

# Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan

General statement of conformity with the  
National Planning Policy Framework

June 2012

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## **1 Introduction**

- 1.1 The National Planning Policy Framework (NPPF) was published by the Department for Communities and Local Government (CLG) on 27 March 2012. The NPPF replaces the existing suite of national planning policy guidance (including Planning Policy Statements, Planning Policy Guidance Notes, Minerals Policy Statements and Minerals Planning Guidance Notes<sup>1</sup>) with immediate effect.
- 1.2 The Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan (previously known as a Development Plan Document (DPD)<sup>2</sup>) has been developed in line with the aforementioned suite of national planning policy but Wiltshire Council and Swindon Borough Council (“the councils”) consider that the document is also in conformity with the recently published NPPF.
- 1.3 The NPPF states that “Local planning authorities should positively seek opportunities to meet the development needs of their area” (paragraph 14). The Minerals Sites Local Plan positively seeks to identify economically viable mineral sites suitable to meet a realistic assessment of future demand for aggregate minerals (sand and gravel) from Wiltshire and Swindon up to 2026.
- 1.4 This statement of conformity sets out the reasons why the councils regard the Minerals Sites Local Plan to be in compliance with the NPPF.

## **2 Achieving sustainable development**

- 2.1 The councils consider that the Minerals Sites Local Plan is consistent with the Framework’s core planning principles for delivering sustainable development.
- 2.2 Paragraph 14 of the NPPF states that “Local plans should meet objectively assessed needs”. The Minerals Sites Local Plan identifies seven sites suitable for sand and gravel extraction in the plan area required to meet a locally–derived forecast rate of 1.2 million tonnes per annum to 2026. This figure is less than the current sub-regional apportionment figure of 1.85<sup>3</sup> million tonnes per annum (set at the regional level), but is based on a 10 year average of production in Wiltshire and Swindon (an approach consistent with paragraph 146 of the Framework). The declining level of extraction in Wiltshire and Swindon over recent years demonstrates a waning interest in the plan area from the minerals industry and as such, the reduced provision rate proposed in the Minerals Sites Local Plan is consistent with the NPPF’s assertion that “Plans should take account of market signals” (paragraph 17).
- 2.3 The Minerals Sites Local Plan is also consistent with other core planning principles of the NPPF. With regard to ‘promoting healthy communities’, the Framework identifies the importance of enhancing public rights of way and access. The Minerals Sites Local Plan has examined the likely impact on public rights of way throughout the comprehensive site selection and appraisal process and identifies the potential to

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<sup>1</sup> See National Planning Policy Framework Annex 3: Documents replaced by this Framework.

<sup>2</sup> Please note, historical references to the DPD remain in the appendices, previous supporting evidence base documents and consultee comments.

enhance public rights of way networks (including the Thames Path National Trail) through restoration proposals outlined for a number of sites included in the Local Plan.

- 2.4 A number of NPPF principles concerned with 'conserving and enhancing the natural environment' are also relevant to the Minerals Sites Local Plan. Where practical, the councils have sought to use areas of poorer quality land in preference to that of higher quality. However, in allocating some 'best and most versatile agricultural land' for mineral extraction, the Minerals Sites Local Plan recognises the economic imperative of providing material to support the growth and development of Wiltshire and Swindon's principal settlements. This is compliant with the NPPF statement that "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land" (paragraph 112).
- 2.5 With regard to minimising impacts on biodiversity, the NPPF declares that planning policies should "plan for biodiversity at a landscape-scale across local authority boundaries" (paragraph 117). This is particularly relevant to the development of preferred restoration objectives for sites included within the Minerals Sites Local Plan. In the Upper Thames Valley area, Wiltshire and Swindon have worked with Gloucestershire County Council on a plan for the Cotswold Water Park. At the site extensions to Brickworth Quarry, to the south east of the plan area and in close proximity to the New Forest National Park, restoration to lowland mixed deciduous woodland has been identified as the preferred objective for the site following engagement with the National Park Authority. The councils held a workshop event<sup>4</sup> with key stakeholders (and the minerals industry), which helped to develop suitable restoration objectives for each site (detailed in paragraph 3.8 of this statement).

### **3 Facilitating the sustainable use of minerals**

- 3.1 Section 13 of the Framework (pp. 32-36) deals specifically with planning for minerals and commences by declaring that "Minerals are essential to support sustainable economic growth and our quality of life" (paragraph 142).
- 3.2 The NPPF establishes that mining operations must not have unacceptable adverse impacts on the natural and historic environment or on human health. Each site option considered in the development of the Minerals Sites Local Plan has been assessed against these potential impacts. In 2009/10, the councils undertook an extensive constraints sieving exercise of the five Mineral Resource Zones (MRZs)<sup>5</sup> in Wiltshire and Swindon. This sieving exercise, informed by the councils' sustainability appraisal (SA) methodology<sup>6</sup> and assessment criteria, was used to identify further site options in addition to those put forward by the minerals industry. The results of this sieving exercise<sup>7</sup> demonstrated that significant areas of unexploited resource are highly

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<sup>4</sup> Wiltshire and Swindon Nature After Minerals Report of Stakeholder consultation event (August, 2011)

<sup>5</sup> The Mineral Resource Zones are identified in the adopted Minerals Core Strategy as broad areas of search for future sand and gravel and soft sand extraction in Wiltshire and Swindon.

<sup>6</sup> 'Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August 2009)' Incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive.

<sup>7</sup> 'Wiltshire and Swindon Aggregate Minerals Site Allocations DPD – Evidence Report. The results of a constraints sieving exercise applied to remaining sand and gravel resources in Wiltshire and Swindon (March 2010)'.

constrained and/or inaccessible in terms of basic highway connectivity. However, through this exercise, owners of potentially mineral bearing land were contacted and a total of 62 site options were put forward for initial consideration.

- 3.3 Although many of the 62 site options would have presented potentially significant issues if they were to be developed as quarries, the councils included them in an initial site options report to provide stakeholders and communities with a meaningful opportunity to present additional information about the suitability of the sites. The primary purpose of this early engagement exercise was to help inform subsequent decision making processes; and to demonstrate that all reasonable site options had been fully considered.
- 3.4 Following this initial consultation and further discussions with colleagues from the councils' Development Management team, 40 initial site options were removed from further consideration on the basis that working the resources would likely lead to overriding environmental constraints. In addition to the work undertaken by council officers, some of those initial (40) site options were withdrawn from further consideration by the landowner. This left 22 site options remaining for further detailed assessment.
- 3.5 The further detailed assessments were undertaken by council officers with expertise in disciplines such as ecology, landscape, archaeology, human health, transport, historic and water environment. The results of these assessments were then used to inform the appraisal and ranking of site options against the councils' adopted sustainability criteria<sup>8</sup>. This reduced the number of site options considered suitable for development to 7 for the plan period to 2026. The final list of 7 site options are considered by the councils to offer the best and most practicable option for delivering a locally derived forecast provision requirement – the site options are estimated to yield a total of 10.86 million tonnes over the period to 2026.
- 3.6 The councils consider that they have taken all reasonable steps to ensure that the capacity of the plan area to deliver the requirements of the sub-regional apportionment has been fully tested against relevant sustainability criteria, in line with previous national policy guidance as expressed in MPS1 paragraph 3.9; and the new NPPF requirements. The profiles of each of the seven sites included in the Minerals Sites Local Plan recognise specific potential environmental and human health concerns that have been identified through site sieving work, consultation exercises and further detailed assessments, and which would need to be addressed through the submission of any subsequent planning application. The site profiles also identify further detailed studies and assessments that would be required before any planning consent could be granted, in order to determine whether there would be impacts on the environment and human health, in addition to potential measures to mitigate adverse effects of this kind.

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<sup>8</sup> The results of all work undertaken (Incorporating the requirements of the Strategic Environmental Assessment [SEA] Directive) on site identification following initial sieving work i.e. outcomes of consultation on the initial 62 potential site options, detailed assessment of 22 remaining options and identification of the final site options to take forward is documented through the 'Wiltshire and Swindon Minerals and Waste Development Framework – Summary of minerals site appraisal matrices (November 2011)' report.

- 3.7 Conversely, the NPPF does recognise that “some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction” (paragraph 143). In any case, sites included in the Minerals Sites Local Plan have been assessed in relation to likely noise impacts and it is recognised that detailed consideration (in line with the proposals as set out in the Local Plan) will need to be applied to the design of each site at the planning application stage. The noise assessment work<sup>9</sup> undertaken on the seven sites included in the Minerals Sites Local Plan is outlined in paragraph 5.4 of this statement.
- 3.8 The councils consider that the restoration-led approach adopted throughout the Wiltshire and Swindon Minerals Development Framework is consistent with the NPPF’s desire for site restoration to be provided at the earliest opportunity. In August 2011, the councils held a workshop event<sup>10</sup> with a wide range of stakeholders to explore restoration issues and options for the seven sites proposed for inclusion in the Minerals Sites Local Plan. This event was held in collaboration with ‘Nature After Minerals’ (NAM), a partnership between Natural England and the Royal Society for the Protection of Birds (RSPB) that works to identify strategic opportunities for delivering biodiversity through high quality habitat creation on mineral sites. The aim of the workshop was to help stakeholders develop a consensus of appropriate restoration options, taking into account the constraints of each site including potential impacts on aviation safety (as recognised in the NPPF), which is relevant given that bird strike had been identified as an issue for some potential restoration options at sites in proximity to RAF Fairford in the Upper Thames Valley. This work helped to inform the ‘preferred restoration objective’ sections outlined for each site in the Minerals Sites Local Plan and helped to ensure that restoration objectives were planned for holistically and at a landscape scale, taking account of the environmental, landscape character and biodiversity aspirations, plans and programmes of each area. The Minerals Sites Local Plan also sets out a new indicator for monitoring restoration proposals, stating a target for all applications received for the sites in the document to be in line with the preferred site restoration objectives as outlined in the document.
- 3.9 The Framework also highlights the significance of taking into account “the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality” (paragraph 144). This has been fully considered in the development of the Minerals Sites Local Plan, and is particularly relevant to the five sites identified in the Upper Thames Valley MRZ. As part of the Wiltshire and Swindon Minerals Development Framework’s effort to plan holistically at a strategic (MRZ) level, the Minerals Core Strategy DPD<sup>11</sup> and Minerals Sites Local Plan identify the potential for cumulative effects in Wiltshire, and bordering areas of other authorities, particularly in the Cotswold Water Park / Upper Thames Valley. Continued close working with Gloucestershire County Council will help to ensure that cumulative effects are identified and, where appropriate addressed, through Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) and Habitats Regulations Assessment processes. As identified in the Minerals Sites Local Plan, there is also

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<sup>9</sup> Wiltshire and Swindon Minerals site options detailed further assessment – Noise Assessment (August, 2011).

<sup>10</sup> Wiltshire and Swindon Nature After Minerals Report of Stakeholder consultation event (August, 2011).

<sup>11</sup> See Core Policy 5 (Collaborative Working) in the Wiltshire and Swindon Minerals Core Strategy (June, 2009).

the potential for cumulative transport implications with Hampshire and Oxfordshire, which will require cooperation with these authorities.

- 3.10 In line with recommendations made by the Minerals Products Association, the new NPPF (paragraph 145) clearly stipulates that local authorities should base their provision rate on the basis of a rolling average of the past 10 years production/sales. For Wiltshire and Swindon, this would equate to a local forecast rate of 1.1 million tonnes per annum. It is therefore reasonable to conclude that a local forecast of 1.2 million tonnes per annum (as the councils are proposing) more closely reflects recent demand than figures previously derived from national and regional forecasts, and would also allow some flexibility to account for changing market conditions or an upturn in production as and when the economy dictates. The Minerals Sites Local Plan presents a flexible approach to the provision of mineral in the plan area, consistent with the adopted Minerals Core Strategy DPD<sup>12</sup> and the NPPF.
- 3.11 The Minerals Policy Statement 1 (MPS1)<sup>13</sup> requirement for Minerals Planning Authorities (MPAs) to maintain a stock of planning permissions or 'landbank' of at least seven years for the extraction of sand and gravel is retained in the NPPF.

## 4 Plan-making

- 4.1 The 'plan-making' chapter of the NPPF reinforces the significance of local plans to delivering sustainable development. As set out in planning law<sup>14</sup>, "planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise" (paragraph 150). The Minerals Sites Local Plan is the third and final document of the Wiltshire and Swindon Minerals Development Framework, after the Minerals Core Strategy DPD and Minerals Development Control Policies DPD were adopted by the councils in 2009.
- 4.2 The approach adopted in the development of the Minerals Sites Local Plan is consistent with the Framework's requirement for ensuring that a proportionate evidence base is used as the basis for plan-making. The councils have worked with other organisations (including the British Geological Survey) to develop a good understanding of the extent and location of mineral resource in the plan area, to assess the projected demand for use of this material through import and export data, historical patterns of mineral supply and through discussion with the minerals industry. As set out earlier in this statement, the site identification process and discussion with the industry has led to the conclusion that Wiltshire and Swindon cannot meet the current regional apportionment figure. Ensuring that the supporting evidence is up-to-date is critical to the delivery of a plan, and this is reaffirmed in the NPPF (paragraph 173).
- 4.3 As prescribed in the Framework, the councils have worked with neighbouring authorities on planning issues that cross administrative boundaries. This has included working with the South West Regional Aggregates Working Party

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<sup>12</sup> Wiltshire and Swindon Minerals Core Strategy (June, 2009).

<sup>13</sup> Minerals Policy Statement 1: Planning and Minerals (November, 2006).

<sup>14</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004.

(SWRAWP) and two periods of public consultation on the Minerals Sites Local Plan between August - October 2010 (on an initial 'long-list' of 62 site options) and January – March 2012 (on the proposed submission draft). The councils have cooperated with Gloucestershire County Council on areas of common interest in the Upper Thames Valley area. The potential for cumulative effects in both the plan area and bordering areas of Gloucestershire on such issues as human health and amenity, traffic and transportation, noise and light pollution, vibration, air quality, the water environment and cultural heritage are identified in the seven site profiles of the Minerals Sites Local Plan. The approach throughout the development of the Minerals Sites Local Plan has been to regularly engage with other authorities and stakeholders and in this respect the document is consistent with paragraph 181 of the NPPF which states, "Cooperation should be a continuous process of engagement". Collaboration with neighbouring authorities to plan at the strategic level on cross-boundary issues will continue beyond the date of adoption of the Minerals Sites Local Plan in effort to address the cumulative effects identified in the document and deliver a holistic plan for restoration.

- 4.4 In addition to the new requirement for plans to be shown to be in accordance with the Duty to Cooperate, the NPPF introduces a fourth test of soundness to be considered at the examination stage – that the plan is 'positively prepared'. The councils consider that the Minerals Sites Local Plan, based on a strategy which seeks to meet an objectively assessed need for sand and gravel through the consideration of all site options and identification of suitable and deliverable sites for inclusion in the plan, will positively contribute to the achievement of sustainable development and is therefore positively prepared.

## **5 Technical guidance**

- 5.1 A 'Technical Guidance to the National Planning Policy Framework' document was published in conjunction with the NPPF on 27 March 2012. This paper provides additional direction on development in areas at risk of flooding and in relation to mineral extraction, both of which are relevant to the Minerals Sites Local Plan.
- 5.2 The NPPF retains the sequential test set out in Planning Policy Statement 25 (PPS 25)<sup>15</sup>, which aims to steer new development to areas with the lowest probability of flooding. The technical guidance document also refers to sand and gravel working as 'water-compatible development', which is consistent with the now replaced PPS 25.
- 5.3 With regard to minerals policy, the technical guidance document provides greater detail on the NPPF's expectation that minerals plan proposals do not have an unacceptable adverse effect on the natural or historic environment or human health, which is akin to Minerals Policy Statement 2 (MPS2)<sup>16</sup> which was replaced by the new Framework. The technical guidance establishes the need for a dust assessment study to be undertaken in respect of proposed mineral working operations. As part of the detailed further assessment work, consultants Mouchel were commissioned to

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<sup>15</sup> Planning Policy Statement 25: Development and Flood Risk (Revised, March, 2010).

<sup>16</sup> Minerals Policy Statement 2: Controlling and Mitigating the Environmental Effects of Mineral Extraction in England (March, 2005).



undertake an air quality assessment of mineral site options, which assessed the likely impacts of operation on local air quality and dust levels. It should be noted that none of the sites included within the Minerals Sites Local Plan are in proximity to 'high dust-sensitive facilities' as defined by the technical guidance (and referenced in the councils air quality assessment report<sup>17</sup>).

- 5.4 In addition, the NPPF technical guidance makes it clear that MPAs should establish appropriate noise limits for extraction in proximity to noise sensitive properties, which have been derived in the detailed noise assessment report produced by Mouchel in August 2011<sup>18</sup>. This assessment involved undertaking noise monitoring surveys at sensitive receiver locations in vicinity of each of the seven site options considered for aggregate minerals extraction in the Minerals Sites Local Plan. From the results of the monitoring exercise and the recommendations of Minerals Policy Statement 2 Annex 2: Noise (MPS2) (much of which has been translated into the NPPF technical guidance paragraphs 30-31), relevant noise criteria were established for each of the assessed sensitive reports. An indicative assessment of potential future noise impacts on these sensitive receptors has also been conducted. It is noted that within the scope of any future planning applications more detailed assessment of noise should be completed taking into account the specifics of the site, working methods and the equipment proposed.
- 5.5 The technical guidance also considers the restoration of mineral sites, stating the requirements of a 'site-specific landscape strategy' which should accompany applications for new or significantly extended sites. Although it is clear that more detail will be required at the planning application stage, the evidence base work that has gone into the preparation of the Minerals Sites Local Plan (particularly the site options detailed assessment of landscape and visual impact<sup>19</sup>, and the outputs of the NAM stakeholder consultation event on restoration opportunities<sup>20</sup>) goes some way to meeting the requirements of a landscape strategy for the seven sites identified in the document. A landscape strategy will be required to accompany any planning application for mineral extraction and should address landscape and visual issues acknowledged in the Minerals Sites Local Plan.

## 6 Conclusions

- 6.1 The councils recognise that the NPPF will have a fundamental impact on the planning system.
- 6.2 However, the councils consider that the Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan is in general conformity with the Framework because it:

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<sup>17</sup> Wiltshire and Swindon Minerals site options detailed further assessment – Air Quality Assessment (November 2011)

<sup>18</sup> Wiltshire and Swindon Minerals site options detailed further assessment – Noise Assessment (August, 2011)

<sup>19</sup> Wiltshire and Swindon Minerals site options detailed further assessment – Landscape and visual impact (Summer, 2011)

<sup>20</sup> Wiltshire and Swindon Nature After Minerals Report of Stakeholder consultation event (August, 2011)

- Identifies viable and deliverable sites to meet an objectively assessed local need for mineral provision, based upon market signals and a 10 year average of sand and gravel production as proposed in the NPPF;
- Facilitates the sustainable use of minerals by identifying the most appropriate sites for extraction across the plan area following an extensive site selection process;
- Identifies potential environmental and human health impacts that will require further consideration at the planning application stage;
- Recognises the potential cumulative effects of mineral extraction at sites in the plan area and in surrounding areas, emphasising the need for continual cooperation between neighbouring Mineral Planning Authorities in the spirit of duty to co-operate;
- Adopts a restoration-led approach to minerals planning consistent with the Wiltshire and Swindon Minerals Core Strategy;
- Presents a positively prepared plan to deliver a steady and adequate supply of mineral over the plan period.

## **Appendices**

### **Appendix A: Planning Advisory Service checklist – Local Plans and the National Planning Policy Framework: LPA Self Assessment**



# Local Plans and the National Planning Policy Framework

# Compatibility Self Assessment Checklist

(May 2012)

## Introduction

We have produced a checklist to help you assess the content of your local plan<sup>1</sup> against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy previously set out in PPGs and PPSs.

*These elements are highlighted in red and in italics.*

Although not part of the NPPF it also includes the 'Planning policy for traveller sites' published on 23 March 2012.

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<sup>1</sup> We use the term "local plan" throughout this document. However, adopted plans may comprise a number of development plan documents prepared under the Planning and Compulsory Purchase Act 2004, in which case it may be all of those documents that a local planning authority may wish to consider in the context of the NPPF using this document.

## How will it help?

We want to help local authorities to get up-to-date plans in place. This tool will help you to:

- assess your local plan against national policy
- identify gaps
- understand risks
- start to plan how to manage those risks.

This will help you to:

- respond proactively and speedily to the NPPF
- prepare for an examination
- make robust planning decisions
- implement your policies.

PAS will continue to work with authorities through the NPPF transition period.

## Why does it matter?

It matters because to have a plan-led system we need to have sound plans in place. The transition arrangements give authorities with an adopted plan a year to get their policies 'up to date' (in conformity with the NPPF). After that, the policies will be judged by their degree of conformity and the presumption in favour of sustainable development will apply. If you haven't got a plan in place, you need to do so as soon as possible; the further along the process you are, and the closer the conformity of your policies, the more weight they will have (for full details see Annex 1 'Implementation' paragraphs 208-219).

For PAS's interpretation of what you need to know about transition, see ['Things we think you should know about the NPPF'](#).

## Who should use it?

The checklist was written with adopted plans in mind, but it should also be useful as a check for emerging local plans. It is for all planning authorities in England, including counties and National Parks.

### **What it doesn't do**

It is not an interpretation of national planning policy or a prescribed solution. It excludes the implications of the Localism Act. It doesn't deal with the process of plan-making or aspects of the NPPF which relate specifically to decision making. Nor does it list the things that you *don't* have to do any more as requirements have been dropped.

### **What else are PAS doing?**

There are more parts to this document to follow, including

- a comprehensive checklist of all requirements, new and retained,
- An understanding of what the 'gaps' or discrepancies might mean for you (your risks)
- Some actions you could take to address these risks

### **How should you use it?**

We have structured the checklist in the order of the NPPF, but you might want to prioritise the areas that you think are most important to your area and your overall strategy, and concentrate on the policy areas where you have the most development pressure.

The checklist has used, wherever possible, the same wording as that set out in the NPPF. However, our focus has been to capture the main 'prompts' that you need to consider while keeping the checklist to a reasonable length. However you should cross-refer to the NPPF itself whilst going through the checklist. We have provided paragraph references to help you do this.

Note, however, that this document highlights the new/significantly different bits of the NPPF compared to PPGs and PPSs. You'll need to think about whether, if you've quite an old adopted plan, it was fully compliant with more recent bits of government guidance (eg PPS3 revised June 2011).

The checklist concentrates on identifying where the gaps (or incompatibilities) are; you might want to also keep your own audit trail of the evidence you have identified to demonstrate compatibility, or otherwise, with the NPPF.

## How we made it

- We looked at the NPPF and the Impact Assessment published alongside the draft NPPF.
- We identified the main things that it asks or requires local plans to include, and highlighted those that are significantly different from previous national policy and guidance as set out in PPGs and PPSs.
- We turned this into a checklist, and set out some ideas about how local planning authorities could identify parts of their local plan that may be most at odds with this, what may happen as a result, and things they could do to manage this (*to follow*).
- We developed these ideas in consultation with a selection of local planning authorities.

We've worked with the Planning Inspectorate on this and it builds on pilot work done by the Inspectorate. The checklist is intended to provide a constructive starting point for any assessment of how the Framework impacts on plan preparation and is an important element of the support service referred to in paragraph 217 of Annex 1 to the National Planning Policy Framework

## What will happen to this document in the future?

It will be reviewed in the light of feedback from local planning authorities that have used it and other stakeholders and updated again as necessary later in 2012.

If you have any feedback please send it to PAS at:

Email: [alice.lester@local.gov.uk](mailto:alice.lester@local.gov.uk)

## Disclaimer

This is a PAS document and has not been endorsed by the Department for Communities and Local Government. We are positive that if you go through this exercise you will be able to make a judgment, with confidence, about how your plan relates to the requirements of the NPPF. It will also give you some indication of the sort of actions you may wish to pursue if you need to move towards alignment with the NPPF in any of the policy areas.



## 1A: Achieving sustainable development

<p><b>The presumption in favour of sustainable development and core planning principles (para 6-17)</b></p>			
<p><b>What NPPF expects local plans to include to deliver its objectives</b></p>	<p><b>Questions to help understand whether your local plan includes what NPPF expects</b></p>	<p><b>Does your local plan address this issue and meet the NPPF's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>

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 Local Plans and National Planning Policy Framework: LPA Self Assessment

<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A <a href="#">model policy</a> is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>Yes. The Wiltshire and Swindon Aggregate Minerals Site Allocations Development Plan Document (“the Minerals Sites DPD”) positively seeks to identify (through an inclusionary approach to site selection) seven suitable sites for sand and gravel extraction in the plan area required to meet an objectively assessed, locally-derived forecast provision rate for the period up to 2026. The objectively assessed local provision rate takes into account market signals (historic and projected future trends), with in-built flexibility to adapt to rapid change.</p> <p>The councils would be willing to accept the model policy to reinforce this point.</p>	<p>Although the Minerals Sites DPD has been predominantly developed in line with a suite of national planning policy guidance that has now been replaced by the NPPF, the councils consider that the Minerals Sites DPD (and the overall strategy of the Wiltshire and Swindon Minerals Development Framework) is consistent with the Framework’s presumption in favour of sustainable development.</p>
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<p>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</p>		<p>The Minerals Sites DPD addresses the twelve principles for planning as set out in paragraph 17 of the NPPF.</p> <ol style="list-style-type: none"> <li>1. The Minerals Sites DPD is a function of what has been set out and agreed in the Local Development Scheme (LDS) project plan for the Wiltshire and Swindon Minerals Development Framework. As such, the document is part of a genuinely plan-led approach to meeting the requirement for minerals supply. The Minerals Sites DPD represents the final key document within the current Minerals Development Framework and has been prepared to supplement the adopted Minerals Core Strategy DPD<sup>2</sup> and Minerals Development Control Policies DPD<sup>3</sup>. At every stage in the plan making process local communities have been invited through various stages of consultation to submit their thoughts and recommendations to help shape the content of the DPD's that make up the Minerals Development Framework.</li> <li>2. In outlining preferred restoration options for each site included within the plan, the Minerals Sites DPD identifies opportunities for enhancing and improving these areas. These</li> </ol>	<p>Although the Minerals Sites DPD has been developed in line with a suite of national planning policy guidance that has now been replaced by the NPPF, the councils consider that the Minerals Sites DPD (and the overall strategy of the Wiltshire and Swindon Minerals Development Framework) is consistent with the Framework's core land-use principles.</p>
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<sup>2</sup> Wiltshire and Swindon Minerals Core Strategy DPD (June, 2009)

<sup>3</sup> Wiltshire and Swindon Minerals Development Control Policies DPD (September, 2009)

		<p>opportunities were explored in a workshop event<sup>4</sup> held by the councils in collaboration with Nature After Minerals (NAM), which invited a wide range of stakeholders to explore potential restoration issues and options for each site option – and form an agreed consensus view on restoration objectives for the seven sites included in the Minerals Sites DPD.</p> <p>3. The Minerals Sites DPD recognises the important role that mineral extraction plays in supporting sustainable economic development, and as such the importance of identifying suitable sites for extraction to meet local needs. The Minerals Sites DPD plans for an objectively assessed, locally-derived forecast for sand and gravel, taking into account market signals and recent production levels of the local mineral industry.</p> <p>4. The councils consider the holistic, restoration-led approach adopted throughout the Minerals Development Framework to be consistent with the NPPF’s desire to secure high quality design. Informed by the councils’ landscape and visual impact assessment<sup>5</sup> and the outputs of the NAM restoration workshop<sup>6</sup> event, the Minerals Sites DPD</p>	
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<sup>4</sup> Wiltshire and Swindon Nature After Minerals Report of Stakeholder consultation event (August, 2011)

<sup>5</sup> Wiltshire and Swindon Minerals site options detailed further assessment – Landscape and visual impact (Summer, 2011)

<sup>6</sup> Wiltshire and Swindon Nature After Minerals Report of Stakeholder consultation event (August, 2011)

		<p>(and Minerals Development Control Policies DPD) sets out the guiding principles and policies for a high quality restoration led approach. This approach is reflected in the restoration proposals outlined for each site included within the Minerals Site Allocations DPD, taking into account the landscape character of the wider area.</p> <p>5. The Minerals Sites DPD takes account of the various roles and characteristics of different areas, as prescribed in the NPPF. The aforementioned landscape and visual impact assessment<sup>7</sup> work considers the sensitivity of sites at the landscape scale. The sustainability appraisal (SA) and site selection and appraisal work<sup>8</sup> which supported the development of the Minerals Sites DPD also considered the need to protect and enhance landscape character, with a number of exclusionary and discretionary indicators. Sites were excluded from consideration if they were deemed to have overriding negative impacts on the landscape character of an area. Likewise, opportunities for landscape enhancements have been explored through the NAM restoration workshop and reflected in the preferred restoration objective section for each site option included in the Minerals Sites DPD.</p>	
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<sup>7</sup> Wiltshire and Swindon Minerals site options detailed further assessment – Landscape and visual impact (Summer, 2011)

<sup>8</sup> See the Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)

		<p>6. Taken as a whole, the Minerals Development Framework supports an approach to maximise the sustainable use of mineral resources, striking a balance between primary and recycled aggregates. The Minerals Core Strategy<sup>9</sup> states that 'recycling and reuse of construction, demolition and excavation waste will be maximised', however there is still an evident need for primary resource. The Minerals Sites DPD also advocates an approach aimed at reducing vehicle mileage, by bringing forward blocks of land and extensions to existing sites, where possible, rather than new quarry sites in locations considered to be less sustainable from a transport perspective.</p> <p>7. A significant level of work has been invested in identifying sites for future minerals extraction. The early work with the Wiltshire and Swindon Minerals Forum and subsequent local engagement processes helped shape the approach to implementing national, regional (draft RSS) and local policy objectives. The 62 site options considered in initial consultation (2010) were fully appraised against a range of criteria informed by the SA/SEA framework. Only those site options considered suitable in social, environmental and economic terms have been included in the Minerals Sites DPD.</p>	
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<sup>9</sup> Wiltshire and Swindon Minerals Core Strategy DPD (June, 2009)

		<p>Those options that are considered unsuitable were excluded from further consideration. The Minerals Sites DPD therefore represents the most suitable approach to bringing forward new minerals sites having considered all reasonable alternatives.</p> <p>The Minerals Sites DPD has adopted a robust approach to site selection throughout the appraisal process, with options appraised against objectives and indicators set out clearly in the Minerals Site Appraisal Methodology<sup>10</sup>. Assessment of the environmental value of land formed the basis of the site appraisal methodology informing the site selection and SA work, using criteria formed upon existing national and local plans, policies and programmes.</p> <p>8. The councils consider that this principle is not directly relevant to minerals planning and the Minerals Sites DPD.</p> <p>9. The councils consider the restoration-led approach adopted throughout the Minerals Development Framework is consistent with the NPPF's desire to encourage multiple benefits from the use of land in rural areas. As stated in the Minerals Core Strategy<sup>11</sup>, mineral working has the potential to bring positives to an area (including benefits to the local economy, flood risk mitigation, habitat</p>	
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<sup>10</sup> Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)

<sup>11</sup> Wiltshire and Swindon Minerals Core Strategy DPD (June, 2009)

		<p>creation etc.) through well-designed and holistically planned restoration schemes. The Cotswold Water Park is one such example of this. The Minerals Development Framework recognises that more can still be done to improve the area through direct working with local authorities, local communities, the minerals and waste industries and bodies such as the RSPB and the Cotswold Water Park Trust. The restoration workshop event held in collaboration with Nature After Minerals<sup>12</sup> (a subsidiary of the RSPB), and involving a wide range of stakeholders (including the Cotswold Water Park Trust), informed the preferred restoration objectives outlined in the Minerals Sites DPD. These restoration objectives will deliver multiple benefits for nature and to local communities once mineral extraction has ceased at the sites allocated in the plan.</p> <p>10. The need 'to preserve and enhance sites or structures of international historic and cultural heritage importance and their setting' was set out as an exclusionary objective in the minerals site selection and site appraisal methodology<sup>13</sup>. As such, site options within a World Heritage Site (WHS) or that would lead to an adverse impact on (or on the setting of) a Scheduled Monument,</p>	
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<sup>12</sup> Wiltshire and Swindon Nature After Minerals Report of Stakeholder consultation event (August, 2011)

<sup>13</sup> Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)



		<p>Grade I/II* listed building, Registered Battlefield and/or Historic Park and Garden were removed from the site selection process and subsequent inclusion in the Minerals Sites DPD.</p> <p>11. Aligned with the NPPF principle to actively manage patterns of growth, the minerals site selection and appraisal methodology<sup>14</sup> includes the objective 'to minimise vehicular movements by encouraging the most sustainable transport mode options for minerals supply'. Indicators of this objective in the appraisal process included the proximity of site options to road, canal and railway networks. In addition, the objective to locate mineral developments as close as practicable to local centres of demand is relevant to this principle of the NPPF. The concentration of sites identified in the Upper Thames Valley, as included in the Minerals Sites DPD, is justified in part, by the proximity of the locality to Swindon (a key primary end-use market) and other key markets in Gloucestershire and Oxfordshire. The Minerals Sites DPD also considers the potential impact on Public Rights of Way (PRoW) and identifies the potential for enhancements to the local PRoW and cycle (where possible) networks to be achieved in site restoration.</p>	
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<sup>14</sup> Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)

		<p>12. The Minerals Sites DPD promotes appropriately designed and holistically managed site restoration proposals to deliver considerable benefits to local communities. For example, this may involve new public access to nature reserves, improvements to PRow and cycle networks and contributions to the restoration of the Cotswold Canals project in the Upper Thames Valley.</p>	
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## 1B: Delivering sustainable development

<b>1. Building a strong, competitive economy (paras 18-22)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).		Although the councils do not consider this policy to be directly relevant to the Minerals Sites DPD, the long-term provision of construction aggregates will help drive economic growth.	No significant difference.

<b>2. Ensuring the vitality of town centres (paras 23-27)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Set out policies for the management and growth of centres over the plan period (23).	<p><i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i></p> <p><i>Have you identified primary and secondary shopping frontages?</i></p>	The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

<b>3. Supporting a prosperous rural economy (para 28)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).	<i>Do your policies align with the objectives of para 28?</i>	Mineral development does have the capability to expand and diversify the rural economy and uses of agricultural land, an approach in line with paragraph 28 of the NPPF. There is also the potential for mineral extraction to lead to spin off benefits for the local economy, such as supporting sustainable growth in industrial development, where appropriate.  The restoration led approach to site development and appropriate after use as promoted through the Minerals Sites DPD has the potential to develop sustainable rural tourism and leisure development in the longer term. The Cotswold Water	No significant difference.

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		Park is again a prime example of how amenity value and opportunities for tourism can be developed in areas undergoing mineral extraction through carefully considered restoration schemes.	
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<b>4. Promoting sustainable transport (paras 29-41)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

<p>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</p> <p>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</p>	<p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39)</i> <i>(The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).</i></p> <p>Has it taken into account how this relates to other policies set out elsewhere in the Framework, <i>particularly in rural areas? (34).</i></p>	<p>The SA Objective (used to inform the development of the Minerals Sites DPD) to 'encourage more sustainable transportation of minerals and reduce the impacts of transport'<sup>15</sup> is consistent with this policy of the NPPF.</p> <p>As part of achieving this objective, the criteria used in the SA and site selection and appraisal work<sup>16</sup> that supported the development of the Minerals Sites DPD, considered the potential to encourage the most sustainable transport mode options for minerals supply in line with policy MCS9 of the Adopted Wiltshire and Swindon Minerals Core Strategy DPD (e.g. proximity to railway network), opportunities to locate mineral developments as close as practicable to local centres of demand and primary end use markets (policy MCS1 (B) of the...</p>	<p>No significant difference.</p>
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<sup>15</sup> Wiltshire and Swindon Aggregate Minerals Site Allocations DPD Pre-Submission Sustainability Appraisal Report (January, 2012)

<sup>16</sup> See the Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)



	<p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>...Adopted Wiltshire and Swindon Minerals Core Strategy) (proximity to principal settlements) and how sites with good access to the Wiltshire HGV and Primary Route Network (PRN) could be promoted (e.g. proximity to road networks and suitability of the local highway network).</p> <p>The Minerals Sites DPD also adopts an approach aimed at reducing vehicle mileage in accordance with policies MCS1 (B) and MCS9 of the Adopted Wiltshire and Swindon Minerals Core Strategy DPD, by bringing forward blocks of land and extensions to existing sites and/or with the potential to utilise the Wiltshire HGV Route Network, where possible and appropriate to do so, rather than new quarry sites in locations considered to be less sustainable from a transport perspective.</p> <p>Where there are potential traffic and transport issues, these are identified in the profiles of each of the seven sites included in the Minerals Sites DPD, as is the requirement for a full Transport Assessment to be</p>	
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		<p>undertaken in support of any planning application to limit the impacts of HGV movements on the HGV route network, on sensitive receptors adjoining these routes and to address local and strategic highway issues. A Transport Assessment should identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal, as outlined in the Minerals Sites DPD.</p> <p>The Minerals Sites DPD has been prepared in full accordance with SA/SEA and the site selection and appraisal process has incorporated SA criteria relating to sustainable transport, human health and amenity etc aspects/policies as informed through other plans and strategies, throughout.</p> <p>The Minerals Sites DPD is a product of continued liaison and engagement with internal transport officers, neighbouring authorities and key stakeholders (such as the Highways Agency) in order to identify and resolve any potential transport issues. The Minerals Sites</p>	
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		<p>DPD fully considers the council's objectives for transport as set out in the third Wiltshire Local Transport Plan (LTP3) and those of the Swindon Borough Council Local Transport Plan (LTP3). These objectives are considered through the supporting Development Framework Evidence Base Chapter Part A.</p>	
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<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	

<p><b>6. Delivering a wide choice of high quality homes (paras 47-55)</b></p>			
<p><b>What NPPF expects local plans to include to deliver its objectives</b></p>	<p><b>Questions to help understand whether your local plan includes what NPPF expects</b></p>	<p><b>Does your local plan address this issue and meet the NPPF's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</i></p>	<p><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites;  <i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i>  c) <i>If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)?</i>  <i>[Para 47].</i></p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>The councils do not consider this policy to be directly relevant to the Minerals Sites DPD. However, the long-term provision of construction aggregates will be vital to supporting the supply of housing development in our growth towns.</p>	<p>No significant difference.</p>

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<p>Illustrate the expected rate of housing delivery through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47).</p>	<p><i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i></p>		
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)</p>	<p><i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs</i></p>		
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p>	<p><i>Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?</i></p>		
	<p><i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i></p>		

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In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	<i>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</i>		
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<b>7. Requiring good design (paras 56-68)</b>			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		The councils do not consider this policy to be directly relevant to the Minerals Sites DPD. However, quarries will need to be sensitively accommodated in the local environment. This will require clear guidance and positive approaches to design – e.g. the siting of soil storage bunds, landscaping features and final restoration details.	



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<b>8. Promoting healthy communities (paras 69-78)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

<p><i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i></p> <p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular</i></p>	<p><i>Does the plan include a policy or policies addressing community facilities and local services?</i></p> <p><i>To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i></p> <p><i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for</i></p>	<p>The Framework identifies the importance of enhancing PRoW and public access to land where appropriate to do so. The Minerals Sites DPD has examined the likely impact on the PRoW network throughout the comprehensive site selection and appraisal process and identifies the potential to enhance PRoW networks (including the Thames Path National Trail) through restoration proposals outlined for a number of sites included in the Minerals Sites DPD. The Minerals Sites DPD also discusses the need for restoration proposals to develop canal network restoration (in certain locations) and cycle route network enhancement.</p> <p>Across the wider Minerals Development Framework the Minerals Core Strategy promotes a restoration led approach to site selection in order to seek to address potential restoration options at the plan preparation stage to inform planning applications.</p> <p>This restoration led approach is promoted through the Minerals Sites DPD and is reflected in the work</p>	<p>No significant difference.</p>
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<p><i>importance to them – ‘Local Green Space’ (76-78).</i></p>	<p><i>Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p>undertaken with NAM to develop restoration options that seek to improve the quality of local areas that have suffered landscape degradation, provide important habitat areas in line with BAP requirements/targets, provide accessible green spaces for communities, protect and enhance PRoW and develop new public access where possible and appropriate to do so.</p>	
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<b>9. Protecting Green Belt land (paras 79-92)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</p> <p>Boundaries should be set using <i>'physical features likely to be permanent' amongst other things</i> (85)</p>		<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	

<b>10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i>	<i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i>  <i>Does your plan actively support energy efficiency improvements to existing buildings?</i>  <i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i>	<p>The SA criteria that was developed was used to inform the site selection and appraisal work<sup>17</sup> that supported the development of the Minerals Sites DPD and considered the implications and impacts of climate change. Objective 13 of the Aggregate Minerals Site Allocations SA seeks to 'ensure that adequate measures are in place to adapt to the impacts of climate change'. A key sub-objective of this is to reduce the risk of flooding, and so SA/SEA assessment questions considered whether site options would result in minerals development within the floodplain, whether sites could mitigate against flooding/drainage issues, and establish whether flood</p>	<p>No significant difference.</p>

<sup>17</sup> See the Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)

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		<p>management could be improved/risk of flooding reduced. At every stage of the site selection process, all site options have been assessed against the criteria developed through the Minerals Site Selection and Site Appraisal Methodology and assessed through the process of SA.</p> <p>The NPPF retains the broad policy thrust (e.g. the sequential test) set out in Planning Policy Statement 25 (PPS 25)<sup>18</sup>, which aims to steer new development to areas with the lowest probability of flooding. The NPPF technical guidance document also refers to sand and gravel working as 'water-compatible development', which is consistent with the now replaced PPS 25.</p> <p>The Minerals Sites DPD does fully consider potential impacts on the 'water environment' and flood risk issues. Issues concerning the water environment formed part of the initial Sustainability Appraisal (SA) criteria informing the process of site selection.</p> <p>Furthermore the formation of the</p>	
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<sup>18</sup> Planning Policy Statement 25: Development and Flood Risk (Revised, March, 2010).

		<p>Minerals Sites DPD has been informed by Hydrogeological Impact Assessment findings (where necessary) and consultation with the Environment Agency. The Minerals Sites DPD explicitly states the need for any applicant to undertake a Flood Risk Assessment (FRA) with any planning application. A robust construction method statement and Hydrogeological Impact Assessment will also be required to address potential issues of groundwater protection.</p> <p>The Minerals Sites DPD also adopts an approach aimed at reducing vehicle mileage and HGV movements, by bringing forward blocks of land and extensions to existing sites, where appropriate, rather than new quarry sites in locations considered to be less sustainable from a transport perspective.</p> <p>Through the proposed restoration objectives, the Minerals Sites DPD seeks to create a diverse range of appropriate habitats that will aid in climate change adaptation and mitigation.</p>	
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<p>Help increase the use and supply of renewable and low carbon energy (97).</p>	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</i></p>	<p>The Minerals Development Framework sets out a clear policy vision to delivering a sustainable approach to resource management. Strategic Objective 1 (Managing Mineral Resources) of the Wiltshire and Swindon Minerals Core Strategy<sup>19</sup> promotes a vision for the reliance on primary mineral resources in Wiltshire and Swindon to be reduced, firstly through more efficient use of the primary resource and reducing the amount of mineral waste, and secondly through the use of recycled and secondary aggregates. Alongside this, the Wiltshire and Swindon Minerals Core Strategy DPD also identifies that the use of alternative construction materials (e.g. wood, glass and metal) will need to be encouraged along with maximising the availability of recycled and secondary resources as part of an overall sustainable minerals strategy.</p> <p>This approach, established in MCS1 and MCS2 of the Wiltshire and Swindon Minerals Core Strategy, has been taken forward through to the</p>	
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<sup>19</sup> Wiltshire and Swindon Minerals Core Strategy DPD (June, 2009)



		development of the Minerals Sites DPD. SA Objective 10 of the site selection and appraisal work <sup>20</sup> that supported the Minerals Sites DPD set out the intention to 'minimise waste and the use of non-renewable minerals resources and where possible promote the use of renewable resources'. Reducing reliance upon primary, land-won minerals in favour of increasing the contribution made by secondary and/or recycled materials is in line with the principles of the NPPF.	
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<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

<sup>20</sup> See the Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August, 2009)

<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>A number of NPPF principles concerned with 'conserving and enhancing the natural environment' are relevant to the Minerals Sites DPD. Where practical, the councils have sought to use areas of poorer quality land in preference to that of higher quality. However, in allocating some best and most versatile agricultural land for mineral extraction, the Minerals Sites DPD recognises the economic imperative of providing material to support the growth and development of Wiltshire and Swindon's principal settlements. This is compliant with the NPPF statement that "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land" (paragraph 112).</p> <p>With regard to minimising impacts on biodiversity, the NPPF declares that planning policies should "plan for biodiversity at a landscape-scale across local authority boundaries" (paragraph 117). This is particularly relevant to the development of preferred restoration objectives for sites included within the Minerals Sites DPD. In the Upper Thames</p>	<p>No significant difference.</p>
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		<p>Valley area, Wiltshire and Swindon have worked collaboratively with Gloucestershire County Council for many years on plans for the Cotswold Water Park (e.g. the CWP Masterplan). At the site extensions to Brickworth Quarry, to the south east of the plan area and in close proximity to the New Forest National Park, restoration to lowland mixed deciduous woodland has been identified as the preferred objective for the site following engagement with the National Park Authority. The councils held a workshop event<sup>21</sup> with key stakeholders (and the minerals industry), which helped to develop suitable restoration objectives for each site (detailed in paragraph 3.8 of this statement) at a landscape scale.</p> <p>The Minerals Sites DPD is supported and informed by a detailed and robust evidence base (including SA/SEA and HRA) and the findings of detailed assessments on key subjects (ecology being one such key subject) carried out for each site option have been used to inform the issues that</p>	
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<sup>21</sup> Wiltshire and Swindon Nature After Minerals (NAM) Report of Stakeholder consultation event (August, 2011)

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		<p>will require addressing at the planning application stage for each site as set out in the DPD.</p> <p>Biodiversity policies included in the Minerals Core Strategy and Development Control Policies DPD's and have been used in the formation of the Minerals Sites DPD – promoting strong biodiversity principles across the Minerals Development Framework.</p>	
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<p><b>12. Conserving and enhancing the historic environment (paras 126 – 141)</b></p>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>The importance of the historic environment in Wiltshire and Swindon is highlighted through approaches detailed in the Minerals Core Strategy and Development Control Policies DPD's and have been used in the formation of the Minerals Sites DPD (informing SA criteria during site selection and receiving detailed consideration in site profiles within the DPD).</p> <p>Furthermore, the Councils have engaged with, and sought the advice of, the Wiltshire County Archaeologist and English Heritage at all stages of the Minerals Sites DPD preparation.</p>	<p>No significant difference.</p>

<p><b>13. Facilitating the sustainable use of minerals (paras 142-149)</b></p>			
<p><b>What NPPF expects local plans to include to deliver its objectives</b></p>	<p><b>Questions to help understand whether your local plan includes what NPPF expects</b></p>	<p><b>Does your local plan address this issue and meet the NPPF's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>

<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</p>	<p><i>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</i></p>	<p>Each site option considered in the development of the Minerals Sites DPD has been assessed against potential impacts on the natural and historic environment and on human health. In 2009/10, the councils undertook an extensive constraints sieving exercise across the five Mineral Resource Zones (MRZs)<sup>22</sup> in Wiltshire and Swindon. This sieving exercise, informed by the councils' sustainability appraisal (SA) methodology<sup>23</sup> and assessment criteria, was used to identify further site options in addition to those put forward by the minerals industry. The results of this sieving exercise<sup>24</sup> demonstrated that significant areas of unexploited resource are highly constrained and/or inaccessible in terms of basic highway connectivity. However, through this exercise, owners of potentially mineral bearing land were contacted and a total of 62 site options were put forward for initial consideration.</p>	<p>The councils consider that they have taken all reasonable steps to ensure that the capacity of the plan area to deliver the requirements of the sub-regional apportionment has been fully tested against relevant sustainability criteria, in line with previous national policy guidance as expressed in MPS1 paragraph 3.9; and the new NPPF requirements.</p> <p>In line with recommendations made by the Minerals Products Association, the NPPF (paragraph 45) clearly stipulates</p>
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<sup>22</sup> The Mineral Resource Zones are identified in the adopted Minerals Core Strategy as broad areas of search for future sand and gravel and soft sand extraction in Wiltshire and Swindon.

<sup>23</sup> 'Wiltshire and Swindon Aggregate Minerals Site Selection and Site Appraisal Methodology (August 2009)' Incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive.

<sup>24</sup> 'Wiltshire and Swindon Aggregate Minerals Site Allocations DPD – Evidence Report. The results of a constraints sieving exercise applied to remaining sand and gravel resources in Wiltshire and Swindon (March 2010)'.

		<p>Although many of the 62 site options would have presented potentially significant issues if they were to be developed as quarries, the councils included them in an initial site options report to provide stakeholders and communities with a meaningful opportunity to present additional information about the suitability of the sites. The primary purpose of this early engagement exercise was to help inform subsequent decision making processes; and to demonstrate that all reasonable site options had been fully considered.</p> <p>Following this initial consultation and further discussions with colleagues from the councils' Development Management team, 40 initial site options were removed from further consideration on the basis that working the resources would likely lead to overriding environmental constraints. In addition to the work undertaken by council officers, some of those initial (40) site options were withdrawn from further consideration by the landowner. This left 22 site options remaining for further detailed</p>	<p>that local authorities should base their provision rate on the basis of a rolling average of the past 10 years production/sales. For Wiltshire and Swindon, this would equate to a local forecast rate of 1.1 million tonnes per annum. It is therefore reasonable to conclude that a local forecast of 1.2 million tonnes per annum (as the councils are proposing) more closely reflects recent demand than figures previously derived from national and regional forecasts, and would also allow some flexibility to account for changing market conditions or an upturn in production as and when the economy dictates.</p>
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		<p>assessment.</p> <p>The further detailed assessments were undertaken by council officers with expertise in disciplines such as ecology, landscape, archaeology, human health, transport, historic and water environment. The results of these assessments were then used to inform the appraisal and ranking of site options against the councils' adopted sustainability criteria<sup>25</sup>. This reduced the number of site options considered suitable for development to 7 for the plan period to 2026. The final list of 7 site options are considered by the councils to offer the best and most practicable option for delivering a locally derived forecast provision requirement – the site options are estimated to yield a total of 10.86 million tonnes over the period to 2026.</p>	
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<sup>25</sup> The results of all work undertaken (Incorporating the requirements of the Strategic Environmental Assessment [SEA] Directive) on site identification following initial sieving work i.e. outcomes of consultation on the initial 62 potential site options, detailed assessment of 22 remaining options and identification of the final site options to take forward is documented through the 'Wiltshire and Swindon Minerals and Waste Development Framework – Summary of minerals site appraisal matrices (November 2011)' report.

## Planning policy for traveller sites

The CLG 'Planning policy for traveller sites' was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. 'Planning policy for travellers sites' should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers which respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (lpas) make their own assessment of need for the purposes of planning
- That lpas work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green Belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Early and effective community engagement with both settled and traveller communities.	Has your evidence been developed having undertaken early and effective engagement including discussing travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

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<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<p>Can you demonstrate that you have a clear understanding of the needs of the traveller community over the lifespan of your development plan? <b>Have you worked collaboratively with neighbouring local planning authorities?</b> Have you used a robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions?</p>		
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<b>Policy B: Planning for traveller sites (paras 7-11)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring lpas (8)	Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)	The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

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<p>Consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.</p>	<p>Have you identified constraints within your local area which prevent you from allocating sufficient sites to meet likely future need? If so have you prepared a joint development plan or do you intend to do so? Is the reason for this clearly explained?</p>	<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	
<p>Relate the number of pitches and plots to the circumstances of the specific size and location of the site and the surrounding population size and density.</p>		<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	
<p>Protect local amenity and environment.</p>		<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	

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<p>Set criteria to guide land supply allocations where there is identified need.</p>	<p>Has an up-to-date assessment of the need for traveller sites been carried out? If an unmet need has been demonstrated has a supply of specific, deliverable sites been identified based on the criteria you have set? Where there is no identified need, have criteria been included in case applications nevertheless come forward?</p>	<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	
<p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>Have your policies been developed taking into account criteria a-h of para 11 of the policy</p>	<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	



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<b>Policy C: Sites in rural areas and the countryside (para 12)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
When assessing the suitability of sites in rural or semi-rural settings lpas should ensure that the scale of such sites do not dominate the nearest settled community?		The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

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<b>Policy D: Rural exception sites (para 13)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
If there is a lack of affordable land to meet local traveller needs, Lpas in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.	If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites <b>in perpetuity?</b>	The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

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<p><b>Policy E: Traveller sites in Green Belt (paras 14-15)</b></p>			
<p><b>What the policy for traveller sites expects local plans to include to deliver its objectives</b></p>	<p><b>Questions to help understand whether your local plan includes what the policy expects</b></p>	<p><b>Does your local plan meet the policy's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p>	<p>Have you made an exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site? Has this alteration been done through the plan-making process and is it specifically allocated in the development plan as a traveller site only</p>	<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	

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<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

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	<p>Have you considered including travellers sites suitable for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents)? If mixed sites are not practicable have you considered the scope for identifying separate sites for residential and for business purposes in close proximity to one another? Have you had regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment? <b>NB Mixed use should not be permitted on rural exception sites</b></p>	<p>The councils do not consider this policy to be relevant to the Minerals Sites DPD.</p>	
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<b>Policy G: Major development projects (para 19)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
	Do you have a major development proposal which requires the permanent or temporary relocation of a traveller site? If so has a site or sites suitable for the relocation of the community been identified (if the original site is authorised)?	The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

## Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
<p>Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)</p>	<p><i>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</i></p>	<p>The NPPF promotes a holistic Local Plan approach for addressing planning issues on a geographical basis. For Wiltshire and Swindon, the development of the Minerals Development Framework has been prepared thus far predominantly in line with the requirements of the Town and Country Planning (Development) (England) Regulations 2004 (as amended). However, the councils have maintained a close eye on national policy and have proceeded with the development of the Minerals Sites DPD despite significant changes to the planning system.</p>	

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		<p>The Minerals Sites DPD, whilst still in conformity with the NPPF requirements, is very much a product of its day and forms the final part of the Minerals Development Framework.</p> <p>Despite the changes to the planning system it is clear that there remains a commitment to a managed aggregates supply system premised upon detailed, long-term forecasting. With this in mind, and through the identification of 7 suitable site options, the Minerals Sites DPD plans for the sustainable release of mineral to provide a steady, continual and secure supply until 2026.</p>	
<p><b>Local Plans should:</b></p> <ul style="list-style-type: none"> <li>Plan positively (para 157)</li> </ul>	<p><i>Have you objectively assessed development needs and planned for them?</i></p> <p><i>If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)</i></p>	<p>The councils consider that the Minerals Sites DPD, based on a strategy which seeks to meet an objectively assessed need for sand and gravel through the consideration of all site options and identification of suitable and deliverable sites for inclusion in the plan, will positively contribute to the achievement of sustainable development and is therefore positively prepared.</p>	<p>No significant difference.</p>



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<b>Using a proportionate evidence base (paras 158-177)</b>			
<b>What NPPF identifies in relation to the development of local plans</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)</b>	<b>Does your local plan meet the NPPF's expectations? How significant are any differences?</b>
<b>Defence, national security, counter-terrorism and resilience</b>	See para 163	The councils do not consider this policy to be relevant to the Minerals Sites DPD.	

<p><b>Ensuring viability and deliverability</b></p> <p>The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)</p>	<p><i>To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements? In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (173)? To what extent have the likely cumulative impacts on development in your area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards been assessed to ensure that the cumulative impact of these standards and policies</i></p>	<p>The proposals set out in the Minerals Sites DPD have been appraised on the basis of ensuring that necessary infrastructure improvements can be delivered without leading to adverse impacts. Specific details (e.g. access / egress design) will be a matter for a subsequent planning application to determine. At no stage of the plan preparation process has viability been presented as an encumbrance to development.</p> <p>The appraisal processes, employed throughout the plan preparation process have investigated the potential direct, indirect and cumulative impacts associated with minerals development on local and strategic highway networks. The policy aspirations of the councils' accords with the principles set out across national policy and thereby impacts are objectively addressed wherever possible at the plan level. As set out above, specific details relating to design and implementation of minerals proposals will be a matter for detailed planning applications to fully address.</p>	<p>No significant difference.</p>
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*do not put implementation of the development plan at serious risk, and facilitate development throughout the economic cycle (174)?*

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Examining Local Plans (para 182)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
<p>Authorities should submit a plan for examination which it considers is sound, including being ....</p>	<p><i>Positively prepared</i></p>	<p>The Councils believe that the Minerals Sites DPD is positively prepared. Site selection has been inclusionary throughout, assessing all site options against a fixed set of Sustainability Appraisal criteria.</p> <p>Furthermore, through an assessment of local need the Councils have proposed a forecast rate that is appropriate, achievable but that is not absolute and leaves opportunities to grow in line with economic development. The DPD follows 'plan, monitor and manage' principles—bringing sites forward as required and in line with monitoring policies developed through the Minerals Sites DPD.</p>	<p>No significant difference.</p>

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		<p>The DPD is closely aligned with key policies of the NPPF, it promotes the most sustainable site options and provides sufficient supply of mineral to enable plans for development and growth. Through an assessment of all site options against sustainability criteria (biodiversity, historic environment, landscape character etc), the options proposed in the DPD have been selected as they have the lowest overall impact, and where impacts are possible - robust mitigation and restoration gains are proposed.</p>	
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