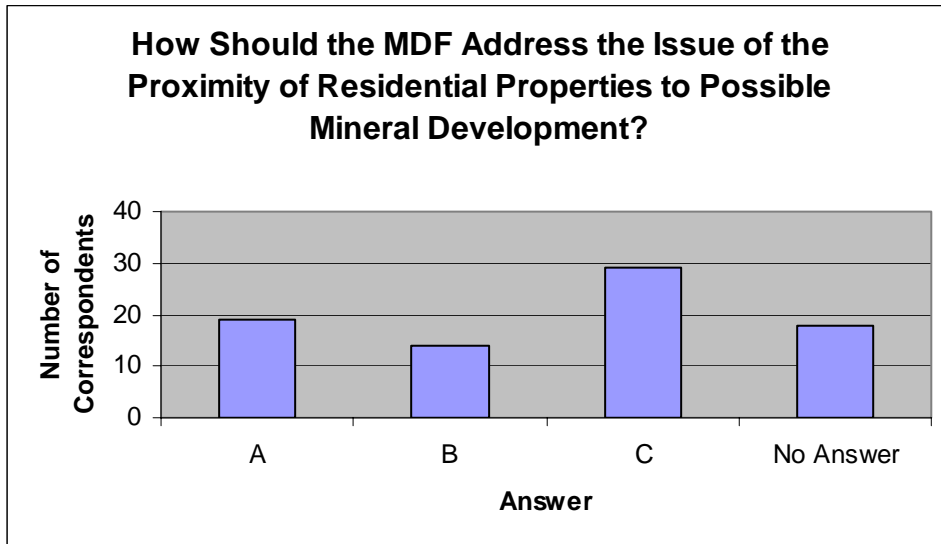


Option	Number of Correspondents
Yes	48
No	4
Unsure	0
No Answer	28

Key Issue 15 Buffer Zones (Q34b)

There was support for Option B as it applies flexibility to individual situations where for instance a distance of 200m might be deemed inappropriate due to the existing terrain which might make development within 200m possible or a distance greater than 200m necessary in some cases. Option C with a stipulation that the minimum distance should be 200m was also mooted several times. This would afford protection to

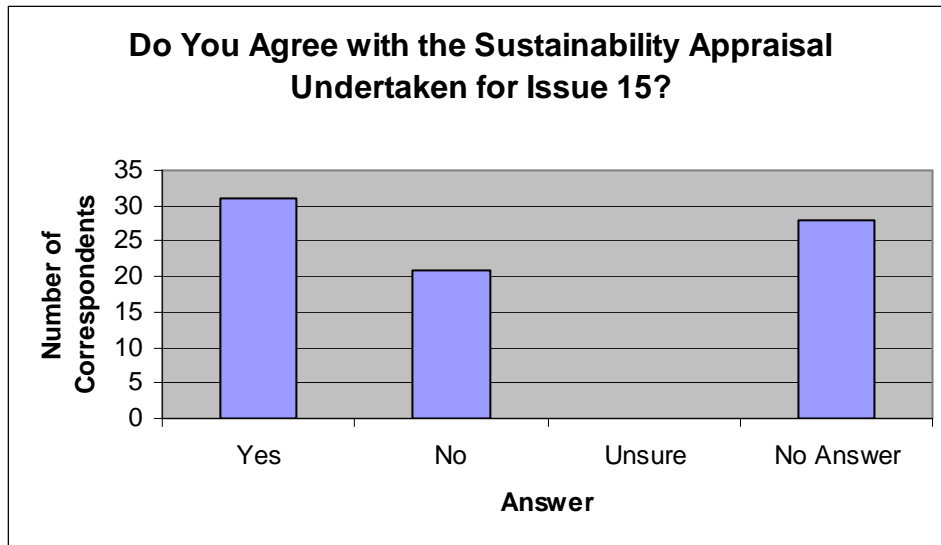
settlements of less than 10 houses. The responses from the industry included the argument that the 200m buffer zone actually sterilises mineral resources and in many cases there may be no loss of amenity within the 200m zone provided there are adequate safeguards which have been through a thorough environmental assessment. One comment stated that buffer zones should also be applied to nature reserves and SSSI's. However this approach could sterilise even more land and if there have been thorough environmental assessments carried out through the planning process then damage to SSSI's should not occur.



Option	Number of Correspondents
A	19
B	14
C	29
No Answer	18

Sustainability Appraisal for Key Issue 15

In the process of formulating the matrix for this issue there appears to have been an error which has made the SA read the opposite to the way it should read. In fact Options B and C score more highly than Option A which was mistakenly described as the best option in the summary. Many respondents pointed this out in their responses. We would like to apologise for the error and confirm once more that Options B and C are in fact the better options in terms of the SA.



Option	Number of Correspondents
Yes	31
No	21
Unsure	0
No Answer	28

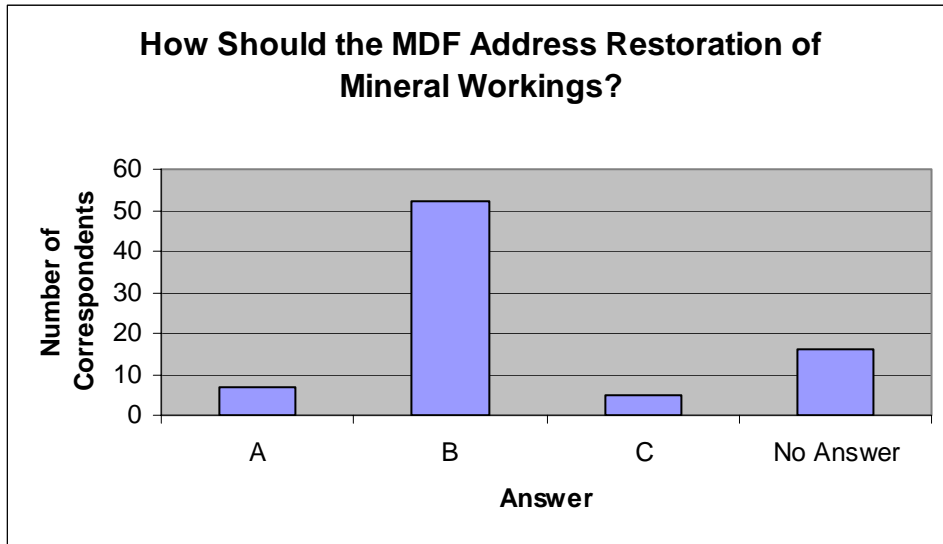
Key Issue 16: Restoration and After Use (Q35b)

This issue generated the most comments which demonstrates its importance. Option B produced the most support because of its flexibility and ability to accommodate a variety of end uses. One comment was made that Option B should be a 2 stage process whereby the end use is chosen at the start of the scheme but detailed restoration plans are not approved until the nearer the time for implementation. The reference in Option B should be expanded to informal sport and recreation. Some comments were made that water park end uses were a do nothing option which looked like a blot on the landscape. This option would be better for biodiversity, geodiversity and the historic environment and landscape character assessments could be applied; in general there would be a more holistic approach than the other options.

Option A has always been the major traditional method of determining restoration schemes with agriculture the primary end use, at least for sites in Warwickshire. Until the mid 20th century, agricultural practices helped biodiversity through the retention of meadows for grazing and hedges and trees for stock control. However, several respondents pointed out that because of modern agricultural practices agriculture is no longer as sustainable as it once was and has a much lower value for biodiversity. In addition it was pointed out that agriculture was becoming much less

important as a rural land use and that diversification away from agriculture was more the order of the day.

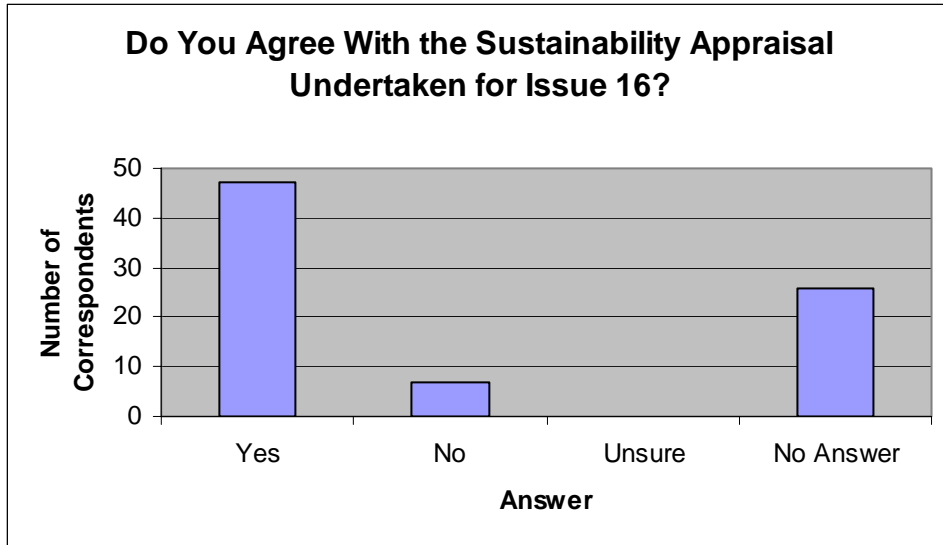
There was some support for Option C as well because it was not too prescriptive allowing schemes to be looked at on a site by site basis and any potential end uses could be tailored to particular sites.



Option	Number of Correspondents
A	7
B	52
C	5
No Answer	16

Sustainability Appraisal for Key Issue 16

Both Options B and C are well supported with Option B coming out on top; Option A attracts very little support although one comment points out that agriculture can support biodiversity and manage flood risk.

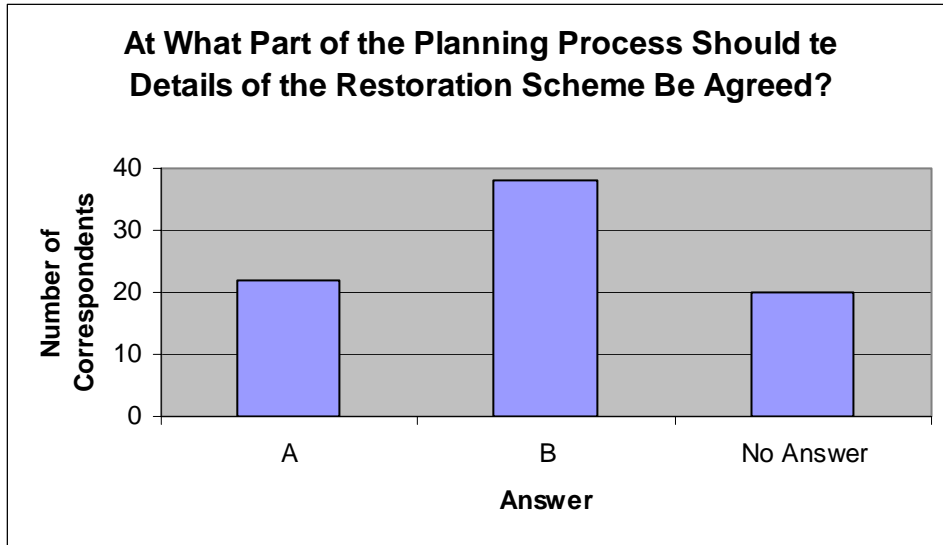


Option	Number of Correspondents
Yes	47
No	7
Unsure	0
No Answer	26

Key Issue 17: Planning for Restoration (Q38b)

From the responses given, there appeared to be support for Option A in that this approach provided greater flexibility over time and allowed for changes to be made over a long timescale to reflect changes in technology or planning policy. Option B was less flexible, but did provide greater certainty for the local community and the industry that a specific end use would result and that end result would be set out in detail prior to any planning approval. Respondents could see the benefits of both approaches and support was fairly equally spread. There was also a concern that if restoration was left to the later stages of a development there is less inclination on the part of the developer to provide a satisfactory scheme. In addition most quarry developments are implemented in phases and this might lead to a piecemeal approach to restoration rather than a fully comprehensive scheme.

Option B was considered in one or two cases to be better because there was no reason why a scheme could not be changed closer to implementation if there were over-riding reasons for this. Of course any changes would have to be approved by the County Council and would have to go through a further consultation process.

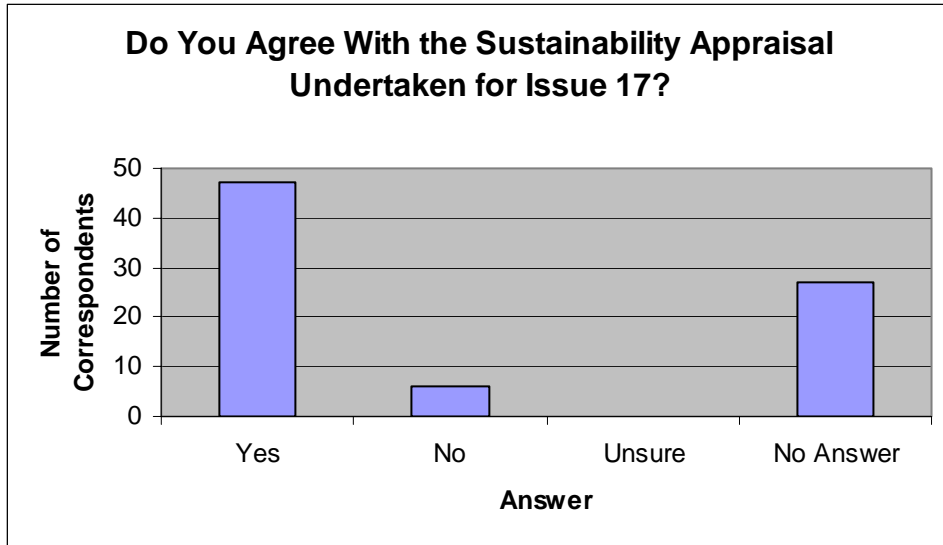


Option	Number of Correspondents
A	22
B	38
No Answer	20

Sustainability Appraisal for Key Issue 17

Option A scored well in the medium and short term while Option B was considered to be better in the long term. Again the conclusion of the SA appears to be slightly flawed as Option A scored better overall. It was pointed out also that Option A could allow response to further consultation and therefore also be more responsive to change in the long term.

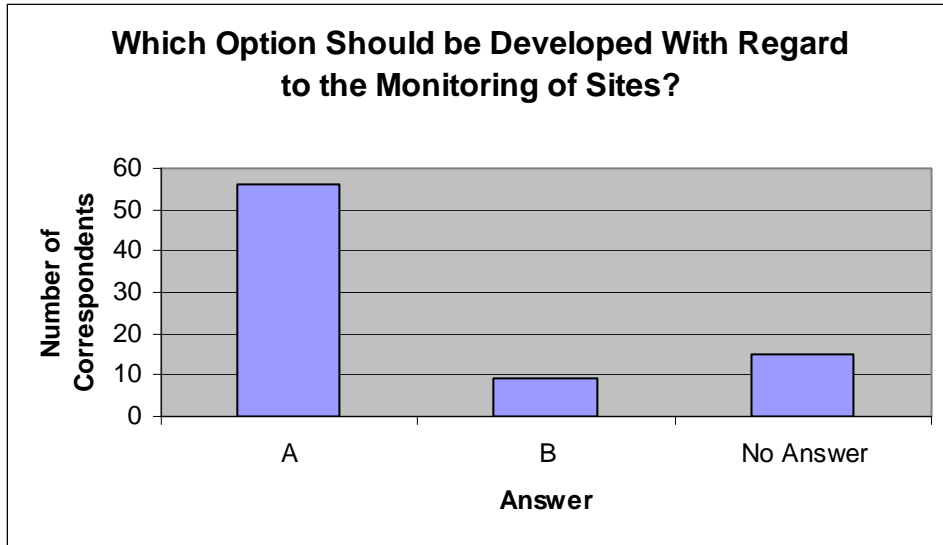
It was considered that there could be further merit in Option B because although sites would be identified in Option A, when the sites were put forward in Option B the proposals would be at a much more detailed level whereby restoration schemes could be assessed much more rigorously. This would also help in the consultation process as more detailed schemes are easier for people to envisage than site allocations.



Option	Number of Correspondents
Yes	47
No	6
Unsure	0
No Answer	27

Key Issue 18: Site Monitoring (Q40b)

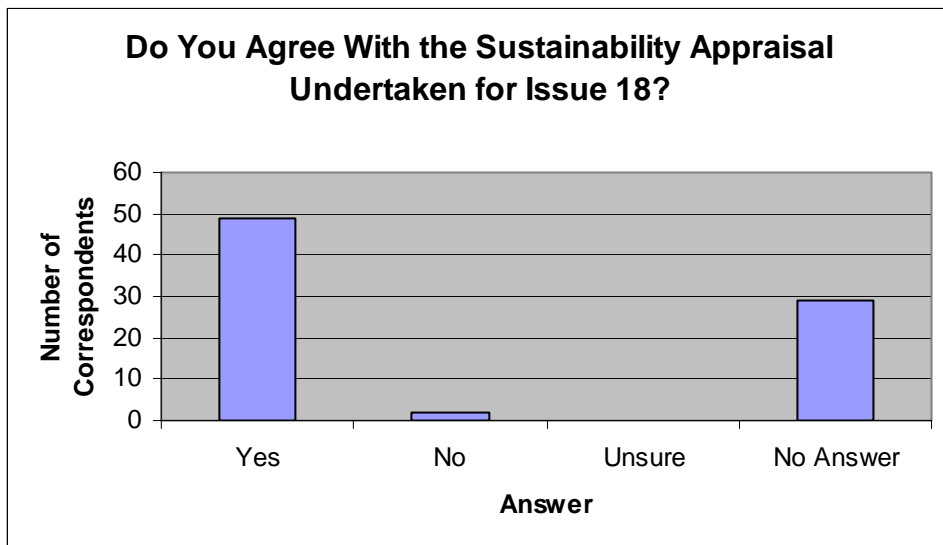
Option A was considered by some to be the best option in a lot of cases as it was considered to be more upfront and transparent. However, it was also strongly rejected by other respondents who quoted national good practice guidance set out in the 2006 regulations rather than local policies. However Option A only seeks to reflect the guidance in the good practice guide. Option A was considered to offer more protection for biodiversity, geo-diversity and long term environmental strategies whereas option B appeared to encourage short term commercial objectives. It was suggested that there be a specific indicator on the impact of minerals on landscape character which would show how far applications are following the guidance in landscape character assessments.



Option	Number of Correspondents
A	56
B	9
No Answer	15

Sustainability Appraisal for Key Issue 18

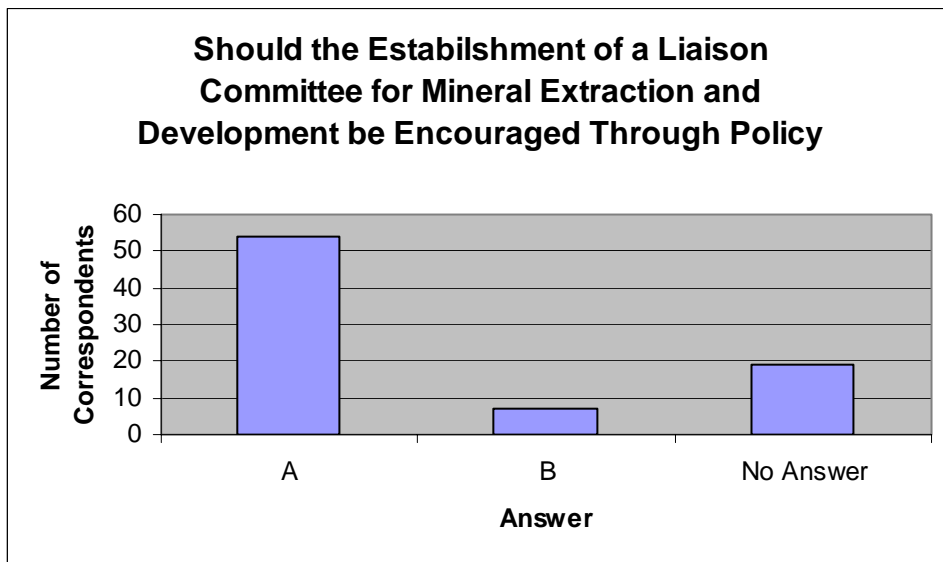
Option A appeared to satisfy the objectives of the SA slightly better than Option B. Most responses agreed that the most sustainable option had been selected although one response suggested that site by site consideration as in Option B would allow consideration of a number of impacts such as biodiversity, human health etc to be monitored in a more targeted manner.



Option	Number of Correspondents
Yes	49
No	2
Unsure	0
No Answer	29

Key Issue 19: Liaison Committees (Q42b)

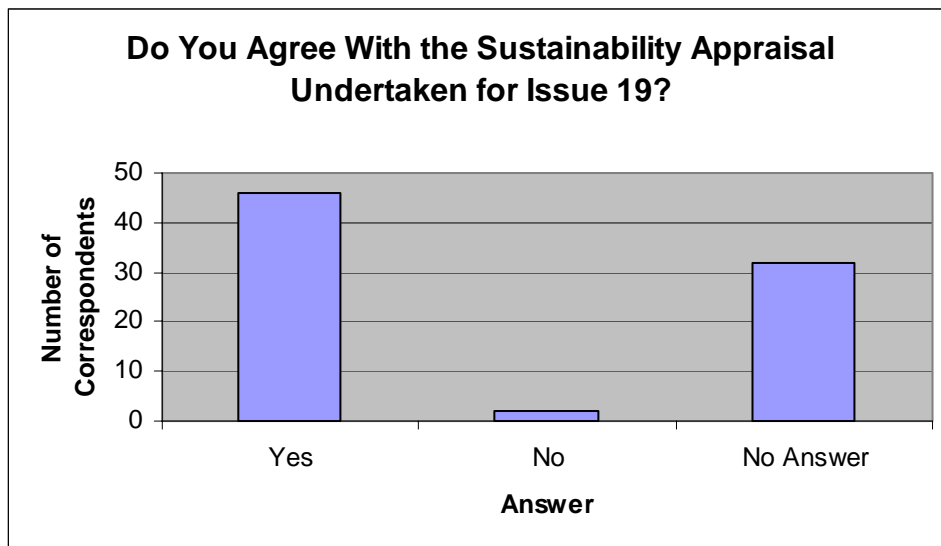
There was overwhelming support for Option A which it was felt, would make developers accountable and place a requirement on them to participate with the community to discuss operations and any potential concerns with them. The process empowers local communities and gives them a framework for consultation with quarry companies and lets operators know at planning approval stage what is expected of them. One or two respondents made the point that it should not be a requirement but something the community wants to get involved in. It is likely that developers would set up liaison meetings voluntarily as some do already and it is clear that operators have no problem with Option A. However, making the setting up of a liaison meeting a requirement would provide certainty at an early stage of what was expected. Finally rather than all applications requiring a liaison committee to be set up it probably should not apply to smaller applications.



Option	Number of Correspondents
A	54
B	7
No Answer	19

Sustainability Appraisal for Key Issue 19

Respondents felt that Option A would satisfy the SA objectives better than Option B. The importance of monitoring over the long term has been raised in some responses. Another response suggested that the SA need not be applied to this issue and that a liaison committee need not be required to be set up unless required.



Option	Number of Correspondents
Yes	46
No	2
No Answer	32

Further Comments about the Core Strategy (Q44)

Comments were made as to the subjectivity of the SA. In practice it is very difficult to produce an SA which is totally objective – there are many different assumptions that can be made, given the long timescale of a minerals operation when compared to the LDF timetable. A geological plan was considered important. Restoration was also considered to be an

important theme. One idea was to enable restoration schemes to be species specific; ie create a habitat for one species rather than several types of habitat. Another idea was for joint working between operators to produce a network of linked habitats as part of a joint restoration process. Following this comment WCC have decided to look at the viability of setting up a Restoration Working Group which could consist of operators and environmental organisations, when sites are eventually allocated.

Concerns were expressed again as to how reserves of non energy minerals will be safeguarded as not all minerals had the safeguarding option. It is considered appropriate to treat each mineral on its merits and a full justification for the choices made will be made. Climate change and in particular the Merton Rule was mentioned ie each site should generate 10% of its own energy on site. This would be difficult with mineral operations given the lack of infrastructure on sites.

Further Comments on the Consultation Process (Q45)

Generally the public consultation process was well received with the workshops being praised as well as the document which was said to be well related to the Sustainability Appraisal and easy to read considering it dealt with complex topics. The questionnaire was however perceived to be rather long and arduous to work through and there were issues regarding the online questionnaire which one person said was hard to find on the website while the statutory consultation period was considered inadequate in some quarters. Interestingly some responses stated that consultation process was excessive while others stated that it was inadequate.