

Wiltshire and Swindon Aggregate Minerals Site Allocations Plan

Regulation 22(1)(c) Statement

July 2012

Table of contents

1. Introduction	1
2. Overview of site selection progress pre 2009/10	5
3. Initial Minerals Site Options Consultation 2010	7
4. Detailed Site Assessment and Wiltshire Council Cabinet Key Decisions	11
5. Proposed Submission draft Minerals Site Allocations Local Plan consultation	15
6. Next steps in the preparation of the Minerals Site Allocations Local Plan	35
Appendices – See Minerals Site Allocations Regulation 22(1)(c) Statement Supporting Appendices document	
Appendix 1 – Wiltshire Council parish newsletter – August 2010 Initial Site Options Consultation (2010) communication and coverage	1
Appendix 2 – ‘Your Wiltshire’ magazine – September 2010 Initial Site Options Consultation (2010) communication and coverage	2
Appendix 3 – Swindon Borough Council Cabinet – Initial Site Options consultation (9 June 2010)	3
Appendix 4 – Wiltshire Council Cabinet – Initial Site Options consultation (27 July 2010)	7
Appendix 5 - Members briefing note Initial Site Options Consultation (2010) communication and coverage	14
Appendix 6 - Advert for the start of consultation period Initial Site Options Consultation (2010) communication and coverage	15
Appendix 7 - Example of advert for the start of consultation period (Swindon Evening Advertiser 2010) Initial Site Options Consultation (2010) communication and coverage	16
Appendix 8 - Example of press coverage during consultation period (Salisbury Journal 2010) Initial Site Options Consultation (2010) communication and coverage	17
Appendix 9 - Example of the press coverage during the consultation event – Gazette & Herald (October 7, 2010) Initial Site Options Consultation (2010) communication and coverage	18
Appendix 10 - Example of the press coverage during the consultation event – BBC website (September 10, 2010) Initial Site Options Consultation (2010) communication and coverage	19
Appendix 11 - Example of Parish Council meeting during the consultation event – Bromham Parish Council meeting (September 9, 2010) Initial Site Options Consultation (2010) communication and coverage	20
Appendix 12 - Example exert of Community Area Board briefing note during consultation Initial Site Options Consultation (2010) communication and coverage	31

Appendix 13 - Initial Site Options Consultation 2010 – summary of key issues tables Wiltshire Cabinet report 22 March 2011	32
Appendix 14 – Wiltshire Council Cabinet Report 22 March 2011	184
<i>Appendices of March 2011 Cabinet report</i>	
<i>Appendix 1a – Summary tables for site options withdrawn, excluded or subject to further assessment</i>	192
<i>Appendix 2a –Additional site options</i>	205
Appendix 15 – Wiltshire Council Cabinet Report 14 June 2011	208
<i>Appendices of June 2011 Cabinet report</i>	
<i>Appendix 1b - A summary of the results of the assessments and how they relate to sustainability criteria</i>	216
<i>Appendix 2b - Site options that would be carried forward into Minerals Sites Local Plan</i>	242
<i>Public participation</i>	250
	251
Appendix 16 – Wiltshire Council Cabinet report (Dec 2011) detailing the proposals outlined in the Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan (and Cabinet report Appendix 2 – copy of letter sent to the Secretary of State)	
Appendix 17 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation advert	262
Appendix 18 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation proof of advert (The Wiltshire Times, 27 January 2012)	263
Appendix 19 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation proof of advert (The Swindon Evening Advertiser, 26 January 2012)	264
Appendix 20 – Proposed Submission draft consultation - Example letter sent to specific bodies	265
Appendix 21 – Proposed Submission draft consultation - Example letter sent to letter to general bodies	266
Appendix 22 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation Parish newsletter circulation (February 2012)	268
Appendix 23 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation example Community Area Board circulations (February 2012)	269
Appendix 24 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation example Community Area Board circulations (Royal Wootton Bassett and Cricklade Community Area network February 2012)	270
Appendix 25 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation example Community Area Board circulations (Malmesbury Community Area Network February 2012)	271
Appendix 26 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation website press coverage	272
Appendix 27 – Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan consultation press coverage (The Wiltshire Gazette & Herald, 9 February 2012)	273
Appendix 28 – Swindon Borough Council timetable of events in relation to the Proposed	274

Submission Draft Aggregate Minerals Site Allocations Local Plan consultation period	
Appendix 29 – Summary of main points raised through the formal consultation stage of the Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan	276
Appendix 30 – Officer comments in response to the summary of main points raised through the formal consultation stage of the Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan <i>Update: Please see submitted schedule of proposed modifications and 'Dialogue following proposed submission consultation' report for an updated position on the councils proposed modifications to the plan</i>	284
Appendix 31 - Detailed schedule of all representations made during the formal consultation stage of the Proposed Submission Draft Aggregate Minerals Site Allocations Local Plan	329

1. Introduction

Please see the accompanying ‘Regulation 22(1)(c) Statement Supporting Appendices document’ for all appendices referred to in this Regulation 22(1)(c) document

- 1.1 Under regulation 22 (1)(c) of The Town and Country Planning (Local Planning) (England)¹ Regulations 2012, Local Planning Authorities (LPAs) are required to prepare a statement setting out:
 - Which bodies and persons the local planning authority invited to make representations under regulation 18
 - How these bodies and persons were invited to make representations under regulation 18
 - A summary of the main issues raised by the representations made pursuant to regulation 18
 - How any representations made pursuant to regulation 18 have been taken into account
 - If representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations
 - If no representations were made in regulation 20, that no such representations were made.
- 1.2 This report details the stages undertaken and progress made in the development of the proposed Aggregate Minerals Site Allocations Local Plan (previously known as a Development Plan Document (DPD)²). The proposed Aggregate Minerals Sites Local Plan (hereafter referred to as the ‘Minerals Sites Plan’) sets out a schedule of proposals that are deemed suitable to meet Wiltshire and Swindon’s annualised provision requirements during the plan period up to 2026.
- 1.3 The stages involved, and the decision making process during the preparation of the Plan are as follows (and will be discussed in greater depth):
 - Minerals Local Development Framework workshops (2005)
 - Initial site selection process – ‘call for sites’ (2004 and 2006)
 - Initial site identification workshops (2007)
 - Methodological sieving exercise of Mineral Resource Zones (2009/2010)
 - Initial Site Options Consultation (2010)
 - Wiltshire Cabinet (March 2011) – following Initial Site Options Consultation 2010
 - Detailed Site Assessments on remaining sites (2011)
 - Wiltshire Cabinet (June 2011) – Following completion of detailed site assessments and identification of local forecast provision rate
 - Additional detailed assessments on remaining sites (2011)

¹ Formerly regulation 30(1)d and e of The Town and Country Planning (Local Development) (England) Regulations 2009.

² Please note, historical references to the ‘DPD’ remain in the appendices, previous supporting evidence base documents and consultee comments.

- Proposed Submission Draft Minerals Sites Plan consultation (2012) – main issues and officer comments
- Next steps in the preparation of the Proposed Submission draft Minerals Sites Plan

Minerals and Waste Development Scheme: partnership with Swindon Borough Council

- 1.4 Since Local Government re-organisation in 1997, Wiltshire Council has maintained a plan-making partnership with Swindon Borough Council for the preparation of Minerals and Waste planning policy. Such joint working partnerships are encouraged by national policy. The original Minerals and Waste Development Scheme (MWDS) and all subsequent reviews have been prepared in full consultation with Swindon Borough Council. All subsequent amendments to the timetables for document preparation have also been agreed by the constituent authorities.

Wiltshire and Swindon Minerals Sites Plan

- 1.5 The Wiltshire and Swindon Minerals Core Strategy and Minerals Development Control Policies DPDs were adopted in June and September 2009 respectively. The Minerals Sites Plan represents the final key document in the policy framework for the provision of aggregate minerals (sand and gravel) sites within Wiltshire and Swindon. Further documents (e.g. Supplementary Planning Documents) may be prepared in due course to augment the joint Minerals Development Plan (previously called the Minerals and Waste Development Framework), but no plans for such work have been agreed as yet.
- 1.6 A combination of a change in regulations (2008)³ and a decision to concentrate resources on the production of the Minerals Core Strategy and Development Control Policies DPDs meant that work on the Minerals Sites Plan ceased between October 2006 and 2009. Work has since been undertaken to develop a list of site options that have the potential to provide an adequate supply of sand and gravel throughout the plan period up to 2026.
- 1.7 This ‘regulation 22 (1)(c)’⁴ Statement accompanies the submission draft Minerals Sites Plan setting out how the councils prepared the document through various stages and who they engaged with. The Minerals Sites Plan will be submitted to the Secretary of State for independent examination on 20 July 2012.

Statements of Community Involvement

- 1.8 Statements of Community Involvement (SCI) set out the councils’ approach to involving the community in the preparation of all planning policy / guidance documents and development management processes. They set the standards that the councils will employ to meet the legal requirements, and overall vision for wider community involvement.

³ Amending the Town and Country Planning (Local Development)(England) Regulations 2004.

⁴ Formerly regulation 30(1) d and e of The Town and Country Planning (Local Development) (England) Regulations 2009.

- 1.9 Wiltshire Council and Swindon Borough Council adopted their original SCIs in July 2006 (subsequently updated and adopted - February 2010) and January 2007 respectively. Both SCIs establish the key principles of public engagement to support and inform the preparation of the Minerals and Waste plans.
- 1.10 Both documents go above the minimum standard required by regulation and state that their respective authority will:
- Deposit all relevant documents at their offices, libraries, parish and town councils
 - Make all documents available on their website
 - Advertise in local newspapers, where necessary
 - Hold forum and public meetings (as required) to publicise the documents on consultation.
- 1.11 The councils believe that they have successfully complied with the consultation exercises outlined above.

2. Overview of site selection progress pre 2009/10

Minerals Local Development Framework workshops (2005)

- 2.1 Wiltshire Council and Swindon Borough Council ('the councils') started the process of consultation and engaging local communities in the development of the Minerals Local Development Framework process back in 2005. Early work involved an initial series of meetings and workshops⁵ which sought to present information to stakeholders and the public on minerals planning issues affecting Wiltshire, Swindon and the sub-regional area. The workshops were facilitated by a company called Adams Hendry Ltd and invitations for Forum membership were sent out to a range of people on the councils' consultation database. The key focus for the Forum was to assist the councils in reviewing the adopted Wiltshire and Swindon Minerals Local Plan and thereby meeting the challenge of planning for the release of aggregate minerals in accordance with new policy drivers and forecast provision rates. The outputs from the initial Forum meetings were collated and presented to the councils in a report for use in developing the scope of the Local Plan review process.

Initial site selection process - call for sites (2004 and 2006)

- 2.2 The councils initially undertook a focused 'call for sites' in April 2004 by writing to mineral operators and landowners known to have an interest in sand and gravel extraction. This resulted in a number of sites being put forward for consideration. However, the estimated yield from these sites was considered to be insufficient to meet government forecasts of demand at the time (1.85 million tonnes per annum). The councils issued a further call for sites in 2006 through a newsletter issued to every contact on the councils' consultation database. However, as a result of this work, no additional land was put forward for consideration.

Initial site identification workshops (2007)

- 2.3 Following on from the development of the Wiltshire and Swindon Minerals Core Strategy, a series of workshops were held in the autumn of 2007⁶ to begin the process of site identification and to help inform Issues and Options work for the Minerals Sites Plan. This work included the development of topic papers covering the key Mineral Resource Zones (MRZs), as identified in the emerging Minerals Core Strategy; and a series of drop in sessions were held focussing on the site identification process, which were advertised and hosted in settlements close to, or within, the proposed MRZs.

Methodological sieving exercise of Mineral Resource Zones (2009/2010)

- 2.4 Following the adoption of the Minerals Core Strategy in July 2009, it was decided that the strategic areas of search (the MRZs) should be examined in detail to begin the process of identifying specific sites and / or preferred areas.
- 2.5 Therefore, taking forward the initial work from 2004, 2006 and 2007, the councils embarked on a methodical sieving exercise of the un-worked areas of

⁵ Wiltshire and Swindon Minerals Development Framework Forum - Report of Forum Process and Outcomes. Adams Hendry Consulting Ltd (2005).

⁶ Issues and Options Site Identification Workshop 2007.

the five MRZs during 2009/2010⁷. This work embedded key criteria from the councils Sustainability Appraisal framework and thereby assisting with the critical process of removing the most constrained areas from further consideration. Landowners within the remaining areas were then identified and contacted to see whether they would consider putting their land forward for sand and gravel extraction.

- 2.6 Initial site appraisals and analysis⁸ was carried out using the key criteria from the councils Sustainability Appraisal framework to remove those areas that were not appropriate from further consideration.

⁷ Wiltshire & Swindon Aggregate Minerals Site Allocations DPD - Evidence Report. The results of a constraints sieving exercise applied to remaining sand and gravel resources in Wiltshire and Swindon (March 2010).

⁸ Wiltshire and Swindon Minerals and Waste Development Framework: Summary of minerals site appraisal matrices (November 2011).

3. Initial Minerals Site Options Consultation 2010

- 3.1 Following the initial site sieving process; initial site appraisal; analysis and communication with landowners, an informal (Regulation 18⁹) consultation on 62 initial site options for sand and gravel extraction in Wiltshire and Swindon took place between 5 August and 31 October 2010¹⁰. The councils used this informal consultation exercise to kick-start the process of appropriate site selection through constructive, open and ongoing dialogue between all interested parties. This approach helped the councils to determine which sites should be dropped and which should be carried forward into a draft plan.
- 3.2 The purpose of this consultation was to provide an early opportunity for stakeholders to review the site options presented by landowners for consideration and comment on the key issues identified for each site option to help determine the scope of any further assessments.
- 3.3 The following organisations, groups and individuals were notified of the start of the informal consultation period by email or letter in accordance with the Wiltshire and Swindon Statements of Community Involvement (SCI):
- Statutory consultees, e.g. the Environment Agency, Natural England, English Heritage as set out in the Statement of Community Involvement
 - Neighbouring local authorities
 - All parish and town councils
 - Parish and town councils adjacent to Wiltshire and Swindon
 - Swindon Borough Councillors, Wiltshire Councillors and Area Board Managers
 - Minerals industry
 - Land and planning agents
 - Landowners
 - General consultees, e.g. schools, MP/MEPs, the military, police authority
 - Individuals and community groups who have asked to be informed of mineral policy work.
- 3.4 Copies of the document were made available for inspection at libraries and council offices throughout Wiltshire and Swindon.
- 3.5 It is not normal practice for Wiltshire Council (or any other local authority) to directly and individually contact people who live adjacent to, or within a reasonable distance of sites identified during the plan making process. The practice of 'neighbour notification' is normally used only at the planning application stage. However, in order to reach as wide an audience as possible, the consultation was also advertised in Wiltshire Council's parish newsletter in August 2010 (see Appendix 1) - which is circulated electronically to all parish councils in Wiltshire; and was also communicated through the 'Your Wiltshire' magazine (see Appendix 2) which was distributed to every household in Wiltshire during September 2010.
- 3.6 In addition, council officers attended a number of parish council and public meetings to answer questions and concerns from local residents and

⁹ The Town and Country Planning (Local Planning) (England) Regulations 2012.

¹⁰ Initial Site Options Report for the Wiltshire and Swindon Aggregate Minerals Site Allocations DPD (August 2010).

community groups.

- 3.7 In light of the high level of interest in the consultation, the decision was made to extend the initial informal consultation period by an additional four weeks to the end of October 2010 to allow more time for comments to be submitted.
- 3.8 The informal consultation met the standards required by legislative requirements and the councils' own policies – as expressed in the councils' Statements of Community Involvement (SCI). Table 1 below sets out the steps involved in the lead up to the informal consultation exercise and details what occurred throughout the consultation period.

Table 1 – Information on initial options consultation exercise and details of actions

Step/Method	Details
Report to Cabinet requesting approval to consult on initial site options.	Approval to commence consultation on initial site options was made by: Swindon Cabinet – 9 June 2010 ¹¹ Wiltshire Cabinet – 27 July 2010 ¹²
Consultation commenced 5 August 2010	
Notification of consultation	All relevant consultees on consultation database were notified by email or letter. The consultation was also advertised in Wiltshire Council's parish newsletter (please refer to Appendix 1 - Parish Newsletter – August 2010) which is circulated electronically to all parish councils in Wiltshire. The consultation was mentioned in the 'Your Wiltshire' magazine which was distributed to <u>all households in Wiltshire</u> during September 2010 (please refer to Appendix 2). A briefing note was issued to all Wiltshire Council Councillors and Area Board Managers (please refer to Appendix 5). Copies of the document were made available at libraries and council offices throughout Wiltshire and Swindon. An advert (see Appendix 6) was also placed in newspapers around Wiltshire. The circulation for the 'Your Wiltshire' magazine does not cover Swindon Borough so an advert was published in the 'Swindon Advertiser' (details of public notice can be found in Appendix 7) on 5 August 2010.
Extension of consultation deadline	In light of the high level of interest in the consultation, the decision was made to extend the consultation period

¹¹ See appendix 3 - Swindon Borough Council Cabinet – Initial Site Options consultation (9 June 2010)

¹² See appendix 4 - Wiltshire Council Cabinet – Initial Site Options consultation (27 July 2010)

	to 31 October 2010.
Meetings	<p>At the request of various parish councils, officers attended the following public meetings:</p> <ul style="list-style-type: none"> • 16 September 2010 - Bromham Parish Council, Bromham Village Hall • 4 October 2010 – Calne Without Parish Council, Lansdowne Hall, Derry Hill • 7 October 2010 – Alderbury Parish Council, Alderbury and West Grimstead School, Alderbury. • 11 October 2010 – Compton Bassett Parish Council, Compton Bassett Village Hall, Compton Bassett. <p>Frequently Asked Questions (FAQ) sheets were created to address key areas of concern for discussion prior to the meetings. An example of the minutes (including FAQs) taken for the Bromham Parish Council meeting can be found at Appendix 11.</p> <p>Furthermore, information was provided at the Calne Area Board meeting held on 26 October 2010 and the Corsham Area Board meeting held on 30 November 2010. Information provided for the Area Board meetings can be found at Appendix 12 (example exert of Community Area Board Briefing Note during consultation).</p>
Media Coverage	<p>An initial press release was issued on 13 July 2010. This was followed up by a further press release notification of the extension of the consultation period on 13 September 2010.</p> <p>Newspaper articles on the subject of the consultation were published as follows:</p> <p>The ‘Salisbury Journal’ on 29 July 2010 (see Appendix 8).</p> <p>The ‘Western Daily Press’ on 9 September 2010.</p> <p>‘Wiltshire Gazette & Herald’ published a series of stories on the 9 September 2010; 7 October 2010 (see Appendix 9); 14 October; 4 November; and 16 December.</p> <p>BBC Wiltshire Radio Items – 9 September 2010¹³ and 5 October 2010¹⁴.</p> <p>BBC News website also published an item on the subject on 10 September http://www.bbc.co.uk/news/uk-england-wiltshire-11250334 (see Appendix 10).</p>

¹³ <http://www.bbc.co.uk/programmes/p009s44v> (please note the feature is no longer available)

¹⁴ <http://www.bbc.co.uk/programmes/p00b94rw> (please note the feature is no longer available)

Summary output from Initial Site Option Consultation 2010

- 3.9 The councils received 4076 comments from 1,297 respondents and Table 2 details the areas in which these comments were received. Summary tables detailing comments received by criteria and specific site are provided in Appendix 13.
- 3.10 During the consultation eight site options and parts of two site options were withdrawn from further consideration at the request of the landowners.
- 3.11 The councils also received petitions from the 'Save Bromham' group objecting to the site options C8 - C11 and C16 - 18 with approximately 590 signatures and the 'Mile Elm Sand Stoppers' group with approximately 1,200 signatures objecting to site options C6 and C7.
- 3.12 The Save Bromham group also submitted details of a resolution of the Devizes Area Board. The resolution stated that "The Devizes Area Board notes the concerns of the parishes of Bromham and Rowde in seeking to have sites C8, C9, C10, C11, C16, C17 and C18 deemed unsuitable for further consideration in Wiltshire and Swindon Minerals Development Plan Documents and asks Wiltshire Council to have full regard to these concerns in the consultation process".
- 3.13 Two additional site options were submitted during the consultation period. These site options were situated at: Petersfinger, near Salisbury (proposed extension to a site option previously submitted and therefore considered as one whole site); and Swillbrook Farm, near the Cotswold Water Park. The Petersfinger extension site option was considered suitable for further assessment and appropriate local consultation.

Table 2 – Total number of comments received during the consultation by area¹⁵

Area	Total number of comments received
General comments	299
Upper Thames Valley	314
Calne Area	2,677
South East of Salisbury (near Whiteparish)	227
Salisbury Avon	59
Bristol Avon	705

- 3.14 Based on the information gathered through desktop analysis, site visits and comments received through the consultation exercise, a report¹⁶ indicating where sites could be dropped from further consideration and where further detailed assessments were required on sites being carried forward was produced. The summary tables in the report are included in Appendix 13. This approach ensured that decisions throughout the entire site identification process were based on robust and credible evidence.

¹⁵ It should be noted that some comments related to more than one area and therefore the numbers provided in Table 2 will total more than the total of comments received.

¹⁶Wiltshire and Swindon Aggregate Minerals Site Allocations DPD: A report of the results of consultation on initial site options for sand and gravel extraction (August – October 2010).

4. Detailed site assessment and Wiltshire Council Cabinet key decisions

- 4.1 Following the analysis of comments received during the Initial Options consultation period between 5 August and 31 October 2010 (as detailed in Appendix 13), an output report¹⁷ was prepared for Wiltshire Council Cabinet on 22 March 2011¹⁸. This report suggested that a further 32 site options be excluded at this stage of the process as they were unlikely to be deliverable given constraints to development.

Wiltshire Council Cabinet 22 March 2011 – Following Initial Site Option Consultation 2010

- 4.2 This Cabinet report recommended that the 22 remaining site options should be subject to further evidence gathering and assessment to ensure that any decision on their suitability is based on robust evidence and qualified professional judgement.
- 4.3 This report, and supporting documents, identified the status of each site option at this time indicating whether they have been dropped or taken forward for further assessment, and the requirements for further assessment for each site taken forward.
- 4.4 Wiltshire Council Cabinet resolved to approve the recommendations outlined within the report. This Cabinet report and supporting documents are provided in Appendix 14.

Detailed Site Assessments (i)

- 4.5 Following approval from Cabinet, the councils undertook detailed assessments on the remaining 22 site options in 2011 covering:
- Transport
 - Archaeology
 - The historic built environment
 - Ecology
 - Landscape and visual impact.
- 4.6 Detailed assessment reports¹⁹ based on the findings of the detailed site assessments outlined above were produced detailing any impacts that may arise if quarrying were to take place in the 22 locations identified. The findings from these assessment reports were used to determine the overall level of impact expected on each site and helped inform decisions as to site suitability

¹⁷ Wiltshire and Swindon Aggregate Minerals Site Allocations DPD: A report of the results of consultation on initial site options for sand and gravel extraction (August – October 2010).

¹⁸ Please note that this report was not required to be presented to Swindon Borough Council as the only site located in the Borough was removed from further consideration during the Initial Site Options consultation. The councils therefore only needed to present the work to Wiltshire Council cabinet and gain approval from Wiltshire Council cabinet to proceed with detailed assessments on those remaining sites (all located in Wiltshire).

¹⁹ Detailed assessment work and a complete evidence base to support site selection can be found at: <http://www.wiltshire.gov.uk/aggregatemineralssiteallocations>.

against key sustainability criteria provided in the Minerals Site Selection and Site Appraisal Methodology.

Wiltshire Council Cabinet 14 June 2011 – Following completion of detailed site assessments

- 4.7 Following the completion of the detailed assessments on the 22 remaining sites, and after considering the extensive evidence base²⁰ for each remaining site option, a report was prepared for Wiltshire Council Cabinet on 14 June 2011 (see appendix 15). This report provided Members with the results of the detailed appraisals on the remaining 22 site options and recommended a schedule of eight site options for inclusion within the Proposed Submission Draft Wiltshire and Swindon Minerals Sites Plan. This number of sites has since been altered to seven as it was felt that it was logical to combine the two site options at Brickworth into one site option in the Minerals Sites Plan. This decision was taken due to their shared characteristics and mitigation requirements, shared restoration potential and the fact that they are likely to come forward as one planning application and be worked and restored in a phased manner.
- 4.8 From the findings of the detailed site assessments it is clear that Wiltshire and Swindon's contribution to national and regional forecasts for sand and gravel, at a rate of 1.85 million tonnes per annum, cannot be met in a sustainable manner.
- 4.9 The results of the assessments, analysis of long-term trend data on aggregates provision and focussed dialogue with the minerals industry indicate that a local forecast provision rate of 1.2 million tonnes per annum should be used as the basis for finalising the list of site options in the Minerals Sites Plan. This local forecast rate was proposed to Cabinet on 14 June 2011 and the Cabinet resolved to approve the recommendations. This report and supporting documents are provided in Appendix 15.
- 4.10 A workshop to explore restoration options for the seven minerals sites proposed for inclusion in the Minerals Sites Plan was held in August 2011. This was jointly hosted by the councils and Nature After Minerals²¹ and was attended by a wide range of stakeholders including amongst others, nature conservation groups, minerals extraction companies and the RAF. A report²² of the outcomes from this workshop was submitted as part of the evidence base alongside the Minerals Sites Plan.

²⁰ Detailed assessment work and a complete evidence base to support site selection can be found at: <http://www.wiltshire.gov.uk/aggregatemineralssiteallocations>.

²¹ Nature After Minerals are a partnership between Natural England and the Royal Society for the Protection of Birds (RSPB) that works to identify strategic opportunities for delivering biodiversity through high quality habitat creation on mineral sites. See: <http://www.afterminerals.com>.

²² 'Report of stakeholder consultation event on the Wiltshire and Swindon Aggregate Minerals Site Allocations Development Plan Document' (August 2011) available at <http://www.wiltshire.gov.uk/aggregatemineralssiteallocations>

Additional Detailed Site Assessments (ii)

- 4.11 Additional site assessments covering noise, air quality and hydrogeological impacts were undertaken, where relevant²³, on the seven site options by external specialist consultants during the autumn of 2011 in order to predict the impacts associated with extraction operations at these sites and to consider the mitigation measures that would be most suitable for reducing any impacts.

²³ Hydrogeological Impact Assessments were only undertaken on the Upper Thames Valley sites in response to concerns raised by the Environment Agency during consultation in relation to the sensitivity of the water environment in the area.

5. Proposed Submission draft Minerals Sites Plan consultation

- 5.1 The proposed submission stage Minerals Sites Plan contained seven sites that were considered suitable to supply sand and gravel resources through the plan period to 2026, and represented the final round of formal consultation in the process of allocating sites for future mineral working in Wiltshire and Swindon. The formal consultation, endorsed by Wiltshire Council members on 13 December 2011 (see appendix 16) and supported by Swindon Borough Council members on 14 December 2011, provided the opportunity to comment on the 'soundness' of the plan before it was submitted to the Secretary of State for independent examination.

Who was consulted?

- 5.2 Consultation with 4,451 statutory and non statutory consultees as per the Wiltshire and Swindon SCIs took place for a period of six weeks between 30 January and 12 March 2012²⁴.
- 5.3 Due to a database error resulting in 513 consultees not being informed as to the start of the consultation, letters were sent to these consultees late. So as to allow for the minimum six week period of opportunity to comment on the document, the consultation exercise was extended by an additional two weeks for those consultees who were contacted late. Comments were accepted from these consultees until 26 March 2012.
- 5.4 Consultees invited to comment included, among others²⁵:
- Statutory consultees, e.g. the Environment Agency, Natural England, English Heritage as set out in the Statement of Community Involvement
 - Neighbouring local authorities
 - Town and parish councils in, and adjacent to, Wiltshire and Swindon
 - Swindon Borough Councillors, Wiltshire Councillors and Area Board Managers
 - The Minerals industry
 - Land and planning agents
 - Landowners
 - General consultees, e.g. schools, MP/MEPs, the military, police authority
 - Individuals and community groups who have asked to be informed of mineral policy work.
 - Organisations/community groups/businesses/individuals with an interest in the proposals
 - Professionals at the councils with an interest in the proposal.

²⁴ An advert was not placed in the Swindon Evening Advertiser on the day of consultation commencement appearing instead on the 26th January 2012. To comply with the requirements of the Swindon SCI, an advert was subsequently re-placed in the Swindon Evening Advertiser on the 3rd February 2012 and the consultation date was extended by five days in the Borough of Swindon.

²⁵ Please see appendices 20 and 21 for example proposed submission consultation letters sent to specific and general bodies

How were they consulted?

- 5.5 The consultation was undertaken using the councils 'online' consultation package and consultees were invited to comment through this portal. The consultation was also advertised using a variety of methods, including:
- Advert/external newspaper/magazine articles (see Appendices 17, 18 and 19)
 - Internally circulated newsletter articles (Councillor bulletins/Community Area Briefing notes and Parish newsletter) (see Appendices 22, 23, 24 and 25)
 - Wiltshire and Swindon websites
 - Letter/email notification of consultation and invite to comment²⁵
- 5.6 The consultation event and Minerals Sites Plan received additional press coverage. Articles were included on both local and national websites (see Appendix 26 for examples) and articles were run in local newspapers (an example is provided at Appendix 27). Appendix 28 details the processes that Swindon Borough Council undertook during the consultation exercise.
- 5.7 Table 3 provides a breakdown of the number of consultees contacted and through which method.

Table 3 – Breakdown of number of consultees by method of notification

Method of invite	Number of consultees contacted
Electronic (email)	1876
Hardcopy letter send through post	2575 ²⁶
Total	4451

- 5.8 Copies of the draft Minerals Sites Plan, supporting evidence base documents and representation forms for returning comments on the document were made available at the following places within Wiltshire and Swindon:
- Council offices (Wiltshire and Swindon)
 - Libraries (across Wiltshire and Swindon)
 - Council website pages
 - Consultation portal website (<http://consult.wiltshire.gov.uk/portal>).

²⁶ Including the additional 513 consultees who were informed late of the consultation due to a database error.

Consultation analysis

5.9 The consultation generated 124 responses from 53 organisations, consultees, industry, interested community groups and members of the public. This amounted to a response rate of 1.2%.

5.10 Consultees were asked to comment on the ‘soundness’ of the plan, in particular whether the plan was:

- Justified
- Effective
- Consistent with national policy.

5.11 A simplified guidance note outlining how to respond to the ‘soundness’ of the plan was published on the councils’ websites and made available at the locations listed in paragraph 5.8.

5.12 All 124 responses were duly made representations (including those 513 consultees who received an extension to the deadline), ten (8%) considered the document, or parts of it ‘sound’. In comparison, 49 representations (40%) considered the document or elements of it to be ‘unsound’. In total; 32 representations reasoned that the plan was not ‘effective’, 29 not ‘justified’, and 16 not ‘consistent with national policy’. A total of 65 representations (52%) did not pass comment on the ‘soundness’ of the document. These are noted as ‘unspecified’ in Table 4 which provides a breakdown of comments received and ‘soundness’ attributed by document section and site option.

Table 4 – Comments received and ‘soundness’ attributed by document section and site option

Consultation Point	Sound	Unsound	Unspecified	Total
Introduction and approach/ General Comment	3	7	24	34
The Upper Thames Valley Area				
General		3	1	4
Table 2.1 Site Options Required (UTV)				0
Cox’s Farm	1	9	5	15
Blackburr Farm	2	11	4	17
North Farm	1	6	4	11
Land east of Calcutt	1	3	4	8
Land at Cotswold Community		1	7	8
The Calne Area				
General				0
Table 3.1 Site Options required (Calne)				0
Land near Compton Bassett		3	9	12
The South East of Salisbury Area				
General				0
Table 4.1 Site Options required (SE Salisbury)				0

Extensions to Brickworth Quarry	2	6	7	15
Monitoring Framework				
Table 5.1 Related Minerals Core Strategy monitoring indicators				0
Table 5.2 Aggregate Minerals Site Allocations monitoring indicators				0
Total	10	49	65	124

- 5.13 Of the 124 comments received during the consultation 69% (86 comments) commented on specific sites included within the plan. The remaining 31% (38 comments) responded to the general approach of the document and/or the introductory chapter. In particular many of these ‘front end’ or general comments centred on the approach taken in site selection and local forecast rate provision.
- 5.14 In terms of site specific comments, 51% (63 comments) were in response to sites in the Upper Thames Valley area. The majority of Upper Thames Valley comments related to the sites at Cox’s Farm, Blackburr Farm and North Farm.
- 5.15 Of the 15 comments received for Cox’s Farm, a number were made by residents of the nearby village of Marston Meysey which endorsed the comments made by Mr Saleem Shamash who found the proposals for this site to be unsound.
- 5.16 Of the 17 comments received for Blackburr Farm, seven comments were made by the neighbouring ‘Second Chance Touring Park’ who found the proposals for this site to be unsound.
- 5.17 The Environment Agency did not object to the inclusion of any of the sites in the document and welcomed the removal of inappropriate sites following previous stages of consultation and site appraisal work. The Agency, however, did make specific reference to the need for detailed consideration of the water environment during extraction and restoration.
- 5.18 A summary of the main points raised in relation to the document and the seven proposed site options is provided in Appendix 29²⁷ and officer comments to the summary of all main points is provided in Appendix 30.
- 5.19 A detailed schedule of all representations made during the formal consultation period is presented in Appendix 31. A copy of the submission documents, including the accompanying evidence base and all representations received, can also be viewed on the council’s online planning portal/website <http://consult.wiltshire.gov.uk/portal>.

²⁷ Please note that this is a summation of the comments and main issues received during the consultation exercise. For complete scripts of all comments received please see Appendix 31.

Main issues arising from the Minerals Sites Plan consultation and officer comments

Please note – this discussion of the main issues should be viewed as a snap shot in time of the position immediately after the proposed submission consultation. Negotiations over wording within the Human Health and Amenity sections of all sites and wording regarding the Cox’s Farm site have been ongoing since the close of this consultation period and additional wording has been proposed by the councils as a result. Please see the submitted ‘Schedule of Proposed Modifications’ for the most up-to-date proposed modifications to the plan and to the ‘Dialogue following proposed submission consultation’ report for the background to the ongoing dialogue.

5.20 Following an assessment of the comments received through the pre-submission consultation process, a number of issues for discussion and further consideration were raised by consultees and these are detailed below with officer responses (in blue – please note where modifications to the plan are proposed by officers, modified text is displayed in **bold underlined**). It is likely that these issues will be discussed during the independent examination of the Minerals Sites Plan and a decision will be made on the merits of each issue where a change to the Minerals Sites Plan is proposed or requested.

Wiltshire and Swindon’s sand and gravel apportionment figure

5.21 Consultee comments - concerns were raised from some sections of the minerals industry that Wiltshire and Swindon are not seeking to allocate sufficient sites to fulfil agreed aggregate provision obligations. Of particular concern was the approach that the councils have taken regarding the implementation of a locally derived forecast figure of 1.2 million tonnes of sand and gravel per annum. A number of comments were made covering this approach and potential implications such as:

- The need to ensure an adequate and steady supply of aggregates for use within the plan area. The councils must consider a more robust method of local forecasting.
- The proposed reduction in provision rates is an abrogation of responsibility and places pressure on surrounding counties who may have to make a larger provision to cover the councils’ shortfall.
- In-direct encouragement of mineral importation by road runs contrary to the policies set out in MPS1 (since replaced by the NPPF²⁸).
- The proposals may lead to a downward spiral of unrealistically low assumptions of the levels of mineral needed [to serve local markets], leading to a reduction in the number of submitted planning applications against a backdrop of continual decline for construction minerals.
- The proposed provision rate does not offer flexibility or workable prospects for landbank maintenance for the industry, nor does it have an in-built contingency should demand increase significantly during the plan period.

²⁸ National Planning Policy Framework, Department for Communities and Local Government, March 2012

- The Draft South West Regional Spatial Strategy (RSS) provision levels should be perpetuated (i.e. at a rate of 1.85 mtpa). The councils' revised figure for sand and gravel provision requirements might require an amendment of the adopted Minerals Core Strategy.
- It was also felt that the proposals do not support the provision of adequate supplies of aggregate minerals from local quarries to support local development.

5.22 The Minerals Sites Plan has been informed by a positive and inclusive approach to site identification, using a detailed methodology, as demonstrated through the consideration of all site options through previous rounds of consultation. The sites presented in the plan offer the most sustainable site options. The councils feel that the current (i.e. government endorsed) sub regional apportionment figure of 1.85mt per annum and recently reviewed, but not endorsed figure of 1.41mt per annum for Wiltshire and Swindon is set too high. Evidence from the past ten years of production of sand and gravel at quarries located within the plan area indicates that production in the plan area has consistently fallen short of the local apportionment figures – currently sitting at less than 1.1mt per annum. Therefore, the councils are confident that the proposed locally derived forecast figure of 1.2mt per annum as detailed through the Minerals Sites Plan is justified, evidence based and flexible to respond to changing market conditions. The plan sets out a reasoned case for a locally derived provision rate in line with national policy. In this sense, the councils are proposing to deliver a steady and adequate supply of aggregate minerals in line with national / local policy and market conditions. As with all plans produced to date, the councils remain committed to the principle of 'plan monitor and manage' and will ensure that issues relating to the supply of aggregates will be kept under review. Where monitoring indicates that local markets are not being adequately served, the councils will work with neighbouring authorities to ensure that there are sufficient sites in the development plan.

5.23 Through the Wiltshire and Swindon Core Strategy, the councils took the approach to “make provision of land in Wiltshire and Swindon sufficient to meet demand for sand and gravel in accordance with national and regional policy” (adopted policy MCS1). This approach provides flexibility to react to changing market conditions; any changes to the plan making system; and alternative apportionment figures for sand and gravel throughout the plan period. This will be an issue for the Planning Inspector to determine whether, in light of the NPPF and the councils' proposal to progress with a locally derived apportionment figure of 1.2 million tonnes per annum, the Minerals Sites Plan inevitably triggers a review of the relevant policies of the Minerals Core Strategy.

Previously dropped sites

5.24 Consultee comments - landowners of previously considered, but dropped sites²⁹ U15, U17 and C16 asked for the councils to revisit the assessment approach; and the information used to drop these sites with the view of reconsidering their inclusion in the Minerals Sites Plan. In the case of dropped

²⁹See 'Initial Site Options Report for the Wiltshire and Swindon Aggregate Minerals Site Allocations DPD' (August 2010) and 'A report of the results of consultation on initial site options for sand and gravel extraction' (August – October 2010).

sites U15 and U17 the landowner provided evidence of survey work and investigations into the quality and depth and resource at these locations. It was argued that the generic estimates used from British Geological Survey (BGS) data was unreliable and that the councils should carry out a robust review of these two dropped sites as they could be suitable options to help meet Wiltshire and Swindon's minerals apportionment figure. With regards to dropped site C16, the landowner and mineral operator put forward an argument that the site should be reconsidered and developed sensitively to provide a sustainable source of local building materials.

- 5.25 The Minerals Sites Plan has been informed by a positive and inclusive approach to site identification, using a detailed methodology as demonstrated through the consideration of all site options through previous rounds of consultation. This work has also been informed by data provided by the BGS to estimate resource yields of particular areas and through local knowledge and knowledge of the minerals industry and these were the principle reasons for removing U15 and U17.
- 5.26 Given the combined issues of proximity to the River Thames and to residential buildings when considered against the need to employ suitable buffers and standoffs and the potential impact that this could have on the yield of the site it was deemed necessary to drop site U15 in pursuit of other, more suitable options.
- 5.27 Due to the poor quality of mineral, site option U17 was excluded from further consideration on the grounds that the mitigation required to allow development to proceed against the criteria graded orange (sustainability issues) during assessment of the site, would outweigh any benefit from extraction. It would have been useful to have received any additional information from the landowner, which proved the quality/depth of the resource, earlier in the plan making process.
- 5.28 With regard to previously assessed site C16, the councils removed the site from further consideration on the basis of detailed transport assessments carried out to inform the process of site selection. It was deemed that the site lacked appropriate access to the advisory HGV route network and would promote undesirable use of the A3102.

Human health and amenity

- 5.29 Consultee comments - a general comment made about all sites suggested that any noise and dust assessments should address the cumulative impacts at relatively remote roadside properties where HGV traffic would pass when transporting mineral from the proposed sites. To mitigate these impacts, planning permissions for mineral workings should be conditioned to control operating hours and vehicle movements associated with the operation of sites. Furthermore, MPS2 (since replaced by the NPPF) should be the minimum standard of noise control that is applied and site specific noise considerations should be developed³⁰.

³⁰ Please refer to the '[Schedule of Proposed Modifications](#)' for the most up-to-date proposed modifications to the plan and to the '[Dialogue following proposed submission consultation](#)' report for the background to the ongoing dialogue regarding discussions over this issue.

- 5.30 It is not for the Minerals Sites Plan to include controls on the hours of vehicle movements as this will be an issue for any subsequent planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Additional text should be included into all Upper Thames Valley and Calne 'Traffic and transportation' site profile tables to the effect of:
- 5.31 "A Transport Assessment should be submitted with a planning application to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal including impacts on individual properties adjoining HGV access and movement routes."

Cumulative effects

- 5.32 Consultee comments - concern was expressed that cumulative effects [associated with proposed minerals development] had not been adequately addressed for all sites. Of particular note, the MOD raised concern about the potential cumulative effects from development of sites identified in proximity to RAF Fairford on aviation safety grounds. Sites close to the Gloucestershire County boundary could have 'in-combination' environmental, amenity and supporting infrastructure effects which should be considered. The cumulative impact of increased HGV traffic was cited as being of particular concern for those sites located in the Upper Thames Valley but also at the site located on land near Compton Bassett, in part due to current HGV traffic associated with waste operations in the area and the movement of this traffic through the centre of Calne and surrounding villages. Hampshire County Council expressed concern that potential HGV traffic associated with workings at the proposed extensions to Brickworth Quarry site be restricted to only using the A36 and thereby avoid using the A27.
- 5.33 The MOD/representatives from RAF Fairford were involved in workshop discussions to determine suitable restoration options for all sites in the Minerals Sites Plan including those sites in proximity to RAF Fairford. Through this workshop, views were sought from a number of bodies and general consensus was drawn up that birdstrike risk should be considered as a determining factor in restoration proposals for those sites in proximity to the airfield. The restoration objectives for Cox's Farm, Blackburr Farm, North farm, Land East of Calcutt and Land at Cotswold Community reflect the findings from this workshop and previous information received from the MOD/DIO³¹ Safeguarding. The councils will continue to work with the MOD and developers in the working and restoration of the sites contained in the Minerals Sites Plan.
- 5.34 Impacts of potential cumulative effects on Gloucestershire are explored and addressed in the Minerals Core Strategy and the issue of collaborative working with Gloucestershire in the Upper Thames Valley is pursued in policy MCS5.
- 5.35 .. Officers are of the view that issues of a strategic and local nature will need to be addressed through the development of minerals proposals in the Upper Thames Valley. As such additional text as a new paragraph to be added beneath paragraph 2.4 in the 'context' section is proposed to read:

³¹ Defence Infrastructure Organisation (DIO).

“The planned release of minerals sites in the Upper Thames Valley will need to ensure that all relevant strategic and local considerations (including HGV movements along the A419 and the requirements of other plans and strategies in the area) have been factored into the development of minerals proposals.”

- 5.36 The traffic and transportation section of the ‘Land near Compton Bassett’ site profile does seek to address issue of HGV movement through the centre of Calne. In regards HGV movements and routes, the traffic and transportation section requests a Transport Assessment will have to be carried out to support the submission of any planning application. These issues would therefore be addressed through said assessment.
- 5.37 Through discussion with colleagues in the Wiltshire Transport team, no change to the current wording of the section is proposed. Brickworth Quarry has a legal agreement in place that states that HGV’s from their site should not use the A27 unless customer location necessitates access. The agreement works well as they have had no records of complaints. Any new or extended use of the site may change traffic conditions and therefore the agreement will need to be re-evaluated. The current agreement states that the route can be used if customer location necessitates which would remain in any revised agreement.

Site specific issues

Cox’s Farm

- 5.38 Consultee comment - the MOD commented that the proposed site is situated within the explosive, height and technical safeguarding consultation zone which surrounds RAF Fairford and subsequently presented a line within the site boundary where they cannot accept mineral working (in line with requirements of explosives safeguarding). The MOD also commented on the need to reduce the risks associated with birdstrike, the requirement to not work within the Inhabited Building Distance (IBD³²), that restoration should not feature wetland habitat and that all phased workings are approved by DIO³³ safeguarding.
- 5.39 Further research into this issue is ongoing and further dialogue with RAF Fairford and the MOD/DIO safeguarding will be sought to reach an agreed position. In addition, the councils would maintain that the site boundary for Cox’s Farm (and all other proposed sites) represents an area of land within which a planning application will be supported. As such, mitigation measures required by the MOD/DIO can be negotiated and agreed through a detailed planning application process. The MOD/representatives from RAF Fairford were involved in workshop discussions to determine suitable restoration options for all sites in the plan including those sites in proximity to RAF Fairford. Through this workshop, views were sought from a number of bodies and general consensus was drawn up that birdstrike risk should be considered

³² Inhabited Building Distance (IBD) - Within this safeguarding zone the MOD monitors the management and use of developments to maintain public safety and tends to object to any persons living, working or congregating for long periods of time. Allowing mineral workings within this zone will introduce a significant risk to operations at RAF Fairford by severely reducing the licensed storage capacity at several ammunitions storage facilities located at the aerodrome.

³³ Defence Infrastructure Organisation – Manages the military estate, including accommodation for Service personnel and their families, on behalf of the MoD. The DIO was formed on 1 April 2011. The DIO should be consulted when a planning application for the site is received.

as a determining factor in restoration proposals for those sites in proximity to the airfield. The restoration objectives for Cox's Farm, Blackburr Farm, North Farm, Land East of Calcutt and Land at Cotswold Community reflect the findings from this workshop and previous information received from the MOD/DIO Safeguarding. The councils will continue to work with the MOD and developers in the working and restoration of the sites contained in the plan. Reference to 'the critical need to reduce the risk of bird strike', is adequately dealt with through the Preferred restoration objective section of the site profile table.

- 5.40 Consultee comment - comments received from residents of Marston Meysey sought an increased buffer zone or designated 'Zone of Sensitivity' (over 100m) to the west of the site to protect the historic setting of the village, limit noise and dust impacts and reduce landscape impacts³⁴.
- 5.41 Through discussion and negotiation with residents of Marston Meysey, it was agreed that reference to a 'zone of sensitivity' should be incorporated into the 'Human health and amenity', 'Landscape and visual' and 'Historic built environment' sections of the site profile table to the effect of "**A 'Zone of Sensitivity' incorporating a proposed minimum 100m 'stand-off distance' will need to be negotiated and agreed at the planning application stage.**" Furthermore, an indicative illustration of the proposed 'zone of sensitivity' is proposed to be added onto Inset Map 1: Cox's Farm subject to further discussion through examination.
- 5.42 Consultee comment - the archaeological value of the site and surrounding areas was highlighted as being of particular importance requiring suitable mitigation in line with policy and guidance notes.
- 5.43 In light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the 'Archaeology' section: "**Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.**"
- 5.44 Consultee comment - numerous comments were received pointing to the need for improvements to the local C class roads in the area, the introduction of a 30/40 mph speed limit and that traffic issues in the area are looked at in a co-ordinated manner.
- 5.45 The traffic and transportation section of the site profile table addresses the issue of highway improvements and maintenance costs by requesting, where considered appropriate in law, financial contributions. Whilst the plan can request that this be a serious consideration in any submitted planning application, it is for the planning application process to determine the level and type of financial contributions to be sought and how these should be implemented.

³⁴ Please refer to the 'Schedule of Proposed Modifications' for the most up-to-date proposed modifications to the plan and to the 'Dialogue following proposed submission consultation' report for the background to the ongoing dialogue regarding discussions over this issue.

- 5.46 Consultee comment - there were calls for more assessments to be undertaken into the impact of quarrying on water courses and water flow and questions were raised over the credibility and robustness of the evidence used by the councils whilst the Environment Agency is carrying out re-modelling work in the area.
- 5.47 A hydrogeological impact assessment has been undertaken on these suggested sites (in the Upper Thames Valley) as part of the plan making process and to inform the site profile tables for these sites. The councils can only use the data that is available at the time of assessment and plan making. The Environment Agency does provide updated re-modelling data as and when it is available and this is used by the councils to inform decision making. As this information is often updated, it is not wise to continually delay plan preparation until new data is provided in this respect.

Blackburr Farm

- 5.48 Consultee comment - the MOD expressed a preference for restoration to dry land on the site whilst the Cotswold Canal trust felt that restoration of the canal and creation of a marina in the area was of great importance to the Cotswold Canal restoration project as a whole.
- 5.49 The MOD/representatives from RAF Fairford were involved in workshop discussions to determine suitable restoration options for all sites in the Minerals Sites Plan including those sites in proximity to RAF Fairford. Through this workshop, views were sought from a number of bodies and general consensus was drawn up that birdstrike risk should be considered as a determining factor in restoration proposals for those sites in proximity to the airfield. The restoration objectives for Cox's Farm, Blackburr Farm, North Farm, Land East of Calcutt and Land at Cotswold Community reflect the findings from this workshop and previous information received from the MOD/DIO Safeguarding. The councils will continue to work with the MOD and developers in the working and restoration of the sites contained in the plan. Reference to "the need to reduce the risk of bird strike associated with air traffic at RAF Fairford", is adequately dealt with through the 'Preferred Restoration Objective' section of the site profile table (Table 2.3). Whilst the preferred restoration objective section of the table could more strongly refer to the need for the restoration of the canal network at this location, to suggest that it 'must' (see consultee comment in Appendix 26) would be to pre-determine any restoration scheme proposed through a planning application. Therefore suggested amended wording to read "Restoration of the canal which bisects the site ~~could also be considered as part of a wider restoration project~~ should be considered within the wider context of the Cotswold Canals restoration project as a whole. However,..."
- 5.50 Consultee comment - concerns around the issues of noise, dust and disruption to village life in Castle Eaton and the nearby 'Second Chance Touring Park' were of particular prominence. Recommendations were proposed whereby any permission at the site should include a comprehensive noise condition derived from a combination of good practice, existing guidance and the current World Health Organisation advice on the impacts of noise on health - with enforceable target noise levels.

- 5.51 The inclusion in the text of references to a minimum 100 metre 'stand off distance' to dust sensitive receptors will limit the impact of dust on village life in Castle Eaton and to the 'Second Chance Touring Park'. A Dust Management Plan (DMP) (which should identify and provide appropriate mitigation and monitoring proposals for dust generating activity) is also listed as a requirement to support any subsequent planning application. Agreed noise measures and proposed controls would need to be addressed through the planning application stage and the need for these considerations is highlighted in the 'Human health and amenity' section of the site profile table. Comprehensive noise conditions (with target noise levels) will be a matter for a planning application process to consider and propose. The councils are confident that the wording of the 'Landscape and visual' section of the site profile table is sufficient to provide appropriate screening to the 'Second Chance Touring Park'.
- 5.52 Consultee comment - due to the relatively elevated position of Castle Eaton, quarrying at this location would have a significant detrimental impact on the historical/landscape character of the area – in particular with impacts to the setting of Caste Eaton conservation area and St Marys Parish Church (Grade 1 listed).
- 5.53 The councils are confident that the wording of the 'Landscape and visual' section of the site profile table is sufficient to provide appropriate screening to avoid visual impact on views from Castle Eaton. The section calls for significant strengthening of screening to the south of the site, the site could also be worked in a phased manner to improve screening to the south.
- 5.54 Consultee comment - the archaeological value of the site and surrounding areas was highlighted, with evidence of a prehistoric/Roman settlement in the vicinity requiring suitable mitigation in line with policy and guidance notes.
- 5.55 In light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the 'Archaeology' section: **“Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.”**
- 5.56 Consultee comment - It was felt that the local C-class roads in the area would require major improvements to service new quarries (similar to points raised against Cox's Farm) and the safety of the A419 was questioned.
- 5.57 The 'Traffic and transportation' section of the site calls for existing access arrangements of nearby quarries to be used where possible. A Transport Assessment should be submitted with any subsequent planning application to assess the potential for transport issues in the vicinity. This section of the site profile table could be strengthened by utilising the same detail as that used for the Cox's Farm traffic and transportation section as both sites could access the C124. Suggested wording to incorporate **“The site should be treated as an extension to nearby sites, utilising existing access arrangements wherever possible. Access from the site could make use of the C124 although appropriately planned improvements will need to be made to this route to ensure that it is of an appropriate standard for accommodating minerals**

HGVs.” There is no evidence to suggest that financial contributions to cover road/ infrastructure improvements would not be achieved as some consultation responses question.

- 5.58 Consultee Comment - there were calls for more assessments to be undertaken on the potential impact of quarrying on water courses and the pattern of water flow. Questions were raised over the credibility and robustness of the evidence used by the councils whilst the Environment Agency is carrying out re-modelling work in the area.
- 5.59 A Hydrogeological Impact Assessment has been undertaken on these suggested sites (in the Upper Thames Valley) as part of the plan making process and to inform the site profile tables for these sites. The councils can only use the data that is available at the time of assessment and plan making. The Environment Agency do provide updated re-modelling data as and when it is available and this is used by the councils to inform decision making. As this information is often updated, it is not wise to continually delay plan preparation until new data is provided in this respect.

North Farm

- 5.60 Consultee comment - part of the site is said to be owned by one of the consultees who objects to the inclusion of the land in the Minerals Sites Plan. They were also of the opinion that the inclusion of the site was an economically unsound proposition as the site had the smallest potential yield of all sites in the Minerals Sites Plan, with the greatest potential difficulty and associated developer costs.
- 5.61 The representor in question has been formally contacted three times regarding their submitted comment. The councils are keen to establish and categorically determine the ownership of the site in order to address any objections raised. However no reply has been forthcoming. The boundary of the site as included in the plan merely reflects a preferred area. It does not indicate that the entire boundary as drawn on Inset Map 3 delineates the entire extent of working. The councils are aware that through BGS estimates, the northern part of the site may have deeper reserves, however the proposed boundary of the site allows any part of the site (subject to appropriate standoff distances, mitigation and control) to be worked if necessary.
- 5.62 Consultee comment - there was support for the proposed restoration objective, however the MOD would prefer the site was restored to dry land, there were also concerns that restored land will reduce landscape value.
- 5.63 The MOD/representatives from RAF Fairford were involved in workshop discussions to determine suitable restoration options for all sites in the Minerals Sites Plan including those sites in proximity to RAF Fairford. Through this workshop, views were sought from a number of bodies and general consensus was drawn up that birdstrike risk should be considered as a determining factor in restoration proposals for those sites in proximity to the airfield. The restoration objectives for Cox's Farm, Blackburr Farm, North Farm, Land East of Calcutt and Land at Cotswold Community reflect the findings from this workshop and previous information received from the MOD/DIO Safeguarding. The councils will continue to work with the MOD and developers in the working and restoration of the sites contained in the plan. Natural England welcomed the preferred restoration objective and through the workshop discussions an

agreed consensus was reached concerning the proposed restoration objective. It is therefore not felt, by the councils, that restoration of the site post working will reduce the landscape value of the area.

- 5.64 Consultee comment - concerns were raised as to the potential impact of working the site on the Thames habitat corridor and associated species and the Thames National Path.
- 5.65 As with all site table sections in the plan, specific wording has been informed by detailed assessment work carried out through the plan preparation process. The plan does call for a robust construction method statement and hydrogeological impact assessment to be submitted with any planning application to address management of habitat features and the water environment, and for an extended Phase 1 habitat survey to be undertaken. Ancient hedgerows and trees can be safeguarded through working and this will be a matter for any subsequent planning application to determine. The 'Preferred Restoration Objective' for the site has been developed collaboratively with stakeholders from various organisations with a view to developing suitable options. The 'Preferred Restoration Objective' for this site does recognise the potential sensitive nature of wildlife in the area and does seek to enhance this environment in line with targets included in the Cotswold Water Park Biodiversity Action Plan (BAP) and Wiltshire BAP.
- 5.66 Consultee comment - the issue of noise, dust and disruption to village life in Castle Eaton and the nearby Second Chance Touring Park was of particular prominence in submitted representations. Recommendations were proposed whereby any permission at the site should include a comprehensive noise condition with target noise levels.
- 5.67 The site profile table ('Human health and amenity' – 'air quality') details the requirement for any applicant to have undertaken a robust Dust Management Plan to support any subsequent planning application. This should identify and provide appropriate mitigation and monitoring proposals for dust generating activities. The requirement for a minimum 100m stand-off distance to dust sensitive receptors (through consultation with public protection services) will also limit the impacts on residents.
- 5.68 The site profile table ('Human health and amenity' – 'air quality') details the need for detailed consideration to be applied to site design and operation to reduce the impact of noise, along with robust mitigation and site monitoring measures.
- 5.69 Consultee comment - it was felt that due to the relatively elevated position of Castle Eaton, quarrying at this location would have a significant detrimental impact on the historical/landscape character of the area – in particular with impacts to the setting of Castle Eaton conservation area and St Mary's Parish Church (Grade I listed).
- 5.70 The site profile table for the site does recognise the need for appropriately planned buffer and screening to limit impacts on the Castle Eaton conservation area. The wording "an appropriately planned buffer and screening" in the 'Historic built environment' section of the site profile table determines that any buffer/screening must be appropriate to the landscape setting of the area. Furthermore, the 'Landscape and visual' section of the site highlights the need

for future working to be “sensitively planned to maintain the integrity and setting of Castle Eaton.”

- 5.71 Consultee comment - there was a strong feeling amongst consultees that the infrastructure in the area is not effective to take additional HGV traffic. Again, safety issues and required road improvements were cited as significant concerns. One transport solution should be sought to address problems of the four proposed sites in the area.
- 5.72 The councils are of the opinion that the infrastructure in the area can accommodate HGV traffic if routed correctly. As suggested in the site profile table ('Traffic and transportation'), the site should be treated as an extension to nearby quarries, utilising existing access arrangements. The site profile table also calls for a detailed Transport Assessment to be submitted with a planning application which will assess any transport issues in the area and provide adequate mitigation for impacts. Where appropriate in law, financial contributions will be sought through the planning application process to cover highway improvements/maintenance.
- 5.73 Consultee comment - the archaeological value of the site and surrounding areas was highlighted as being of considerable importance and likely to contain more finds of equal if not greater significance requiring suitable mitigation in line with policy and guidance notes.
- 5.74 In light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the 'Archaeology' section: **“Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.”**
- 5.75 Consultee comment - concern was raised that the land is subject to winter flooding which could increase the risk of pollutants entering the surrounding land and the River Thames.
- 5.76 The 'Water environment' section of the site profile table adequately outlines measures required to prevent such situations from occurring. A robust construction method statement and Hydrogeological Impact Assessment to include details of groundwater protection and stockpile storage areas to reduce pollution is also called for as part of any submitted planning application.

Land east of Calcutt

- 5.77 Consultee comment - it was pointed out that the site is in close proximity to a Sewage Treatment Works; and that Thames Water have operational assets crossing the site. It was suggested that the Minerals Sites Plan be amended to reflect this fact.
- 5.78 Agreed, this information should be incorporated into the 'site description'. Suggested addition to text **“The site is crossed by an oil pipeline, and low level power lines and possible water mains and sewer. Early consultation with the relevant infrastructure providers to establish the location of**

installations, and to arrange for them to be diverted and/or safeguarded where necessary should be made.”

- 5.79 Site Profiles – to introduce the requirement for consideration regarding the infrastructure running across the site, add an additional row titled ‘Any other issues’ above the ‘Cumulative effects’ row with the following text: “Early consultation with the relevant infrastructure providers to establish the location of installations on site, and to arrange for them to be diverted and/or safeguarded where necessary, should be made as part of any planning application process.”
- 5.80 Consultee comment - concerns were expressed that the habitat and landscape value of the River Thames will be spoilt by the erection of bunds and screening.
- 5.81 As with all site table sections in the Minerals Sites Plan, specific wording has been informed by detailed assessment work carried out through the plan preparation process. The plan does call for a robust construction method statement and hydrogeological impact assessment to be submitted with any planning application to address management of habitat features and the water environment, and for an extended Phase 1 habitat survey to be undertaken. The site profile table stresses the need to appropriately and sensitively plan mitigation along the south west and south east boundaries of the site. Appropriate standoff distances to the river Thames will need to be employed so that bunding does not increase the risk of flooding as referenced in the ‘Water environment’ section of the site profile table.
- 5.82 Consultee comment - the archaeological value of the site and surrounding areas was highlighted, with the site located in proximity to Ermin Way and the site of a former Roman Villa requiring suitable mitigation in line with policy and guidance notes.
- 5.83 In light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the Archaeology section: “Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.”
- 5.84 Consultee comment - there was a strong feeling amongst consultees that the infrastructure in the area is not effective to take additional HGV traffic. Again, safety issues and required road improvements were cited as significant concerns. One transport solution should be sought to address problems of the four proposed sites in the area.
- 5.85 The councils feel that the infrastructure in the area can accommodate HGV traffic if routed correctly. As suggested in the site profile table (‘Traffic and transportation’), the site should be treated as an extension to nearby quarries, utilising existing access arrangements. The site profile table also calls for a detailed Transport Assessment to be submitted with a planning application which will assess any transport issues in the area and provide adequate mitigation for impacts. Financial contributions will be sought through the planning application process to cover highway improvements/maintenance.

- 5.86 Consultee comment - concern was raised that the land is subject to winter flooding which could increase the risk of pollutants entering the surrounding land and the River Thames.
- 5.87 The 'Water environment' section of the site profile table adequately outlines measures required to prevent such situations from occurring. A robust construction method statement and Hydrogeological Impact Assessment to include details of groundwater protection and stockpile storage areas to reduce pollution is also called for as part of any submitted planning application.

Land at Cotswold Community

- 5.88 Consultee comment – there was support for the inclusion of this site, however there were conflicting views regarding how issues of access should be approached within the Minerals Sites Plan. Hills Quarry Products Ltd. (an adjacent mineral operator), felt that the site should be treated as an extension to the adjoining quarrying activity located to the north of the proposed site. However the owner of the site objected to the site being treated as an extension to the adjoining quarry to the north and instead requested that the site be treated as independent with its own access arrangements (direct to the Western Spine Road) developed.
- 5.89 The preference would be to see the site worked as a natural extension of the quarrying activity to the north. This would alleviate the need for upgraded junction arrangements to be constructed as part of any subsequent planning application. If the landowner wishes to pursue working the site as a stand-alone quarry, the application will still have to address all aspects of mitigation set out in profile.
- 5.90 Consultee comment - the archaeological value of the site and surrounding areas was highlighted, whilst English Heritage commented on the likely potential change to the context and setting of the former school/farmstead and Grade II listed buildings. However, it was also suggested that these buildings may have already been compromised by past construction and that restoration could improve these aspects.
- 5.91 Table 2.6 – 'Archaeology'. In light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the 'Archaeology' section: **“Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.”**
- 5.92 Table 2.6 – 'Historic Built Environment'. Due to the listed status of some of the buildings located towards the centre of the site, information should be included within the plan requesting measures be put in place during operations to limit the impact on these buildings and to incorporate the buildings into any restoration proposals. Additional text should be inserted after the current text in this section and to read **“A cultural heritage assessment and conservation plan to inform which buildings might be removed and the measures required to secure the enhancement of the historic farmstead should form part of any mitigation/restoration plan.”** (proposed to cross reference this point in the restoration section of the site profile).

Land near Compton Bassett

- 5.93 Consultee comment - The proposed Preferred Restoration objective for the site split opinion. Natural England broadly welcomed the proposals and the potential to enhance public rights of way and cycle routes. However local residents felt that a restoration timescale was required, there was still concern that sand extraction would be followed by waste disposal (landfilling) activities. Comments were made that the inclusion of the site was to the detriment of strategic restoration and amenity proposals considered for the whole Lower Compton site.
- 5.94 The plan is insistent that none of the minerals sites proposed in this document will be used for the landfilling of putrescible waste at any time during their restoration. Wiltshire and Swindon have sufficient landfill capacity to meet requirements over the plan period and as such do not require additional landfill sites. Extraction timetables and schedules of working and restoration are matters for a planning application to decide, to do so in the Minerals Sites Plan would be to pre-determine any planning conditions placed on the site. The councils are of the opinion that, following the NAM led restoration workshop and discussion with a wide variety of stakeholders, that the restoration objectives for the site are appropriate and seek to improve amenity/wildlife value in the area.
- 5.95 Consultee comment - concern was expressed that working of the site would impact on the well-being of Calne communities as a result of air quality impacts and associated movement of HGV traffic through the centre of Calne. The issue of HGV traffic and associated movements was raised by a number of consultees. It was felt that the location of the site was likely to exacerbate traffic issues in Calne whilst increases in HGV traffic along the A3102 and through Royal Wootton Bassett, Lyneham, Goatacre and Hilmarton would not be acceptable to residents in these locations. It was also highlighted that HGV routeing would have to be down Sandpit Lane where a new housing estate has recently been built and that traffic pressures would increase around Lower Compton Road and the A4 junction.
- 5.96 Due to the relative remoteness of the site, the councils are confident that local air quality should not be adversely affected provided the site is sensitively designed and incorporates appropriate mitigation and monitoring measures. Furthermore a robust Dust Management Plan should be provided to support any subsequent planning application process. The 'Human health and amenity' section reflects the council's position on this matter. The 'Traffic and transportation' section of the site profile does seek to address issues of HGV movement through the centre of Calne. In regards HGV movements and routes, the 'Traffic and transportation' section requests that a Transport Assessment be carried out to support the submission of any planning application. These issues would therefore be addressed through said assessment.
- 5.97 Consultee comment - comments considered that the likely impact on the nearby North Wessex Downs AONB and visual impact on Morgan's Hill had not been adequately assessed and that an Environmental Impact Assessment would be required for proposed works.

- 5.98 Issues of landscape and visual impact have been assessed through the SA/SEA informed site selection methodology and site assessment process and through further detailed site assessments following the Initial Site Options consultation - to inform site profile tables of the Minerals Sites Plan. The potential for visual impact from Morgans Hill is recognised in the 'Landscape and visual' section of the site profile. The text calls for this impact to be assessed and for appropriate mitigation to be put in place to limit long distance views into the site.
- 5.99 Consultee comment - it was also considered that current workings in the area have affected underlying groundwater and aquifer dynamics and that further extraction in the area would exacerbate this issue.
- 5.100 The water environment section of the site profile does call for a number of assessments to be submitted as part of the planning application process. Furthermore, the suggested general modifications to the 'Water environment' sections of the plan are considered to re-enforce the robustness of this section.
- 5.101 Extensions to Brickworth Quarry
- 5.102 Consultee comment - a recurring issue expressed by consultees was an objection to the footprint of the site being located in an area designated as Ancient Woodland and County Wildlife Site. Comments raised suggested that the Minerals Sites Plan does not show that the need for the site outweighs the loss of woodland habitat; that Ancient Woodland (as a system) cannot be translocated; that the loss of Ancient Woodland would run contrary to government forestry policies and that although soil structures can be maintained and preserved, areas of Ancient Woodland that are disturbed are unlikely to survive.
- 5.103 The suggested site area contains no ancient or veteran tree specimens since the Ancient Woodland was felled a considerable number of years ago and the site is now under agricultural and planted (conifer) woodland management, due for felling as a cash crop within the next few years. The residual Ancient Woodland soils are evident by the ground flora they support and may be lost entirely if the area is not replanted after felling. The benefit of working the site will be realised through the restoration of the site to broad leaved woodland, with the retention and conservation of the Ancient Woodland soils managed carefully throughout the extraction process. Loss of woodland cover will be temporary but can be phased to minimise the exposure of sensitive soils. A suitable soil handling strategy will help to conserve what is left of the Ancient Woodland seed bank while the mineral reserve is extracted from beneath it.
- 5.104 Consultee comment - in line with comments relating to Ancient Woodland removal, it was felt that restoration of the site post working using the Ancient Woodland seedbank would not be feasible and retention of the seedbank would be impractical.
- 5.105 Restoration will be to broad leaved woodland. The Ancient Woodland has already been cleared and replanted with conifers that are managed as a cash crop and will be due for felling in the next few years. Mineral extraction will provide the opportunity for restoration to broad leaved woodland that may otherwise not arise. A suitable soil handling strategy will help to conserve what is left of the Ancient Woodland seed bank while the mineral reserve is

extracted from beneath it.

- 5.106 Consultee comment - Natural England commented that the Minerals Sites Plan does not mention the potential for the site to affect the New Forest SSSI and felt that the Minerals Sites Plan should be able to demonstrate that the site is developable without adversely impacting on the SSSI.
- 5.107 Table 4.2 – ‘Biodiversity and geodiversity’. This issue is referenced in the ‘Water environment’ section of the site profile. Through discussion with the County Ecologist, it has been confirmed that the detailed ecological site assessment does assess potential hydrological impacts to the New Forest SSSI. An addition to the text in the ‘Biodiversity and geodiversity’ section of the Minerals Sites Plan can be made to make reference to the need for any planning applicant to provide evidence that the minerals workings will not impact on the water levels in adjacent areas such as the New Forest SSSI. Suggested text to read: ‘As the County Wildlife Sites and New Forest SSSI are dependent on both surface water and ground water levels to maintain their special interest...’
- 5.108 Consultee comment - Hampshire County Council expressed concern that HGVs may use the A27 and that the Minerals Sites Plan should acknowledge that any future traffic associated with the site allocation be restricted and appropriately secured to the A36 only.
- 5.109 Through discussion with colleagues in the Wiltshire Transport team, no change to the current wording of the section is proposed. Brickworth Quarry has a legal agreement in place that states that HGV’s from their site should not use the A27 unless customer location necessitates access. The agreement works well as they have had no records of complaints. Any new or extended use of the site may change traffic conditions and therefore the agreement will need to be re-evaluated. The current agreement states that the route can be used if customer location necessitates which would remain in any revised agreement.

6. Next steps in the preparation of the Minerals Sites Plan

- 6.1 The latest stage in the preparation of the Minerals Sites Plan involved the presentation of the final version of the document to the respective Cabinets and Full Council meetings of Wiltshire (19 June Cabinet; 26 June (2012) Full Council) and Swindon (11 June Cabinet; 19 July (2012) Full Council) for approval. At all critical stages, the document has received the necessary political mandate to proceed to the next stage.
- 6.2 Following the last round of democratic approval, the Minerals Sites Plan and all supporting evidence was submitted to the Secretary of State for Communities and Local Government on 20 July 2012. From that point, the Minerals Sites Plan entered the independent examination process.
- 6.3 The examination period is expected to last 9-12 months and will conclude with the publication of the Report of the Government's Inspector, which will determine whether the Minerals Sites Plan is 'sound', or 'un-sound'. The Report may recommend that further changes need to be made to the Plan in order to address soundness issues before it can be adopted.
- 6.4 If the Minerals Sites Plan is found to be 'sound' by the Inspector, it will be presented to the respective councils for adoption.
- 6.5 However, if the document is found to be unsound, the councils will need to consider restarting the process of plan making from the start of the process.

