

# Wiltshire and Swindon Aggregate Minerals Site Allocations Plan

Detailed schedule of all representations  
made during the formal consultation  
stage

Comment ID:	95	Mr and Mrs Mark Freeman Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 393298 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Executive Summary				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Wiltshire Council called for sites in 2004 and 2006. 62 were proposed but 55 were later dropped from consideration because they were considered to have overriding environmental constraints or were believed to be unsuitable for inclusion in the development plan. It is of great concern that Wiltshire is not seeking sufficient sites to fulfil its provision obligations when suitable sites are known to be available.</p> <p>At the same time, Wiltshire proposes to reduce its apportionment / provision because it believes there is insufficient mineral available. This is an abrogation of responsibility. There is a continuing demand for building materials as the Melksham area continues to develop and the Council must ensure an allocation of an adequate supply rather than relying on minerals imported from other counties.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation	To ensure full discussion of issues.					
Summary	Concern that Wiltshire not seeking sufficient sites to fulfil its provision obligations when suitable sites are available. Abrogation of responsibility. Council must ensure adequate supply – demand for building materials in Melksham area.					

Comment ID:	111	Mr John Salmon		Person ID: 637185	Is the DPD legally compliant?	
Comment point	Executive Summary				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Wiltshire Council called for sites in 2004 and 2006. 62 were proposed but 55 were later dropped from consideration because they were considered to have overriding environmental constraints or were believed to be unsuitable for inclusion in the development plan. It is of great concern within the minerals industry that Wiltshire is not seeking sufficient sites to fulfil its provision obligations when suitable sites are known to be available. It is believed that sites may have been turned down based on information which is 6 or 8 years out of date. Others are known to have been dropped on scant information without full landowner or operator consultation.</p> <p>At the same time that Wiltshire has dropped 90% of the proposed sites, the County proposes to reduce its apportionment / provision because it believes there is insufficient mineral available to sustain it. This is an abrogation of responsibility. There is a continuing demand for building materials as Wiltshire, particularly the urban areas and north Wiltshire towns, continues to develop and the country is commencing its long haul out of recession. Wiltshire Council must not allow planning to be a bar to enterprise or economic recovery. It must ensure an allocation of an adequate supply of aggregates for use within the County's boundaries rather than relying on minerals imported from other counties.</p>					
Reasons for oral participation						
Summary	<p>Concern within minerals industry that Wiltshire is not seeking sufficient sites to fulfil its provision obligations when suitable sites are known to be available. Believed that sites may have been turned down based on out of date information and others dropped without full landowner/operator consultation. Reduction in apportionment is an abrogation of responsibility. Need to ensure adequate supply of aggregates for use within County.</p>					

Comment ID:	18	Mrs Jane Bowker-Praed		Person ID: 473261	Is the DPD legally compliant?	
Comment point	1. Introduction				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally						

compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>I live in Norley Lane, Studley, Calne right next to the proposed C12 site. I wrote a letter when the original consultation came out, but was then relieved to hear that Lord Lansdowne had withdrawn permission for three of the proposed sites. I am hoping that this is still the case.</p> <p>I live in an old stone property, number 114, and any gravel extraction in the next field could have a detrimental effect on foundations etc. The field is not level, but has a slope away from the properties so there is a possibility of ground slipping. The noise and dust pollution would be intolerable and the loss of agricultural land where deer and pheasants roam, plus the fact of our narrow lane having to be widened to allow access for the many lorries would be very inconvenient. The value of the property would drop and no doubt would be hard to sell if the occasion arose. How many people would be happy living right next door to a gravel extraction/waste site? Not many. if any.</p> <p>I await any reply.</p>
Reasons for oral participation	
Summary	Objection to C12 site (previously withdrawn).

Comment ID:	28	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?		
Comment point	1. Introduction				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make the DPD legally compliant?							
Reasons for not sound							
What change(s) are necessary to make the DPD sound?							
Other comments	<p>The MOD is very concerned about the potential cumulative effect of the development of sites identified in the vicinity of RAF Fairford on aviation safety. Provision needs to be made to ensure that restoration and aftercare management of sites located in the birdstrike safeguarding zone are designed to ensure that birdstrike risk is not increased either as a result of the restoration of an individual site or as a consequence of increasing the bird attractants in an area in conjunction with other existing restoration sites and habit features in the area.</p> <p>The need to take account of the cumulative effect of permitting a new mineral site in proximity to another submitted site or an existing mineral site to increase birdstrike risk is identified in Circular 01/03: Safeguarding Aerodromes, technical Sites and Military Explosive Storage Areas at Annex 2 – Aerodrome Safeguarding Maps: "Birdstrike Hazard. This states: "A local planning authority will need to consider not only the individual potential bird attractant features of a proposed development but also whether the development, when combined with existing land features, will make the safeguarded</p>						

	<p>area, or parts of it, more attractive to birds or create a hazard such as bird flightlines across aircraft flightpaths".</p> <p>Taking into account the coexistence of significant regional sand and gravel and a key military aerodrome of strategic importance to UK defence, the MOD considers it important that a restoration led approach is taken in identifying future mineral extraction sites for inclusion in the Minerals Development Plan Document.</p> <p>The MOD is willing to work with the council and developers to identify the most suitable address for each individual site.</p>
Reasons for oral participation	
Summary	<p>MOD concerned by potential cumulative effect of the development of sites identified in the vicinity of RAF Fairford on aviation safety. Provision needs to be made to ensure that restoration and aftercare management of sites located in the birdstrike safeguarding zone are designed to ensure that birdstrike risk is not increased either as a result of the restoration of an individual site or as a consequence of increasing the bird attractants in an area in conjunction with other existing restoration sites and habit features in the area.</p> <p>Taking into account the coexistence of significant regional sand and gravel and a key military aerodrome of strategic importance to UK defence, the MOD considers it important that a restoration led approach is taken in identifying future mineral extraction sites for inclusion in the Minerals DPD.</p> <p>The MOD is willing to work with the council and developers to identify the most suitable address for each individual site.</p>

Comment ID:	33	Mr Malcolm Watt	Cotswolds Conservation Board Planning Officer	Person ID: 198565	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation						
Summary	DPD considered to be legally compliant and sound. No further comments.					

Comment ID:	35	Cllr Tim Ball	Bath and North East Somerset Council Cabinet Member for Homes and Planning	Person ID: 633447	Is the DPD legally compliant?	
					Is the DPD sound?	

Comment point	1. Introduction	Oral participation?	
Reasons for not legally compliant			
What change(s) are necessary to make the DPD legally compliant?			
Reasons for not sound			
What change(s) are necessary to make the DPD sound?			
Other comments	<p>On behalf of Bath &amp; North East Somerset Council I would like to express support for the Aggregate Minerals Site Allocations DPD. The document includes a thorough assessment of each site proposed and also discusses the potential for cumulative effects within and adjoining the Plan area. Owing to the location of the Cricklade sites these cumulative effects exclusively relate to Gloucestershire and in the cases of the other two, either no cumulative are identified or they are very local to the site and can be mitigated. On the basis of the information set out in consultation document it appears that the allocation of these sites for sand and gravel extraction is unlikely to have any adverse impact on Bath &amp; North East Somerset.</p> <p>Whilst we have no specific comments on the proposals we would like to be kept informed of progress of the Aggregate Minerals Site Allocations DPD and consulted on any minerals planning applications of a scale and nature that would either directly or indirectly impact on this district's environmental interests especially the Bath Hot Springs and their aquifers. The Council has a particular concern to be aware of any proposals for hydro-fracturing which may affect Bath &amp; North East Somerset.</p>		
Reasons for oral participation			
Summary	Support for Site Allocations DPD. Unlikely to have any impact on Bath and North East Somerset.		

Comment ID:	36	Mr Andrew Maxted	Vale of White Horse District Council Senior Planning Policy Officer	Person ID: 633568	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						

Other comments	Thank you for the opportunity to comment on the above consultation. This letter represents the Vale of White Horse District Council's formal response to the consultation which has been agreed by the Cabinet Member for Planning, Councillor Roger Cox. The content of the above document are noted. It is understood that five of the seven proposed sites identified as suitable for minerals extraction within Wiltshire are located close to the boundary with the Vale of White Horse District and Swindon Borough Council. Although it is accepted that any cumulative impacts will be most likely to affect Wiltshire or Gloucestershire, consideration for impacts on Oxfordshire should not be overlooked. In particular, it is suggested that any transport assessments undertaken should consider the potential for increased traffic flow on the A420.
Reasons for oral participation	
Summary	Traffic and transportation: Suggested that any transport assessments undertaken should consider the potential for increased traffic flow on the A420.  Understood that five of the seven proposed sites are located close to the boundary with the Vale of White Horse District. Consideration for impacts on Oxfordshire should not be overlooked.

Comment ID:	38	Barbara Morgan	Network Rail Town Planning Technician (Western)	Person ID: 488946	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	Upon review of this document, Network Rail has no comments to make.					
Reasons for oral participation						
Summary	No comments.					

Comment ID:	56	Mr John Salmon	Hills Quarry Products Ltd	Person ID: 635228	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not						

legally compliant	
What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>Wiltshire Council called for sites in 2004 and 2006. 62 were proposed but 55 were later dropped from consideration because they were considered to have overriding environmental constraints or were believed to be unsuitable for inclusion in the development plan. Hills Quarry Products Ltd (“Hills”) are concerned that Wiltshire is not seeking sufficient sites to fulfil its provision obligations. Sites may have been turned down based on information which is 6 or 8 years out of date.</p> <p>At the same time, Wiltshire proposes to reduce its apportionment / provision because it believes there is insufficient mineral available. Hills believe that the Council should revisit the available sites and ensure an allocation of an adequate supply.</p>
Reasons for oral participation	
Summary	<p>Hills are concerned that Wiltshire is not seeking sufficient sites to fulfil its provision obligations. Council should revisit available sites to ensure an allocation of an adequate supply.</p> <p>Sites may have been turned down based on out of date information as call for sites made in 2004 and 2006.</p>

Comment ID:	57	Mr John Salmon	Hills Quarry Products Ltd	Person ID: 635228	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>If Wiltshire walks away from government’s target provision there will be a direct impact on surrounding counties to provide more mineral. It is known, following government’s proposal to remove Regional tiers, that the Managed Aggregate Supply System, which has formed a sound core of national aggregate supply over the last 40 years, is breaking down. Many counties, including adjoining Hampshire and Oxfordshire, are also planning to reduce</p>					



	their provision. If adjoining counties supply less aggregate into Wiltshire, then, unless Wiltshire provides correspondingly more, there will no longer be a steady and adequate supply and Wiltshire's Core Strategy may be proved unsound.
Reasons for oral participation	
Summary	Impact on surrounding counties to provide more mineral. Surrounding counties also planning to reduce provision. Danger that there will no longer be a steady and adequate supply and Wiltshire's Core Strategy may be proved unsound.

Comment ID:	58	Mr John Salmon	Hills Quarry Products Ltd	Person ID: 635228	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Wiltshire Council is following its own course of identifying its own provision. The dangers of this are; firstly, as described above, surrounding counties will have to make a larger provision to prop up Wiltshire's shortfall. Secondly, a downward spiral will be perpetuated whereby, as the mineral planning authority proposes that less mineral is worked, fewer applications will be made and the wrong view will be reached that the county needs even less mineral in future. Thirdly, a shortage of indigenous mineral will encourage importation by road from further afield (Somerset or Leicestershire) which will fly in the face of National Objectives in Mineral Policy Statement 1 ("MPS1") to reduce carbon footprint. Unless planning policy supports the provision of adequate supplies of minerals from local quarries to supply local development (and it is not considered that 1.2 million tonnes per annum of sand and gravel is an adequate provision), the Minerals Plan in the context of national policy will be neither robust nor sound.</p> <p>Wiltshire Council proposes to forecast future needs based on the average of the last ten years production. This will start the downward spiral of unrealistic low levels of mineral being needed prompting reducing numbers of planning applications, reducing quantities of mineral to be extracted and even further reductions in future provision. In practice, there will be no reduction in minerals consumed in Wiltshire. Wiltshire's continued requirements will be obtained by transporting longer distances by road. If the Managed Aggregates Supply System which has provided a sound system until now is to be dismantled by individual counties, Wiltshire must consider a slightly more robust way of forecasting. One possible option has been proposed in Dorset. In that county it is intended to take the average of 12 years production, remove the highest and lowest year's production, calculate the average of the remaining 10 years production and add 10% contingency.</p>					
Reasons for oral participation						
Summary	Impacts of reduced apportionment - surrounding counties will have to make a larger provision for Wiltshire's shortfall. Encourage importation of mineral by road – against MPS1. Downward spiral of unrealistic low levels of mineral being needed prompting reduced numbers of planning applications – without reduction in materials consumed in Wiltshire. Wiltshire must consider more robust way of forecasting. Alternative apportionment proposed in Dorset					

	should be considered.
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Comment ID:	63	Mr Kevin Phillips	Gloucestershire County Council Minerals and Waste Planning Policy	Person ID: 391042	Is the DPD legally compliant?	
Comment point	1. Introduction				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>I notice that the consultation on your mineral site allocations DPD is running until 12 th March. We have been tied up with our Waste Core Strategy Examination and there is a reconvened session for that on 12 th March.</p> <p>I therefore provide this brief response. I am aware that Wiltshire has had difficulty in finding suitable and deliverable site allocations to meet the potential future mineral provision. To some extent the sites you now propose are those which Wiltshire considers provides the best balance of environmental suitability and ensuring sufficient provision. In that sense that balance is for your Council to make although I do note some sites very adjacent to the Gloucestershire County boundary therefore there may be both environmental, amenity and supporting infrastructure considerations which should ideally be considered. As I outline in my introduction we don't have capacity at present to consider those issues as they might affect Gloucestershire.</p> <p>On a different but potentially related matter you will be aware that development plans now have to accord with S33A (Duty to Cooperate) of the Planning &amp; Compulsory Purchase Act (as brought into force through S110 of the Localism Act). I can advise that this issue has arisen through our Waste Core Strategy Examination and we have made submissions on that. The basic summary is that PINS/CLG are outlining that that DTC applies to all plans submitted after 15 th November. There is emerging guidance as to what planning authorities need to do on this to comply. As the Wiltshire Site allocations DPD has revised figure for future sand and gravel requirements contained within it (which might require an amendment to your adopted Minerals Core Strategy?). You might need to consider this very carefully in the context of DTC before you proceed to Publication and Submission stages with your DPD. As you know Gloucestershire intends to reactivate its Minerals Core Strategy/Local Plan later this year once we can finalise adoption of the WCS. Clearly the requirements of DTC will need to be considered very carefully for both Councils as it is not an easy issue to retrofit if you find that you have a problem at Examination stage. I know that Keith Holland at PINS has provided some briefings on this.</p> <p>Please come back to me if you have any queries on this. It may be useful to meet up and discuss this in the near future.</p>					
Reasons for oral participation						
Summary	<p>Some sites close to Gloucestershire County boundary therefore there may be environmental, amenity and supporting infrastructure considerations which should be considered.</p> <p>Revised figure for sand and gravel requirements might require an amendment of adopted Minerals Core Strategy. Need to consider this in context of Duty to Cooperate.</p>					

Comment ID:	76	Anne Henshaw	Campaign to Protect Rural England (CPRE) Group Chaiman, North Wilts and Swindon Group	Person ID: 399075	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Our comments on this submission draft document are set out below.</p> <p>At the Cabinet meeting of 22 March 2011 a report was put forward by Cllr Brady. In this report it was made very clear at point 15 that the present state of the minerals industry in Wiltshire is one of a downward production spiral. This, it would appear, is not merely derived from the current economic downturn and less demand from the building industry, but also from choice by the industry.</p> <p>Our principle issue with regard to all the sites is Transport and the long term restoration plans.</p>					
Reasons for oral participation						
Summary	<p>Cabinet meeting - Minerals industry in Wiltshire is one of a downward production spiral.</p> <p>Principle issues with regard to all sites is transport and long term restoration plans.</p>					

Comment ID:	80	Mrs Gill Smith	Dorset County Council Senior Planning Officer	Person ID: 634998	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						

Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>1. Level of Provision</p> <p>Background : Policy MCS1 in Wiltshire's Minerals Core Strategy (adopted in 2009) stated that the Council would 'aim to make provision of land - to meet demand for sand and gravel in accordance with national and regional policy.' This was considered to be 'a sustainable policy commitment to testing the environmental acceptability of meeting the Government's forecast of aggregate demand up to 2016 and beyond.' It was stated that 'Wiltshire and Swindon have an expectation to make sufficient provision of land to achieve production of 1.85 million tonnes of sand and gravel per annum over the period up to 2016. Beyond 2016, the picture is less clear.'</p> <p>The (current) Aggregates Site Allocations DPD revises proposed production levels and suggests a new level based on recent production trends, which is less than the figure of 1.85 million tonnes per annum (mtpa) referred to in the Core Strategy and even less than the more recent proposed sub-regional apportionment guideline figure of 1.41 mtpa.</p> <p>The figure proposed through the Aggregates Site Allocations DPD is the average of the past 10 years production, which equates to making a level of provision of 1.2 mtpa. Your Council considers that this figure more closely reflects actual demand, is achievable and would still provide a sufficient supply of mineral in times of increased or reduced production.</p> <p>Comment: Although Dorset County Council has no objection to the method of deriving this figure of 1.2 mtpa, there is some concern over whether the adoption of an apportionment figure this low could have an impact on neighbouring Mineral Planning Authorities. If demand for aggregate was to increase significantly during the plan period, could Wiltshire's output rise to match this given that there is no in-built contingency in the proposed 1.2 mtpa figure? It is acknowledged that the figure of 1.2 mtpa is still above current production. However, of greater relevance is the fact that Wiltshire exports relatively little aggregate to Dorset and even if demand were to rise to such a level that it exceeded the proposed level of supply, it is not considered that such pressure would be placed on production in Dorset to warrant an objection to this DPD proposal.</p> <p>On this basis it is not considered necessary to raise an objection to the proposed level of production. However, Dorset County Council reserves the right to make subsequent comments and if necessary to raise objections to the proposed level of production to Wiltshire Council and if necessary would be willing to participate in a discussion of this issue if raised at an examination into the DPD's proposals .</p>
Reasons for oral participation	
Summary	Concern over whether the adoption of a lower apportionment figure could have an impact on neighbouring Mineral Planning Authorities. No in-built contingency for if demand for aggregate was to increase significantly during the plan period. Acknowledged that 1.2 mtpa figure is still above current production. Not considered that such pressure would be placed on production in Dorset to warrant an objection to this DPD proposal.

Comment ID:	84	Mr Roger Cullimore	Moreton C. Cullimore (Gravels) Ltd Chairman	Person ID: 395489	Is the DPD legally compliant?		
Comment point	1. Introduction				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make							

the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	We have been advised by Dr Clive Waddington, who has written the National Archaeological guideline, that all your site allocations are high in archaeological content and with shallow reserves, mostly under 4 metres in depth and will be totally uneconomical. This will be a major problem for you and likely to vastly increase costs for construction in the future.
Reasons for oral participation	
Summary	Shallow reserves at allocated sites will be uneconomical – likely to increase costs of construction in the future.  Archaeology – all site allocations are high in archaeological content.

Comment ID:	87	Ms Liz Harris	RSPB Nature After Minerals Restoration Adviser	Person ID: 636807	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Thank you for consulting the RSPB and Nature After Minerals on the Proposed Submission Draft Aggregate Minerals Site Allocations Development Plan Document (DPD) . We welcome the work that has been ongoing in preparation of this detailed document.</p> <p>The RSPB, alongside the Nature After Minerals programme (a partnership between RSPB and Natural England), support the restoration-led approach to minerals development in Wiltshire advocated by Wiltshire and Swindon Councils. We share the councils' aspiration to restore minerals sites to after-uses that are appropriate, high quality and sustainable and we are pleased that the draft DPD has incorporated the recommendations made the Stakeholder workshop at County Hall in August 2011 into a set of preferred restoration objectives for each site.</p> <p>We support the aspiration for creation of BAP Priority habitats, post-extraction, that contribute to targets in the Wiltshire Biodiversity Action Plan and the Cotswold Water Park Biodiversity Action Plan. We welcome recognition of the importance of protecting habitat connectivity during extraction and the opportunities for improving connectivity through appropriate restoration.</p> <p>Whilst there is no reference in the draft DPD to recreation as an after-use on any of the proposed sites, where recreational after-uses are considered</p>					

	<p>compatible, we would advocate that they are carefully planned so as not to compromise the viability of the habitat created and the developing nature conservation value.</p> <p>The DPD clearly and succinctly outlines the environmental constraints for each site and identifies the key issues and mitigation (including for biodiversity) that will need to be considered at the planning application stage.</p> <p>We look forward to opportunities for further engagement with the councils and other stakeholders as they arise. I hope that these comments are helpful. If you wish to discuss any of the issues addressed in this response, or require any additional information, please do not hesitate to contact me</p>
Reasons for oral participation	
Summary	Preferred restoration objective - The RSPB, alongside the Nature After Minerals programme (a partnership between RSPB and Natural England), support the restoration-led approach to minerals development in Wiltshire advocated by Wiltshire and Swindon Councils. Pleased that the draft DPD has incorporated the recommendations made by the Stakeholder workshop at County Hall in August 2011 into a set of preferred restoration objectives for each site. Support aspiration for creation of BAP Priority habitats post-extraction. Advocate that recreational after-uses do not compromise the habitat created/nature conservation value.

Comment ID:	92	Mr Adrain Gleed Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 636834 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	1. Introduction				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Wiltshire Council called for sites in 2004 and 2006. 62 were proposed but 55 were later dropped from consideration because they were considered to have overriding environmental constraints or were believed to be unsuitable for inclusion in the development plan. It is of concern that Wiltshire is not seeking sufficient sites to fulfil its provision obligations and sites may have been turned down based on unsubstantiated information which may be 6 or 8 years out of date.</p> <p>At the same time, Wiltshire proposes to reduce its apportionment / provision because it believes there is insufficient mineral available. There is a growing demand for sand and gravel to be supplied from the Upper Thames Valley and the Council must ensure an allocation of an adequate supply.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation	To ensure full discussion of issues					
Summary	Concern that Wiltshire is not seeking sufficient sites, and that sites may have been removed based on out of date and unsubstantiated information.					

Growing demand for sand and gravel to be supplied from the Upper Thames Valley and the Council must ensure an allocation of an adequate supply.

Comment ID:	93	Mr Adrain Gleed Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 636834 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	1. Introduction				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The Council has stated that there are very few mineral sites which it proposes to promote to provide a steady and adequate supply of minerals (paragraph 1.10). However, at least two of the fifty five sites have been dropped from consideration due to misinformation or lack of information and should be revisited.</p> <p>Paragraph 1.9 indicates that some sites have been considered on the basis of "generic estimates" which are admitted to be "less reliable". It suggests that because of the unreliability of resource estimates, detailed estimates of the proposed sites will be put forward in the planning application. However, it is clear that some sites have been dropped from consideration as a result of unreliable generic estimates made five or more years ago. Sites U15 and U17 are such cases in point. Wiltshire Council should carry out a robust review of those two dropped sites because they will help in meeting Wiltshire's fair share of mineral provision as required by government.</p> <p>The owner of Sites U15 and U17 has had no approach from Wiltshire Council in the last 5 years and yet the Council has said it has contacted and consulted mineral owners. He has had no approach from mineral operators which would indicate that the comment made by the County that "two mineral companies have previously investigated the land ... " and informed the Council that "the mineral is shallow and of poor quality" is correct in any way. In recent weeks a detailed borehole survey has been undertaken which proves the opposite. The site detail is more fully described below. Unless sites are assessed in a robust way, especially when it has become apparent that there may be insufficient sites to provide an adequate and steady supply, the Plan will not be sound.</p> <p>If Wiltshire simply walks away from government's target provision there will be a direct impact on surrounding counties to provide more mineral. It is known that following government's proposal to remove Regional tiers, the Managed Aggregate Supply System which has formed the core of national aggregate supply over the last 40 years is breaking down. Many counties, including adjoining Hampshire and Oxfordshire, are aiming to reduce their provision too. If adjoining counties supply less aggregate in the area then, unless Wiltshire provides correspondingly more, there will no longer be a steady and adequate supply and Wiltshire's Development Documents may be proved unsound.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation	To ensure full discussion of issues					
Summary	At least 2 of the 55 sites put forward have been dropped due to misinformation/lack of information and should be revisited. Generic estimates from the British Geological Survey on potential yield are less reliable – some sites (such as U15 and U17) have been dropped on this information. Council should					

<p>carry out a robust review of these two dropped sites as they would help to meet Wiltshire's mineral provision. Landowner of sites U15 and U17 has had no approach from Wiltshire Council in last 5 years. Mineral companies have not previously investigated the land. Less provision in Wiltshire will have a direct impact on surrounding counties to provide more mineral. Adjoining counties also aiming to reduce their provision. Need for steady and adequate supply.</p>
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Comment ID:	94	Mr Adrain Gleed Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 636834 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	1. Introduction				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Wiltshire Council appears to be following its own course of identifying its own provision. The dangers of this are; firstly, as described above, surrounding counties will have to make a larger provision to prop up Wiltshire's shortfall. Secondly, a downward spiral will be perpetuated whereby, as the mineral planning authority proposes that less mineral is worked, fewer applications will be made and the wrong view will be reached that the county needs even less in future. Thirdly, a shortage of indigenous mineral will encourage importation by road from further afield (Somerset or Leicestershire) which will fly in the face of National Objectives in Mineral Policy Statement 1 ("MPS1") to reduce carbon footprint. Unless planning policy supports the provision of adequate supplies of minerals from local quarries to supply local development (and it is not considered that 1.2 mt of sand and gravel is an adequate provision to make), the Minerals Plan, in the context of national policy, will be neither robust nor sound.</p> <p>Wiltshire Council proposes to forecast future needs based on the average of the last ten years production. This will start the downward spiral of perceived mineral needs and future years will see reducing quantities whereby in reality mineral will be transported longer distances to supply the County. If the Managed Aggregates Supply System is to be dismantled by individual counties a slightly more robust way of forecasting, which has been proposed in Dorset, is to take the average of 12 years production, remove the highest and lowest take the average of the remaining 10 years and add 10% contingency.</p> <p>Wiltshire Council proposes to forecast future needs based on the average of the last ten years production. This will start the downward spiral of unrealistic mineral needs being perceived prompting reducing quantities of mineral to be extracted in Wiltshire and even further reductions in future provision. In practice, there will be no reduction in minerals consumed in Wiltshire. Wiltshire's continued requirements will be obtained by transporting longer distances by road. If the Managed Aggregates Supply System which has provided a sound system until now is to be dismantled by individual counties, Wiltshire must consider a slightly more robust way of forecasting. One possible option has been proposed in Dorset. In that county it is intended to take the average of 12 years production, remove the highest and lowest year's production, calculate the average of the remaining 10 years production and add 10% contingency.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation	To ensure full discussion of issues					



Summary	Wiltshire Council appears to be identifying its own provision. Dangers - surrounding counties will have to make up for this shortfall, downward spiral will reduce minerals applications in future, and shortage will encourage importation by road. Inadequate supply of minerals from local quarries – plan neither robust nor sound. Potential to use Dorset’s proposed way of forecasting.				
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Comment ID:	96	Mr and Mrs Mark Freeman Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 393298 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	1. Introduction				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The Council has stated that there are very few mineral sites which it proposes to promote to provide a steady and adequate supply of minerals (paragraph 1.10). However, it is known that sites have been dropped from consideration due to misinformation or lack of information. Sahara believes that Wiltshire Council is not acting in the best interests of the community by removing so many sites from consideration. Small sites may not add significantly to the landbank but they provide local materials for local building works. That is the most sustainable way of supplying construction materials rather than relying upon large aggregate quarries many miles away and Wiltshire Council should, as a mineral planning authority, look to help the minerals industry identify suitable sites.</p> <p>It is clear that some sites have been dropped from consideration as a result of unreliable, unsubstantiated information provided by objectors or groups of objectors. Site C16 is such a case in point. Wiltshire Council should carry out a robust review of this dropped site. It will assist in meeting Wiltshire's fair share of mineral provision sustainably by supplying locally to Melksham, Devizes, Calne and Chippenham.</p> <p>Wiltshire is ignoring government's target provision and in so doing is creating a direct adverse impact on surrounding counties which will be required to provide more mineral. It is known that following government's proposal to remove Regional tiers, the Managed Aggregate Supply System which has formed the core of national aggregate supply over the last 40 years is breaking down. Many counties, including adjoining Hampshire and Oxfordshire, are aiming to reduce their provision too. If adjoining counties supply less aggregate in the area then, unless Wiltshire provides correspondingly more, there will no longer be a steady and adequate supply and Wiltshire's Development Documents may be proved unsound.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation	To ensure full discussion of issues.					
Summary	Sites have been dropped due to misinformation/lack of information. Small sites provide local materials for local building works – sustainable. Wiltshire Council should carry out review of dropped C16 site – role in supplying mineral locally. Wiltshire ignoring government’s target and creating impact on surrounding counties. Concern that there will not be a steady and adequate supply of aggregate.					

Comment ID:	97	Mr and Mrs Mark Freeman Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 393298 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No

Comment point	1. Introduction	Oral participation?	
Reasons for not legally compliant			
What change(s) are necessary to make the DPD legally compliant?			
Reasons for not sound	<p>Comments on Sub Regional Apportionment</p> <p>Wiltshire Council is following a course of identifying its own provision. The dangers of this are; firstly, as described above, surrounding counties will have to make a larger provision to prop up Wiltshire's shortfall. Secondly, a downward spiral will be perpetuated whereby, as the mineral planning authority proposes that less mineral is worked, fewer applications will be made and the wrong view will be reached that the county needs even less mineral in future. Thirdly, a shortage of indigenous sand will encourage importation by road from further afield (Dorset, Northamptonshire) which will fly in the face of National Objectives in Mineral Policy Statement 1 ("MPS1") to reduce carbon footprint. Unless planning policy supports the provision of adequate supplies of minerals from local quarries to supply local development, the Minerals Plan, in the context of national policy, will be neither robust nor sound. Wiltshire Council proposes to forecast future needs based on the average of the last ten years production. This will start the downward spiral of unrealistic mineral needs being perceived prompting reducing quantities of mineral to be extracted in Wiltshire and even further reductions in future provision. In practice however, there will be no reduction in minerals consumed in Wiltshire. Melksham and the north Wiltshire towns are still expanding and will continue to do so.</p>		
What change(s) are necessary to make the DPD sound?			
Other comments			
Reasons for oral participation			
Summary	Wiltshire Council following course of identifying its own provision. Dangers of this – surrounding counties to make up for shortfall, downward spiral of less mineral working, shortage of indigenous material and unsustainable importation by road. There will be no reduction in minerals consumed in Wiltshire – Melksham and north Wiltshire towns are expanding.		

Comment ID:	98	Mr and Mrs Mark Freeman Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 393298 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	1. Introduction			Oral participation?	Yes	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Site C16</p> <p>The County Council's comments have not shown that the site is inappropriate. On the contrary an extension to Sahara Sandpit using existing</p>					

infrastructure with an excellent access directly on to the trunk road network is to be recommended. The sand ridge has had a long history as a source of good quality sand and Sahara has had a 50 year history of providing sand and as a site for making secondary aggregates from improved materials and as a low-key, inert landfill all of which provides a valuable service to the local building and construction industry which should be perpetuated. The landowner's brief synopsis below indicates that, as a sustainable way of producing building materials, C16 should be strongly supported by the Council.

Landowner Assessment	
Wiltshire Council Issues	Landowner Assessment
Likely damage from Dust	Typically sand is inherently damp when extracted and dust is rarely caused in extraction. Dust may be caused by wheels on dry haul roads but that can be overcome by good management and techniques such as damping the roads or imposing speed limits as necessary.
Damage from Vibration	There will be no vibration in working a sand quarry. Vibration is more common when blasting a hard rock quarry.
Impact of Noise	Sand extraction will cause less noise than that currently emitted from the existing recycling operations on site which is not known to cause nuisance. Local people have claimed not to have known that recycling has been operating whereas it has continued for over 15 years. Sand extraction is quieter.
Impact of Lighting	It would not be necessary to introduce lighting into a sand quarry.
Impact of Visual Intrusion	There are many acceptable ways of reducing visual impact sensitively such as by using soils to make screen bunds; by landscape planting; by working from below ground level which is the common way of operating a sand pit ensures that no machinery need be visible.
Impacts to Landscape Character	This sandy ridge has provided building materials for hundreds of years. It has been a part of the area's history to do so and that is part of its character.
Impact on Biodiversity	Biodiversity can be substantially improved in restoration. Ponds, wetlands, habitat of all kinds can be created by innovative design which the minerals industry undertakes as a matter of course.
Traffic Concerns about traffic on the Trunk Road network and Concerns about access safety.	Quarrying, Plant Operations, Plant Hire, Recycling and Landfilling have continued on this site at one time or another for over 50 years. The County Council used Sahara materials when the A3102 outside of Sahara Sandpit was upgraded. The road now provides a perfectly adequate "A" classified route between Melksham and the A342. Access into Sahara Sandpit was improved at the same time and a safe access with excellent visibility exists. The A3102 carries a high proportion of Heavy Goods Vehicles. The number of HGVs which would operate from C16 would be insignificant in comparison. Some materials could be carried on a back-haul basis to reduce traffic.
Impacts to Groundwater	No hydrological impact has been raised as a result of previous extraction and landfilling over the last 50 years. Crops do not rely upon water table for their moisture and the sandy soil is not water retentive. The water table is in any case expected to be below the level of extraction. Therefore it is difficult to see how sand quarrying might affect adjoining growing crops if at all. A flood risk assessment will show that the sand quarry will not flood nor will it exacerbate flooding elsewhere.
Restoration Options.	The site has the potential to be restored for agriculture using soils and subsoil materials for infill. This will have two advantages; firstly providing a site for the disposal of local soils arising from construction sites and secondly, providing water retentive soils to improve agriculture. Alternatively the site could be used for biodiversity providing small scale wetlands or woodland.
Impact on Rights of Way	Quarrying is a rural activity. Users of rights of way should expect to see quarrying and similar uses of land in the countryside.

Sahara (Melksham) Ltd would be pleased to provide additional information to support the view that:

	<p>(i) Local materials are need for local projects.  (ii) Sahara Sandpit has been sustainably providing a valuable service in the supplyof minerals and the management and reuse of recyclable materials  (iii) C16 is an excellent site to continue the provision of sand aggregates.  (iv) Wiltshire Council is wrong to propose not to meet government targets and to seek to import its building materials when sites of the quality of C16 and others are both suitable and available for sustainable minerals development.</p> <p>Recommendation</p> <p>The Council should review the merits of this site prior to the examination in public of the Sites Allocation Document. C16 should be a Preferred Site in the Site Allocation Document.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	To ensure full discussion of issues.
Summary	<p>Council's comments have not shown site C16 to be inappropriate. Extention to Sahara Sandpit using existing infrastructure with excellent access directly onto trunk road network is recommended. Source of good quality sand and Sahara has 50 year history of provision. The Council should review the merits of site C16 prior to examination of the document and include C16 as a preferred site.</p> <p>Landowner assessment:  <b>Preferred restoration objective</b> – potential to be restored for agriculture using soils and subsoil materials for infill. Alternatively site could be used for wetlands/woodland.  <b>Biodiversity and geodiversity</b> – biodiversity can be improved in restoration.  <b>Human health and amenity</b> – dust rarely caused in extraction. Good management can overcome issues of vehicle-related dust. No vibration in working a sand quarry. Noise will be less than existing recycling operations. Lighting would not be necessary.  <b>Landscape and visual</b> – ways of sensitively reducing visual impact. Sandy ridge long been part of area's history and landscape character.  <b>Traffic and transportation</b> – history of minerals and waste operations at site. A342 has been upgraded. A3102 carries a high proportion of HGVs.  Suggested measures to reduce traffic.  <b>Water environment</b> – no hydrological impact raised previously. Water table expected to be below level of extraction. FRA will show quarrying of site will not cause/exacerbate flooding.</p>

Comment ID:	100	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?		
Comment point	1. Introduction				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make the DPD legally							

compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments		<p>Thank you for providing English Heritage with the opportunity to consider and comment on the proposed allocations document and the array of background information supporting the approach advocated. In particular we note the evidence and expert commentary in relation to landscape, archaeology and the built environment.</p> <p>The proposals will clearly have a direct and indirect impact on the historic environment and a refined approach will be required to ensure substantial harm to the significance of the historic environment is to be avoided and the plan is subsequently consistent with national planning policy. Due to the importance of the issues raised in this letter it would be appreciated if the concerns expressed could be addressed by the Minerals Authority and discussed with English Heritage prior to the Plans submission to the Secretary of State.</p>				
Reasons for oral participation						
Summary		<p>English Heritage not evidence and expert commentary in relation to landscape, archaeology and the built environment.</p> <p>Proposals will have direct and indirect impact on the historic environment.</p> <p>Concerns should be discussed with English Heritage prior to submission of DPD.</p>				
Comment ID:	108	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments		<p>A generic point relating to each site - Hydrology.</p> <p>The preservation of below ground archaeology is affected by changes to the water table which can be affected by aggregate extraction and subsequent restoration. To ensure significant archaeology will not be adversely affected, in the short and long term, you will need to investigate the matter further to determine whether mitigation is required.</p>				
Reasons for oral						

participation	
Summary	A generic point relating to each site - Hydrology. Preservation of below ground archaeology is affected by changes to the water table, which can be affected by aggregate extraction and subsequent restoration. Need to investigate this matter to determine whether mitigation is required.

Comment ID:	109	Mr Dave Pring	Planning Liason Technical Specialist	Person ID: 637160	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>The Agency welcomes the removal of a number of sites previously under consideration, which were highlighted as being of particular concern due to the nature of local environmental receptors/constraints and the associated potential for significant adverse environmental impact. Unfortunately, the strategic allocations currently proposed include a number of sites that raise significant environmental issues, as detailed in our letter dated 29 October 2010 sent in response to the initial site options report.</p> <p>We previously advised that proposed allocation sites U3 and U7, and to a lesser degree sites U4 and U5, should be subject to additional assessment to establish the potential impact on highlighted groundwater, biodiversity and flood risk management interests. Accordingly, it is held that the requested assessment work would provide an important resource in respect of the evidence base informing the allocation process. This is considered to be of particular relevance in the context of your council's previous comments regarding the potential for a deficit in supply due to an insufficient number of strategic sites.</p> <p>Although it is acknowledged that the proposed submission draft details the relevant environmental issues for each site, and the additional assessment work required, it proposes that this should be undertaken through individual applications at the development management stage. With a limited number of potential allocations, and the consequential constraints on minerals supply, it is considered to be of particular importance to ensure that an appropriate degree of confidence exists, through a robust and credible evidence base, that the individual sites can be delivered, or delivered to the extent necessary to meet the target yield.</p> <p>Although we remain of the view that the additional assessments should be undertaken as an integral element of the allocations process, we do not wish to object to the preferred sites at this stage. However, we must advise that any subsequent application would be assessed on its own merits, in terms of those issues within our remit and regulatory framework.</p>					
Reasons for oral participation						
Summary	<p>Environment Agency welcomes removal of a number of sites previously under consideration.</p> <p>Strategic allocations currently proposed include a number of sites that raise significant environmental issues (as detailed in response to initial site options</p>					

<p>report – October 2010).</p> <p>Sites U3 and U7 (plus U4 and U5 to a lesser degree) should be subject to additional assessment to establish potential impact on groundwater, biodiversity and flood risk management interests. Need to bring forward additional assessment work.</p> <p>Environment Agency does not wish to object to the preferred sites at this stage.</p>
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Comment ID:	110	Mr Dave Pring	Planning Liason Technical Specialist	Person ID: 637160	Is the DPD legally compliant?	
Comment point	1. Introduction				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Key Restoration Drivers</p> <p>For all of the Mineral Resource Zones the implications for restoration associated with groundwater issues should be included. In particular for those areas that fall within groundwater Source Protection Zones (SPZs). This is important because of restrictions on the restoration of sites in specific circumstances. Reference should also be made in all cases to the relevant Catchment Flood Management Plan (CFMP). It should be ensured that the restoration objectives align comfortably with the CFMPs long term policy for the unit into which the site falls, and that all opportunities for flood risk reduction to the wider area are explored and secured via the allocation and working of the preferred sites. Planning Policy Statement 25: Development and Flood Risk (PPS25) key objectives to reduce flood risk overall should be adhered to at all sites.</p> <p>Reference should also be made to Wiltshire Council's Strategic Flood Risk Assessment (SFRA).</p> <p>Detailed assessments</p> <p>We would require the following types of assessment/ survey for each of the sites:</p> <ul style="list-style-type: none"> <li>- identification of all environmental constraints – SPZs; aquifers; conservation designations; flood zones; presence of historic and current landfills; water interests such as watercourses, ponds, lakes, springs, etc.</li> <li>- hydrogeological risk assessments (including assessment of restoration proposals as well as the extraction stage).</li> <li>- flood risk Sequential Test of the sites in accordance with Planning Policy Statement 25 (PPS25), utilising the aforementioned SFRA.</li> <li>- flood risk assessment for all sites.</li> <li>- ecological survey to establish the nature conservation value of the site and determination of mitigation requirements.</li> </ul>					

- assessment of appropriate restoration proposals

The level of detail of these assessments and surveys may vary depending on the constraints identified at each site. Some of these are discussed in more detail hereunder:

**Groundwater** - In general we consider that all sites have the potential to impact on controlled waters. Therefore the issue needs to be addressed in respect of all allocated sites with consideration of potential impacts by means of a hydrogeological risk assessment. We refer you to our Groundwater Protection Policy and Practice document (GP3) and in particular Policies P6-7 and P6-11. <http://www.environment-agency.gov.uk/research/library/publications/40741.aspx>

In all instances there is the potential for the presence of private unlicensed abstractions in proximity of the application sites, which may constrain development proposals.

Please note that a new groundwater risk assessment document (Annex (j) Groundwater) specific to permitting of groundwater activities has been published. This is associated with, and falls under the umbrella of, the EPR H1 Environmental Risk Assessment series of documents. Annex (j) Groundwater is an introductory text on what is required when we ask for a groundwater risk assessment under the Environmental Permitting Regulations. This document can be used as a generic guidance document for Hydrogeological Risk Assessments for Mineral Development sites. Extractive Wastes

The Mining Waste Directive requires that extractive wastes from mines, quarries and other mineral extractions are managed in a way that minimises harm to human health and the impact on the environment. Our Position statement: 'Definition of Extractive Waste', sets out our interpretation of extractive waste and describes the principles we will apply in assessing whether materials arising during an extraction process are extractive waste.

[http://www.environment-agency.gov.uk/static/documents/Research/PS015-Extractive\\_waste.pdf](http://www.environment-agency.gov.uk/static/documents/Research/PS015-Extractive_waste.pdf)

**Flood Risk** - Acknowledging that the sand and gravel can only be extracted where the deposits naturally occur, we would still expect you to undertake the sequential test when selecting the most appropriate sites to allocate. Where Flood Zone 3/2 is unavoidable, we would then expect to see a sequential approach to development within those sites i.e. processing operations moved to the least vulnerable flood parts of the site. Reference should be made to the relevant SFRA documents to assist with the sequential testing exercise.

Restoration and after use options will themselves need to be compatible with the flood vulnerability classifications in Annex D of PPS25, especially where sand and gravel is extracted in any FZ3 part of a site. All sites greater than 1ha in FZ1 or any intersecting with FZ3/2 will need to be supported by site specific FRAs by the promoter in due course. Where the site is predominantly in FZ3 already, we would advise that your council commission an FRA/ require an FRA to be undertaken by the promoter, at the DPD stage. This will determine whether the working of the site is viable whilst maintaining the necessary flood storage and conveyance required to ensure that third party flood risk is not increased during the working phase.

**Restoration** – Landfilling. We recommend that you refer to our document 'Understanding the Landfill Directive'. Chapter 6 may be particularly useful, as it relates to landfill location. [http://intranet.ea.gov/static/documents/Knowledge/RGN\\_LFD1\\_Landfills\\_\(v2.0\)\\_30\\_March\\_2010.pdf](http://intranet.ea.gov/static/documents/Knowledge/RGN_LFD1_Landfills_(v2.0)_30_March_2010.pdf)

This document outlines the restrictions and requirements that are applicable to proposed landfills. It includes reference to our Groundwater Protection Policy and Practice document (GP3) which sets out where landfills may not be appropriate in relation to groundwater issues. Please refer to this weblink:

<http://publications.environment-agency.gov.uk/pdf/GEHO0708BOGU-e-e.pdf>

GP3 Part 4 - Chapter 3 Solid Waste Management, policy P3-1, is particularly relevant. This policy states:



	<p>P3-1 Landfill location policy (planning)</p> <p>(i) The Environment Agency will object to any proposed landfill site in groundwater Source Protection Zone 1.  (ii) For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes and the natural setting and properties of the location.  (iii) Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution, the Environment Agency will object to sites:  below the water table in any strata where the groundwater provides an important contribution to river flow or other sensitive surface waters;  on or in a Major/Principal Aquifer; within Source Protection Zones 2 or 3. This essentially means that there are restrictions if the restoration includes a proposed landfill.</p> <p>In addition, any restoration through the importation of wastes will require an Environmental Permit from us. For a permit for a landfill site to be issued the applicant will be required to demonstrate compliance with the Groundwater Regulations and the Landfill Regulations. We recommend early consultation with us to discuss the permitting requirements, if applicable.</p>
Reasons for oral participation	
Summary	<p>Key restoration drivers - Implications for restoration associated with groundwater issues should be included, particularly for areas that fall within SPZs. Restoration objectives should align with the relevant Catchment Flood Management Plan (CFMP). Reference should also be made to Wiltshire Council's Strategic Flood Risk Assessment (SFRA).</p> <p>Detailed assessments required at each site include identification of all environmental constraints, hydrogeological risk assessments, flood risk sequential test, flood risk assessment, ecological survey and assessment of appropriate restoration proposals. The level of detail of these assessments and surveys may vary depending on the constraints identified at each site.</p>

Comment ID:	112	Mr John Salmon		Person ID: 637185	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	If Wiltshire walks away from government's target provision there will be a direct impact on surrounding counties to provide more mineral. It is known, following government's proposal to remove Regional tiers, that the Managed Aggregate Supply System, which has formed a sound core of national aggregate supply over the last 40 years, is breaking down. Many counties, including adjoining Hampshire and Oxfordshire, are also planning to reduce					

	their provision. If adjoining counties supply less aggregate into Wiltshire, then, unless Wiltshire provides correspondingly more, there will no longer be a steady and adequate supply and Wiltshire's Core Strategy may be proved unsound.
Reasons for oral participation	
Summary	Pressure on surrounding counties to provide more mineral. Adjoining counties also planning to reduce their provision. Danger that there will no longer be a steady and adequate supply and Wiltshire's Core Strategy may be proved unsound.

Comment ID:	113	Mr John Salmon		Person ID: 637185	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>The dangers of Wiltshire Council following its own course of identifying its own provision are threefold;</p> <p>(i) as described above, surrounding counties will have to make a larger provision to prop up Wiltshire's shortfall.</p> <p>(ii) as the mineral planning authority proposes that less mineral is to be worked, fewer applications will be made because the higher risk of success may outweigh the exorbitant cost of making a planning application and the wrong view will be reached that the county needs even less mineral in future. A downward spiral in reducing provision will be started if this has not started already.</p> <p>(iii) the resulting shortage of available indigenous construction materials will encourage importation by road from further afield (stone from Somerset, Leicestershire or marine dredged gravels from Southampton and sand from Northamptonshire or south Dorset) which will fly in the face of National Objectives in Mineral Policy Statement 1 ("MPS1") to reduce carbon footprint.</p> <p>Unless planning policy supports the provision of adequate supplies of minerals from local quarries to supply local development (and it is not considered that 1.2 million tonnes per annum of sand and gravel is an adequate provision), the Minerals Plan in the context of national policy will be neither robust nor sound.</p> <p>We strongly believe that the provision for mineral working at levels below those adopted by the Regional Spatial Strategy ("RSS") is not justified nor is it based on firm evidence. The reason that the Managed Aggregates Supply System has worked so well over the last 30 or 40 years is that levels of provision have exceeded annual production but that has given the industry flexibility. The RSS levels were never used as a target but have always provided industry with practical landbanks to work within. That flexibility has not resulted in any over-provision of land with planning permission either in Wiltshire or elsewhere and that is why we believe that the RSS levels should be perpetuated. Even so, in Wiltshire over many years the landbank has been below an adequate level and, as minerals are used, is not being generally replenished by the grant of new permissions. We are very concerned that</p>					

	<p>a change in the method of assessment is being pursued which will inevitably reduce flexibility. A change for changes sake is not necessary.</p> <p>In producing the Site Allocation Document Wiltshire should undertake full consultation with surrounding Councils. It is important in the Upper Thames Valley that Wiltshire and Gloucestershire cooperate to ensure that sand and gravel is managed to avoid potential cumulative impacts upon the community and to prevent one County's reliance upon the resources of the other. A clear extraction protocol for quarries in the Upper Thames Valley in the interests of the conservation of the resource, efficiency of extraction and protection of community interests should be developed.</p> <p>With regard to the allocation of sufficient sites to supply needs rather than reliance upon adjoining or neighbouring counties such as Oxfordshire, Hampshire, Somerset and Dorset, it is important that Wiltshire carries out full consultation with these counties. Section 110 of the Localism Act, which came into effect on November 15th 2011, requires local authorities to consult and engage with neighbouring Councils in the preparation of Local Plans. This is to fill the void left by the abolition of regions. It would appear, from the allocation of insufficient sites, that Wiltshire may not have consulted fully and has not understood the cross-border implications of minerals supply.</p> <p>Wiltshire Council proposes to forecast future needs based on the average of the last ten years production. This will start the downward spiral of unrealistic low levels of mineral being "needed" prompting fewer planning applications and reducing Wiltshire's production leading to even further reductions in future provision. In practice, there will be no reduction in minerals consumed in Wiltshire. Wiltshire's continued requirements will then have to be obtained by transporting longer distances by road.</p> <p>If the Managed Aggregates Supply System is to be dismantled by the actions of individual counties, Councils must consider a more robust way of forecasting to delay the impact of the downward spiral. In Dorset it is intended to take the average of 12 years production, remove the highest and lowest year's production, calculate the average of the remaining 10 years production and add 10% contingency. Whilst this will not stop the downward trend occurring it may make replenishment of reserves in the near to medium future less difficult.</p> <p>In practice what is required is for the Council to redouble its efforts to find the mineral needed from its own resources to meet future demand. Sufficient mineral does exist. Ways of exploiting that mineral sustainably and without undue adverse impact should be sought by the Council and it is likely that additional sites to assist in the supply of Wiltshire's needs will be found.</p> <p>Dorset Council, in preparing its mineral strategy in 2011, invited an ex senior public servant to critically appraise their approach. The "critical friend analysis" determined that the Council had adopted a very negative approach towards the mineral industry which was not the proper role of a mineral planning authority nor would it be acceptable as sound policy. Dorset subsequently re-wrote its policy in a way which offered stronger support to the industry. The way Wiltshire has suggested that an inability to find sufficient sites will simply be accepted so that development requirements should be met by importing minerals from outside its boundaries is a similarly negative approach which may also be deemed unsound.</p>
Reasons for oral participation	
Summary	<p>Dangers of Wiltshire Council identifying its own provision – surrounding counties will have to make up for shortfall, fewer applications will be put forward (downward spiral), encourage importation from further afield (carbon footprint).</p> <p>Policy does not support the provision of adequate supplies of minerals from local quarries to support local development. Provision not justified or based on firm evidence. Does not give flexibility/practical landbanks for the industry to work within. RSS levels should be perpetuated.</p> <p>Important that Wiltshire and Gloucestershire cooperate to manage cumulative impacts in the Upper Thames Valley. Clear extraction protocol for quarries in the Upper Thames Valley should be developed.</p> <p>Wiltshire should engage with neighbouring authorities to fill void left by abolition of the regions. Wiltshire may not have consulted fully on cross-border</p>

	implications of minerals supply. Reference to Dorset's method of apportionment.
	Sufficient mineral does exist in Wiltshire – ways of exploiting this sustainably should be sought.

Comment ID:	115	Mr John Salmon		Person ID: 637185	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>LMML draws attention to sites in the Allocation Document which have been dropped for, it would appear, reasons that the Council has accepted objector criticism without first having undertaken an objective assessment. For example, Site C16 is a small site which could be developed sensitively to continue to provide a sustainable, low-key source of local building materials in the Melksham, Calne, Devizes and Chippenham quadrangle. The Council's principle reliance upon an unsuitable highway as the reason for objection when the highway, which carries a high proportion of HGV traffic, was substantially improved, using materials from C16's adjoining quarry, at the same time providing an excellent and safe access on to the "A" classified road is a case in point.</p> <p>Similarly sites U15 and U17 have been dropped following industry comment that they contain insufficient mineral. The site owners have recently completed a comprehensive investigation which shows a clean, deep deposit of suitable material in a location which would ordinarily be acceptable for mineral working. The Council suggested access problems from these sites but the sites' access to the highway network is believed to be supported by the Highways Authority.</p>					
Reasons for oral participation						
Summary	<p>Sites have been dropped on basis of objector criticism without objective assessment.</p> <p>Site C16 could developed sensitively to provide a sustainable source of local building materials. Highway has been substantially improved.</p> <p>Sites U15 and U17 dropped following industry comment that they contain insufficient mineral. Site owners have completed an investigation which shows a clean, deep deposit of suitable material. These sites' access to the highway network is believed to be supported by the Highways Authority.</p>					

Comment ID:	116	Mr John Salmon		Person ID: 637185	Is the DPD legally compliant?	
					Is the DPD sound?	

Comment point	1. Introduction	Oral participation?	
Reasons for not legally compliant			
What change(s) are necessary to make the DPD legally compliant?			
Reasons for not sound			
What change(s) are necessary to make the DPD sound?			
Other comments	<p>Wiltshire Council is wrong to propose not to meet government targets and to seek to import its building materials when sites of the quality of C16, U17 and U15 are both suitable and available for sustainable minerals development.</p> <p>(i) Local materials are needed for local projects to maintain sustainability and reduce carbon footprint.</p> <p>(ii) Wiltshire's negative approach in simply accepting that there are insufficient sites is not sound.</p> <p>(iii) There are adequate sites in Wiltshire to help meet demand. Small sites in particular can help to meet local demand sustainably without undue adverse impact.</p> <p>The Council should re-visit the dropped sites and undertake more robust assessment with landowners and operators to allocate sites which are available and suitable to meet demand</p>		
Reasons for oral participation			
Summary	<p>Council wrong to propose not to meet government targets. Sites of the quality of C16, U17 and U15 are suitable and available for sustainable minerals development.</p> <p>Local materials needed to maintain sustainability and reduce carbon footprint. Wiltshire adopting a negative approach in accepting that there insufficient sites is not sound. There are adequate sites in Wiltshire to help meet demand. Small sites can help to meet local demand sustainably without undue adverse impact. Council should re-visit dropped sites and undertake more robust assessment.</p>		

Comment ID:	124	Mr Ormond		Person ID: 393354	Is the DPD legally compliant?	Yes
					Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make						

the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>Thank you for the opportunity to examine the 'submission draft' associated with the content of your letter.</p> <p>I have now had the opportunity to examine all the documents associated with the submission draft of the Development Plan Document (DPD). Having responded to the previous informal consultations associated with the DPD I am satisfied in all respects, of the soundness of the proposed submission draft for independent examination by the Secretary of State.</p> <p>Please keep me informed of the submission to the Secretary of State and all other developments associated with the Wiltshire and Swindon Aggregate Minerals Site Allocations Development Plan Document. Thank you very much for your future actions in progressing and informing me of any associated actions with the DPD.</p>
Reasons for oral participation	
Summary	

Comment ID:	39	Miss Helen Garside	Wiltshire Council - Conservation (built historic environment) Principal Conservation Officer	Person ID: 547469	Is the DPD legally compliant?		
Comment point	1. Introduction				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make the DPD legally compliant?							
Reasons for not sound							
What change(s) are necessary to make the DPD sound?							
Other comments	I have had a quick look through and am happy that our previous comments have been taken into account and carried forward in respect of these sites. I don't think there is anything further that we can add at this stage.						
Reasons for oral participation							
Summary	Nothing further to add at this stage.						

Comment ID:	44	Mr Allister Gittins	Wiltshire Council - Public Protection	Person ID: 633796	Is the DPD legally compliant?	
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			Services Contaminated Land Officer		Is the DPD sound?	
Comment point	1. Introduction				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>General Comments site 1 to 3</p> <p>Looking at the proposals for sites 1 to 3 there are no issues in principle that preclude the use of any of these locations. I note however that the traffic routing has the potential to result in a large number of heavy quarry / landfill related vehicles passing very close to a small number of residential properties on the access route. This will have an inevitable impact on the amenity of these properties.</p> <p>There is unlikely to be such an impact on local air quality that the guidance on NOx or PM10 is compromised BUT the nuisance and amenity impacts of the vehicle movements should not be overlooked.</p> <p>As a number of the quarries seem to be potentially sharing the same access route to the A419 this means that either the quarries will be operating concurrently, thus increasing the impact on noise and dust sensitive properties or sequentially, therefore increasing the number of years the potential nuisances will occur.</p> <p>I accept that in planning terms there needs to be a balance between the need for minerals sites, and their impacts on the environment but in the cases of options 1 to 3 any noise and dust assessments must include the cumulative impacts at relatively remote roadside properties. Any permissions will need to be conditioned to mitigate these impacts and potentially to control the hours of vehicle movements associated with the site.</p>					
Reasons for oral participation						
Summary	<p>Looking at the proposals for sites 1 to 3 there are no issues in principle that preclude the use of any of these locations.</p> <p>Human health and amenity – Traffic routing has potential to result in a large number of heavy vehicles passing close to residential properties on the access route – impact on amenity of these properties. Sharing of same access route to A419 will mean that quarries will be operating concurrently, thus increasing the impact on noise and dust sensitive properties or sequentially, therefore increasing the number of years the potential nuisances will occur. Any noise and dust assessments must include the cumulative impacts at relatively remote roadside properties. Permissions to be conditioned to mitigate these impacts – potentially to control the hours of vehicle movements associated with the sites.</p>					

Comment ID:	49	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
Comment point	1. Introduction				Is the DPD sound?	
					Oral participation?	

Reasons for not legally compliant	
What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>The current guidance on noise from quarrying operations is contained within MPS 2 and makes a number of assumptions regarding acceptable noise from this type of activity. I believe that MPS2 should be the absolute minimum standard of noise control that is applied and any site that can not meet these requirements should not even be considered for development.</p> <p>In practice we should look at developing site specific noise conditions to address vehicle movements on and off site, noise from plant and machinery etc. These conditions should draw on MPS2, and BS4142:1997 to ensure the lowest level of noise disturbance possible and the maximum protection of local amenity. This is particularly important in otherwise quiet rural areas where it is conceivable that using the provisions of MPS2 alone certain premises could be exposed to noise levels in excess of 15db(a) above the background levels.</p>
Reasons for oral participation	
Summary	Human health and amenity - The current guidance on noise from quarrying operations is contained within MPS2 and makes a number of assumptions regarding acceptable noise from this type of activity. MPS2 should be the minimum standard of noise control that is applied. Should look to develop site specific noise conditions.

Comment ID:	78	Anne Henshaw	Campaign to Protect Rural England (CPRE) Group Chaiman, North Wilts and Swindon Group	Person ID: 399075	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	2. The Upper Thames Valley Area				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	The sites in this zone are grouped together and, despite the negative effect on the local roads and small villages, are more able to demonstrate					



	accessibility without major environmental damage.  We would support inclusion of these sites with the caveat that there should be controls on numbers of HGVs under a phasing formula if demand returns, and rises, with increased house building.
Reasons for oral participation	
Summary	Traffic and transportation – sites in Upper Thames Valley will have negative effect on local roads and small villages. Support inclusion of these sites with caveat that there should be controls on number of HGVs.

Comment ID:	89	Mr Humphrys		Person ID: 392721	Is the DPD legally compliant?	No
Comment point	2. The Upper Thames Valley Area				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p><b>GENERAL OVERVIEW</b></p> <p>1. You ask, "Is the Plan unsound?". My answer is that, "Yes, it is unsound." Certainly, in plain English, it is unsound in the following senses :</p> <p>it is not wise; it is not properly strategic; and it is not likely to lead to good outcomes. As I shall explain, it is also tainted by the "corruption" endemic in much recent planning in the Cotswold Water Park.</p> <p><b>2. "Not wise."</b> For 25-50 years, it has been Wiltshire's Policy to concentrate all sharp sand and gravel digging on the Upper Thames. The present Plan seeks to continue this Policy, partly out of the self-interest of DUSEBYs. Yet the Plan looks forward to the day when the other river valleys of Wiltshire will also be stripped of their natural floodplains.</p> <p><b>3. FLOODPLAIN.</b> To seek to continue ripping the heart out of the floodplain of England's national river is a folly which future generations will sorely regret. When the gravel is removed, it is often replaced by non-porous heavy clays, intermixed with builders' rubble(which should be recycled). Or the gravel terraces are replaced by lakes, which once full, cannot accept any more rainfall.</p> <p>Either way, when monsoon rains hit southern England (as they did in July 2007), the Thames is likely to become much "flashier". The resulting floods are likely to become far more destructive, and on a much wider scale. Government's response to this threat has been to make flood protection an individual householder's responsibility. This is an abdication of strategic planning.</p> <p><b>4. The Money Equation.</b> Some jobs, chiefly in the haulage industry, are dependent on continuing in the same old way, exploiting the gravel until it is exhausted. Some politicians speak as if the only way that Britain can restart its present ailing economy is to ramp up the construction industry : dig more holes, mix more concrete, and cover the land with more hard-standings (car-parks) and more new buildings.</p>					

Yet the flood risk could outweigh much of this : when low-lying Boroughs of London are under water, because the Thames floodplain no longer exists to retard flood waters coming downstream, it will then, belatedly, be seen how the sums did not add up. The damage to existing property could well be in the £Billions, while the profit to a few firms for extracting gravel will only have been in the £Millions.

### **CORRUPTION IN THE COTSWOLD WATER PARK**

5. The last two years have seen one man jailed for blatant corruption. Yet his initial appointment should never have happened. The system in the Water Park had itself become "corrupt". The local Councils which have been pilloried in Private Eye's "Rotten Boroughs" column, and elsewhere, had themselves, over many years, become tainted by a very English form of "corruption". For "corruption" in the Water Park is far more deep-seated and endemic than one man's blatant dishonesty. Dennis Grant may have been the only employee or official to have been caught in outright illegality and private profiteering. But the whole planning process in the area has been open to misuse for decades.

6. Major political parties have long been financed by large donations from Companies in the aggregates and building trades, in return (it was understood) for continued Planning Permissions. Recent compliance and FOI legislation may have made this more difficult, but the underlying assumptions are still there. "You scratch my back, I'll scratch yours."

7. The Town and Country Planning Acts have been flouted by a deliberate sleight of hand in the Water Park, allowing a few men to become millionaires while the ancient Cotswold and Upper Thames landscape suffers. This can be substantiated by reviewing the decisions of many Planning Authorities and Committees, chiefly in connection with the after-uses permitted around old gravel pits.

8. "Revolving doors". It is an established fact that many of the procurement failures, and overspends, in the Ministry of Defence can be traced back to the "revolving doors" syndrome. Senior officers in all three Services, and officials, (and even perhaps former Secretaries of State) leave the MoD, and after an indecently short space of time take up highly-paid jobs in the Defence industry. The same has been happening in the minerals business. County officers move to industry jobs. Minerals men, trained by the commercial side, move on to important posts in the County planning departments. It is hardly surprising, then, that the Policy is always, "Carry On Digging". Something similar also happens on the archaeology side of mineral extraction, with County officers coming in from commercial operations, and keeping the results of many digs a commercial secret, instead of insisting on public access.

9. Local newspapers. Coverage of local mineral developments has for decades been heavily influenced by the fact that most local newspapers are financed largely by their property pages. Estate agents are not keen for their potential clients to know too much about the ghastliness of mineral operations just over the horizon, or just beyond some nearby bund. Millionaires place full-page ad's, and are rewarded with friendly coverage of their asset-stripping and exploitative schemes. The exposure of local scandals is seldom the result of investigative reporting by local newspapermen. In the high-profile case of Dennis Grant, the truth only came out because of the courage and tenacity of a single honest employee. Blind eyes are regularly turned to the mistakes of powerful bodies.

10. Committee Chairmen. A succession of Committee Chairmen, particularly of the Cotswold Water Park Committee, have nodded through developments which they themselves did not have to suffer. Their own homes were well away from the Water Park, in Colesbourne or North Cerney. "Let others have the wide noisy roads; let others have the shabby chalet ribbon development; and let others have to cope with the constant changes to agreed Conditions". This has been a prevailing attitude for too long, both in the Cotswolds and in Wiltshire; and will continue to undermine any Localism Act.

11. Councils. There has always been a majority within Wiltshire for unwelcome development to take place out of sight and out of hearing of that majority, up on the Upper Thames floodplain, and beyond the M4 corridor. This has been the case both on the old District Councils and at County Hall, and even with conservation bodies such as CPRE. "Let undesirable things happen elsewhere" is the prevailing consensus. (A "DUSEBY" is a Councillor who thinks and votes to "Dig Up Someone Else's Back Yard".)

12. Parish Chairmen. Even at the very local level, there is a strong tendency for people only to fight for the field outside their own back door. Their formal Objections to County Plans may be wrapped up in the appropriate planning lingo, but they are usually motivated by simple concerns about house prices and property values.

### **LACK OF STRATEGIC THINKING**

13. Habits, attitudes and practices which are not against the law, nor strictly-speaking corrupt, are nevertheless contributing to long-term and irreversible damage. We are all familiar with arguments in the case of fossil fuel use, "carbon footprints", and robbing future generations. We are, or have become, an extremely selfish species. To recognise this is not to condone it. An industry with such long-term and potentially damaging effects as the mineral industry should be subjected to the most rigorous and searching examination at the strategic level.

14. "Buck-passing". Instead of such examination, we now have a national, regional and county mineral planning process which deliberately seeks to pass the buck, and avoid responsibility. National and regional apportionments are used to tie the hands of MPA's. Local decisions on Preferred Areas can duck behind a sense of "force majeure"; while Central Government innocently looks the other way and says local decisions are for local people. Yet who sits on the RAWPs? Chiefly the aggregates industry and their paid lobbyists, with obvious motivations, and the County officers, some of whom have come through "revolving doors".

15. The result is a fundamental lack of strategic thinking, especially about floodplains. The only question they ask is "Where next?"

### **OUTCOMES**

16. The minerals industry like to point out that their operations are only temporary. This claim allows them to despoil one area, before "moving on" to despoil another. In hard fact, most of their operations are irreversible - at least until the next Ice Age in 10,000s of years.

17. Despite numerous promptings since the 2007 floods, no effort has yet been made to quantify the amount of flood storage space that will be required in future to counter-balance the loss of natural storage space in the Thames gravel terraces. Only a catastrophic flood, perhaps still 20 years away, will force a change of attitude - by which time there will be very little of the old Thames floodplain left.

18. Such flood storage space could also be used, in periods of drought, to add to reservoir capacity. An evolving scientific methodology is being developed to measure the human "WaterFootprint" in various countries. The volumetric method should be adequate for our still temperate climate, although in hot countries a different method is being tested.

19. Villages, from Roman and Anglo-Saxon times, have traditionally been about two miles apart. The lakeside developments of so-called "holiday villages" have changed all that in the western Water Park; and may shortly do the same in the recently exhausted eastern Water Park. The result, especially if repeated by the Co-op in Latton and Down Ampney, will be a completely unplanned conurbation from Poole Keynes in the west right across to Lechlade; and thence on into Oxfordshire. No reassurances that this is against present planning policy will prevent this happening. Look at the reassurances villages were given, ten and twenty years ago, that they would have buffer zones, or Settlement Protection Zones - now suddenly whipped away and disclaimed as "unlawful".

20. "Bundscape". Ancient views across unspoilt farmland will be replaced for 10-15 years by "bundscape". Designed to mitigate the effects of noise and dust, these bunds are all too often used merely to hide a multitude of sins : infill with material which is not inert; dumping of large quantities of recyclable material; rooting out and burning of ancient hedges and trees; displacement of footpaths and bridleways to new ugly routes; and shortcuts in the full and proper process of rescue archaeology.

	<p>21. Remoteness. County minerals officers prefer to play with abstract words on computers at Trowbridge, or to manipulate fancy coloured maps, than to see what is actually happening on the ground. If mineral extraction is to continue in Wiltshire, largely on the Upper Thames floodplain, then it would make sense for at least two officers to be based in Cricklade. From there, they would be able to monitor real outcomes, not just paper plans.</p> <p>22. Conclusion. For all the above reasons, and perhaps for others unstated, it can be seen that the present Minerals Plan for Wiltshire is fundamentally UNSOUND.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	
Summary	

Comment ID:	90	Mr Adrain Gleed Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 636834 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	2. The Upper Thames Valley Area				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The County Council has rejected this site because of the potentially limited quantity of mineral and potentially poor access. Landowner Assessment</p> <p>A site investigation has been carried out by the Landowner in 2012. Over 32 trial pits were constructed and samples taken and a geological and mineralogical report has been prepared. The trial pit show that the depth of working extends to over 4 metres which is on a par with, or deeper, than in many parts of the Water Park although this is not consistent throughout the whole of the site. Evidence of lignite was found but, after research was found to be of a nature which, unlike certain lignite intrusions, can be readily removed in a washing process. Generally the quality of the sand and gravel was considered to be impressive. Quality of the sands and gravel is also good. The site should not be dismissed on the grounds of insufficient mineral reserve as it is likely that the nature of the deposit will outweigh the few, if any, of the perceived disadvantages of the site.</p> <p>A summary of the mineralogy report is appended and the full site investigation report will be made available to the Council on a confidential basis. Discussions have been held with the Highways authority. It is understood that the Highways authority is satisfied with the proposed arrangements for the transportation of mineral from the site.</p> <p>The Council should review the merits of these two sites prior to the examination in public of the Sites Allocation Document Recommendation</p> <p>That U15 is re-appraised and incorporated in the Site Allocation Document.</p>					

What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	To ensure full discussion of issues
Summary	<p>Site option U15 should be re-appraised and incorporated in the Sites DPD.</p> <p>Landowner assessment carried out in 2012. Samples taken and a geological and mineralogical report has been prepared. Trial pits show depth of working extends to over 4 metres in places – equal to many parts of the Water Park. Quality of mineral considered to be good. Site should not be dismissed on grounds of insufficient mineral reserve. Full site investigation report will be made available to the Council on a confidential basis.</p> <p>Traffic and transportation - Discussions have been held with the Highways authority. It is understood that the Highways authority is satisfied with the proposed arrangements for the transportation of mineral from the site.</p>

Comment ID:	91	Mr Adrain Gleed Ms Binnie	Land & Mineral Management Limited Consultant	Person ID: 636834 545732	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	2. The Upper Thames Valley Area				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The County Council comments that access to site would be feasible in principle but excludes the site because of anticipated poor mineral quality and depth. It is stated that two companies have previously investigated the land and poor quality mineral is assumed. Due to the poor quality the site has not been incorporated.</p> <p>Landowner Assessment</p> <p>A site investigation has been carried out by the Landowner in 2012. Over 32 trial pits were constructed and samples taken and a geological and mineralogical report has been prepared. The trial pit show that the depth of working extends to over 4 metres which is on a par with, or deeper, than in many parts of the Water Park although this is not consistent throughout the whole of the site. Evidence of lignite was found but, after research was found to be of a nature which, unlike certain lignite intrusions, can be readily removed in a washing process. Generally the quality of the sand and gravel was considered to be impressive. Quality of the sands and gravel is also good. The site should not be dismissed on the grounds of insufficient mineral reserve as it is likely that the nature of the deposit will outweigh the few, if any, of the perceived disadvantages of the site.</p> <p>A summary of the mineralogy report is appended and the full site investigation report will be made available to the Council on a confidential basis. Discussions have been held with the Highways authority. It is understood that the Highways authority is satisfied with the proposed arrangements for the transportation of mineral from the site.</p> <p>The Council should review the merits of these two sites prior to the examination in public of the Sites Allocation Document</p>					

	Recommendation That U17 is re-appraised and incorporated in the Site Allocation Document.
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	To ensure full discussion of issues
Summary	Site option U17 should be re-appraised and incorporated in the Sites DPD.  Landowner assessment carried out in 2012. Samples taken and a geological and mineralogical report has been prepared. Trial pits show depth of working extends to over 4 metres in places – equal to many parts of the Water Park. Quality of mineral considered to be good. Site should not be dismissed on grounds of insufficient mineral reserve. Full site investigation report will be made available to the Council on a confidential basis.  Traffic and transportation - Discussions have been held with the Highways authority. It is understood that the Highways authority is satisfied with the proposed arrangements for the transportation of mineral from the site.

Comment ID:	12	Mr W Hughes		Person ID: 448135	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	Table 2.2 : Cox's Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. It does not wish to add any further comments.					
Reasons for oral participation						
Summary	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. No further comments.					

Comment ID:	13	Mrs Teresa Griffin	Kempsford Parish Council Clerk	Person ID: 630888	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.2 : Cox's Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	Kempsford Parish Council is concerned about the hydrogeological impact on groundwater and increased flood risk to Kempsford Parish. Please see below for other concerns and requirements.					
What change(s) are necessary to make the DPD sound?	<p>Hydrogeological Impact  Deep concerns over groundwater impact and increased flood risk to Parish  Request no final decision is made until completion of EA re-modelling work carried out.</p> <p>Restoration  Further consultation required with RAF Defence Estates concerning bird strike risk.</p> <p>Highways  C124 would require major improvements.  Major improvements to Top Road (allotments corner) junction in Kempsford required.</p> <p>Noise, Air Quality and Visual Impact  A larger standoff required between site boundary and Marston Meysey, Dunfield and Cox's Farm to protect residents.</p> <p>Footpaths  Protection of footpaths required and suitable temporary diversions (with minimal amenity value loss) during operations.</p>					
Other comments						
Reasons for oral participation						
Summary	<p>Preferred restoration objective – further consultation required with RAF Defence Estates concerning risk of birdstrike.</p> <p>Human health and amenity – a larger standoff required between site boundary and Marston Meysey, Dunfield and Cox's Farm to protect residents from noise, air quality and visual impacts. Protection of footpaths/suitable temporary diversions required during site operations.</p> <p>Traffic and transportation – C124 would require major improvements. Major improvements to Top Road (allotments corner) junction in Kempsford required.</p> <p>Water environment – Kempsford Parish Council is concerned about the hydrogeological impact on groundwater and increased flood risk to Kempsford Parish. Request no final decision is made until completion of EA re-modelling work carried out.</p>					

Comment ID:	20	Major C Giles		Person ID: 632853	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.2 : Cox's Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Cumulative effects - [Comment: This section is a platitude and lacks precision as to exactly how cumulative effects will be considered. It is also unclear as to whether close working with GCC will occur before, during or after approval, which leaves space for cumulative effects not to be considered at all, and in the worse case considered forensically when harm/damage/change will already have occurred. At an outline business case level (as this is an economic activity) they should be considered before approval.]</p> <p>Detailed guidance for planning and environmental impact assessment is provided by Defra, but does not appear to have been included or followed. Therefore when approval from SoS is sought, there is a risk that this has not been undertaken and therefore approval may not be made. Furthermore, the cumulative effects do not consider the likely and legal duties that will arise potentially from the Flood and Water Management Act 2010 (the Act), which is in consultation.</p> <p>The Treasury Green Book highlights the importance of trying to identify all costs and benefits including environmental. While impacts on the environment often do not have any market prices, it is important to try and use evidence on non market values attached to environmental impacts where feasible (see Tools for Environmental Valuation ). Costs and benefits to the environment that have not been valued should also be appraised. All costs and benefits must therefore be clearly described in an appraisal, and should be quantified where this is possible and meaningful. Where it is not possible to provide a monetised or quantified assessment, it is important to provide a qualitative assessment of potential impacts.</p>					
What change(s) are necessary to make the DPD sound?	<p>There is Potential for cumulative effects (in both Wiltshire and bordering areas of Gloucestershire) on human health and amenity, the functional connectivity of the local PRoW network, traffic and transportation, noise and light pollution, vibration, air quality and cultural heritage. Mitigation could be achieved through strategic phasing of workings in the area to reduce in combination effects. In addition, continued close working with Gloucestershire County Council, the Environment Agency, Flood Forum and Civil Contingencies Secretariat will help ensure that cumulative effects are identified and, [delete - where appropriate ] mitigated , through Sustainability Appraisal / Strategic Environmental Assessment and Habitats Regulations Assessment processes and compliance with the Flood and Water Management Act 2010 (the Act)</p>					
Other comments	<p>There is already serious deterioration of the C road surface in the local area, and poor traffic behaviour more generally including the excessive speed of aggregate vehicles particularly through Reevey, Kempsford and Whelford.</p> <p>The site is likely to result in significantly more heavy traffic making a bad situation much worse when combined with other aggregate sites, which already degrades the rural life experience of this part of the Gloucestershire and Wiltshire border. Given this information, the traffic management and road improvement plans should be widely considered and evidenced in detail prior to final approval being sought. Currently there is a lack of detail in all cumulative effects about flooding and traffic impacts and therefore the plan is not sound.</p>					
Reasons for oral participation						
Summary	<p>Traffic and transportation – existing deterioration of the C road surface in the local area. Speeding aggregate vehicles. Site likely to exacerbate existing traffic issues.</p> <p>Cumulative effects – section unclear as to how cumulative effects will be considered. Government guidance/Acts have not been followed/included.</p> <p>Potential for cumulative effects on human health and amenity, functional connectivity of the local PRoW network, traffic and transportation, noise and light pollution, vibration, air quality and cultural heritage. Mitigation could be achieved through strategic phasing of workings in the area to reduce in</p>					



	combination effects. Continued close working with Gloucestershire County Council, the Environment Agency, Flood Forum and Civil Contingencies Secretariat will help ensure that cumulative effects are identified. Current lack of detail in all cumulative effects related to flooding and traffic impacts.
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Comment ID:	22	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.2 : Cox's Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>This site abuts Fairford aerodrome. The site falls within the explosive, height and technical safeguarding consultation zones surrounding the aerodrome as explained below.</p> <p>Explosives Safeguarding - The majority of the northern part of the working area falls within the innermost safeguarding explosive zone known as 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.</p> <p>The MOD therefore cannot accept mineral working inside the yellow line as identified on the attached safeguarding plan extract.</p> <p>Technical Safeguarding – the extraction site falls within the technical safeguarding zone surrounding a transmitter/receiver facility at RAF Fairford aerodrome. In this area the MOD needs to assess the deployment of plant and machinery, the development of structures and ground engineering works to ensure that the operation of the transmitter will not be impeded or degraded.</p> <p>The MOD will require details of cross sections of any extraction scheme put forward for any part of the site identified as well as details of how the site will be worked to ensure the transmitter is not adversely affected.</p> <p>Aerodrome Safeguarding – The whole extraction site falls within the height and birdstrike safeguarding zone surrounding RAF Fairford and abuts the aerodrome itself. The extraction site will present a serious birdstrike risk if it is restored to create wetland habitats. Areas of wetland habitat can be attractive to bird species such as gulls and geese which are considered hazardous to air traffic increasing the risk of a birdstrike incident.</p> <p>The MOD therefore requires that any mineral workings in this area are restored as a dry land once mineral extraction has ceased. During the extraction phase, water levels must be kept at an absolute minimum to avoid large numbers of hazardous bird species congregating on site.</p> <p>Additionally, any structure, equipment or machinery used within the extraction area must be assessed against aerodrome height and technical safeguarding requirements to ensure that the obstacle limitation surfaces are not subjected to any infringement caused by such equipment.</p>					

	The MOD does not oppose part of the site nominated being identified for mineral working subject to confirmation that extraction will not take place within IBD, the restoration of any mineral workings will not feature wetland habitats and that all phased workings are submitted for approval by DIO Safeguarding.
Reasons for oral participation	
Summary	Preferred restoration objective - Birdstrike risk if restored to create wetland habitats. MOD requires that site is restored to dry land.  Any other issues - Site abuts Fairford aerodrome. The site falls within the explosive, height and technical safeguarding consultation zones surrounding the aerodrome. The MOD cannot accept mineral working inside the yellow line as identified on the attached safeguarding plan extract (Explosives Safeguarding). During extraction, water levels must be kept to a minimum – to avoid risk of birdstrike. The MOD does not oppose part of the site nominated being identified for mineral working subject to confirmation that extraction will not take place within Inhabited Building Distance (IBD), the restoration of any mineral workings will not feature wetland habitats and that all phased workings are submitted for approval by DIO Safeguarding.

Comment ID:	29	John Coole	Cricklade Town Council	Person ID: 396177	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.2 : Cox's Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The [Cricklade Town] Council continues to be concerned about the impact these sites will have on the Town and it's infrastructure in relation the the Traffic and Transportation recommendations for each of the sites which adjoins the Town's boundary. We do not therefore consider that the DPD is sound, justified or effective in its present form.</p> <p>Whilst these sites have been given four different names it is in effect one large joined up area representing over 50% (5.71 million tonnes) of the County's requirements. I attach a copy of the transport recommendations for these four sites which are almost identical. One solution should be sought which will address all of these problems and this should be a condition of, and in place, before any of the developments actually taking place.</p> <p>Phrases such as 'Concerns with road network suitability, access/egress from the A419 and HGV's travelling through Latton rather than using the A419 southbound junction to Calcutt Junction will need to be fully addressed at the planning application stage' and 'Consultation with the Highways Agency must be undertaken by any future applicant to satisfactorily demonstrate' do not give local residents any confidence that these matters will be adequately addressed. Past experience demonstrates that individual applications are then granted without reference to the whole picture and are not then considered a factor in granting of any permission. As a result, and over a period of time, no improvements are then made and the actual problems of HGVs using out Town particularly as a through route to West.</p> <p>The community is currently faced with numerous traffic problems from developments and changes outside of our control. Improvements to the A419, future large housing and industrial developments on the northern edge of Swindon, Waste Management changes and now Mineral Extraction. It is our contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.</p>					
What change(s) are necessary to make						

the DPD sound?	
Other comments	
Reasons for oral participation	
Summary	Traffic and transportation – One transport solution should be sought to address problems of the four proposed mineral extraction sites in the area, and be in place prior to development. The community is currently faced with numerous traffic problems from developments and changes outside of our control - contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.

Comment ID:	50	Chris and Sally Francis		Person ID: 633904	Is the DPD legally compliant?	No
Comment point	Table 2.2 : Cox's Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Firstly, I am writing as a resident of Marston Meysey with particular interest in the Cox's Farm site as it is adjacent to our property. Secondly, I would endorse all that Saleem Shamash has written on behalf of Marston Meysey Parish Meeting but would add the following (see below) as they are of particular concern to us for the reasons above.</p> <p>The Preferred Restoration Objective - This sub - section is unsound, because it is not consistent with National Policy. Marston Meysey is set in a Conservation Area and contains a large number of listed buildings. The area of Cox's Farm has numerous footpaths / rights of way across it which have molded the local landscape. Also these amenities are important to local residents. The restoration scheme should give adequate safeguards to preserve and enhance these important features noted above.</p> <p>Human Health and Amenity As our boundary is so close to the proposed site a 100metre stand off does not, in our opinion, seem enough to guard against general health, quality of life i.e. dust, noise etc. This arbitrary figure gives uncertainty to local residents. Why not follow the line of the existing fields?</p> <p>Landscape and Visual, and Historic Built Environment. For the same reasons, as above these sub sections are unsound. The stand-off areas should be excluded from the site allocation and should be drawn up with the landscape both visual and historical in mind. i.e. looking at the area as a whole with regard to the position of the village and its environs as a " living area" and a "conservation area".</p> <p>Traffic and Transportation We consider this sub-section is not deliverable.</p>					

	<p>There are huge issues with the safety and capacity of the C124 and C116. The Cox's Farm site should not be taken in isolation. The volume of traffic along these roads is forever increasing and no development should be allowed to take place until appropriate measures have been taken to make these roads safe.</p> <p>Should the developers not be asked for an annual contribution to allow for wear and tear to the C124 and C116? Both these roads should be reclassified as B roads to ensure a more appropriate inspection and maintenance regime) The speed limit along these roads should be reduced to 40mph.</p>
Reasons for oral participation	
Summary	<p>Site adjacent to consultee's property. Consultee endorses Marston Meysey Parish Meeting representations.</p> <p>Preferred restoration objective – this sub-section is unsound – not consistent with National Policy. Restoration scheme should safeguard PRoW across site, Marston Meysey Conservation Area, and listed buildings.</p> <p>Human health and amenity – 100m standoff insufficient to guard against dust, noise etc. Why not follow the line of existing fields?</p> <p>Landscape and visual – unsound. Stand-off areas should be excluded from site allocation.</p> <p>Historic built environment – unsound. Stand-off areas should be excluded from site allocation.</p> <p>Traffic and transportation – not deliverable. Issues with safety and capacity of C124 and C116. The Cox's Farm site should not be taken in isolation. Volume of traffic along these roads ever increasing. Developers should contribute to annual wear and tear of roads. Roads should be reclassified to B roads. Speed limit should be reduced to 40mph.</p>

Comment ID:	51	Mr Ian Sparks		Person ID: 476584	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.2 : Cox's Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p><b>Restoration</b> - this is inconsistent with National Policy (MPS1 and Planning and Minerals Practice Guide) which sets out that a restoration scheme is an important part of minerals development and as yet no viable and long term restoration scheme has been identified for Cox's Farm.</p> <p><b>Human Health and Amenity</b> - the boundary of the proposed site immediately adjoin the villages of Dunfield and Marston Meysey and does not allow sufficient protection from noise and dust for the residents of these villages in accordance with MPS 1. Dunfield is NE of the site and with the prevailing SW winds this will be a major issue. Not having a defined and adequate Settlement Protection Zone/Buffer Zone/Stand Off Area does not protect human health and is inconsistent with National Policy.</p> <p><b>Water Environment</b> - the plan is unsound as it has not adequately considered the impact on water courses and drinking water quality. The gravel and</p>					

	sand forms a critical course for the water coming down from the north of the area to the River Thames in the south. Any disruption to this may alter the water courses around the area through the villages of Dunfield and Marston Meysey and no assessment has been made to this risk. The gravel and sand also acts as a water purification filter and no assessment has been undertaken into the impact on water quality for houses that are not connected to mains water and take their drinking water from wells.
What change(s) are necessary to make the DPD sound?	<p>A long term viable restoration scheme should be agreed before the inclusion of Cox's Farm in the plan There should be adequate stand-off areas defined and this area excluded from the site allocation to protect the villages adjoining the area of at least one field</p> <p>A full hydrological survey should be undertaken into the impact of gravel extraction and any restoration, in particular with reference to water courses and drinking water quality</p>
Other comments	
Reasons for oral participation	
Summary	<p>Preferred restoration objective – inconsistent with national policy as no viable and long term restoration plan has been identified for the site. Restoration scheme should be agreed before inclusion of site in plan.</p> <p>Human health and amenity – noise and dust impacts on nearby village residents. Prevailing winds to Dunfield an issue. Adequate stand-off areas should be defined to protect adjoining villages.</p> <p>Water environment – plan does not adequately consider impact on water courses and drinking water quality. A full hydrological survey should be undertaken into the impact of gravel extraction and any restoration.</p>

Comment ID:	61	Mr Tim McConnel		Person ID: 635388	Is the DPD legally compliant?	No
Comment point	Table 2.2 : Cox's Farm			Is the DPD sound?		
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>We would endorse all that Saleem Shamash has written on behalf of Marston Meysey Parish Meeting in his letter dated 9 March 2012. Marston Meysey is set in a Conservation Area with archaeological and heritage features and contains a number of listed buildings. The area of Cox's Farm has numerous footpaths / rights of way across it which are important to local residents and any restoration scheme should give adequate safeguards to preserve and enhance these important features.</p> <p>There are important issues with the safety and capacity of the C124 and C116. The Cox's Farm site should not be taken in isolation. The volume of traffic along these roads is forever increasing and no development should be allowed to take place until appropriate measures have been taken to make these roads safe and allow sensible access to and from the A419.</p>					
What change(s) are necessary to make	Refer to Saleem Shamash's letter of 9 March 2012. [see attached]					

the DPD sound?	
Other comments	The 100metre stand off is not of sufficient distance from the nearest houses to give reasonable protection to residents. Why not follow the line of the existing field boundaries as long as they are in excess of 100m from any excavation site.
Reasons for oral participation	
Summary	<p>Preferred restoration objective - should safeguard numerous PRoW that run across site.</p> <p>Human health and amenity – 100m standoff is not sufficient. Why not follow the line of existing field boundaries as long as they are in excess of 100m from excavation site.</p> <p>Archaeology – Archaeological features in Marston Meysey</p> <p>Historic built environment – Marston Meysey set in a Conservation Area and contains a number of listed buildings</p> <p>Traffic and transportation – safety and capacity issues with C124 and C116. Site should not be taken in isolation. Access to and from A419 should be improved before further development.</p> <p>Also endorses Saleem Shamash's letter of 9 March 2012 (attached).</p>

Comment ID:	64	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	No
Comment point	Table 2.2 : Cox's Farm				Is the DPD sound?	
Reasons for not legally compliant	Oral participation?					
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>We note that public rights of way enhancements are not included in the preferred restoration objective. There appear to be onsite opportunities to do this (such as upgrading the footpaths to bridleways so that the existing bridleways which run across part of the site continue across the site). We advised in our response to the initial site options consultation that " Opportunities for enhancements to the public right of way network need to be systematically considered for all sites ". Page 94 of the Report on The Results Of Consultation Initial Site Options for Sand and Gravel Extraction says under " Issues raised by consultees " that "</p> <p>Existing public rights of way should be protected and enhanced where possible " and under " further assessments required ", that " the potential impacts on public rights of way will be considered as part of further detailed assessments ". It is not clear how opportunities for enhancement have been considered for all sites, and this site in particular, and insofar as they have not, the document may be considered unsound</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						

Reasons for oral participation	
Summary	Preferred restoration objective – ProW enhancements not included – opportunities to do this.

Comment ID:	65	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.2 : Cox's Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	In other regards we welcome the preferred restoration objective.					
Reasons for oral participation						
Summary	Preferred restoration objective welcomed.					

Comment ID:	83	Mr Derek Richards		Person ID: 636655	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.2 : Cox's Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>I wish to generally support the statements made by Mr Saleem Shamash on behalf of Marston Meysey Parish Meeting</p> <p>In addition I would like to make the following comments:</p> <p><b>Traffic/Transport</b></p> <p>If the identified minerals extraction sites get the go ahead then this will result in very high numbers of HGV vehicles on the C124/C116. Drivers of HGV</p>					

	<p>vehicles are generally paid with respect to performance (e.g. so many £ per load) and so can be expected to exceed the national speed limit (for HGVs this is 40 mph on a road such as the C124/C116). High numbers and high HGV speeds are mainly responsible for the poor condition of the C124/C116 and the destruction of grass verges. There is no pavement along the C124/C116 and the road is used by pedestrians, horse riders and cyclists and so there is a need to address safety issues. A 30 mph speed limit is required along the C124/C116 between Kempford and the A419, in the interests of safety and satisfactory maintenance of the road and verges.</p> <p><b>Restoration &amp; Hydrology</b></p> <p>There does not seem to be a coherent restoration plan for the Upper Thames area. Some areas are designated as restoration to farming, others to woodland and others to nature conservation. An overall plan for the Upper Thames is needed. The restoration proposals envisaged in each case seem to be more of suggestion rather than any firm requirement. The phasing of extraction and agreed restoration is likely to have impact on the water flow through the area and might increase flood risk. Phasing and restoration in the context of hydrology and in particular flood risk is required.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	
Summary	<p>Preferred restoration objective – need for coherent, overall restoration plan for Upper Thames area. Restoration in context of hydrology/flood risk is required.</p> <p>Traffic and transportation – proposal will result in high numbers of HGV vehicles travelling at high speed on C124/C116. HGVs will cause damage to road and destruction of grass verges. Safety issues with no pavement along C124/C116. A 30mph speed limit is required along C124/C116 between Kempford and the A419.</p> <p>Water environment - Phasing of extraction and restoration likely to impact on water flow and may increase flood risk.</p> <p>General support for statements made by Mr Saleem Shamash on behalf of Marston Meysey Parish Meeting.</p>

Comment ID:	85	Mr Andrew Brand		Person ID: 479518	Is the DPD legally compliant?	
Comment point	Table 2.2 : Cox's Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make						



the DPD sound?	
Other comments	<p>I write to give you my comments on this draft DPD.</p> <p>I believe the DPD is not sound in relation to the Upper Thames Valley and the area known as Cox's Farm in the respects and for the reasons set out in the letter to you dated 9 March from Mr Saleem Shamash on behalf of the Marston Meysey Parish Meeting, a copy of which I have received, and I adopt his submissions.</p> <p>In particular, for the purposes of the section on Human Health and Amenity, the boundaries of the site allocation should define the stand - off areas, which should also be drawn having regard to material considerations rather than the stated 100 metres which sounds arbitrary and may not be adequate. This should also be made clear in the sections on Landscape / Visual and Historic Built Environment, where (if the stand - off areas are not shown on the plan) the stand - off distances must also be stated.</p> <p>On the Western side of the Cox's Farm site the first field boundaries make a more logical stand off area - they are not an arbitrary distance, but have proper planning rationale having particular regard to the landscape setting of the village of Marston Meysey and the setting of the Conservation Area. Alternatively, the Site Allocation should identify this area as a Zone of Sensitivity, where especial regard should be had to all these factors. Please acknowledge and ensure that these comments are taken into account on ghe further consideration of this document.</p>
Reasons for oral participation	
Summary	<p>DPD not sound in relation to Upper Thames Valley and Cox's Farm site in respects of letter sent by Mr Saleem Shamash on behalf of the Marston Meysey Parish Meeting.</p> <p>Human health and amenity – boundaries of site allocation should define the stand-off areas, which should be drawn with regard to material considerations rather than the (arbitrary) 100m. On western site of site, the first field boundaries make a more logical stand-off area. Alternatively, the Site Allocation should identify this area as a Zone of Sensitivity.</p> <p>Landscape and visual – stand-off distances should be stated.</p> <p>Historic built environment – stand-off distances should be stated.</p>

Comment ID:	86	Mr Shamash	Mr Saleem Shamash	Person ID: 391621	Is the DPD legally compliant?	No
Comment point	Table 2.2 : Cox's Farm			Is the DPD sound?	Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	I submit this response on behalf of the Marston Meysey Parish Meeting (MMPM) to the above. As you know, Marston Meysey is a village situated within the Upper Thames Valley Area and we have taken an active interest in the emerging Local Development Framework for minerals. We are pleased that the County has been prepared to enter into constructive dialogue. We note, for example, that a number of concerns expressed in the representations we submitted on 22 October 2010 on the Initial Site Options Report and subsequently discussed at our meeting on 30 September 2011 have been reflected					

in the current draft. However, we are concerned that the emerging document remains unsound and I amplify upon the reasons below.

#### The Preferred Restoration Objective .

This sub - section is unsound, because it is not consistent with National Policy. MPS1 and the accompanying Planning and Minerals Practice Guide recognise the restoration scheme forms an important part of minerals development and that it is the lasting effect. The environmental impacts of minerals development are specified as including:

- Visual intrusion into the local setting and the wider landscape
- Archaeological and heritage features

Marston Meysey is largely designated a Conservation Area and contains a number of listed buildings, which all have statutory as well as policy protection in terms of their appearance and setting.

As indicated in the Site Description, the site is criss crossed by a network of Public Rights of Way and these also make a major contribution to the appearance and setting of the area.

*This sub - section fails to give adequate prominence to these factors and should be amended accordingly to ensure a restoration scheme that either preserves or enhances the appearance and setting of these nationally important features and maintains or improves the degree of public access.*

#### Human Health and Amenity

The reference to 100 metre stand off distances to safeguard against dust and noise is welcome, although the figure sounds arbitrary and may not be adequate. In any event, this sub - section remains unsound, because it is not effective and is inconsistent with national policy as it does not provide sufficient certainty of where sustainable mineral working will take place as required under paragraph 15 of MPS1.

*The boundaries of the site allocation should therefore define the stand - off areas, which should also be drawn having regard to material considerations as emphasised below.*

#### Landscape and Visual, and Historic Built Environment

For the same reasons as above, these sub sections are unsound.

*The stand - off areas, which should be excluded from the site allocation should be drawn with due reference to these issues. The first field boundaries make a more logical stand off area - they are not an arbitrary distance, but have proper planning rationale having particular regard to the landscape setting of the village and the setting of the Conservation Area. Alternatively, the Site Allocation should identify this area as a Zone of Sensitivity, where especial regard should be had to all these factors.*

#### Traffic and Transportation

This sub - section is unsound because it is not deliverable. Whilst it recognises potential highway issues, it is not based upon sound infrastructure delivery as required by paragraph 4.45 of PPS12. Instead of planning for this properly it relegates the issue to the development control system, which goes against the very purpose of forward planning. It also fails to provide an adequate policy basis for securing contributions by way of Section 106 Agreements and the Community Infrastructure Levy.

There are three essential issues with traffic and transportation and to make this sub -section sound, it should be clear in indicating:

*The need for safe access and egress to the site - which should be required to be funded by way of a Section 106 Agreement*

*The highway safety and capacity issues will need to be addressed through a Transport Assessment and considered cumulatively with other proposals.*

*No development will be permitted without appropriate mitigation measures, or allowance for future measures in the event that other schemes also come forward, such as the creation of shared pavement and cycle path along the C124 and C116; and the provision of an all movement junction at the junction with the A419. As appropriate, these will be secured by way of a Section 106 Agreement or a tariff under the Community Infrastructure Levy.*

*The need for a tariff under the Community Infrastructure Levy to allow for a wear and tear contribution and no development to be permitted until the C124 and C116 have been reclassified as B roads (to ensure a more appropriate inspection and maintenance regime).*

	<p><b>Water Environment</b>  This sub - section is unsound for a number of reasons. Whilst the Environment Agency is carrying out re-modelling work the evidence used cannot be regarded as robust or credible. The sub - section also fails to address phasing and any restoration scheme, which might present significant water management challenges both in terms of hydrology and also minimising the potential for bird strike.  <i>This sub - section needs to await the work being carried out by the Environment Agency and needs to address the water environment issues more fully</i></p>
What change(s) are necessary to make the DPD sound?	<p>Please see the above underlined suggestions in italics.</p> <p><b>The Preferred Restoration Objective .</b>  This sub - section fails to give adequate prominence to these factors and should be amended accordingly to ensure a restoration scheme that either preserves or enhances the appearance and setting of these nationally important features and maintains or improves the degree of public access .</p> <p><b>Human Health and Amenity</b>  The boundaries of the site allocation should therefore define the stand - off areas, which should also be drawn having regard to material considerations as emphasised below.</p> <p><b>Landscape and Visual, and Historic Built Environment</b>  The stand - off areas, which should be excluded from the site allocation should be drawn with due reference to these issues. The first field boundaries make a more logical stand off area - they are not an arbitrary distance, but have proper planning rationale having particular regard to the landscape setting of the village and the setting of the Conservation Area. Alternatively, the Site Allocation should identify this area as a Zone of Sensitivity, where especial regard should be had to all these factors.</p> <p><b>Traffic and Transportation</b>  There are three essential issues with traffic and transportation and to make this sub -section sound, it should be clear in indicating:</p> <ul style="list-style-type: none"> <li>- The need for safe access and egress to the site - which should be required to be funded by way of a Section 106 Agreement</li> <li>- The highway safety and capacity issues will need to be addressed through a Transport Assessment and considered cumulatively with other proposals. No development will be permitted without appropriate mitigation measures, or allowance for future measures in the event that other schemes also come forward, such as the creation of shared pavement and cycle path along the C124 and C116; and the provision of an all movement junction at the junction with the A419. As appropriate, these will be secured by way of a Section 106 Agreement or a tariff under the Community Infrastructure Levy.</li> <li>- The need for a tariff under the Community Infrastructure Levy to allow for a wear and tear contribution and no development to be permitted until the C124 and C116 have been reclassified as B roads (to ensure a more appropriate inspection and maintenance regime).</li> </ul> <p><b>Water Environment</b>  This sub - section needs to await the work being carried out by the Environment Agency and needs to address the water environment issues more fully.</p>
Other comments	
Reasons for oral participation	Yes, but we would prefer to explore through further dialogue possible changes that might overcome our concerns.
Summary	<p>Response submitted on behalf of the Marston Meysey Parish Meeting. We are pleased that the County has been prepared to enter into constructive dialogue. A number of concerns expressed previously have been reflected in the current draft. Some concerns remain and representation sets out some suggested changes.</p> <p>Preferred restoration objective – not consistent with National Policy (MPS1) as it fails to give adequate prominence to factors such as Marston Meysey Conservation Area, listed buildings and PRoW. Should be amended to ensure a restoration scheme that preserves/enhances the appearance and setting of these nationally important features and maintains/improves the degree of public access.</p>

	<p>Human health and amenity – not consistent with National Policy (MPS1; para 15) as it does not provide sufficient certainty of where mineral working will take place. 100m standoff distances sound arbitrary and may not be adequate.</p> <p>Landscape and visual – First field boundaries make a more logical stand-off area – proper planning rationale with regard to the landscape setting of the village. Alternatively, area should be identified as a Zone of Sensitivity.</p> <p>Historic built environment – First field boundaries make a more logical stand-off area – proper planning rationale with regard to the setting of the Conservation Area. Alternatively, area should be identified as a Zone of Sensitivity.</p> <p>Traffic and transportation – not deliverable - not based on sound infrastructure delivery. Does not provide a policy basis for securing S106/CIL. Need for safe access/egress to site. Highway safety and capacity issues need to be addressed through a Transport Assessment and considered cumulatively with other proposals. Need to ensure a more appropriate road maintenance regime. Shared pavement/cycle path along C124 and C116.</p> <p>Water environment - Whilst the Environment Agency is carrying out re-modelling work the evidence used cannot be regarded as robust/credible. Fails to address phasing/restoration implications in terms of hydrology and bird strike.</p>
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Comment ID:	101	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.2 : Cox's Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Landscape and built environment - the extent of the quarrying should reflect the proximity and setting of the heritage assets affected. No objection is raised on the basis of the mitigation proposed and, in addition, the consideration of the grade 2 listed Cox's Farm setting.</p> <p>Archaeology - This site contains archaeology of considerable importance and is also likely to contain more finds of equal if not greater significance. Further investigation is therefore vital prior to any planning application. The appropriate investigation and response (recording/mitigation/restoration...) should be informed by the relevant policy, guidance and advice[1]. In accordance with national planning policy for the historic environment, the relative significance of the archaeology affected will determine how it might/should be conserved and whether preservation in situ may be appropriate. [1]PPS5 Planning for the historic environment and its practice guide; Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008)</p>					
Reasons for oral						

participation	
Summary	<p>Landscape and visual – extent of quarrying should reflect the proximity and setting of the heritage assets affected. No objection on basis of mitigation proposed.</p> <p>Archaeology – site contains important archaeology. Further appropriate investigation vital prior to any planning application.</p> <p>Historic built environment - extent of quarrying should reflect the proximity and setting of the heritage assets affected. No objection on basis of mitigation proposed. Cox's Farm is grade 2 listed.</p>

Comment ID:	41	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
Comment point	Table 2.2 : Cox's Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>The site is marked with the thicker red line and in land contamination terms I have no specific objections. There is an area of the site to the north east which is marked as unknown filled ground which may have already been subject to landfill of some sort. The site to the north ( in light blue was military land and appears to have had a number of tanks on site although this is no surprise given the past use. I suspect given the history there may be more land contamination on that site than indicated on the plan.</p> <p>In practice I can see no objection in land contamination terms to the use of this site for quarrying. In terms of possible impacts on controlled waters either as a result of quarrying or infill the Environment Agency would need to be the primary consultee and advisor.</p> <p>We have no adverse comments to make regarding this site in terms of the impact upon local air quality.</p> <p>Conclusion for Site 1: No objection or adverse comment from a land contamination or local air quality perspective. There are residential properties within 50m of the western edge of the site. The consultation document does refer to the need for noise and concern regarding the likely transport routes. This must also include an assessment of the impact of noise and dust from vehicles on premises adjoining the possible access routes. Conditions may be needed to protect property on these from these vehicle impacts and potential an hour's restriction on vehicle movements associated with the site.</p>					
Reasons for oral participation						
Summary	Human health and amenity - No objection or adverse comment from a local air quality perspective. Assessment needed on the impact of noise and dust					

	<p>from vehicles on premises adjoining the possible access routes. Conditions may be required to protect property from vehicle impacts – potential one hour's restriction on vehicle movements associated with site.</p> <p>Water environment - No objection/adverse comment from a land contamination perspective. Environment Agency would need to be the primary consultee and advisor in terms of possible impacts on controlled waters either as a result of quarrying or infill.</p>
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Comment ID:	4	Wilkins		Person ID: 627325	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The position of Blackburr Farm is significantly close to Castle Eaton, much of which is a conservation area. The infrastructure in this area is not effective to take HGV or regular HGV traffic. The noise, dust and disruption to village life in this conservation area would far outway the forgoing proposal. Castle Eaton is access either from the A419, which is already a very difficult junction to co-ordinate at ones own safety, or by the single track roads which seggregate Blackburr Farm. The safety of local residents and the impact of the disruption is unacceptable. Castle Eaton is an historic area and should be protected from large disruption or impact.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments	<p>The position of Blackburr Farm is significantly close to Castle Eaton, much of which is a conservation area. The infrastructure in this area is not effective to take HGV or regular HGV traffic. The noise, dust and disruption to village life in this conservation area would far outway the forgoing proposal. Castle Eaton is access either from the A419, which is already a very difficult junction to co-ordinate at ones own safety, or by the single track roads which seggregate Blackburr Farm. The safety of local residents and the impact of the disruption is unacceptable. Castle Eaton is an historic area and should be protected from large disruption or impact.</p>					
Reasons for oral participation						
Summary	<p>Human health and amenity - noise, dust and disruption to village life in Castle Eaton.</p> <p>Historic built environment - site close to Castle Eaton conservation area. Castle Eaton is a historic area and should be protected from large disruption.</p> <p>Traffic and transportation - Infrastructure in this area is not effective to take HGV traffic. Safety of local residents and the impact of the disruption is unacceptable.</p>					

Comment ID:	9	Mr W Hughes		Person ID: 448135	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment	Table 2.3 : Blackburr Farm				Oral participation?	No

point	
Reasons for not legally compliant	
What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. It does not wish to add any further comments.
Reasons for oral participation	
Summary	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. No further comments.

Comment ID:	14	Mrs Teresa Griffin	Kempsford Parish Council Clerk	Person ID: 630888	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	Kempsford Parish Council is concerned about the hydrogeological impact on groundwater and increased flood risk to Kempsford Parish. Please see below for other concerns and requirements.					
What change(s) are necessary to make the DPD sound?	<p>Hydrogeological Impact  Deep concerns over groundwater impact and increased flood risk to Parish  Request no final decision is made until completion of EA re-modelling work carried out.</p> <p>Restoration  Further consultation required with RAF Defence Estates concerning bird strike risk.</p> <p>Highways  C124 would require major improvements.  Major improvements to Top Road (allotments corner) junction in Kempsford required.</p>					
Other comments						

Reasons for oral participation	
Summary	<p>Preferred restoration objective – further consultation required with RAF Defence Estates concerning risk of birdstrike.</p> <p>Traffic and transportation – C124 would require major improvements. Major improvements to Top Road (allotments corner) junction in Kempsford required.</p> <p>Water environment – Kempsford Parish Council is concerned about the hydrogeological impact on groundwater and increased flood risk to Kempsford Parish. Request no final decision is made until completion of EA re-modelling work carried out.</p>

Comment ID:	17	Neville Nelder		Person ID: 463097	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>The statement contained within the 'Preferred Restoration Objective states '.....the restoration of the [Thames &amp; Severn] Canal could be considered as part of a wider restoration project.' The Cotswold Canals Trust considers this statement to be wholly inadequate. We propose that it is amended as follows; '... the restoration of the canal MUST be considered within the wider context of the restoration of the Cotswold Canals as a whole. Wiltshire Council is a member of the Cotswold Canals Partnership, dedicated to the restoration of the Stroudwater and Thames &amp; Severn Canals. In your statement, there is reference to the canal '...bisecting the site..'</p> <p>There is already a condition [no. 39] on the adjoining Round House farm minerals extraction consent to re-instate the route of the canal to an appropriate line and level. The 'wider restoration project' already exists, and is active. The restoration of the Thames &amp; Severn canal must be an essential element of the restoration of the site. To what extent restoration is fully feasible at this site may depend on many factors, particularly on markets and prices of minerals at the time of minerals extraction, but it must be made clear that there is a minimum requirement on the applicant to incorporate the canal in his restoration plan. We perceive that there is a commercial opportunity for the owner/developer of this site in constructing a medium-sized marina on the north side of the canal route, ie between canal and the C124 road, thus giving good road access to the site. We appreciate that there will be concerns raised about the phenomenon of bird strike. But where there are boats moored on a permanent basis [as we envisage at this site] birds will not be able to land, and will seek open water elsewhere.</p> <p>I attach a letter written to Wiltshire Council on 18 October 2011 on the subject of the Community Infrastructure Levy, which could well apply to situations such as this, supplementing conditions that undoubtedly be applied to any consent for this site. We suggest that it may be possible to associate such</p>					



	<p>conditions with the development of the Cox's Farm site in parallel, thus spreading the financial burden over a wider area. Noting the concerns expressed for Castle Eaton, for which we have sympathy, an opportunity exists with the development of the site to rationalize the two inadequate roads on the boundaries by combining them into one higher standard road passing through the site in a north-south direction, initially being created as a haul road from the C124. The westernmost road could then revert to become available land suited for incorporation into the application for extraction. This would have the added advantage of reducing the number of bridge crossings of the canal from 2 to 1. The Cotswold Canals Trust welcomes dialogue on these issues.</p>
Reasons for oral participation	
Summary	<p><b>Preferred restoration objective</b> – restoration of the canal MUST be considered within the wider context of the restoration project of the Cotswold Canals as a whole. Condition on adjoining Round House farm minerals extraction consent to re-instate canal. Commercial opportunity of this site in constructing a marina on the north side of the canal route. Community Infrastructure Levy may apply. Conditions may be associated with development of Cox's Farm site. <b>Traffic and transportation</b> – opportunity to combine two inadequate roads on the boundaries to a higher standard road.</p>

Comment ID:	23	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?	
Comment point	Table 2.3 : Blackburr Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Both of these sites are located within the statutory height and birdstrike safeguarding zones surrounding RAF Fairford. The Blackburr Farm site is approximately 1.6km south of the aerodrome whilst the North Farm site is approximately 2.5km away. The principal aerodrome safeguarding concern in relation to both sites is that the restoration of mineral workings at these sites through restoration schemes dominated by wetland habitat would increase bird populations in proximity to the aerodrome heightening birdstrike risk.</p> <p>The MOD does not object to these areas being included in the mineral development plan provided any mineral extraction and restoration schemes are designed specifically to prevent the site becoming an attractant to large and flocking bird species and to prevent any increase in birdstrike risk. The MOD would therefore prefer that if taken forward for mineral extraction that both sites are restored as dry land to prevent any potential increase in birdstrike risk.</p>					
Reasons for oral participation						
Summary	<p>Preferred restoration objective: The MOD does not object to site being included in the mineral development plan provided any mineral extraction and restoration schemes are designed specifically to prevent the site becoming an attractant to large and flocking bird species and to prevent any increase in birdstrike risk. MOD preference for restoration to dry land.</p>					

	Any other issues: Site is located within the statutory height and birdstrike safeguarding zones surrounding RAF Fairford.
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Comment ID:	30	John Coole	Cricklade Town Council	Person ID: 396177	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The [Cricklade Town]Council continues to be concerned about the impact these sites will have on the Town and it's infrastructure in relation the the Traffic and Transportation recommendations for each of the sites which adjoins the Town's boundary. We do not therefore consider that the DPD is sound, justified or effective in its present form.</p> <p>Whilst these sites have been given four different names it is in effect one large joined up area representing over 50% (5.71 million tonnes) of the County's requirements. I attach a copy of the transport recommendations for these four sites which are almost identical. One solution should be sought which will address all of these problems and this should be a condition of, and in place, before any of the developments actually taking place.</p> <p>Phrases such as 'Concerns with road network suitability, access/egress from the A419 and HGV's travelling through Latton rather than using the A419 southbound junction to Calcutt Junction will need to be fully addressed at the planning application stage' and 'Consultation with the Highways Agency must be undertaken by any future applicant to satisfactorily demonstrate' do not give local residents any confidence that these matters will be adequately addressed. Past experience demonstrates that individual applications are then granted without reference to the whole picture and are not then considered a factor in granting of any permission. As a result, and over a period of time, no improvements are then made and the actual problems of HGVs using out Town particularly as a through route to West.</p> <p>The community is currently faced with numerous traffic problems from developments and changes outside of our control. Improvements to the A419, future large housing and industrial developments on the northern edge of Swindon, Waste Management changes and now Mineral Extraction. It is our contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.</p>					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation						
Summary	Traffic and transportation – One transport solution should be sought to address problems of the four proposed mineral extraction sites in the area, and be in place prior to development. The community is currently faced with numerous traffic problems from developments and changes outside of our control - contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.					

Comment ID:	54	Mrs Mary Cowieson		Person ID: 629842	Is the DPD legally compliant?	Yes
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					Is the DPD sound?	No
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p><b>Flooding</b> The area has already been identified as part of the Flood Plain and there is great concern over the impact of removing the gravel, which currently provides natural drainage and filtration of water, and replacing it with unspecified materials which may not have the same functionality, and may therefore result in a greater risk to flooding and pollution of the surrounding waterways. Whilst the report indicates that the post extraction landfill must be done sympathetically there is insufficient detail about of the element of control and policing of the type and suitability of materials to be used in the landfill.</p> <p><b>Transport and access</b> The road from Castle Eaton to the A419 has already been identified as being inadequate for slow-moving heavily-laden vehicles, and in particular the added danger of such vehicles joining pulling out into the fast moving traffic on the A419 at a point where several deaths have already occurred over the past few years. If the alternative to this road being used is the implementation of conveyor belts to carry the minerals across the Thames to connect to other road access, insufficient detail has been provided to explain how the impact of noise and dust pollution is to be managed.</p> <p><b>Environment</b> Extraction will almost certainly destroy existing ancient hedgerows and wildlife habitats and increase the risk of causing pollution in the River Thames and damaging the beauty and tranquillity of the Thames Path area. The construction of "baffle mounds" and "acoustic screening" will impose an eyesore on the local residents for an unacceptable length of time and to visitors seeking to enjoy the current ambiance of the surrounding areas.</p>					
Reasons for oral participation	It may help to reinforce our views					
Summary	<p>Preferred restoration objective – insufficient detail about materials to be used for infill.</p> <p>Biodiversity and geodiversity – detrimental impact on existing ancient hedgerows and wildlife habitats. Risk of pollution to River Thames.</p> <p>Landscape and visual – damage to beauty of Thames Path area. Mounds/screening mitigation will be an eyesore.</p> <p>Traffic and transportation – road from Castle Eaton to A419 is inadequate. Dangerous access onto A419 – recent fatalities in this area. Insufficient detail provided to explain how conveyor belts alternative will manage noise and dust pollution issues.</p> <p>Water environment – Concern that removed of gravel will result in a greater risk of flooding and pollution of the surrounding waterways.</p>					

Comment ID:	66	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	We welcome the preferred restoration objective.					
Reasons for oral participation						
Summary	Preferred restoration objective welcomed.					

Comment ID:	102	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	Landscape and built environment - the proposed quarry is within an extremely sensitive landscape and close to Castle Eaton Conservation Area and St Marys Parish Church, a C13 Grade 1 listed building of national importance. It's setting, particular the relationship to the Thames and views beyond, contributes to its significance and is therefore an important factor when considering the quarry's suitability [1]. The topography accentuates the impact and at present the quarry would appear too close. As such to avoid substantial harm I would recommend the quarry's southern boundary is moved further north.					

	<p>Archaeology - This site contains archaeology of considerable importance and is also likely to contain more finds of equal if not greater significance. Further investigation is therefore vital prior to any planning application. The appropriate investigation and response (recording/mitigation/restoration...) should be informed by the relevant policy, guidance and advice[2]. In accordance with national planning policy for the historic environment, the relative significance of the archaeology affected will determine how it might/should be conserved and whether preservation in situ may be appropriate. In addition there is evidence of Prehistoric or Roman settlement with enclosures, hut circles, field boundaries and ditches to the north of the church between the brook and the track which passes to the south of Blackburr Farm. This is the same area I consider could be retained to offset a substantial impact on the setting of St Mary's.</p> <p>[1]Reference made to PPS5 Policy HE9 and 10; PPS5 Practice Guide and The Setting of Heritage Assets (EH Guidance, October 2011  [2]PPS5 Planning for the historic environment and its practice guide; Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008)</p>
Reasons for oral participation	
Summary	<p>Landscape and visual – quarry within sensitive landscape. Topography accentuates impact. Recommendation that quarry's southern boundary is moved further north.</p> <p>Archaeology – site contains important archaeology. Further appropriate investigation vital prior to any application. Evidence of Prehistoric/Roman settlement.</p> <p>Historic built environment – quarry close to Castle Eaton Conservation Area and St Marys Parish Church (Grade I listed) – setting contributes to its significance.</p>

Comment ID:	117	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Historic Built Environment</p> <p>As it is the considered opinion of local residents at Castle Eaton, that due to the elevated position of Castle Eaton no amount of screening to prevent the visual impact of mineral extraction at this planned site would prevent such an impact. They consider these measures to be absolutely unable to be effective or successful. It is also considered that the noise and air pollution would be an intolerable burden to their health and well being because the noise and dust would carry to the village due to the elevated position of the village and prevailing winds.</p>					
What change(s) are necessary to make the DPD sound?	<p>It perhaps should be noted of the opinions of the residents or Castle Eaton that they consider that significantly strengthening and planting to the south of the Blackburr Farm site would be ineffectual due to the elevated position of the village and that the noise and air pollution would carry to the village with the wind.</p>					

Other comments	
Reasons for oral participation	We would like to put our objections to the proposal for Blackburr Farm to be included in the proposed Aggregate Site Allocations Development Plan Document.
Summary	Human health and amenity - Noise, dust and air pollution impacts on residents of Castle Eaton. Exacerbated by prevailing winds and elevated position of village.  Landscape and visual - Due to elevated position of Castle Eaton, screening would not prevent visual impact. Strengthening and planting to south of site would be ineffectual.

Comment ID:	118	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	No
Comment point	Table 2.3 : Blackburr Farm			Is the DPD sound?	Yes	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	Landscape and Visual  We question the soundness of this paragraph, as is the local community opinion that no amount of screening would avoid visual impact of quarrying activity to the second chance touring and residential caravan park. Blackburr Farm or Castle Eaton due to the elevated position of the village to the south of Blackburr Farm, the statement that mitigation is needed throughout the site to limit the visual impact of quarrying activity on the second chance touring and residential park and Blackburr Farm is considered unsound, as these measures have proved to be absolutely useless during the quarrying at the Roundhouse Farm site, when that activity took part in the fields, adjacent to the second chance property, from the incessant unbearable noise and air pollution so compromising the residents health and well being during that time.					
What change(s) are necessary to make the DPD sound?	It perhaps should be noted that the strengthened screening mentioned in this paragraph was used at the Roundhouse Farm site and was considered by the residents of second chance touring and residential park to be of no use and the views of the community of Castle Eaton are of the opinion that such screening would be impossible to avoid visual impact associated with quarrying activity, due to the elevated position of the village. We would like to express our objections to the proposal for Blackburr Farm to be included in the proposed Aggregate Site Allocations Development Plan Document as there are so many reasons for our objection.					
Other comments						
Reasons for oral participation						
Summary	Objection to inclusion of Blackburr Farm site.  Landscape and visual – local opinion that screening would not prevent visual impact of quarrying to the caravan park. Measures to provide mitigation measures throughout the site have proved to be ineffective during quarrying at Roundhouse Farm.					

Comment ID:	119	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	No
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					Is the DPD sound?	
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Air Quality</p> <p>This paragraph is considered unsound as the robust mitigation and site monitoring measures mentioned, is in our opinion in the two parcels of land closest to our property at Blackburr Farm site, is an impossible practicality or achievement.</p> <p>As such measures put in place at the Roundhouse Farm Quarry Site, have proved to be absolutely useless to the residents at the second chance from the quarrying activity when extra high bafflemounds were erected and when extraction took part in the fields adjacent to our homes and property, the noise and air pollution of the plant machinery excavations and HGV's was absolutely horrendous and unbearable.</p> <p>Also the term (noise sensitive receptors) appears in this paragraph we would be of the opinion that they should be deleted and replaced with the appropriate descriptive words, especially so as not to be considered. A ploy to confuse the fact that if these words do actually mean people/residents whom will have their health and welfare compromised once again should Mineral Extraction gain planning consent at Blackburr Farm in the future.</p>					
What change(s) are necessary to make the DPD sound?	<p>It should be noted in this paragraph that the mitigation and site monitoring measures mentioned, have proved to be absolutely ineffective for the permanent residents, during mineral excavation at Roundhouse Farm property, when in the fields adjacent to the second chance property boundary. We would suggest that the problem arising from the term (noise sensitive receptors) appearing once again in this chapter, is addressed as already mentioned. The appropriate descriptive words should replace this term, especially if they do actually mean people/residents whom would have their health and welfare compromised again. Should Blackburr Farm site be granted extraction planning consent. It is offensive to be referred as (noise sensitive receptors) if indeed that is the meaning.</p>					
Other comments						
Reasons for oral participation	We would like to explain why we are against the proposal for Blackburr Farm to be included in the proposed Aggregate Minerals Site Allocations Development Plan Document.					
Summary	Human health and amenity – air quality paragraph considered unsound as mitigation and monitoring measures specified are not practical. Such measures put in place at Roundhouse Farm quarry site have proved ineffective. Noise and air pollution of the plant machinery excavations at Roundhouse Farm has been unbearable. The term 'noise sensitive receptors' should be deleted and replaced with appropriate descriptive words (i.e. people/residents).					

Comment ID:	120	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	No
Comment point	Table 2.3 : Blackburr Farm				Is the DPD sound?	Yes
Reasons for not legally compliant						
What change(s) are						

necessary to make the DPD legally compliant?	
Reasons for not sound	<p>Site Description</p> <p>This chapter/paragraph is considered unsound as it fails to mention the public footpath that runs centrally through the small parcel of land to the west of the proposed site. Also it fails to identify the requirement for access to be retained for vehicles of the electricity company to maintain and repair the low overhead power lines, to the second chance touring and residential park. Across two of the small parcels of land of Blackburr Farm.</p>
What change(s) are necessary to make the DPD sound?	We suggest that the omissions of the identified issues be inserted to paragraph 1, Site Description.
Other comments	
Reasons for oral participation	We would like to explain why we are against the proposal for Blackburr Farm to be included in the proposed Aggregate Minerals Site Allocations Developmant Plan Document. As there are so many reasons for our objections.
Summary	Site description – unsound as public footpath not mentioned. Requirement for electricity company vehicles to be able to access/maintain overhead power lines should be included.

Comment ID:	121	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	No
Comment point	Table 2.3 : Blackburr Farm				Is the DPD sound?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The descriptive text in this chapter are incorrect, therefore this paragraph is considered to be unsound. There are no nearby sites to utilise existing access arrangements due to the fact that the three small parcels of land at Blackburr Farm are isolated by inappropriate small roads. There would be a need for mineral HGV's to use these small unsuitable roads, if future mineral planning permission were to be granted. At Blackburr Farm thus causing a road safety hazard to local traffic, school buses, pedestrians and cyclists. Also there are no pavements along these small roads and no street lighting. The question arises, how would the minerals be transported across these roads to the plant machinery? The excavation machinery would also have to use these roads, so presenting another safety hazard.</p> <p>In addition, the statement that (where appropriate in Law) financial contributions will be sought to cover high improvements and where deemed necessary long term management costs. It is thought, that unless there is already a law in place, for such contributions, this would not be achieved. Such conditions in the past for mineral companies working in this area have been abandoned. It is considered unable to be asserted.</p>					
What change(s) are necessary to make the DPD sound?	It is suggested that the text/the site should be treated as an extension to nearby sites, utilising existing accessing arrangements should be deleted, as there are no nearby sites to use existing accessing arrangements. Due to the fact that the Blackburr Farm site is isolated by unsuitable small roads, surrounding the three small parcels of land of the site. The text should mention the road safety hazards to local traffic, school buses, pedestrians and cyclists. Also the fact that there are no pavements or street lighting along any of the small roads surrounding the Blackburr Farm three small parcels of land.					



	The statement that (where considered appropriate in law, financial contributions will be sought through the planning application process to cover highway improvements and where deemed necessary long term maintenance costs) should be deleted or altered, unless a law already exists to allow such contribution conditions. As these conditions could not be upheld, if a law for these financial contributions is not already in place.
Other comments	
Reasons for oral participation	We would like to explain our objections for the proposal for Blackburr Farm to be included in the Proposed Aggregate Site Allocations Development Plan Document.
Summary	Traffic and transportation - No nearby sites to utilise existing access arrangements. Three parcels of site are isolated by inappropriate small roads. HGV (and excavation machinery) use of these roads would cause a road safety hazard. No pavements or street lighting. Financial contributions to cover improvements would not be achieved.

Comment ID:	122	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Cumulative Effects</p> <p>As the government plans for the aspirations of communities and the LPA's statement of community involvement to be involved in local planning decisions has not been upheld concerning the opportunity for the communities of Castle Eaton and surrounding areas to be involved in the (Resource sieving exercises) in the process of elimination and subsequent assessment of individual sites of the Wiltshire Council and Swindon Borough Council and that they have been held behind closed doors which is considered undemocratic, therefore these communities would like to exercise their democratic rights of involvement to have the opportunity to express their objections and concerns and would like cumulative effect issues to be addressed publicly, before the submission draft of Swindon Borough Council and Wiltshire Council Aggregate Minerals Site Allocations Development Plan Document is sent to the Secretary of State for independent examination later this year. We consider the failure for local communities to be involved in this process makes this paragraph unsound.</p>					
What change(s) are necessary to make the DPD sound?	We would be pleased if these identified issues could be publicly addressed before the matter goes any further. As it has been proven in the past that any objections, once the documents of submissions drafts to the Secretary of State for independent examinations are sent usually fall on deaf ears, concerning any future mineral applications from mineral companies.					
Other comments						
Reasons for oral participation	We would like to object to the proposal for Blackburr Farm to be included in the Proposed Aggregate Site Allocations Development Plan Document.					
Summary	Cumulative effects – statement of community involvement not upheld – failure of local communities to be involved in process. Cumulative effect issues should be addressed publicly prior to examination.					

Comment ID:	123	Mrs Stroud	Second Chance Touring Park	Person ID: 392666	Is the DPD legally compliant?	
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					Is the DPD sound?	No
Comment point	Table 2.3 : Blackburr Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Air Quality</p> <p>We consider this paragraph unsound, as the chapter raises the question of the actual meaning of the term (dust sensitive receptors) we would like those words deleted and replaced with an appropriate description of the actual meaning of them. Especially, if (dust sensitive receptors) do indeed mean, as I suspect, but perhaps I am wrong, that they refer to residents. So as not to confuse the fact that there are people involved, who would be adversely affected in their health and well being, from the Proposed Aggregate Mineral Extraction at this site.</p> <p>Note: We would like to meet the members of the Minerals DPU's who are responsible for the decisions concerning the mitigation of dust generating activities so that a democratic discussion can be expressed and challenged, before the submission draft is sent to the Secretary of State for independent examination.</p>					
What change(s) are necessary to make the DPD sound?	<p>We would suggest the problem arising from the term used in this paragraph (dust sensitive receptors) should be addressed and the appropriate descriptive words used. Especially if they do actually mean people/residents as it is extremely offensive to be referred to as a thing or things, as these words imply.</p> <p>If the meaning of this phrase is of another meaning, then it should be explained properly so as not to be confusing.</p>					
Other comments						
Reasons for oral participation	We would like to explain why we are against the proposal for Blackburr Farm to be included in the Proposed Aggregate Site Allocations Development Plan Document. As there are so many reasons for our objections.					
Summary	<p>Human health and amenity – air quality paragraph is unsound. Words ‘dust sensitive receptors’ should be deleted and replaced with an appropriate description (i.e. residents).</p> <p>Would like to meet members of the Minerals DPU’s who are responsible for decisions concerning the mitigation of dust generating activities prior to examination.</p>					

Comment ID:	42	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
Comment point	Table 2.3 : Blackburr Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make						

the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>The site is subject to flooding and the northern part of the site is bisected by a filled canal. The nature and extent of the fill is unknown. There is no reason to object to the use as this fill is unlikely to be particularly hazardous but the nature and extent of the fill should be determined before it is re excavated. This is likely to be covered by the health and safety requirements at the time it happens but a condition could be attached if we wish.</p> <p>Additionally I note that the site is very close to a housing (between 200 and 900m at different extents). There is unlikely to be an air quality impact as you have already noted as guidance tends to downplay the production of PM10 and smaller at any distance. The report notes the need for assessment and mitigation measures for dust and I believe that the close proximity means that nuisance impacts from dust emissions are certainly possible and consequently any permission should include a requirement for a robust dust management plan as a condition either of the planning consent and waste management licence as appropriate. We have no adverse comments to make regarding this site in terms of the impact upon local air quality.</p> <p>In terms of noise I again note the proximity of the residential sites. The report states "Detailed consideration will need to be applied to the design of the site at the planning application stage. Robust mitigation and site monitoring measures will need to be designed to reduce the impact of quarrying on surrounding properties and businesses.....". Historically the noise controls from quarry and landfill sites were formulated using guidance found in MPG11. The baseline noise levels allowed in that guidance were much higher than in comparable guidance on industrial noise and this sometimes led to long term noise problems. MPG11 has now been replaced by MPS2.</p> <p>Given the proximity of housing I believe the noise measures and proposed controls would need to be addressed prior to the submission of any planning application and the applicant must demonstrate that noise levels will be mitigated to an acceptable level. I would recommend that any permission relating to this site should include a comprehensive noise condition with target noise levels derived from a combination of good practice, existing guidance and the current World Health Organisation advice on the impacts of noise on health.</p> <p>The consultation document does refer to the need for noise and concern regarding the likely transport routes. This must also include an assessment of the impact of noise and dust from vehicles on premises adjoining the possible access routes. Conditions may be needed to protect property on these from these vehicle impacts and potential an hour's restriction on vehicle movements associated with the site.</p> <p>Conclusion for Site 2: No objection or adverse comment from a land contamination or local air quality perspective but detailed consideration needed in terms of possible nuisance and amenity impacts from noise and dust.</p>
Reasons for oral participation	
Summary	<p>Human health and amenity: No objection or adverse comment from a local air quality perspective but detailed consideration needed in terms of possible nuisance and amenity impacts from noise and dust. Noise measures and proposed controls would need to be addressed prior to the submission of any planning application. Recommendation that any permission relating to this site should include a comprehensive noise condition with target noise levels.</p> <p>Traffic and transportation: Assessment of the impact of noise and dust from vehicles on premises adjoining the possible access routes is required.</p> <p>Water environment: No objection or adverse comment from a land contamination perspective. The site is subject to flooding and the northern part of the site is bisected by a filled canal. The nature and extent of the fill is unknown – unlikely to be hazardous but nature/extent of fill should be determined before it is re-excavated.</p>

Comment ID:	5	Wilkins		Person ID: 627325	Is the DPD legally compliant?	No
					Is the DPD sound?	No
Comment point	Table 2.4 : North Farm				Oral participation?	
Reasons for not legally compliant	how would i know if this is legally compliant i am not a solicitor or from a legal background					
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The position of North Farm is significantly integrated to Water Eaton and Castle Eaton, much of which is a conservation area. The infrastructure in this area is not effective to take HGV or regular heavy traffic.</p> <p>The noise, dust and disruption to village life in this conservation area would far outway the foregoing proposal. Castle Eaton is accessed either from the A419, which is already a very difficult junction to co-ordinate at ones own safety, particular with the constant stream of HGV traffic. There have already been 2 more fatalaties in the previous 2 years. HGVs obstruct the A419 as they cut across or U Turn in the Castle Eaton Junction. The access road from the A419 is not wide enough or surfaced appropriate in many areas. The other access to Castle Eaton is by the single track roads seggregated by Blackburr Farm. The safety of local residents and the impact of the disruption is unacceptable.</p> <p>Castle Eaton is an historic area and should be protected from large disruption or impact as per national policy. Your proposal would significantly increase the disruption to the local village and decrease the quality of life for the villagers. Quarrying would be the start and then what happens at the end of that phase????</p>					
What change(s) are necessary to make the DPD sound?	Consider other sites away from small historic settlements					
Other comments						
Reasons for oral participation						
Summary	<p>Human health and amenity – noise, dust and disruption to village life. Detrimental impact on quality of life.</p> <p>Historic built environment - position of the site is integrated to Water Eaton and Castle Eaton, much of which is a conservation area. Castle Eaton is a historic area and should be protected from large disruption.</p> <p>Traffic and transportation – infrastructure in this area is not effective to take HGV or regular heavy traffic. Safety issues at A419/Castle Eaton junction. The access road from the A419 is not wide enough or surfaced appropriately in many areas. Alternative access to Castle Eaton is by single track roads seggregated by Blackburr Farm.</p>					

Comment ID:	7	Mr Julian Summer		Person ID: 627663	Is the DPD legally compliant?	No
					Is the DPD sound?	No
Comment	Table 2.4 : North Farm				Oral participation?	Yes

point	
Reasons for not legally compliant	The potential for damage to the environment, to the Thames Path and to local inhabitants are brushed over and the "solutions" are unspecified but see below for detailed comments
What change(s) are necessary to make the DPD legally compliant?	I doubt that this can be achieved, but bsee below
Reasons for not sound	This is an inappropriate proposal in that it damages the environment and will blight the lives and well-being of a large number of people and in addition is probably an economically unsound proposition. It is unlikely that any developer would touch it given the difficulties involved and the hostile reaction from all the inhabitants of Castle Eaton. It would be in everyones's interests if the North Farm site is simply dropped
What change(s) are necessary to make the DPD sound?	It cannot be made "sound" as it is flawed ab initio
Other comments	<p>The document identifies a number of problems with this site, which I would like to emphasise out here, as many are incurable. The bottom line however, is that this site has the smallest potential yield at 300,000 tonnes and the greatest potential difficulty of all the sites in your proposal.</p> <p>1.The site is bounded by the Thames and the Thames Path National Trail. Dwellings in Castle Eaton are 250 metres east of the site. No amount of screening or dust management will conceal the site or its noise or effluent.</p> <p>2. As you say "the high water table in the area will present a significant challenge". Post use the site will require "inert fill" and should be returned to agricultural use. Biodiversity will require an "extended Phase 1 survey". All very expensive for a developer, especially given the relatively meagre returns.</p> <p>3.Access. You say that "new access onto the site will need to avoid using the adjacent C114". How ? This site is south of the Thames. Other than building another bridge, the C114 would have to be used, if not across the bridge at Castle Eaton, then along the C114 to the A419. This is a country road used by riders and pedestrians as the Thames Path actually runs along the C114 for part of its length. additionally, the turning onto the A419 is highly dangerous and there have been several fatalities. A series of lorries using this turning will inevitably lead to further accidents. Furthermore you state that " financial contributions will be sought" ...to cover highway improvements", again reducing the financial attractiveness of the site.</p> <p>4. You state that " this site should be treated as an extension to nearby quarries". This is nonsense as the nearby quarries are all on the other side of the river. This is what distinguishes this site ( and the land east of Calcutt) and why it is simply not comparable.</p> <p>5. This land is subject to winter flooding. Again, this reduces its potential attraction and increasesd the likelihood of pollutants entering the surrounding land and the Thames.</p>
Reasons for oral participation	It is essential that concerned voices are heard as well as those seeking to profit directly from this proposal
Summary	<p><b>Human health and amenity</b> – impact on well-being of local inhabitants brushed over. Screening/dust management will not conceal the site, its noise or effluent.</p> <p><b>Landscape and visual</b> – potential for damage to the environment and Thames Path.</p> <p><b>Traffic and transportation</b> – Query as to how the site could be accessed without the C114. Safety issues for riders and pedestrians. Junction between C114 and A419 is highly dangerous and there have been several fatalities. Nearby quarries are on other side of the river so site cannot be treated as an extension to nearby quarries as stated in document.</p> <p><b>Water environment</b> – land subject to winter flooding, increases risk of pollutants entering surrounding land and River Thames.</p> <p>Other – economically unsound proposition. Smallest potential yield of sites in document, with greatest potential difficulty – and additional costs to developer.</p>

Comment ID:	10	Mr W Hughes		Person ID: 448135	Is the DPD legally compliant?	Yes
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					Is the DPD sound?	Yes
Comment point	Table 2.4 : North Farm				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. It does not wish to add any further comments.					
Reasons for oral participation						
Summary	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. No further comments.					

Comment ID:	15	Ms Sally Martin		Person ID: 631707	Is the DPD legally compliant?	No
					Is the DPD sound?	No
Comment point	Table 2.4 : North Farm				Oral participation?	
Reasons for not legally compliant	The red line boundary is incorrect as we own part of the site identified by the red line boundary for North Farm. Is it legal to put forward a site without the owner's permission? Taking it out of the proposal description would make site descriptions, restoration proposals and gravel calculations incorrect.					
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>Impact on Biodiversity:</p> <p>The Thames importance as a habitat corridor is national, international even. In order to function as a habitat corridor it needs its associated floodplain, marsh and associated terrestrial habitats. Habitats on the opposite bank have been lost to gravel workings which have made the North Farm site even more important for these species and the viability of the habitat corridor as a whole. Working this site would create a critical break in the functioning of the Thames floodplain habitat corridor.</p> <p>The North Farm site is used by at least three European Protected Species (i.e. protected by the EC Habitats Directive, Conservation (Natural Habitats, &amp;c.) Regulations 1994.), otters, water voles and bats (pipistrelle and another unidentified species). All three would be significantly affected by development from habitat loss, pollution, increased sediment load, lighting and direct injury.</p> <p>These species are not confined to the river Thames but their home ranges and foraging areas extend into the whole of the North Farm site. From sightings and tracks the Thames otter home ranges appear to incorporate sections of the ditch network across the North Farm site. Otter movements</p>					

	<p>often incorporate separate river systems, and movements south of the Thames would expose otters to an increased risk of mortality from development vehicles as well as habitat loss. Your appraisal does not acknowledge that otters can use streams and other terrestrial habitats many kilometres away from a watercourse. They can have holts up to 500m away from their main watercourse. Similarly water voles and bats are not confined to the watercourse itself, with many studies showing extensive use of adjacent floodplain.</p> <p>The site contains two main badger setts and many more outlying setts. Badgers and their setts are protected under the Protection of Badgers Act 1992. No mention of this very obvious species in the site description implies poor ecological study of the site to date.</p> <p>The development runs counter to several national initiatives to conserve and enhance the wildlife value of the Thames habitat corridor for birds. The development and restoration proposals go against the needs of several internationally important wading bird species that use the Thames habitat corridor targeted by these initiatives. North Farm site provides rare open, frequently wet, grassland habitat favoured by lapwing, redshank, and curlew which move along the Thames corridor at a national level.</p> <p>There are a number of important farmland birds present and breeding at the North Farm site which again are not mentioned in your report casting further doubt on your ecological investigation (incl. yellowhammer, tree sparrow, bullfinch, turtle dove, skylark, corn bunting, cuckoo, snipe and barn owl) The development would have significant impact on the species through habitat loss and direct disturbance.</p> <p>Landscape and Visual Impacts: As a qualified landscape architect I believe the landscape of the North Farm Site cannot 'accommodate change'. The willow coppice mentioned in the report was a bio-energy crop, long harvested and the landscape is one of open pastoral floodplain, indigenous to the Thames floodplain (as described in Landscape Character Area 108 Upper Thames Clay Vales, Natural England National Landscape Character Areas.) The landscape at the site is highly typical of the Thames floodplain, expansive flatlands, open grazing marsh and big open spaces and therefore highly sensitive to change.</p> <p>Mitigation proposals to 'appropriately buffer and screen' (typically large unnaturally steep earth bunds, dense buffer tree planting or screen fencing) would be particularly incongruous to the landscape character of the site.</p> <p>With regard to the final restoration proposals we doubt the ability to restore this site back to any semblance of its original landscape character as the quantity of inert fill required would be impossible from a financially and logistically. Over forty years of evidence shows that the default restoration solution is a small scale introverted landscape of lakes surrounded by woodland and scrub which is completely counter to the historic landscape found at the site and locality.</p> <p>The large majority of the hedgerows that border and traverse the North Farm site would qualify as 'ancient' under the Hedgerow Regulations (1997). Several of the trees are also very old, important landscape features in themselves and for local biodiversity, not least their function as roosts for protected bat species present at the site. Ancient trees are particularly susceptible to the changes in water table which the development would create. Ancient hedgerows and trees cannot be re-planted as the mitigation proposals suggest.</p> <p>Historic built environment: The impact of development on the floodplain landscape surrounding the Castle Eaton conservation area would be significant. Historically Thames valley churches were designed to be seen for miles in the open floodplain and grazing marshes of this historic landscape. Again the proposal to 'appropriately buffer and screen' the development will be of considerable detriment to the historic landscape of Castle Eaton. Large unnaturally steep earth bunds, dense buffer tree planting or screen fencing would seriously degrade the wider context of St Mary's church in which it was designed to be viewed.</p>
What change(s) are necessary to make the DPD sound?	Take the North Farm site out of the DPD
Other comments	
Reasons for oral participation	
Summary	Part of the site is owned by this consultee – objection to inclusion of land in document.

Preferred restoration objective - The development and restoration proposals go against the needs of several internationally important wading bird species that use this Thames habitat corridor. Doubt ability to restore site to any semblance of its original landscape character – financial and logistical reasons.

Biodiversity and geodiversity – Impact on Thames habitat corridor. Habitats on other side of Thames have been lost to gravel workings. Important function of Thames floodplain would be affected. Site occupied by European Protected Species (Otters, Water Voles, Bats) which would be affected by habitat loss, pollution, increased sediment load, lighting and direct injury – species not confined only to watercourse. Two main Badger sets and more outlying sets on site. Proposal is counter to national initiatives to conserve value of Thames habitat corridor for birds. Site provides open, wet, grassland habitat favoured by lapwing, redshank and curlew. Disturbance to important farmland birds present and breeding at site.

Landscape and visual – Site cannot ‘accommodate change’. Landscape is open pastoral floodplain (typical of the Thames floodplain) and is highly sensitive to change. Mitigation proposals would be incongruous to the landscape character of the site. Majority of hedgerows that border/traverse site would qualify as ‘ancient’ under the Hedgerow Regulations (1997). Ancient trees are important landscape features and particularly susceptible to changes in water table. Ancient hedgerows and trees cannot be re-planted as the mitigation proposals suggest.

Historic built environment – Impact on floodplain landscape surrounding Castle Eaton Conservation Area would be significant. Proposal to ‘appropriately buffer and screen’ the development will be of considerable detriment to the historic landscape of Castle Eaton. Large unnaturally steep earth bunds, dense buffer tree planting or screen fencing would seriously degrade the wider context of St Mary’s church in which it was designed to be viewed.

Comment ID:	16	Ms Sally Martin		Person ID: 631707	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.4 : North Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The land identified in the North Farm parcel covers 75.6 ha, and the gravel reserves are estimated at 300,000 tons. A simple calculation indicates that on average this would imply a very thin veneer of gravel across the site. Evidence apparent on site, trial pits, ditch sections and river banks, indicates deeper reserves to the Northern extent of the North farm parcel, tailing off rapidly to the south i.e. of the estimated reserves, the greater part is likely to lie on the Northern boundary, whilst the remainder of the land is likely to contain (if any gravel) at a minimum, an uneconomic layer of mineral, unsuitable for extraction.</p> <p>On this evidence it seems that the Planning authority has at best been careless, and at worst negligent in identifying such an extensive parcel of land for inclusion in the minerals plan. The impact of inclusion of land without a viable gravel resource is to blight homes, property values and hopes of residents. The planning authority must have a responsibility to allocate land for the minerals plan having carried out adequate surveys to enable them to be more precise about the location of reserves and therefore avoid the unnecessary blight that the estimates for North farm imply.</p> <p>The North farm parcel as identified, 75.6 ha of land and an estimated 300,000 tons of gravel appears by simple calculation to imply a thin veneer of gravel across the site. The resource is tiny, but lies in a location of significant potential human impact. The properties to the West side of Castle Eaton being downwind of the site will suffer Noise and Dust, and visual intrusion.</p>					



The properties to the South sit in an elevated position with extensive views to the north. Here the same conditions will prevail, but, due to the elevated position, noise from the site is likely to be significant, for which screen and noise bunds will have to be very high and intrusive to achieve any significant effect.

Walkers on the Thames Path, approach Castle Eaton, cross a classic upper Thames, water meadow landscape, wide open vistas along the river, long views of the local churches, views to the south of willows and ancient oaks in hedgerows' rising gently towards the ridges of Hannington. This is not a protected landscape in the formal sense, but I would suggest it has significant cultural value to those who come to experience the Thames Path. However the combined allocations in the mineral plan imply that the majority of a days walk from Cricklade along one of the country's great footpaths, will now be blighted by bunds and screening.

The Landscape description of the North Farm site contained in the draft minerals plan, is notable for its poverty of detail, and its anodyne description. The subtlety of the landscape topography is ignored. The impact of the slight elevation afforded by the ridge to the south of the parcel on both afforded views, and the subsequent impact of small woodland planting on the ridge is undervalued.

The gentle change in elevation also determines the extent of the seasonal flooding, and the breadth of the flood plain. As a visual spectacle, the flooding of the low land meadows is extensive, covering two thirds of the identified site and reaching to within metres of local homes perched on the higher ground. This seasonal spectacular risks being lost during extraction as bunds and pumps fight to hold back the waters. If they do not, water contamination from the workings will be severe. And this is not just a winter occurrence, having happened in summer within the last few years, and predicted to become more common in response to global warming. This poses significant questions about the viability of campaign working (see below).

Much is made of the ephemeral willow coppice, but this has already been harvested and grubbed up. The landscape is divided by hedgerows around large fields. The hedgerows are ancient and dominated by Willow and Oak. Insufficient weight is given to the ancient hedgerow oaks that dominate this landscape. The oak trees are concentrated on the North farm parcel, they have achieved great age within the regime of fluctuating water table of seasonal flooding. Photographs from pre 1980 show the oaks complimented by huge elm trees, now lost. Any threat to these oaks would pose a significant harm to the landscape value of this area. A clear plan and strategy for retention and water management around these trees would be critical. The open landscape structure allows long vistas, the shallow ridge affording long views, the river corridor opening up the landscape, the water meadows naturally uncluttered. The landscape also affords the very local phenomena of views between the local church towers in the valley as you walk between the villages, in particular Cricklade to Castle Eaton, to Kempsford.

The established pattern of gravel pit restoration, demonstrated for decades in this area, reduces the restored landscape to a series of introverted cells, margins dominated by tree and scrub belts, residual bunds with tree planting. This is the new landscape of post extraction, an industrially influenced landscape, the traditional, modest, open landscapes of the upper Thames Valley are rarely restored after the gravel has gone.

The above impacts on balance seem a very high price to pay for such a minimal gravel reserve.

Re. Campaign working : Campaign or seasonal working has been proposed as a solution has been proposed to mitigate the identified risk of working in the flood meadows ( and flood plain ) of north farm . As noted above the flooding is not just a winter a phenomenon, mature winter wheat crops have been under water in recent years. Campaign working implies a drawn out extraction period, extended impact on people and wildlife, extended risk of water contamination, long periods of workings sat unattended, possibly water filled and dangerous, close to homes and the village of Castle Eaton. As above, campaign working seems like a high risk proposal for such a minimal reserve.

The plan also states that no putrecible waste will be used to fill gravel pits back to existing levels, or levels to facilitate adequate restoration. However there are many types of waste other than putrecible. All imply extended working of the land, all imply noise, dust, visual intrusion. Tips taking material from the open fragmented market are likely to take longer to fill than the original excavation period, and will extend the period to when restoration is achieved.

The planning authorities owe it to the local people to be very specific about the sources of waste material they expect to be used, the rate of availability

	<p>and impact on restoration periods. This cannot be an open ended risk to residents. I would propose that a time limit is set between excavations ceasing and filling and restoration being complete of two years, ie excavation and restoration plans should anticipate the availability of fill material and plan accordingly.</p> <p>In summary, as a local resident, I believe the Planning Authority should be more accurate in its definition of the identified areas for mineral extraction to minimise the impact of blight. The current tonnage values for the North farm site suggests either a thin veneer of reserve or an over allocation of site area for the available reserves. The landscape assessment is poor, does not provide sufficient weight to key issues of topography, structure, ancient trees, and culture. The proposition for campaign working is flawed and inappropriate. The issue of waste as backfill for restoration has been poorly explained and evaluated by the planning authority. On balance, 300,000 tons of gravel, is an insignificant resource, and its extraction from North Farm has the potential for great impact, for minimal return. The value of landscape, natural systems and people, should in this instance be set above the minimal commercial and resource value of this deposit.</p>
What change(s) are necessary to make the DPD sound?	No gravel extraction at the North Farm site
Other comments	
Reasons for oral participation	Because i could expand upon my reasons for finding the proposals unsound.
Summary	<p>Preferred restoration objective – established pattern of gravel pit restoration reduced restored landscape value. Tipping of waste will extend restoration period. Sources of waste material should be more specific. Time limit should be set.</p> <p>Human health and amenity - Resource lies in a location of significant potential human impact. Properties to west of Castle Eaton are downwind of the site – will suffer noise, dust and visual intrusion. Properties to the south of the site sit in an elevated position overlooking the site – screening/noise bunds would be intrusive.</p> <p>Landscape and visual - cultural value of Thames Path, which would be blighted by bunds and screening. Landscape description of site is not sufficiently detailed - subtlety of the landscape topography is ignored. Willow coppice has already been harvested and grubbed up. Insufficient weight is given to the ancient hedgerow oaks that dominate this landscape. A clear plan and strategy for retention and water management around the oak trees would be critical. Open landscape allows long vistas.</p> <p>Water environment – gentle change in elevation determines the extent of seasonal flooding, and the breadth of the floodplain. Flooding of low land meadows is extensive, covering 2/3 of the site. Potential for water contamination. Flooding not restricted to winter.</p> <p>Other - Evidence on site suggests deeper reserves to the north of the site, along northern boundary – as such this extensive parcel of land to the south should not have been included in the plan. The proposition for campaign working is flawed and inappropriate.</p>

Comment ID:	24	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?		
Comment point	Table 2.4 : North Farm				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are							

necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>Both of these sites are located within the statutory height and birdstrike safeguarding zones surrounding RAF Fairford. The Blackburr Farm site is approximately 1.6km south of the aerodrome whilst the North Farm site is approximately 2.5km away. The principal aerodrome safeguarding concern in relation to both sites is that the restoration of mineral workings at these sites through restoration schemes dominated by wetland habitat would increase bird populations in proximity to the aerodrome heightening birdstrike risk.</p> <p>The MOD does not object to these areas being included in the mineral development plan provided any mineral extraction and restoration schemes are designed specifically to prevent the site becoming an attractant to large and flocking bird species and to prevent any increase in birdstrike risk.</p> <p>The MOD would therefore prefer that if taken forward for mineral extraction that both sites are restored as dry land to prevent any potential increase in birdstrike risk.</p>
Reasons for oral participation	
Summary	<p>Preferred restoration objective: The MOD does not object to site being included in the mineral development plan provided any mineral extraction and restoration schemes are designed specifically to prevent the site becoming an attractant to large and flocking bird species and to prevent any increase in birdstrike risk. MOD preference for restoration to dry land.</p> <p>Any other issues: Site is located within the statutory height and birdstrike safeguarding zones surrounding RAF Fairford.</p>

Comment ID:	31	John Coole	Cricklade Town Council	Person ID: 396177	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 2.4 : North Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>The [Cricklade Town] Council continues to be concerned about the impact these sites will have on the Town and it's infrastructure in relation the the Traffic and Transportation recommendations for each of the sites which adjoins the Town's boundary. We do not therefore consider that the DPD is sound, justified or effective in its present form.</p> <p>Whilst these sites have been given four different names it is in effect one large joined up area representing over 50% (5.71 million tonnes) of the County's requirements. I attach a copy of the transport recommendations for these four sites which are almost identical. One solution should be sought which will address all of these problems and this should be a condition of, and in place, before any of the developments actually taking place.</p>					

	<p>Phrases such as 'Concerns with road network suitability, access/egress from the A419 and HGV's travelling through Latton rather than using the A419 southbound junction to Calcutt Junction will need to be fully addressed at the planning application stage' and 'Consultation with the Highways Agency must be undertaken by any future applicant to satisfactorily demonstrate' do not give local residents any confidence that these matters will be adequately addressed. Past experience demonstrates that individual applications are then granted without reference to the whole picture and are not then considered a factor in granting of any permission. As a result, and over a period of time, no improvements are then made and the actual problems of HGVs using our Town particularly as a through route to West.</p> <p>The community is currently faced with numerous traffic problems from developments and changes outside of our control. Improvements to the A419, future large housing and industrial developments on the northern edge of Swindon, Waste Management changes and now Mineral Extraction. It is our contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	
Summary	Traffic and transportation – One transport solution should be sought to address problems of the four proposed mineral extraction sites in the area, and be in place prior to development. The community is currently faced with numerous traffic problems from developments and changes outside of our control - contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.

Comment ID:	52	Mrs Mary Cowieson		Person ID: 629842	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.4 : North Farm				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p><b>Flooding</b>  The area has already been identified as part of the Flood Plain and there is great concern over the impact of removing the gravel, which currently provides natural drainage and filtration of water, and replacing it with unspecified materials which may not have the same functionality, and may therefore result in a greater risk to flooding and pollution of the surrounding waterways.  Whilst the report indicates that the post extraction landfill must be done sympathetically there is insufficient detail about of the element of control and policing of the type and suitability of materials to be used in the landfill.</p> <p><b>Transport and access</b></p>					

	<p>The road from Castle Eaton to the A419 has already been identified as being inadequate for slow-moving heavily-laden vehicles, and in particular the added danger of such vehicles joining pulling out into the fast moving traffic on the A419 at a point where several deaths have already occurred over the past few years.</p> <p>If the alternative to this road being used is the implementation of conveyor belts to carry the minerals across the Thames to connect to other road access, insufficient detail has been provided to explain how the impact of noise and dust pollution is to be managed.</p> <p><b>Environment</b></p> <p>Extraction will almost certainly destroy existing ancient hedgerows and wildlife habitats and increase the risk of causing pollution in the River Thames and damaging the beauty and tranquillity of the Thames Path area. The construction of "baffle mounds" and "acoustic screening" will impose an eyesore on the local residents for an unacceptable length of time and to visitors seeking to enjoy the current ambiance of the surrounding areas</p>
Reasons for oral participation	It may help to reinforce our views.
Summary	<p>Preferred restoration objective – insufficient detail about materials to be used for infill.</p> <p>Biodiversity and geodiversity – detrimental impact on existing ancient hedgerows and wildlife habitats. Risk of pollution to River Thames.</p> <p>Landscape and visual – damage to beauty of Thames Path area. Mounds/screening mitigation will be an eyesore.</p> <p>Traffic and transportation – road from Castle Eaton to A419 is inadequate. Dangerous access onto A419 – recent fatalities in this area. Insufficient detail provided to explain how conveyor belts alternative will manage noise and dust pollution issues.</p> <p>Water environment – Concern that removed of gravel will result in a greater risk of flooding and pollution of the surrounding waterways.</p>

Comment ID:	67	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.4 : North Farm				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	We welcome the preferred restoration objective.					
Reasons for oral participation						
Summary	Preferred restoration objective welcomed.					

Comment ID:	103	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
Comment point	Table 2.4 : North Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Landscape and built environment - no objection subject to the mitigation proposed.</p> <p>Archaeology - This site contains archaeology of considerable importance and is also likely to contain more finds of equal if not greater significance. Further investigation is therefore vital prior to any planning application. The appropriate investigation and response (recording/mitigation/restoration...) should be informed by the relevant policy, guidance and advice [1]. In accordance with national planning policy for the historic environment, the relative significance of the archaeology affected will determine how it might/should be conserved and whether preservation in situ may be appropriate.</p> <p>_____</p> <p>[1]PPS5 Planning for the historic environment and its practice guide; Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008)</p>					
Reasons for oral participation						
Summary	<p>Landscape and visual – no objection subject to mitigation proposed.</p> <p>Archaeology – site contains important archaeology. Further appropriate investigation vital prior to any planning application. Relative significance of the archaeology affected will determine how it might/should be conserved.</p> <p>Historic built environment – no objection subject to mitigation proposed.</p>					

Comment ID:	43	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
Comment point	Table 2.4 : North Farm				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are						

necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>In land contamination terms the site does not present any particular issues. Part of the site is liable to flooding and this ties in with the comments in the consultation regarding the high water table. The largest potential receptor as a result of the excavation and fill of this site is clearly ground and surface waters so I would defer any comments to the Environment Agency in this case.</p> <p>The document contains a standard reference to noise and dust. There are residential properties within 250 metres of the site and there is clearly the potential for an adverse impact on amenity or the occurrence of nuisance as a result of noise and dust. Given the smaller number of residence and the distance involved there is less reason for concern than with some other sites. Dust and noise however can also be associated with the vehicle movements on and off site. The access to the site appears to pass approximately 10 to 15m from the front facade of housing so conditions to control noise and dust from vehicles would usually be important. I note however that due to existing weight restrictions on the road, access is proposed via other sites to the North of this one. I would concur that a routing agreement will be necessary and would add the noise impact on nearby property to the justification of this requirements. We have no adverse comments to make regarding this site in terms of the impact upon local air quality.</p> <p>Conclusion for Site 3: No objection or adverse comment from a land contamination or local air quality perspective but detailed consideration needed in terms of possible nuisance and amenity impacts from noise and dust.</p>
Reasons for oral participation	
Summary	<p>Human health and amenity: No objection or adverse comment from a local air quality perspective but detailed consideration needed in terms of possible nuisance and amenity impacts from noise and dust. Given the smaller number of residence and the distance involved there is less reason for concern than with some other sites. Dust and noise however can also be associated with the vehicle movements on and off site. Concur that routing agreement will be necessary.</p> <p>Water environment: No objection or adverse comment from a land contamination perspective. Part of site liable to flooding.</p>

Comment ID:	11	Mr W Hughes		Person ID: 448135	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	Table 2.5 : Land east of Calcutt				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						

What change(s) are necessary to make the DPD sound?	
Other comments	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. It does not wish to add any further comments.
Reasons for oral participation	
Summary	Castle Eaton Parish Council made detailed comments on the previous draft, most of which are now reflected in the text. No further comments.

Comment ID:	25	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?		
Comment point	Table 2.5 : Land east of Calcutt				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make the DPD legally compliant?							
Reasons for not sound							
What change(s) are necessary to make the DPD sound?							
Other comments	This is a large working area approx 5.2km southwest of RAF Fairford and is located within the statutory height and birdstrike safeguarding zoned surrounding the aerodrome. The principal aerodrome safeguarding concern is that a site restoration scheme dominated by wetland habitat would increase bird populations in the vicinity of the aerodrome heightening a birdstrike risk. The MOD does not object to this area being included in the mineral development plan provided any mineral extraction and restoration schemes are designed specifically to prevent the site becoming an attractant to large and flocking bird species and to prevent any increase in birdstrike risk.						
Reasons for oral participation							
Summary	Preferred restoration objective: Site within statutory height and birdstrike safeguarding zone surrounding RAF Fairford. The MOD does not object to this area being included in the mineral development plan provided any mineral extraction and restoration schemes are designed specifically to prevent the site becoming an attractant to large and flocking bird species and to prevent any increase in birdstrike risk.						

Comment ID:	32	John Coole	Cricklade Town Council	Person ID: 396177	Is the DPD legally compliant?	No
Comment point	Table 2.5 : Land east of Calcutt				Is the DPD sound?	
					Oral participation?	



Reasons for not legally compliant	
What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	<p>The [Cricklade Town] Council continues to be concerned about the impact these sites will have on the Town and it's infrastructure in relation the the Traffic and Transportation recommendations for each of the sites which adjoins the Town's boundary. We do not therefore consider that the DPD is sound, justified or effective in its present form.</p> <p>Whilst these sites have been given four different names it is in effect one large joined up area representing over 50% (5.71 million tonnes) of the County's requirements. I attach a copy of the transport recommendations for these four sites which are almost identical. One solution should be sought which will address all of these problems and this should be a condition of, and in place, before any of the developments actually taking place.</p> <p>Phrases such as 'Concerns with road network suitability, access/egress from the A419 and HGV's travelling through Latton rather than using the A419 southbound junction to Calcutt Junction will need to be fully addressed at the planning application stage' and 'Consultation with the Highways Agency must be undertaken by any future applicant to satisfactorily demonstrate' do not give local residents any confidence that these matters will be adequately addressed. Past experience demonstrates that individual applications are then granted without reference to the whole picture and are not then considered a factor in granting of any permission. As a result, and over a period of time, no improvements are then made and the actual problems of HGVs using our Town particularly as a through route to West.</p> <p>The community is currently faced with numerous traffic problems from developments and changes outside of our control. Improvements to the A419, future large housing and industrial developments on the northern edge of Swindon, Waste Management changes and now Mineral Extraction. It is our contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	
Summary	Traffic and transportation – One transport solution should be sought to address problems of the four proposed mineral extraction sites in the area, and be in place prior to development. The community is currently faced with numerous traffic problems from developments and changes outside of our control - contention that these need to be looked at in a co-ordinated way and a solution to many of the concerns addressed as a whole.

Comment ID:	37	Carmelle Bell Mr Mark Mathews	Thames Water Utilities Ltd Planning Administrator Thames Water Property Services Town Planning Manager Acting	Person ID: 401427 633708	Is the DPD legally compliant?	No
Comment point	Table 2.5 : Land east of Calcutt				Is the DPD sound?	No
Reasons for not legally compliant						
What change(s) are necessary to make						

the DPD legally compliant?	
Reasons for not sound	Thames Water are the statutory sewerage undertaker for the Swindon Borough and parts of the Kennet and North Wilts Districts. Land east of Calcutt is in close proximity to our Sewage Treatment Works and we have assets crossing the proposed minerals site. Early consultation to establish the position of such mains, and to arrange for them to be diverted where necessary should be made to the relevant water/sewerage company. Where public sewers or water mains cross the site the developer will be responsible for the reasonable costs of diverting the asset
What change(s) are necessary to make the DPD sound?	Amend DPD to mention that public Water Mains and Sewers may lie across land from which it is proposed to extract minerals. Early consultation to establish the position of such mains, and to arrange for them to be diverted where necessary should be made to the relevant water/sewerage company.
Other comments	
Reasons for oral participation	
Summary	Site description - Site in close proximity to Sewage Treatment Works and Thames Water have assets crossing the site. Amend DPD to mention that public Water Mains and Sewers may lie across land from which it is proposed to extract minerals. Early consultation to establish the position of water mains and to arrange for them to be diverted where necessary should be made to the relevant water/sewerage company. Developer responsible for reasonable costs of diverting this asset.

Comment ID:	53	Mrs Mary Cowieson		Person ID: 629842	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 2.5 : Land east of Calcutt				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p><b>Flooding</b> The area has already been identified as part of the Flood Plain and there is great concern over the impact of removing the gravel, which currently provides natural drainage and filtration of water, and replacing it with unspecified materials which may not have the same functionality, and may therefore result in a greater risk to flooding and pollution of the surrounding waterways. Whilst the report indicates that the post extraction landfill must be done sympathetically there is insufficient detail about of the element of control and policing of the type and suitability of materials to be used in the landfill.</p> <p><b>Transport and access</b> The road from Castle Eaton to the A419 has already been identified as being inadequate for slow-moving heavily-laden vehicles, and in particular the added danger of such vehicles joining pulling out into the fast moving traffic on the A419 at a point where several deaths have already occurred over the</p>					

	<p>past few years. If the alternative to this road being used is the implementation of conveyor belts to carry the minerals across the Thames to connect to other road access, insufficient detail has been provided to explain how the impact of noise and dust pollution is to be managed.</p> <p><b>Environment</b> Extraction will almost certainly destroy existing ancient hedgerows and wildlife habitats and increase the risk of causing pollution in the River Thames and damaging the beauty and tranquillity of the Thames Path area. The construction of "baffle mounds" and "acoustic screening" will impose an eyesore on the local residents for an unacceptable length of time and to visitors seeking to enjoy the current ambiance of the surrounding areas</p>
Reasons for oral participation	It may help to reinforce our views.
Summary	<p>Preferred restoration objective – insufficient detail about materials to be used for infill.</p> <p>Biodiversity and geodiversity – detrimental impact on existing ancient hedgerows and wildlife habitats. Risk of pollution to River Thames.</p> <p>Landscape and visual – damage to beauty of Thames Path area. Mounds/screening mitigation will be an eyesore.</p> <p>Traffic and transportation – road from Castle Eaton to A419 is inadequate. Dangerous access onto A419 – recent fatalities in this area. Insufficient detail provided to explain how conveyor belts alternative will manage noise and dust pollution issues.</p> <p>Water environment – Concern that removed of gravel will result in a greater risk of flooding and pollution of the surrounding waterways.</p>

Comment ID:	68	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.5 : Land east of Calcutt				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	We agree with the conclusions of the Habitats Regulations Assessment for this site, and welcome the preferred restoration objective.					
Reasons for oral participation						
Summary	Preferred restoration objective welcomed. Agreement with conclusions of the Habitats Regulations Assessment.					

Comment ID:	104	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
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					Is the DPD sound?	
Comment point	Table 2.5 : Land east of Calcutt				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Landscape and built environment - the extent of the quarrying should reflect the proximity and setting of the heritage assets affected. No objection is raised on the basis of the mitigation proposed.</p> <p>Archaeology - This site contains archaeology of considerable importance and is also likely to contain more finds of equal if not greater significance. Further investigation is therefore vital prior to any planning application. The appropriate investigation and response (recording/mitigation/restoration...) should be informed by the relevant policy, guidance and advice [1]. In accordance with national planning policy for the historic environment, the relative significance of the archaeology affected will determine how it might/should be conserved and whether preservation in situ may be appropriate. In addition the proximity of Ermin Way and the site of a former Roman Villa (SM 31664 - Kingshill Farm) suggest the likelihood of further important remains within the south west of the proposed allocation. The appropriate investigation and response will be necessary.</p> <p>_____</p> <p>[1]PPS5 Planning for the historic environment and its practice guide; Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008)</p>					
Reasons for oral participation						
Summary	<p>Landscape and visual – no objection subject to mitigation proposed.</p> <p>Archaeology – site contains important archaeology. Further appropriate investigation vital prior to any planning application. Relative significance of the archaeology affected will determine how it might/should be conserved. Proximity of Ermin Way and site of a former Roman Villa suggest likelihood of further important remains within south west of site.</p> <p>Historic built environment – no objection subject to mitigation proposed. Extent of quarrying should reflect proximity and setting of the heritage assets affected.</p>					

Comment ID:	45	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
Comment	Table 2.5 : Land east of Calcutt				Is the DPD sound?	
					Oral participation?	

point	
Reasons for not legally compliant	
What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>In land contamination terms the site does not in itself pose a significant problem. There are a small number of locations which may have had some previous filling or land raising but this is not uncommon and certainly presents no obstacle.</p> <p>In terms of noise impacts there are a number of premises ( shown as red dots on the map) which our data indicates have a residential use as of 2011. There are 16 residential premises within 50m of the south west boundary of the site, admittedly adjacent to the A road. On the Eastern boundary of the site there are residential premises within 35 m. There is also a potential residential property within the enclave of buildings in the 'centre' of the site. The quarry has the potential to generate noise and dust impacts on local residential and business premises. Robust controls will need to be put in place via the planning system to minimise these impacts. We have no adverse comments to make regarding this site in terms of the impact upon local air quality.</p> <p>The proposed infill for the reclamation is of the inert type so this should not present any additional concerns to this department.</p> <p>Conclusion for Site 4: No objection or adverse comment from a land contamination or local air quality perspective but detailed consideration needed in terms of possible nuisance and amenity impacts from noise and dust.</p>
Reasons for oral participation	
Summary	<p>Preferred restoration objective – proposed infill is of the inert type which should not present additional concerns to this development.</p> <p>Human health and amenity - No objection or adverse comment from a land contamination or local air quality perspective but detailed consideration needed in terms of possible nuisance and amenity impacts from noise and dust.</p>

Comment ID:	27	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?		
Comment point	Table 2.6 : Land at Cotswold Community				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make the DPD legally							

compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>These site are located approximately 11km west of RAF Fairford within the statutory birdstrike safeguarding zone surrounding the aerodrome. Both of the sites are located in the immediate vicinity of Cotswold Water Park.</p> <p>The MOD does not object to the allocation of these sites for mineral extraction but would wish to be consulted on the design of restoration schemes to ensure appropriate measures to limit the attractiveness of restored sites to large and flocking birds are implemented.</p>
Reasons for oral participation	
Summary	Preferred restoration objective: Site within statutory birdstrike safeguarding zone surrounding RAF Fairford aerodrome. The MOD does not object to the allocation of these sites for mineral extraction but would wish to be consulted on the design of restoration schemes to ensure appropriate measures to limit the attractiveness of restored sites to large and flocking birds are implemented.

Comment ID:	59	Mr John Salmon	Hills Quarry Products Ltd	Person ID: 635228	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.6 : Land at Cotswold Community				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Hills support the inclusion of the Council owned Cotswold Community Land and accepts the traffic assessment which identifies concerns about mineral traffic leaving the site on local roads. Hills operate the adjoining Shorncote Quarry to the north and currently extracts from Cotswold Community land between the buildings and the quarry. All of this mineral is processed through Shorncote Quarry and exits onto the highway network through a well established, safe and suitable access.</p> <p>For the avoidance of considerable environmental and traffic impact, and the reduction to a minimum of the carbon footprint to transport these minerals, and the reduction of impacts upon the local community, further consideration should be given to extract, process and transport minerals from the Land at Cotswold Community utilising the current infrastructure at Shorncote Quarry.</p> <p>In this regard the specification of access for the Land at Cotswold Community would be no different to the County's specification of access through an existing quarry at North Farm. With regard to North Farm the Transport analysis states; "The site should be treated as an extension to nearby quarries, utilising existing access arrangements to the north". Wiltshire should consider incorporating a similar statement into the assessment for the Land at Cotswold Community. It will provide greater certainty for the community and the mineral industry that a more suitable access will be used and will provide</p>					

	<p>an opportunity to maintain investment and working practices in Shorncote Quarry to accommodate this extension in future.</p> <p>In producing the Site Allocation Document Hills propose that Wiltshire undertakes full consultation with Gloucestershire County Council. It is important that the two mineral planning authorities cooperate to ensure that sand and gravel is extracted from the Upper Thames Valley in a managed sequence to avoid potential cumulative impacts upon the community. Whilst it may be possible for all Wiltshire's allocated sites to operate at once, there may be too great an impact if they are operated at the same time as Gloucestershire's sites. Hills recommend that the Site Allocation document identifies a clear extraction protocol for quarries in the Upper Thames Valley in the interests of the conservation of the resource, efficiency of extraction and protection of community interests.</p>
Reasons for oral participation	
Summary	<p>Hills support Council owned site.</p> <p>Traffic and transportation – acceptance of traffic assessment which identifies concerns about mineral traffic leaving site on local roads. Hills operate adjacent Shorncote Quarry to north where mineral exits onto highway network through a safe and suitable access. Further consideration should be given to utilising the current infrastructure at Shorncote Quarry. Request for statement similar to that for North Farm site, which states “The site should be treated as an extension to nearby quarries, utilising existing access arrangements to the north” to provide greater certainty.</p> <p>Cumulative impacts - Wiltshire should undertake full consultation with Gloucestershire County Council to manage sand and gravel extraction from Upper Thames Valley in sequence.</p>

Comment ID:	69	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.6 : Land at Cotswold Community				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	We note that the assessment of likely significant effect states that the site is within 200m of North Meadow and Clattinger Farm SAC and also that it is 2km from the SAC. Wiltshire Council have confirmed that the 2km figure is the correct one, and on this basis we agree with the conclusions of the Habitats Regulations Assessment for this site. We also welcome the preferred restoration objective.					
Reasons for oral participation						
Summary	Preferred restoration objective welcomed. Agreement with conclusions of the HRA for this site.					

Comment ID:	79	Ms C Smallwood	Action for Children	Person ID: 461244 636613	Is the DPD legally compliant?	Yes
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	Mr Robert Davies	Gerald Eve LLP Associate		Is the DPD sound?	No
Comment point	Table 2.6 : Land at Cotswold Community			Oral participation?	
Reasons for not legally compliant					
What change(s) are necessary to make the DPD legally compliant?					
Reasons for not sound	<p>We fully support the identification of Land at Cotswold Community as a Mineral extraction site. However, we object to the site being simply treated as an extension of the adjoining Quarry to the north. We understand that the Quarry to the north has extracted the significant majority of its minerals and therefore has a limited life span. With this in mind we suggest that the Cotswold Community is considered as an independent minerals site. Notwithstanding this we will endeavour to work with adjoin land owners to minimise and mitigate the environmental impact of mineral extraction on site.</p>				
What change(s) are necessary to make the DPD sound?	<p>Table 2.6, page 35 of the Wiltshire and Swindon, Proposed Aggregate Minerals Site Allocations DPD.</p> <p>Traffic and transportation</p> <p>New access onto the site should avoid using the C85 Spine Road West and the adjoining junction with the current Cotswold Community access as these access routes are not suitable to serve this site due to current road alignment and land constraints. Significant upgrading of both the road, visibility and junction alignment will be required if these routes were to be used. Delete - Adequate assess will be possible if the site is treated as an extension to the adjoining quarry to the north, utilising any existing assess arrangements and conveyor systems - Delete . These highlighted concerns will need to be addressed through a Transport Assessment submitted with a planning application and to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal.</p>				
Other comments					
Reasons for oral participation					
Summary	<p>Landowner fully supports identification of site for mineral extraction. However, objection to site being treated as an extension of the adjoining quarry to the north – independent site.</p> <p>Landowner will work with adjoining land owners to minimise and mitigate the environmental impact of mineral extraction on site.</p> <p>Traffic and transportation – Suggested deletion of sentence regarding use of existing access arrangements and conveyor systems.</p>				

Comment ID:	105	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.6 : Land at Cotswold Community				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make						



the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>Landscape and built environment - the context and setting of the former school/farmstead and its grade 2 listed buildings will clearly be transformed by such extensive quarrying. However the historic farmstead may have already been compromised by recent development and may be improved by the removal of certain structures. A " cultural heritage assessment" as suggested 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.</p> <p>Archaeology - The archaeological significance of the wider site pose a significant challenge. There will no doubt be archaeology yet to be discovered of significant importance and the response will need to be sensitive and considered. This will no doubt affect the extent of the quarrying. Nevertheless we note the views of the county archaeologist and subject to "sufficient and suitable mitigation", as recommended, we raise no objection in principle to this allocation.</p>
Reasons for oral participation	
Summary	<p>Archaeology – The archaeological significance of the wider site pose a significant challenge. Likely to be important archaeology that is yet to be discovered, which will affect the extent of quarrying. Views of county archaeologist are noted. No objection raised in principle to this allocation.</p> <p>Historic built environment – context and setting of former school/farmstead and its grade 2 listed buildings will be transformed by quarrying. Historic farmstead may have already been compromised by recent development and may be improved by the removal of certain structures. Cultural heritage assessment and conservation plan should form part of any mitigation/restoration plan.</p>

Comment ID:	114	Mr John Salmon		Person ID: 637185	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.6 : Land at Cotswold Community point				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	LMML supports the inclusion of the Council owned Cotswold Community Land and accepts the traffic assessment which identifies concerns about mineral traffic leaving the site on local roads. Hills Quarry Products operates the adjoining Shorncote Quarry to the north and currently extracts from Cotswold Community land. This mineral is processed through Shorncote Quarry and exits onto the highway network through a well established, safe and					

	<p>suitable access.</p> <p>For the avoidance of environmental and traffic impact, and to minimise the carbon footprint to transport these minerals, and to minimise impacts on the local community, further consideration should be given to extract, process and transport minerals from the Land at Cotswold Community utilising the current infrastructure at Shorncote Quarry.</p> <p>If there is an obvious solution to a difficult site the Council should state the solution. In this regard the specification of access for the Land at Cotswold Community would be no different to the County's specification in the Allocation Document of access through an existing quarry at North Farm. With regard to North Farm the Transport analysis states; "The site should be treated as an extension to nearby quarries, utilising existing access arrangements to the north". Wiltshire should consider making a similar statement in the assessment of the Land at Cotswold Community. It will provide greater certainty for the community and the mineral industry that a more suitable access will be used and will provide an opportunity to maintain investment and working practices in Shorncote Quarry to accommodate this extension in future.</p>
Reasons for oral participation	
Summary	<p>LMML supports inclusion of site and accepts traffic assessment which identifies concerns about mineral traffic leaving the site on local roads.</p> <p>Traffic and transportation – further consideration should be given to extract, process and transport minerals from this site using the current infrastructure at Shorncote Quarry. Specification of access for this site would be no different to DPD specification of access through an existing quarry at North Farm – Council should consider making a similar statement for greater certainty.</p>

Comment ID:	40	Ms M Pomeroy-Kellinger	Wiltshire Council	Person ID: 391236	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 2.6 : Land at Cotswold Community				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	There is a SM right in the middle of the two areas allocated for extraction. I suggest that the boundary of the SM gets put on inset map 5. Also in the archaeology section could you include that English Heritage as well as the County Archaeologists will need to be involved in discussions on mitigation.					
Reasons for oral participation						
Summary	<p>SM in middle of the two areas allocated for extraction. SM boundary should be included on inset map 5.</p> <p>Archaeology - English Heritage as well as the County Archaeologists will need to be involved in discussions on mitigation.</p>					

Comment ID:	46	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
Comment point	Table 2.6 : Land at Cotswold Community				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	<p>The proposal is an improvement on the original consultation which had quarrying activity surrounding the Cotswold Community Site in that it now removes the dust and noise receptors by the expedient of including the premises in the redlined area.</p> <p>There are, not surprisingly a number of other historic quarrying activities shown on the historic data. These present no issue or concern at this location. I do note that there is a sewage works included in the proposed quarry footprint. Sewage works can result in land contamination and this should be taken into account when the site is cleared. We have no adverse comments to make regarding this site in terms of the impact upon local air quality.</p> <p>In terms of traffic related noise and dust I believe this can be satisfactorily addressed by condition once the traffic routing is confirmed.</p> <p>Conclusion for Site 5: No objection or adverse comment from a land contamination or local air quality perspective but some consideration needed in terms of possible nuisance and amenity impacts from noise and dust</p>					
Reasons for oral participation						
Summary	<p>Human health and amenity – Dust and noise receptors removed by change in proposal area. No objection or adverse comment from a land contamination or local air quality perspective but some consideration needed in terms of possible nuisance and amenity impacts from noise and dust. Sewage works included in site - Sewage works can result in land contamination and this should be taken into account when the site is cleared. Number of historic quarrying activities shown on the historic data – present no issue/concern at this location.</p> <p>Traffic and transportation - Traffic noise and dust can be addressed by condition once the traffic routing is confirmed.</p>					

Comment ID:	1	Ms Sarah Perkins		Person ID: 461490	Is the DPD legally compliant?	
Comment point	Table 3.2 : Land near Compton Bassett				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make						

the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	There is a public bridleway between the two suggested fields that is regularly used and needs to be honoured.
Reasons for oral participation	
Summary	Public bridleway across site is regularly used and should be honoured.

Comment ID:	2	Ms Jani Etherington		Person ID: 472774	Is the DPD legally compliant?	
Comment point	Table 3.2 : Land near Compton Bassett				Is the DPD sound?	
					Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	Calne has had enough loirries coming through it with the recycling centre and the people of Calne don't want it anymore.					
Reasons for oral participation						
Summary	Traffic and transportation - exacerbate issue of lorries going through Calne.					

Comment ID:	3	Mrs Ann Kingdon		Person ID: 626718	Is the DPD legally compliant?	
Comment point	Table 3.2 : Land near Compton Bassett				Is the DPD sound?	
					Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make						

the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>The table heading 'Traffic and Transportation' suggests that the A3102 access to Sand Pit Lane is a suitable access to this site so as to avoid more HGV traffic through the centre of Calne. This comment suggests that no account has been taken of the fact that the A3102 route would take HGV traffic to the Sand Pit Lane access through Royal Wootton Bassett, Lyneham, Goatacre and Hilmarton, something that is not acceptable to residents in that town and those villages. The A3102 is not marked on the Wiltshire Freight Route map as being suitable for HGV traffic beyond Lyneham. Residents of Lyneham already suffer HGV traffic accessing the land fill site in this area, some of which also uses the B4069 along Lyneham Banks to access the A3102, travelling through Sutton Benger, Christian Malford and Dauntsey. Furthermore, Lyneham Banks is geologically unstable and HGV traffic already causes unacceptable damage to Lyneham Banks, which regularly has to be closed for repairs. There have been accidents involving HGV on Lyneham Banks in the recent past, again causing local residents to have to take long diversion journeys to access their homes at Bradenstoke and Lyneham. If this site has to be used to extract minerals, a different route must be chosen for the HGV traffic to access it.</p> <p>Any decent traffic impact assessment should take account of the HGV traffic impact on the area and villages around the site, not just that through Calne town centre. The 'law of unintended consequences' applies here!</p>
Reasons for oral participation	
Summary	Traffic and transportation - HGV traffic on A3102 route would not be acceptable to residents of Royal Wootton Bassett, Lyneham, Goatacre and Hilmarton. The A3102 is not maked on the Wiltshire Freight Route map as being suitable for HGV traffic beyond Lyneham. Residents of Lyneham already suffer HGV traffic accessing the landfill site in this area. Lyneham Banks is geologically unstable and HGV traffic already causes unacceptable damage. Recent history of accidents involving HGVs on Lyneham Banks. Different route must be chosen for HGV traffic to access this site.

Comment ID:	6	Ms Sarah Perkins		Person ID: 461490	Is the DPD legally compliant?	No
					Is the DPD sound?	No
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant	Abberd Lane is a privately owned public bridleway. It is not a free for all that can be used as and when it suits the Council. Is the right of way that this document clearly assumes accurate?					
What change(s) are necessary to make the DPD legally compliant?	If the site must be used, conveyor belts should take sand to both Sandpit Road access and Lower Compton access so that the status quo is preserved along Abberd Lane at the very least. Lorries using Sandpit Road / Abberd Lane need to respect that the latter is a public bridleway and there should be very restricted use of these lanes (in terms of speed and hours).					
Reasons for not sound	It seems that this site is a 'soft target' because fewer residents will object than the other sites proposed in the original documents. This is not a sound reason for forcing this particular site through. There will still be a long term detrimental impact on a very beautiful area. What is the timescale? I think knowing how long the process of extracting and re-filling the site would be useful when judging the situation.					
What change(s) are necessary to make the DPD sound?	Put a very limited timescale on extraction - including annual limits of how much sand can be extracted, hours of operation and for how many years it can remain available.					

Other comments	I very much support the comments about HGV use of roads through local towns and villages. It seems this part of the county is fair game and there is very little we can say to persuade the Council that all such industry should take account of properly designated lorry routes.
Reasons for oral participation	
Summary	<p>Site description - Query against PRow through site. Abberd Lane is a privately owned public bridleway.</p> <p>Preferred restoration objective - timescale required. Limited timescale on extraction should be enforced.</p> <p>Landscape and visual - long term visual impact on beautiful area</p> <p>Traffic and transportation - Support for comments about HGV use of roads through local towns and villages. Abberd Lane should be preserved by using conveyors to take sand to Sandpit Road and Lower Compton accesses. HGVs need to respect public bridleway. Speed and time restrictions should be placed on lanes.</p>

Comment ID:	19	Deborah Bourne	Lyneham and Bradenstoke Parish Council	Person ID: 632825	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	When carrying out transport assessment for the Calne Land near Compton Basset site, consideration should be made as to the wider traffic implications on surrounding villages and not just the impact on Calne Town Centre.					
Reasons for oral participation						
Summary	Traffic and transportation – Transport assessment should consider wider traffic implications on surrounding villages.					

Comment ID:	26	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						

What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	The MOD has no objections to this site being identified for future mineral development.
Reasons for oral participation	
Summary	No objection from MOD.

Comment ID:	34	Mr Andrew Lord	North Wessex Downs AONB Planning Advisor	Person ID: 472647	Is the DPD legally compliant?		
Comment point	Table 3.2 : Land near Compton Bassett				Is the DPD sound?		
Reasons for not legally compliant						Oral participation?	
What change(s) are necessary to make the DPD legally compliant?							
Reasons for not sound							
What change(s) are necessary to make the DPD sound?							
Other comments	<p>Thank you for consulting the North Wessex Downs AONB on the draft Minerals site Allocations DPD for Wiltshire. The only comment we have (as already noted in the DPD) is to highlight the proximity of the Calne Minerals Site Allocation to the edge of the North Wessex Downs AONB.</p> <p>Its proximity to the edge of the AONB requires consideration to ensure that the setting of the AONB is not impacted on any more than as existing. I attach the North Wessex Downs AONB Position Statement on Setting that sets out the specific issues that this type of activity may relate to. We would also expect that should in the future an EIA be required for the works proposed, full consideration to potential AONB impact is given and mitigation measures recommended in consideration of our Position Statement and Management Plan 2009-2014.</p>						
Reasons for oral participation							
Summary	Site should consider setting of nearby North Wessex Downs AONB. Expectation that an EIA would be required for works proposed. AONB Position Statement and Management Plan 2009-2014 is provided.						

Comment ID:	55	Mrs Abigail Maddox	Compton Bassett Parish Council Parish Clerk	Person ID: 635141	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	Please see attached document from Compton Bassett Parish Council					
What change(s) are necessary to make the DPD sound?						
Other comments	<p>Following the publication of the above document, and discussions held during a special Parish Council meeting the objections and issues below would like to be considered.</p> <p>Of all of the identified sites the land near Compton Bassett would only yield 0.45 million tonnes, making this one of the smallest identified sites in the plan. That given with the large area identified on the included map would suggest that the sand layer is not really economic to pursue. In other words the quantity of sand extracted against the area of (valuable farming) land required does not justify development of this site as a priority in the overall plan.</p> <p>Restoration options must be considered before any plan is progressed. EU policy is firmly set against landfill with waste, and now that much building waste is recycled, the availability of inert waste to back fill any extraction is problematic. The level of reserves in the Calne Area 1 is modest, at best, as demonstrated by the low volume of sand removed during the recent extension to the Hills workings. Without waste landfill the economic case for the extraction of sand at the Compton Bassett site is questionable.</p> <p>There is some evidence to indicate that the current workings have affected the underlying groundwater and aquifer dynamics. Springs have dried up, and in some cases disappeared, and there have been reports of cracking and settling in buildings near to existing workings. No further extraction should take place that may have an impact upon the existing aquifers.</p> <p>The Parish Council are very concerned that the sand extraction plans for this site would act as a "Trojan horse" for increasing the existing landfill capacity. From previous experience, other planning applications for the local Hills site which have gone ahead have not been adhered to as laid out in the detailed plans. The Parish Council has little confidence that any future sand extraction would be immediately followed by restoration and not additional landfill</p>					
Reasons for oral participation						
Summary	<p>Preferred restoration objective – Concern that sand extraction would be followed by landfill rather than restoration.</p> <p>Water environment – evidence to indicate that current workings have affected underlying groundwater and aquifer dynamics. Further extraction may have an impact upon existing aquifers.</p> <p>Other issues - Site not economically justified – large site for low yield. Without waste back fill the economic case for extraction at this site is questionable.</p>					



Comment ID:	70	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	We welcome the preferred restoration objective, particularly the public right of way enhancement aspect.					
Reasons for oral participation						
Summary	Preferred restoration objective welcomed, particularly the PRoW enhancement aspect.					

Comment ID:	77	Anne Henshaw	Campaign to Protect Rural England (CPRE) Group Chaiman, North Wilts and Swindon Group	Person ID: 399075	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>We do not believe that the Site Allocation at this MRZ is sound for the following reasons.</p> <p>The estimated resource of 450,000 tonnes is extremely small when compared to Cox's Farm, Blackburr Farm and land east of Calcutt and land at Cotswold Community. Only North Farm is comparable.</p> <p>If this soft Calne sand has to be transported over greater distances than the sharp Upper Thames sand it becomes less environmentally acceptable in transport terms to continue extraction from the site. Either the commodity becomes a very high priced luxury item and the environmental costs are met, or it is priced out of the market.</p>					

	<p>Not one of the extraction routes from the five Upper Thames Valley sites runs through, or along the urban edge of a market town with a considerable population.</p> <p>The route for extraction at the Calne site has to be down Sandpit Lane which has a new housing estate being constructed on the southern side and the only vehicular exit for residents being on to Sandpit Lane.</p> <p>To exit aggregates vehicles from the joint Minerals/Waste site via Compton Road onto the A4 south merely adds to the pressure on the junction of the Lower Compton road and the A4 and for journey routes west requires routing through the town centre. Moreover there is a second housing development application, already submitted, for the area to the northern side of Sandpit Lane. Despite this development's proposed exit being on to the Oxford Road, all residential traffic would have to travel, with the aggregates HGVs, along the Oxford Road to the Bypass roundabout and then along the Bypass to the A4.</p> <p>Even if this second development does not take place immediately, or ever, the fact remains that Sandpit Lane and the Oxford Road are now urban edge roads increasingly used by residents in cars, on foot or cycle and waiting for buses. These uses are simply not compatible with constant flows of large aggregate vehicles now, let alone in the future, when the question of safety for an increasing local population and a desire to reduce heavy vehicle traffic along these routes is likely to be included in the emerging Town Plan.</p> <p>Given the high level of environmental constraints on this site, which simply cannot be adequately mitigated or compensated for, along a busy urban edge, and the low quantity of the resource available, we do not believe that this site should continue to be included within the Site Allocations. Moreover we find it disturbing that an extant, albeit dormant, mineral planning permission should be permitted to continue since this clearly will have a detrimental effect on any strategic restoration and amenity proposals being considered by local people with regard to the long term future of the whole of the Lower Compton site...that is to say the combined Waste and Minerals area.</p> <p>The question of what the restoration, once sand extraction has ceased, should be would appear to be governed by 1.31 at page 7 of the document, which seeks a holistic restoration led approach for individual sites and the restoration being in conformity with other plans or programmes. How can the larger area of the Lower Compton waste site start to contemplate and devise holistic restoration (bearing in mind permissions expiring in 2016 and 2022) with the threat of a minerals extraction site which could be opened up at any time into the foreseeable future.</p> <p>The question is that of the tipping point between possible market needs and pressures over the next decade (s) (see comment on 2011 report) and the present and permanent environmental constraints for the social and physical well-being of those Calne communities which would be detrimentally affected. We believe that existing evidence of the detrimental effect of heavy traffic use and resultant deteriorating air quality in the town as well as the continuing visual impact on Morgans Hill, within the AONB, has not been properly assessed.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	
Summary	<p>Estimate resource is small in comparison to other sites.</p> <p>Preferred restoration objective - Inclusion of site to detriment of any strategic restoration and amenity proposals being considered for the whole Lower Compton site. Restoration guided by paragraph 1.31 on page 7 of DPD – holistic restoration led approach.</p> <p>Human health and amenity – impact on well-being of Calne communities and air quality impacts.</p>

	<p>Landscape and visual – continuing visual impact on Morgans Hill (within the AONB) has not been properly assessed.</p> <p>Traffic and transportation – sand would have to be transported over greater distances than from Upper Thames area (less environmentally acceptable). Extraction route would have to be down Sandpit Lane. New housing estate accesses onto Sandpit Lane. Also development at Oxford Road – increased use of urban edge roads. Aggregate vehicles will add pressure on Lower Compton Road/A4 junction.</p>
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Comment ID:	106	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	No objection subject to suitable and sufficient mitigation as suggested.					
Reasons for oral participation						
Summary	No objection subject to suitable and sufficient mitigation as suggested.					

Comment ID:	47	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 3.2 : Land near Compton Bassett				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						

Other comments	<p>There are a number of areas of filled ground near to this site and clearly there is already a history of quarry activity in the area. There are several areas of filled ground and a nearby waste transfer station. On balance though there are no land contamination issues of concern.</p> <p>In terms of the impact of the site upon local air quality I would stress that Air Quality Monitoring for Nitrogen Dioxide (NO<sub>2</sub>) levels in Calne have indicated that there is a potential for an exceedence of the annual mean objective for NO<sub>2</sub> in the town and that a detailed assessment of the Air Quality is to be carried out in 2011. As such we would expect a robust examination of the impact of the development to accompany any planning application associated with the use of the site. Further advice on the content and scope of such a report is available from the public protection team.</p> <p>The nearest residential property is approx 500m from the proposed site with the bulk of the urban area being some 1km away. Given that the proposal requires a standard assessment of dust and noise relating to plant along with additional work on traffic routing I believe that the dust and vehicle transport noise can be addressed via this process rather than requiring separate conditions.</p> <p>The consultation document does refer to the need for noise and concern regarding the likely transport routes. This must also include an assessment of the impact of noise and dust from vehicles on premises adjoining the possible access routes. Conditions may be needed to protect property on these from these vehicle impacts and potential an hour's restriction on vehicle movements associated with the site.</p> <p>Conclusion for Site 6: No objection or adverse comment from a land contamination perspective but some consideration needed in terms of possible nuisance and amenity impacts from noise and dust and detailed consideration required in terms of the possible impact upon the air quality in Calne.</p>
Reasons for oral participation	
Summary	<p>Human health and amenity – No objection or adverse comment from a land contamination perspective but some consideration needed in terms of possible nuisance and amenity impacts from noise and dust and detailed consideration required in terms of the possible impact upon the air quality in Calne.</p> <p>Traffic and transportation - Additional work on traffic routing required – dust and vehicle transport noise can be addressed via this process. Conditions may be needed to protect property from vehicle impacts – potential hour's restriction on vehicle movements.</p>

Comment ID:	8	Mr Ian Briscoe	Forestry Commission	Person ID: 628685	Is the DPD legally compliant?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						

Other comments	<p>This application is likely to have a major effect on ancient woodland. As the Government department responsible for woodlands and forestry, The Forestry Commission are pleased to provide you with information that may be helpful in your consideration of this application. This includes stating the Government's forestry policy, both nationally and regionally (Annexe 1) and definitions of woodland types and ancient woodland inventory (Annexe 2).</p> <p>The Government's forestry policies highlight the importance of ancient woodland (in particular 'Managing Ancient and Natural Woodland in England' a Practice Guide) and strongly discourages development that results in its loss or deterioration, unless there are overriding public benefits arising from the development. From this you will note the importance that the Government places on preventing further loss or deterioration of ancient woodland.</p> <p>Extensions to Brickworth Quarry. Both area A and area B cover large tracts of woodland on Ancient Woodland Site. Ancient woodlands are irreplaceable. They have great value because they have never been converted to another land use, with many features remaining undisturbed. In particular they often retain some of the biodiversity and soil structure from our primordial woodland, even the parts which have been felled and replanted. Native species that have survived in these woods can, with good management, colonise restored natural habitats nearby, for instance new native woodlands, heathlands or even native grassland. They are integral to the character of local and regional landscapes.</p> <p>These comments are based upon information available to us through a desk study of the case, including the Ancient Woodland Inventory (developed by English Nature) and our general local knowledge of the area. For more details on this inventory see Annexe 2.</p> <p>Within the area of the planning application the Forestry Commission is currently grant aiding woodland management through the English Woodland Grant Scheme (EWGS). This includes the requirement to replant any felled area and maintain it for ten years. If you require any further information about the EWGS and how it relates to this area please contact the Forestry Commission at Postern Hill, Marlborough, SN8 4ND..</p> <p>We hope these comments are helpful to your consideration of the application.</p> <p>Central Government, PPS9 - Biological and Geological Conservation (published July 2005) Paragraph 10 - " Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as a SSSI). They should not grant planning permission for any development that would result in its loss or deterioration unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals."</p> <p>Planning for Biodiversity and Geological Conservation: A Guide to Good Practice. Page 38: Checklist of biodiversity and geological issues which might be covered in a LDF Core Strategy or other DPD policy: "a strategic framework for the protection, restoration or creation of priority BAP habitats (and for Ancient Woodland and other habitats of recognised importance) and the protection and enhancement of the populations and habitats of priority BAP species".</p> <p>The England Forestry Strategy (published December 1998): Page 23: "We will continue to exercise a general presumption against the conversion of woodland to other land uses unless there are overriding public benefits, for example to restore important semi-natural habitats."</p> <p>The UK Forestry Standard (published January 1998): Page 43 "The area occupied by semi-natural woodland should not be reduced."</p> <p>Tree Preservation Orders: A Guide to the Law and Good Practice (March 2000) Paragraph 5.15 advises on consultation regarding development proposals likely to affect ancient woodland.</p> <p>Keepers of Time - A Statement of Policy for England's Ancient and Native Woodland (published June 2005) Page 10 "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland"</p> <p>Managing Ancient and Natural Woodland in England a Practice Guide published 2011</p>
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### Regional Policy

Within South West England, the Draft Regional Spatial Strategy (June 2006) contains a regional policy RE8 on Woodlands and Forests , which includes:

- i Local authorities and other bodies will support the implementation of the RWFF;
- ii Ensuring that the environmental character of woods and forests are protected and enhanced;
- iii Woodland areas, including ancient and semi-natural woodland, should be maintained at least at 2005 levels;
- iv Replacing woodland unavoidably lost through development with new woodland on at least the same scale;

Policy RE8 very much reflects the policies outlined in the Regional Woodland and Forestry Framework for South West England (published August 2005).

This document also states that ancient woodland (including veteran trees) should be protected against development through the planning system (p29).

#### Annexe 2 - Native Woodland Types

##### Ancient Semi Natural Woodland (ASNW)

Woodland composed of mainly native trees and shrubs derived from natural seedfall or coppice rather than from planting, and known to be continuously present on the site since at least AD 1600. Ancient Woodland sites are shown on Natural England's (English Nature's) Inventory of Ancient Woodland.

##### Plantations on Ancient Woodland Site (PAWS)

Woodlands derived from past planting, but on sites known to be continuously wooded in one form or another since at least AD 1600. Very old PAWS composed of native species can have characteristics of ASNW. Ancient Woodland sites (including PAWS) are on Natural England's (English Nature's) Inventory of Ancient Woodland.

##### Other Semi-Natural Woodland (OSNW)

Woodland which has arisen since AD 1600, is derived from natural seedfall or planting and consists of at least 80% locally native trees and shrubs (ie species historically found in England that would arise naturally on the site). Sometimes known as 'recent semi-natural woodland'. Other woodlands may have developed considerable ecological value, especially if they have been established on cultivated land or been present for many decades.

#### Information Tools - The Ancient Woodland Inventory

This is described as provisional because new information may become available that shows that woods not on the inventory are likely to be ancient or, occasionally, vice versa. In addition ancient woods less than 2 ha or open woodland such as ancient wood-pasture sites were generally not included on the inventories. For more technical detail see the English Nature paper below. Inspection may determine that other areas qualify. The Inventory can be downloaded from English Nature at [http://english-nature.org.uk/pubs/gis/GIS\\_register.asp](http://english-nature.org.uk/pubs/gis/GIS_register.asp) . This can also be viewed on: [www.magic.gov.uk](http://www.magic.gov.uk) .

As an example of further information becoming available, Wealden District Council, in partnership with the Forestry Commission, Countryside Agency, the Woodland Trust and the High Weald AONB have recently revised the inventory in their district, including areas under 2ha. Some other local authorities are currently considering this approach.

Further guidance: Further information about the value of Ancient Woodlands may be obtained from English Nature, the Government's statutory advisors on nature conservation. A useful publication is: English Nature (2005) - Ancient woodland: guidance material for local authorities -

<http://www.english-nature.org.uk/publications>. This paper explains in more detail the guidance on Planning Policy Statement 9 on ancient woodland, the definition of ancient woodland, its importance, ways to identify it, background on ancient woodland inventories. It also considers ancient woodlands less than 2ha, ancient woodpasture and ancient woodland indicators.

Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a licence may lead to prosecution and the issue of a restocking notice.

Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 deforestation which is likely to have a significant impact

	on the environment may also require formal consent from the Forestry Commission. Further information is available from <a href="http://www.forestry.gov.uk/forestry/infd-6dfk2u">http://www.forestry.gov.uk/forestry/infd-6dfk2u</a>
Reasons for oral participation	
Summary	<p>The Forestry Commission - Government department responsible for woodlands and forestry. The Government's forestry policies highlight the importance of ancient woodland (in particular 'Managing Ancient and Natural Woodland in England' a Practice Guide) and strongly discourages development that results in its loss or deterioration, unless there are overriding public benefits arising from the development.</p> <p>Forestry Commission desk study of Brickworth Quarry extensions case.</p> <p>Biodiversity and geodiversity – this plan is likely to have a major effect on ancient woodland. Ancient woodlands are irreplaceable with biodiversity and soil structure value. Within the area of the planning application the Forestry Commission is currently grant aiding woodland management through the English Woodland Grant Scheme (EWGS). This includes the requirement to replant any felled area and maintain it for ten years.</p> <p>Landscape and visual – Ancient woodlands are integral to the character of local and regional landscapes.</p> <p>Reference to national and regional woodlands policy, and native woodland types.</p>

Comment ID:	21	Christopher Evans	Defence Infrastructure Organisation Assistant Safeguarding Officer	Person ID: 545685	Is the DPD legally compliant?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Is the DPD sound?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	The MOD has no objections to these sites being identified for future mineral development.					
Reasons for oral participation						
Summary	No objection from MOD.					

Comment ID:	60	Susan Solbra	Southern Water	Person ID: 396145	Is the DPD legally compliant?	
Comment	Table 4.2 Extensions to Brickworth Quarry				Is the DPD sound?	
					Oral participation?	

point	
Reasons for not legally compliant	
What change(s) are necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>Two of the sites fall within Southern Water's wastewater service area: areas A and B at Brickworth Quarry, Whiteparish. None of the sites fall within Southern Water's water supply area.</p> <p>We have reviewed the two sites within our wastewater service area. Neither of the sites is crossed by existing wastewater infrastructure, nor located adjacent to existing wastewater assets such as wastewater treatments works. No constraints have therefore been identified in terms of the need to protect existing sewerage infrastructure.</p> <p>We have not assessed the risk of pollution to drinking water supplies as the sites fall outside our water supply area.</p> <p>If required, effluent arising from domestic activities at mineral sites, e.g. toilets and canteens, can be connected to the public sewerage system. An assessment of existing sewer capacity will be necessary when specific proposals come forward to determine the nearest point where sufficient capacity is available to meet the demand. Connection to the nearest point of capacity will be required to make sure that the system does not become overloaded.</p> <p>There is no right of connection to the sewer of effluent arising from mineral processing activities, including contaminated surface water. However, Southern Water may allow trade effluent to connect to the public sewer, subject to an assessment of the nature and quantity of the waste. If permitted, it would be subject to a formal trade effluent consent to discharge.</p>
Reasons for oral participation	
Summary	Water environment - Brickworth sites within Southern Water's wastewater service area but not within its water supply area. No constraints in terms of the need to protect existing sewerage infrastructure. An assessment of existing sewer capacity will be necessary when specific proposals come forward. Southern Water may allow trade effluent to connect to the public sewer, subject to an assessment of the nature and quantity of the waste.

Comment ID:	62	Mr Graham Baker	New Forest association Planning Committee Chairman	Person ID: 635479	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make						



the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	New Forest Association (NFA) has interest only in the extractions close to the boundary of the New Forest, ie the Brickworth site. NFA do not object to the extraction in principle, but have an interest in restoration. The restored land will be precious for its ability to support fauna and flora, as amenity land or for agriculture. NFA seeks that on restoration consideration is given to allow any land reserved for agriculture to serve as back up grazing land for New Forest commoners or indeed for the creation of a commoners holding on the land. NFA seeks to be involved in the discussion of the restoration package.
Reasons for oral participation	
Summary	Preferred restoration objective - New Forest Association (NFA) do not object to extract to extraction at site in principle, but have an interest in its restoration. Restoration consideration should be given to allow any land reserved for agriculture to serve as back up grazing land for New Forest commoners. NFA seeks to be involved in the discussion of the restoration package.

Comment ID:	71	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	No
Comment point	Table 4.2 Extensions to Brickworth Quarry			Is the DPD sound?		
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	We note that the development of this site will lead to the destruction of two County Wildlife Sites, designated for ancient woodland interest. We also note that whilst the council has consulted widely via the Initial Site Options Report in August 2010, this consultation did not ask about the desirability of allocating particular sites, or their policy compliance, but merely whether the key issues and potential restoration options had been correctly identified. On this basis the DPD may be unsound. Our response to this to this earlier consultation advised that (for all sites) " In order to properly assess the pros and cons of each site, an analysis of impacts on biodiversity and the public right of way network needs to be undertaken ".					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation						
Summary	Biodiversity and geodiversity - Development of site will lead to destruction of two County Wildlife Sites, designated for ancient woodland interest.  Consultation did not ask about the desirability of allocating particular sites.					

Comment ID:	72	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	We further note that while the Initial Site Options Report identified the impacts on the ancient woodland as being a key issue requiring further assessment, and this was reiterated in the Report on The Results of Consultation Initial Site Options for Sand and Gravel Extraction, the Ecological Site Briefing for this site does not assess the importance of the site itself. We are therefore unclear how the importance of this site has been considered, and on this basis the DPD may be unsound.					
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation						
Summary	Biodiversity and geodiversity – Ecological Site Briefing for this site does not assess importance of site itself. Unclear how importance of site has been considered.					

Comment ID:	73	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>PPS9 states: Local planning authorities should not grant planning permission for any development that would result in its loss or deterioration unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat . The DPD documentation does not appear to show that the need for, and benefits of, the development in this location outweigh the loss of the woodland habitat, and the DPD may therefore be unsound.</p> <p>Both semi-natural ancient woodland and plantation on an ancient woodland site are ancient woodland, and both types should be treated equally in terms of the protection afforded to ancient woodland in PPS9. This has been confirmed by the Forest Pines planning inquiry decision, where the inspector found that there is no policy distinction between "semi-natural ancient woodland" and "plantation on an ancient woodland".</p> <p>Ancient wood as a system cannot be moved. It has developed over hundreds, and sometimes thousands of years. The soil composition and structure,</p>					

<p>varied topography, range of micro-habitats, species assemblages, and mycorrhiza fungi associations with tree roots, cannot be moved in their entirety. Translocation may also involve the loss of mature tree cover that cannot be replaced for tens if not hundreds of years. Therefore, whilst the translocation of ancient woodland is sometimes proposed as a compensation measure for the loss of ancient woodland, it is not possible to replicate the conditions at the site lost. At best some elements of the system - for example coppice stools, some soil (but not its current structure), large pieces of dead wood - can possibly be moved but the long-term benefits from this for biodiversity are largely unproven.</p> <p>If it is judged that the need for, and the benefits of, the development in this location outweigh the loss of the woodland habitat, then a package of measures should be required to ensure that as far as is practicable, the loss of these sites is offset. This might include management of the site post restoration principally for biodiversity, reviewing opportunities across the remainder of the wider minerals site which already has planning permission, and exploring options with the land owner who I understand has a wider land holding where opportunities might be realised, and/or a financial contribution to biodiversity projects off site.</p> <p>Further detail on Natural England's advice regarding ancient woodland can be found at:  <a href="http://www.naturalengland.org.uk/Images/aw_standing_advice_tcm6-25315.pdf">http://www.naturalengland.org.uk/Images/aw_standing_advice_tcm6-25315.pdf</a></p>						
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral participation						
Summary						
Biodiversity and geodiversity – DPD does not show the need for, and benefits of, the development in this location outweigh the loss of the woodland habitat. Both types of ancient woodland should be treated equally in terms of protection. Ancient wood as a system cannot be moved. Package of measures should be required to offset loss of these sites – may involve review of opportunities across the remainder of the wider minerals site and exploring options with the landowner.						
Comment ID:	74	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	No
Comment point	Table 4.2 Extensions to Brickworth Quarry				Is the DPD sound?	
Oral participation?						
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
We note that the DPD states that the New forest SSSI, designated for its wet meadows interest, lies within 500m of, and is hydrologically connected to, the site. However, nothing more is said about the potential for the allocated site to affect the SSSI. We would expect the DPD to be able to demonstrate that the site was developable without affecting the SSSI interest features. In the absence of knowing whether the site is developable whilst not affecting the SSSI interest features, we advise that the DPD is unsound.						
What change(s) are necessary to make the DPD sound?						
Other comments						
Reasons for oral						

participation	
Summary	Biodiversity and geodiversity – nothing said about the potential for the site to affect the New Forest SSSI. Would expect DPD to be able to demonstrate that the site was developable without affecting the SSSI interest features.

Comment ID:	75	Charles Routh	Natural England Planning and Local Government	Person ID: 382216	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	We note that the Habitats Regulations Assessment of this site has two typographic errors in Part B. However, Wiltshire Council have confirmed what the correct text should be and we are satisfied with the conclusion of the Habitats Regulations Assessment regarding this site.					
Reasons for oral participation						
Summary	Two typographic errors in Part B of HRA of this site. Wiltshire Council have confirmed the correct text and Natural England are satisfied with this.					

Comment ID:	81	Mrs Gill Smith	Dorset County Council Senior Planning Officer	Person ID: 634998	Is the DPD legally compliant?	Yes
					Is the DPD sound?	Yes
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	4.1 – 4.5 and accompanying Policy					

	<p>2. Sites – Extension to Brickworth Quarry</p> <p>Seven preferred sites for sand and gravel production are identified in the document. These sites are expected to yield an estimated 10.86 million tonnes in total and meet the locally derived forecast figure of 1.2 million tonnes per annum.</p> <p>There is only one site identified within the South Wiltshire area. This is an extension to the existing Brickworth Quarry, located c.10km south-east of Salisbury. The site comprises two areas, totalling 25.2hectares. It is estimated that this would provide 1.94 million tonnes of sand.</p> <p>Due to the nature of some of the end-uses, the aggregates produced supply not only local markets but are also believed to be transported over greater distances (in excess of 50km), sometimes further afield than what can be considered as the local market areas of Salisbury, Southampton and Bournemouth / Poole.</p> <p>Comment: Dorset County Council has no objection to the allocation of these site extensions to contribute to a continued supply of sand.</p>
Reasons for oral participation	
Summary	Dorset County Council has no objection to the allocation of these site extensions to contribute to a continued supply of sand.

Comment ID:	82	Mr Neil Massie	Hampshire County Council Planning Officer	Person ID: 438065	Is the DPD legally compliant?	Yes
					Is the DPD sound?	No
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	No
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	<p>As the neighbouring Highways Authority Hampshire County Council previously raised concerns about land allocated near Brickworth Quarry and the potential for HGVs to use the A27 (see attached response for reference).</p> <p>Hampshire County Council's concerns are centred around the use of the A27 by HGVs which HCC consider is unacceptable. Wiltshire Council are proposing that the lorry routing will be secured via legal agreement should the site come forward for development.</p> <p>Hampshire therefore consider that the Minerals Site Allocations DPD should acknowledge that any future traffic associated with this site allocation and requiring travel into Hampshire, be restricted and appropriately secured to the A36 only .</p>					
What change(s) are necessary to make the DPD sound?	<p>To ensure that the document recognises the County Council's concerns regarding a Table 4.2 of the document should be amended as follows:</p> <p>Traffic and transportation Access/egress from the site onto the A36 is suitable through existing access to Brickworth Quarry. Infrastructure is currently in place and any planning application should seek to utilise this as a continuation of existing access arrangements. The existing traffic routeing agreement should be maintained and, where appropriate, updated and re-applied through the completion of a new legal agreement. Use of the A27 is not appropriate and Hampshire County Council will be party to any new legal agreement.</p>					
Other comments						
Reasons for oral participation						
Summary	Traffic and transportation – Hampshire County Council concerned by potential for HGVs to use the A27. DPD should acknowledge that any future traffic associated with this site allocation and requiring ravel into Hampshire, be restricted and appropriately secured to the A36 only. Suggested addition to table: Use of the A27 is not appropriate and Hampshire County Council will be party to any new legal agreement.					

Comment ID:	88	Maria Pennington	Whiteparish Parish Council Clerk	Person ID: 500702	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	Whiteparish Parish Council requires that the lorry routing agreement is continued i.e. rigorous control on traffic movement. Whiteparish Parish Council to be kept informed about infill. Restoration of the site with the same type of material that is used at present (inert material when completed).					
Reasons for oral participation						
Summary	Preferred restoration objective – Parish Council should be kept informed about infill. Site should be restored with the same type of material that is used at present (inert).  Traffic and transportation – requirement for lorry routing agreement to be continued.					

Comment ID:	99	Mr Ivor Ellis	Whiteparish Preservation Group Chairman	Person ID: 480590	Is the DPD legally compliant?	No
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	Yes
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound	Further to our letter of the 25th October 2010 in relation to the initial draft of the above named plan, the Whiteparish Preservation Group wishes to make the following comments on this subsequent draft Aggregates Minerals Site Allocations DPD of January 2012 and the 'soundness' of the Plan before it is submitted to the Secretary of State for independent examination later this year.					

In particular these comments relate to table 4.2 covering the South East of Salisbury and the proposed extension to Brickworth Quarry as described by the proposed areas "A" and "B". We consider the Plan is 'unsound' for the following reasons.  
Firstly, should areas A and B persist into the final Site Allocations DPD, it is hard to understand how the Public Rights of Way as demonstrated by the present footpaths, could be moved without considerable detours.  
Secondly, we are surprised that the proposed areas A and B within Brickworth Quarry have remained in the 2012 plan, given the strength of the arguments put forward by several bodies and experts indicating that these are areas of Ancient Woodland and are very unlikely to survive should they be disturbed.

Areas A and B have also been designated as County Wildlife Sites by Wiltshire Council. The Council's website states that these areas are of recognised value for wildlife, as defined by a robust set of habitat and species criteria. Moreover, it is also acknowledged that they provide a vital network of threatened habitats and act as reservoirs of declining animal and plant species.  
Given that the stated aim of this Wiltshire Wildlife Site project is to encourage management that will conserve and enhance the value of the sites for wildlife, it is a contradiction in planning to include Areas A and B as options for mineral extraction. It is in direct conflict with the purpose of their current designation, and with the aims of the Wildlife Site Project.

To argue that such areas could properly be restored after sand extraction would be a triumph of hope over experience. One only has to look at the current restoration of soils strata on the Brickworth site after sand extraction to see that once dug up, areas A and B will not return to their current appearance for several lifetimes, if ever. This is not what the public wants. They wish to see their Councils preserve designated Ancient Woodland sites, and protect designated County Wildlife Sites.

Information from the Wiltshire branch of Butterfly Conservation indicates that there have been several records in recent years of specialised woodland butterflies, namely White Admiral ( a principle species in the UK Biodiversity Action Plan) and Silver-washed Fritillary ( a more robust butterfly, the presence of which indicates suitable habitat) from areas close to the copses. In the recent summer months, surveys of moths in the locality have provided records of 15 of the rarest UK species. Observations of quantities of mature hazel along the public right of way, together with large oaks, maple, ash and birch, raise the possibility that some of the habitat is suitable for dormice.

Furthermore, we have recently received reports that Great Crested Newts have been found on the Brickworth Quarry site adjacent to (and maybe on) the proposed development areas of A and B. It is probably unnecessary to remind you of the status of these creatures, but since the 1940s, populations of Great Crested Newts have declined in most of Europe due to loss of habitat. In England , Wales and Scotland , it is a protected species under Schedule 5 of the Wildlife and Countryside Act 1981 . It is also a European Protected Species and as such it has additional protection in the UK under Regulation 39 of the Conservation (Natural Habitats etc.) Regulations 1994 ( the Habitats Regulations ), as amended by the Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 .

It is an offence to:

Intentionally kill, injure or take a Great Crested Newt

Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a Great Crested Newt (in practice this means both its breeding sites, and its terrestrial habitat)

Intentionally or recklessly disturb a Great Crested Newt while it is occupying a structure or place which it uses for that purpose.

It is our understanding that consideration is currently being given to tempting these amphibians away from the proposed development areas to other locations. We intend to approach the operators and landowners and ask if this is true.

As these newts have evidently chosen Brickworth Quarry as their homes over adjoining locations, we can only assume that areas A and B are possibly the most appropriate sites for them, and any attempts to move them would need to be conducted with a view to the above described regulations. Given the topology of the quarry, we are doubtful about any affordable strategy used to ameliorate the situation, and think that it would fail in the long-term.

Turning to the matter of the restoration of the copses in areas A and B, designated as Ancient Woodland Sites, two requirements are essential:-

	<p>1) To maintain the soil structure and 2) To keep some continuity of canopy cover.</p> <p>Clearly, mineral extraction permits neither of these key objectives to be achieved. Any expectation that ancient woodland, with its high levels of biodiversity, can be restored in the short to medium term is totally unrealistic. The suggestion that the seed banks should be retained is impractical. At best it might be returned, after several years, as top soil and a new plantation developed on it. Such a process, effectively recreating "Ancient Woodland", is not what the planners want - such an exercise takes hundreds of years. Current planning guidelines are designed to preserve our remaining sites. Site restoration of ancient woodland after sand extraction has taken place is impossible in an acceptable time frame. If the top soil and seed bank of the woodland species were to be conserved and reinstated after the extraction work was completed, it is likely that the seeds of many species would have perished.</p> <p>We have estimated the timescales needed below, and furthermore, the soil would then be spread over an exposed site, because replacement tree planting would not provide significant shade for approximately twenty years. In this time seeds would germinate and fail since woodland species are adapted to survival under the tree canopy.</p> <p>As we pointed out in our letter of the 25 th October 2010, given the estimated sand yield for the two proposed sites of areas A and B, and the agreed extraction rate of 200,000 tonnes per annum of sand for the existing operation at Brickworth Quarry, the proposed sites will be quarrying sand for the following periods: Area A - 3.5 Years Area B - 6.4 years</p> <p>Given that on average a further three to four years would be required to fill the voids created with inert construction and demolition waste, means that the proposed Area A would be in operation for approximately six to eight years and Area B for approximately nine to ten years. This of course is dependent on enough inert material being available so that site restoration could be completed in a reasonable time.</p> <p>Over this time scale the stored seeds of the many species will have perished. The two sites will be ruined and would probably no longer be classifiable as County Wildlife Sites.</p> <p>To reinforce our points, we enclose with these comments a report carried out by Dr Pat Woodruffe on the two proposed areas of A and B (referred to as SE2 and SE3 in the Initial Site Options Report) following a survey of the proposed extension areas in July 2011.</p> <p>In summary, we find it difficult to understand why further sand extraction is being considered in areas A and B, given that Wiltshire County Council has designated them as County Wildlife Sites and Ancient Woodlands. By designating areas A and B in such a way, and then simultaneously suggesting that at the planning stage developers will need to overcome the planning hurdles we list above, we feel that the Wiltshire and Swindon Proposed Aggregate Minerals Site Allocations DPD is counterproductive and 'unsound'.</p> <p>If sites A and B pass into the final plan, it is possible that Wiltshire County Council may ultimately have reduced the areas available for sand extraction, compared to the situation pertaining if the proposed areas of A and B were to be struck from the plan now, and other Wiltshire sites substituted.</p>
What change(s) are necessary to make the DPD sound?	
Other comments	
Reasons for oral participation	To put the views of the Whiteparish preservation Group representing the villages of Whiteparish and the surrounding area.
Summary	<p>Plan unsound.</p> <p>PRoW – hard to understand how present footpaths could be moved without considerable detours.</p>



	<p>Biodiversity and geodiversity – areas of Ancient Woodland unlikely to survive should they be disturbed. Areas A and B also designated as County Wildlife Sites – vital network of threatened habitats – inclusion in conflict with Wiltshire Wildlife Site Project. Record of specialised woodland butterflies and rare moth species close to copses. Habitat suitable for dormice. Reports that Great Crested Newts (protected species) found on Brickworth Quarry site.</p> <p>Preferred restoration objective – areas of Ancient Woodland unlikely to be properly restored. Essential that in the areas of ancient woodland, soil structure is maintained and there is some continuity of canopy cover – mineral extraction permits neither of these key objectives to be achieved. Any expectation that ancient woodland, with its high levels of biodiversity, can be restored in the short to medium term is totally unrealistic. Suggestion that seed banks should be retained is impractical. Restoration of ancient woodland impossible in an acceptable time frame – stored seeds will have perished. Proposed sites will be quarrying sand for the following periods: 3.5 years (Area A) and 6.4 years (Area B). On average a further 3 or 4 years required to fill voids with inert waste (dependent on if enough inert material is available).</p> <p>Report carried out by Dr Pat Woodruffe on the two proposed areas is attached.</p>
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Comment ID:	107	Rohan Torkildsen	English Heritage	Person ID: 403792	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are necessary to make the DPD legally compliant?						
Reasons for not sound						
What change(s) are necessary to make the DPD sound?						
Other comments	No objection subject to suitable and sufficient mitigation as suggested.					
Reasons for oral participation						
Summary	No objection subject to suitable and sufficient mitigation as suggested.					

Comment ID:	48	Mr Allister Gittins	Wiltshire Council - Public Protection Services Contaminated Land Officer	Person ID: 633796	Is the DPD legally compliant?	
					Is the DPD sound?	
Comment point	Table 4.2 Extensions to Brickworth Quarry				Oral participation?	
Reasons for not legally compliant						
What change(s) are						

necessary to make the DPD legally compliant?	
Reasons for not sound	
What change(s) are necessary to make the DPD sound?	
Other comments	<p>There are a number of quarried areas in the vicinity of this site and several areas of land that have been previously filled, licensed or otherwise. There is nothing in our contaminated land data that contraindicates the use of these sites for minerals extraction. We have no adverse comments to make regarding this site in terms of the impact upon local air quality.</p> <p>In terms of noise there is a standard requirement for noise and dust monitoring. Given the proximity of the A36 to the site the additional impact of quarry related vehicle movements is likely to be proportionately limited and is unlikely to be a critical noise factor. There are a number of residential premises within 250 to 300m but the noise control of the onsite operations combined with an hours of use restriction if necessary should be adequate to address noise impacts.</p> <p>Conclusion for Site 7: No objection or adverse comment from a land contamination or local air quality perspective but some consideration needed in terms of possible nuisance and amenity impacts from noise and dust.</p>
Reasons for oral participation	
Summary	<p>Human health and amenity - No objection or adverse comment from a land contamination or local air quality perspective but some consideration needed in terms of possible nuisance and amenity impacts from noise and dust. Noise control of onsite operations combined with an hours of use restriction if necessary should be adequate to address noise impacts.</p> <p>Traffic and transportation - Given proximity of site to A36 the impact of additional vehicle movements is likely to be limited.</p>



