

MLPpub166					1	1	7.26 – 7.31	Policy S6 Allocation at Site 6 Coney Grey Farm, Ryton on Dunsmore	Figure 1.16 Site 6 Coney Grey Farm, Ryton on Dunsmore	1																																											representatives (Councillors –County –District –Parish, local businesses, local organisations) There should be an advertised 24hour contact person by telephone and email The land must be reinstated afterwards to the same contour levels as it was before (not lower) Should any site be chosen for extraction then all of the above requirements should be included in the permissions granted to the operator. Geoffrey Tooke, Clerk to Ryton on Dunsmore Parish Council, XXXX CV8 2EY, 11th January 2017 The Council has the following comments on Policy S6 Allocation at Site 6 Coney Grey Farm, Ryton on Dunsmore The plan is deficient in the following areas: <input type="checkbox"/> The plan does not take into account that there are residential properties on the norther boundary, southern boundary and within the site area. <input type="checkbox"/> There is no routing plan for vehicles entering and leaving the site to prevent traffic entering the village of Ryton on Dunsmore, particularly restricting traffic from using the Leamington Road A445 between the A423 an A45. Any extraction without a routing plan is not acceptable. <input type="checkbox"/> The stand-off from individual properties must be 200m not 100m as stated in the plan. Anything less that 200m is not acceptable <input type="checkbox"/> Any planning application must have better noise and dust prevention measures, this should also be stated in the plan so that there is no misunderstanding. The Council has said before, but sees no evidence in the current plan, so repeats its request and expects that the same conditions that were applied to the recent Wolston Fields Farm sand and gravel extraction would become the normal minimum requirements for any operation extraction site. <input type="checkbox"/> Where there are 10 or more properties there should be no extraction or processing within 200m <input type="checkbox"/> There should be an agreed and enforceable lorry routing plan. All lorries should be identifiable and covered. <input type="checkbox"/> The roads and lorries must have the ability to be kept clean to maintain road amenity and safety <input type="checkbox"/> There should be regular (recommended quarterly) liaison meetings between the operator and local representatives (Councillors –County –District –Parish, local businesses, local organisations) <input type="checkbox"/> There should be an advertised 24hour contact person by telephone and email <input type="checkbox"/> The land must be reinstated afterwards to the same contour levels as it was before (not lower) Should any site be chosen for extraction then all of the above requirements should be included in the permissions granted to the operator. Geoffrey Tooke, Clerk to Ryton on Dunsmore Parish Council, XXXX 11th January 2017	1		1									
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The proposal is not "Positively Prepared" because it ignores the Local Neighbourhood Plan and Warwickshire C.C. have ignored the publication of the LNP from Barford which impacts on this site. Our village community created a robust LNP which insisted that "irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture". This site contains some of the highest quality graded agricultural land in Warwickshire and should be retained at all times and not used for mineral extraction. The proposal is not "Positively Prepared" due to the potential impact of dust emissions from the site. There is a prevailing SW wind across this site which is in close proximity to village of Barford. The village has over 200 children attending primary school and nursery school every year. The dust emissions will result in poor health of children and residents of the village throughout the period of the extraction. Despite modern techniques of dampening dust with water this is not possible to contain at all times and dust will blow into the village with dire long term serious health consequences. The proposal is not "Positively Prepared" as the impact of traffic has not been taken fully into consideration. Traffic levels in the last 12 months have increased hugely on Barford bypass and through the village. The thousands of homes currently being built at Wellesbourne and Barford will increase traffic volumes. The site 4 will bring extra lorries onto/off these busy roads and the impact of increased risk of accidents will be greatly increased. It is impossible to extract the minerals without large commercial lorries entering / leaving this site and is totally unsuitable given impact on motorway network. Any traffic delays on the Barford Bypass always have a serious back up delay on Longbridge island and the adjoining M40/A46/M42 and no consideration of this has been taken into account in the proposals. The proposal is "Not Justified/ Not Effective" as the reinstatement of the site cannot be justified and proven. Visits to other sites in other counties of mineral extraction suggest that the high quality agricultural land cannot be replaced to the same standard once extraction process has been complete. The restoration of the site cannot be guaranteed. The proposal is "Not consistent with National Policy" as it does not take into account the fact that the planning permission to extract minerals was refused on Appeal in 1993 when the Secretary of State conceded that a number of environmental objections were "significant". Nothing has materially changed since then and therefore this policy should still apply. The proposal is "Not Justified" as there will be a blight on certain properties such as Forge Cottage, Wellesbourne House plus properties in Barford at Sandy Way & Wasperton Lane. This project will lead to difficulty in selling properties, increased insurance premiums for those properties "blighted" in Barford which, at present, is impossible to quantify. The worry and concern suffered by local residents of potential proposal development cannot be quantified and thereby lies the problem.

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MLPpub1 612	1	1	1	1.5 - 1.11		1	1	1	1	1	1	1	1	1	1	1	1	1	1	These paragraphs misrepresent Government policy, because they deal only with making provision for primary minerals and therefore do not present a proper account of what mineral local plans are required to enable the delivery of, as set out at Section 13 of the National Planning Policy Framework (NPPF) headed "Facilitating the sustainable use of minerals". 2. Whilst the source of the first sentence of paragraph 1.5 is not given, it is assumed to be paragraph 145 of the NPPF, which however does not say that mineral planning authorities (MPAs) should plan for a steady and adequate supply of "minerals including the provision of certain amounts of 'aggregates' i.e. sand and gravel and crushed rock", but merely uses the simple term "aggregates". 3. The difference is critical, because the word "aggregates" is not only concerned with (primary) minerals, but also encompasses secondary and recycled aggregates. This fact is apparent from the following bullet points to paragraph 145 of the NPPF that in planning for a steady and adequate supply of aggregates the following (as summarised) is required: <ul style="list-style-type: none"> 1st bullet: Preparation of a Local Aggregate Assessment of all supply options - including marine dredged, secondary and recycled sources; 3rd bullet: To make provision for the land-won and other elements of the Local Aggregate Assessment in mineral plans; 4th bullet: To take account of published National and Sub National Guidelines on future provision; 5th bullet: Using landbanks of aggregate minerals reserves to indicate the additional provision that needs to be made for aggregate extraction and alternative supplies in mineral plans. 4. The underlining has been added to show clearly that the relevant Government guidance relied upon in the Plan is not only concerned with making provision for primary extraction but also for alternative sources of aggregates. In addition the reason for the reference to the 4th bullet of NPPF paragraph 145 is that the National and Sub National Guidelines, to which account must be had in considering future aggregate provision, include figures for alternative materials - as well as for primary minerals. 5. Indeed, not only does the NPPF require mineral plans to include provision for alternative aggregates, it makes clear at paragraph 143 (2nd bullet) that the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials should be taken account of before considering extraction of primary materials (emphasis added). 6. The focus in the Plan should therefore be in the first instance on what provision is there/can there be for alternative aggregates, because only then should the extra that is needed from primary sources be considered. Unfortunately, however, the Plan does not do this, instead these introductory paragraphs consider only primary extraction, setting the tone for the remainder of the Plan, with the issue of alternative materials not being dealt with until much later in the Plan as an afterthought. 7. Comments relating to the need to consider all aggregate supply options in these introductory paragraphs to the Plan were also made on the previous consultation on the Preferred Option and Policies in December 2015. Unfortunately these comments do not appear to have been recorded in Appendix F to the Consultation Report. 8. In summary the introductory paragraphs to the Plan are not sound because they are: Not positively prepared. By not properly representing Government policy and dealing only with the provision of primary minerals they have not been prepared with the objective of contributing to the achievement of sustainable development. Not justified. They do not represent the most appropriate strategy, when considered against the alternative (and correct) approach of focussing first on the contribution that can be made to the need for minerals by alternative materials, and reflect an approach of continued over-reliance on primary aggregate, which is inconsistent with and counter-productive to delivering sustainable development. Not effective. They neglect to address the need to deliver the sustainable use of minerals, and are at odds with the Plan objective of reducing the overall demand for primary mineral extraction for construction aggregates. Not consistent with national policy. They fail to satisfy the NPPF's requirement to consider using alternative materials in preference to primary materials (paragraphs 143 and 163), and are incompatible with the NPPF's requirement that the planning system should play an active role in guiding development to sustainable solutions (paragraphs 8 and 142).	In order for the Plan to be sound, the following changes need to be made to the introductory paragraphs of the Plan: The first sentence of paragraph 1.5 must be amended to read as follows Government guidance requires that Mineral Planning Authorities (MPAs) should plan for a steady and adequate supply of aggregates. A new paragraph needs to be inserted before paragraph 1.7 with the following heading and suggested text: Secondary and Recycled Aggregate Provision in Warwickshire The National Planning Policy Framework states that MPAs should so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously. Warwickshire has a number of recycled aggregate sites and a source of secondary aggregate in the residual cement kiln ash from the cement manufacturing process at Rugby Cement Works. Whilst recycled and secondary aggregate may not currently be entirely interchangeable for primary aggregates there is potential to increase both the volumes and performance of recycled aggregate through the introduction of new wash plant technology, so that it can increasingly provide a viable alternative to the extraction and use of landwon mineral. These changes would remedy the failings in relation to the tests of soundness that have been identified at paragraph 8 of the comments in the preceding section 5, and would make the Plan legally compliant in respect of the requirement to have regard to national planning policy.			1	1		
																				Amounts for the provision of alternative aggregates should be included in the Plan and ideally in this policy in order for it to be consistent with national policy. 2. The National Planning Policy Framework (NPPF) requires at paragraph 145 that mineral planning authorities (MPAs) should plan for a steady and adequate supply of aggregates and the 3rd bullet is a clear indication that provision needs to be made for the requirement in the mineral plan for both the landwon and other elements (of aggregates) through the Local Aggregate Assessment (LAA) process. 3. Furthermore the 2nd bullet of paragraph 143 of the NPPF requires account to be taken of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of minerals, before considering extraction of primary materials (emphasis added). 4. The LAA must therefore first and foremost assess what could be supplied by alternative aggregates, because only then can the extra that is needed from primary sources be determined. For secondary aggregate this means identifying the potential sources and the likelihood of their availability and use. For recycled aggregate the process involves determining the quantity of waste arisings, the level of this that is recycled, and then the quantity of this that with improved performance could theoretically be recycled or have value added to as is a direct substitute for virgin aggregate. 5. Unfortunately whilst the LAA has considered the existing availability of alternative aggregate supply, it has not carried out any analysis to consider the potential for future provision, and this is despite the acknowledgement at page 28 of the LAA that there has been a reduction in primary aggregates sales, with a parallel growth in construction and demolition waste recycling in the county. 6. The lack of this provision would have the effect of a continued over-reliance on primary aggregate and could lead to unduly increasing the annual requirement for primary aggregate through the LAA. For example if the supply of alternative aggregate is low, because of a perceived lack of any need to make							

more provision for it (or generally more positive approach to promoting use of secondary and recycled materials), sales of primary aggregate might have to increase to fulfil the county's construction needs. 7. Such an approach does not demonstrate any compliance with the NPPF requirement(s) to provide for a steady and adequate supply of aggregates in a plan, which is to be based on adequate, up-to-date and relevant evidence (paragraphs 145 and 158). The National Planning Policy Guidance (NPPG) clarifies (ID: 12-014-20140306) that an appropriate and proportionate evidence is essential for producing a sound plan, and NPPF paragraph 163 (under the heading "Using a proportionate evidence base") makes clear that MPAs need to assess the projected demand for the use of minerals, taking full account of opportunities to use materials from secondary and other sources which could provide suitable alternatives to primary materials. The NPPG (at ID: 27-063-20140306) further identifies recycled and secondary aggregates as the first two supply options on which the LAA should be based, with land-won resources as the last 8. In planning for a steady and adequate supply of aggregates NPPF paragraph 145 identifies (4th bullet) that account should be taken of published National and Sub National Guidelines on future provision, and the NPPG makes clear (ID: 27-068-20140306) that these will provide individual mineral planning authorities, where they are having difficulty in obtaining data, with some understanding or context of the overall demand and possible sources that might be available, and that they are capable of being a material consideration when determining the soundness of mineral plans. It is apparent from the LAA that Warwickshire is one of those authorities, which is having difficulty in assessing the potential future provision that should be made, and therefore rather than simply not addressing the issue, as has been done, account should instead be had to the national and sub-national guidelines to determine the provision that needs to be made in Policy MCS1. To do otherwise would not be supported by robust evidence or be properly justified having regard to local and national need, and would be contrary to National policy. The most recent national and sub-national guidelines, the National and regional guidelines for aggregates provision in England 2005-2020, published by the Communities and Local Government in June 2009, indicate that for the West Midlands there should be an annual supply of 6.25 million tonnes per annum of alternative materials. Calculated on the basis of the equivalent percentage apportionment (10.3%) found to be appropriate for Warwickshire for sand and gravel provision (West Midlands Regional Aggregate Working Party Annual Report 2010) this would indicate that Warwickshire should be providing for a supply of at least 644,000 tonnes of alternative aggregates per year. 10. The Plan complies with the NPPF by making provision for sand and gravel and crushed rock with reference to the LAA in policies MCS2 and MCS3, and must also do so for alternative aggregate to comply with national policy and therefore to be sound. 11. The absence of a target for the supply of recycled and secondary aggregates policy does not make for a properly positive approach to minerals planning as required by the NPPF. In order to comply with the tests of soundness (paragraph 182 of the NPPF) the plan must be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements, is appropriate, effective and sustainable (emphasis added). For minerals this means both making provision in the local plan for the supply of alternative materials (NPPF paragraph 145 3rd bullet), and seeking to maximise the potential contribution that they can make, i.e. by determining the extent that this can be done before considering the extraction of primary materials (NPPF paragraph 143 2nd bullet). 12. The NPPF also requires plans to set out a positive vision for the future of the area, and to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency (1st core planning principle NPPF paragraph 17). To this end NPPF paragraph 154 makes clear that local plans should be aspirational but realistic, setting out clear policies on what will or will not be permitted and where, and only having policies that provide a clear indication of how a decision maker should react to a development proposal. As currently drafted the Plan does not comply with this National policy, as it is entirely unclear how the objectively assessed development needs of alternative aggregate supply will be met. Paragraph 8.3 of the Plan promotes maximising the use of alternative sources of materials, but Policy MCS1 seeks only to maintain "a supply". The lack of any quantified provision provides no certainty about how new development proposals for aggregate recycling will be dealt with and lacks the aspirational approach required by National policy. The Plan does not provide any real encouragement for improved levels of recycled or secondary aggregate provision that could more sustainably displace the need that has been identified for primary extraction. 13. Comments relating to the need to quantify the provision that is to be made to the supply of minerals and materials from alternative sources in order to comply with national policy were also made on the previous consultation on the Preferred Option and Policies in December 2015. The Council's response to these comments has been that the words "so far as practicable" at 2nd bullet of paragraph 143 of the NPPF recognise the difficulty of quantifying and predicting the level of contribution that can be made and sustained. 14. Unfortunately, however, the Council has in its response confused NPPF paragraphs. The requirement for provision to be made in mineral plans is at paragraph 145 not paragraph 143. The paragraph 145 requirement is very clear; it is to make "provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans..." (3rd bullet), with the LAA notably having been required to include an assessment of all supply options – including secondary and recycled sources (2nd bullet). There is no limitation or qualifier about the extent to which provision for alternative aggregate sources needs to be made at NPPF paragraph 145. It is simply required. 15. Furthermore, the words "so far as practicable" at the 2nd bullet of paragraph 143 of the NPPF should not be interpreted as only meaning difficulties in quantifying this source of supply. They could also refer to factors such as for example: • no practicable sources in the MPA area of secondary aggregate; • no scope for further recycled facilities due to environmental constraints; or • full potential for aggregate recycling from available construction, demolition and excavation (CDE) waste sources already having been realised. With regard in particular to this last factor, this is not a position that has been reached in Warwickshire, and there is significant potential to increase both the volumes and performance of recycled aggregate. Aggregate recycling is now beginning to undergo significant advances in capability and new systems are in operation that enable the production of higher quality substitute aggregate from CDE waste, which can meet practically all building specifications. These are static processing plant systems, which are very similar to a mineral processing plant, but with added functions, which wash, screen and grade the waste, and manufacture recycled aggregate to a quality assured level that substitutes for and competes directly with land won minerals across the spectrum of building needs, including in concrete manufacture. Furthermore these plants can process mixed demolition and excavation waste containing high quantities of dirt (soils and clays) that a conventional system cannot. (The dirt is washed off and manufactured into a suitable material filler.

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It is strongly considered that this additional wording is not justified or consistent with national policy, because it would mean that a proposal for primary extraction (of an allocated site) could not be resisted even though the need might already be being met by alternative sources. This policy approach would lead to an unsustainable over-reliance on primary aggregates and/or unwarranted suppression of recycled aggregate production. 18. The LAA is required to be reviewed annually and this could produce a reduction in the annual requirement for primary aggregate and/or an increase in the assessment of future provision for alternative aggregate, which could mean that not all of the proposed allocated sites might need to be provided over the life of the Plan. This eventually needs to be built into the Plan, in order to safeguard against unnecessarily depleting the finite natural mineral resource, as opposed to securing its long-term conservation (as required by NPPF paragraph 142). 19. The Plan as currently drafted, without identifying in policy the provision that will be made to meet all the minerals needs of the county and by not prioritising the use of alternative materials fails the soundness test. 20. In summary Policy MCS1 is not sound because it is: Not positively prepared. By lacking a minimum level of alternative aggregate provision that should be made, it has not been structured on the basis of any objective assessment of the requirements for alternative aggregate supply and does not encourage provision from this source, contrary to the aims of achieving sustainable development. Not justified. It is not the most appropriate strategy, when considered against the alternative of identifying a minimum level of provision that should be aimed for, because it supports continued over-reliance on primary aggregate, which is inconsistent with and counter-productive to delivering sustainable development. Not effective. The lack of a minimum level of provision to be made by alternative aggregates, as guided by the national and sub-national guidelines published by the Government, will undermine the Plan objective of reducing the overall demand for primary mineral extraction for construction aggregates. Not consistent with national policy. The strategy, with regard to the lack of a minimum level of provision of secondary and recycled aggregate to be made, has not been based on a proportionate evidence base (as required by paragraph 158 of the NPPF). It fails to satisfy the NPPF's requirement to consider using alternative materials in preference to primary materials (paragraphs 143 and 163), to plan for a steady and adequate supply of alternative aggregates and take account of published national and sub-national guidelines on future provision as a guideline (paragraph 145). In addition it does not provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency, contrary to the NPPF's 1st core planning principle at paragraph 17, and is incompatible with the NPPF's requirement that the planning system should play an active role in guiding development to sustainable solutions (paragraphs 8 and 142).</p>	<p>In order for the Plan to be sound, the first part of Policy MCS1 should read as follows: The County Council will seek to maintain a supply of at least 644,000 tonnes per annum of materials from substitute or secondary and recycled materials and mineral waste and will take account of this when considering proposals to extract minerals in the County. This change would remedy the failings in relation to the tests of soundness that have been identified at paragraph 20 of the comments in the preceding section 5, and would make the Plan legally compliant in respect of the requirement to have regard to national planning policy.</p>	1		1	Bourton & Draycote Parish Council represents local residents who will be directly affected by the policies of the Plan, and considers that it is very important to be represented at the hearings into the relevant issues, in order to help inform the discussions and ensure that its views are fully taken into account.
																<p>1. It is entirely unclear how the figure of 8.022 million tonnes (mt) has been arrived at in Policy MCS2. A straightforward calculation of the 10 year average sales figure of 0.573 million tonnes per annum (tpa) multiplied by the 15 year plan period gives a requirement of 8.595 mt. 2. Paragraph 8.6 of the Plan states that the latest Local Aggregates Assessment (LAA) shows a need for 8.022 mt of sand and gravel to be provided over the life of the plan, and that to ensure that the annual predicted rate of production is maintained during the plan period eight sites need to be identified and provided for in the plan. However, there is in fact no mention that can be found in the latest LAA of a local plan requirement for sand and gravel amounting to 8.022 mt. The only references are a requirement of 8.595 mt in the table on page 3 and, on page 28, a 10.32 mt requirement calculated on the basis of the previous (2015) LAA rolling average of 0.688 mt - it would appear that this part of the 2016 LAA has not been fully updated to reflect the more recent sales figures. Notably 14 (not 15) years of the annual average sales of 0.573 million tpa gives the 8.022 mt figure. 3. In addition, even if the total plan requirement is actually 8.595 mt, what the policy or the supporting text must also do is clarify the remaining requirement that needs to be provided for in the Plan having taken account of already permitted reserves. As is clear from the 5th bullet point of the National Planning Policy Framework (NPPF) paragraph 145, the already permitted reserves - or landbanks - provide the basis for indicating the additional provision that needs to be made in the plan for new aggregate extraction and alternative supplies (emphasis added). 4. The LAA identifies that the existing permitted reserves at the end of 2015 amounted to 3.869 mt and that a further 3.4 mt were granted at Brinklow Quarry in June 2016, which gives a total permitted reserves figure of 7.269 mt. Accounting for further sales in 2016 and assuming those were at the level of the historical sales average of 0.573 mt (even though the 3 year average does not show this to have been likely), this would give a permitted reserves figure of 6.696 mt. The remaining requirement that the Plan therefore needs to provide for is in the order of 1.899 mt, (i.e. the 15 year Plan requirement of 8.595 mt minus the existing permitted reserves). 5. Nevertheless, Policy MCS2, together with its supporting text and cross-reference to Policy SO which proposes the allocation of eight new sites with reserves amounting to 8.48 mt (see also separate representation of Bourton & Draycote Parish Council on Policy SO), would have the effect of providing considerably more than this remaining requirement. The provision would amount to more than 4 times the total that is required, or about 27 years of supply - almost double that of the plan period (or in all likelihood even longer given the downward trend in sales as evidenced by the 3 year sales average). If the additional 3.4 mt of reserves recently approved in 2016 at Brinklow Quarry are not to be added to the landbank, because of the base date of the LAA (of 2015), then they should instead be identified as an allocated site, to safeguard against the doubling up of this new supply that is already available. 6. There is no requirement or justification for making provision beyond the end of the plan period at all, and let alone by this significant amount. The question of mineral supply beyond the end of this plan period is not for debate now, but is a matter for the rolling forward of the Plan at a later stage. To fix the planned approach that far in advance would not be an appropriate or proportionate approach. Circumstances are likely to have changed quite significantly before the end of the plan period (not least given the continuing downward trend in primary aggregates sales), and the proposed on-going nature of mineral planning provision will need to be subject to further review and consultation, as informed by the relevant considerations prevailing at that time. 7. The strategy is therefore fundamentally unsound, because it is based on a flawed evidence base - the development needs, which provide the starting point for the strategy, not having been properly or objectively assessed. This has resulted in Policy MCS2 promoting massive over-provision of a finite natural resource, contrary to the NPPF's aim that their long-term conservation should be secured, and runs directly counter to the key objective of a local plan that it must deliver sustainable development (NPPF paragraph 142 and 150). 8. In addition to this basically erroneous approach, there are other concerns about the wording of policy MCS2. 9. In the first instance the policy does not contain sufficient flexibility to respond to changing circumstances. The first part of Policy MCS2 appropriately seeks to provide for a steady and adequate supply of sand and gravel based on the latest LAA, as required by paragraph 145 (1st bullet point) the NPPF. The LAA is required to be conducted annually, and therefore the assessment of the demand and supply of aggregates is likely to fluctuate year on year, and may well lead to changes in the mineral provision that will be needed over the life of the Plan. Unfortunately the second part of Policy MCS2 does not reflect this position, and makes categorical provision for a fixed amount of aggregate supply of sand and gravel derived from the 2016 LAA figures (only). In these circumstances, should future LAAs result in a reduction in the annual requirement for primary aggregate and/or an increase in the assessment of future provision for alternative aggregate, it would not be possible with the policy as drafted to resist proposals at the allocated sites, even though there might not be any need for the mineral. 10. This policy approach runs directly counter to the NPPF's guiding principle for plan-making of seeking to achieve sustainable</p>					

MLPpub1 614	1	1	1	1	1	MCS2	1	1	1	1	1	1	1	1	1	1	1	1	development (paragraphs 150 - 152), because it could result in the unnecessary consumption of finite natural mineral resources, as opposed to securing their long-term conservation (as required by NPPF paragraph 142). 11. It is strongly considered therefore, that the wording of this part of the policy as currently drafted is not sound, because it is not justified or consistent with national policy. To remedy this position there should be additional references to the production rate being in accordance with the requirement in the most recent LAA, and any planning permissions at the allocated sites being forthcoming subject to there being a need to ensure that a landbank of permitted reserves equivalent to 7 years of supply is maintained. This would provide suitable flexibility to enable a steady and adequate supply, rather than an excess of supply, which the policy as currently drafted, could produce and would thus be entirely counter-productive to the Government's aim of facilitating the sustainable use of minerals. 12. The second point concerns the third part of the policy and the proposed wording to maintain a landbank "throughout the plan period". Whilst there is no objection to seeking to maintain a landbank of permitted reserves, the reference to throughout the plan period is unnecessary and would have the same effect as the fundamental objection to the policy raised above, in that it provides for continuing supply in accordance with this plan strategy beyond its life time, which for the reasons given is not the correct approach, because an alternative approach may be found to be more appropriate for rolling forward mineral provision. 13. Policy MCS2 and the strategy for sand and gravel provision, by promoting massive over-provision and without including the caveat that the requirement for sand and gravel should be in accordance with the most recent LAA fails the soundness test. 14. In summary Policy MCS2 is not sound because it is: Not positively prepared. By promoting vastly more provision for primary minerals than is justified and not including safeguards against over reliance on primary extraction, the policy has not been prepared with the objective of securing the long-term conservation of this finite resource or contributing to the achievement of sustainable development. Not justified. It is not the most appropriate strategy, when considered against the alternative of an approach that provides for the level of supply that is actually required, and allows for an adjustment of the level of primary aggregate provision dependent on the outcome of the most recent LAA. Not effective. It would lead to a considerable over provision of primary aggregate, which is inconsistent with and counter-productive to delivering sustainable development. Not consistent with national policy. The policy, by failing to account for already permitted reserves and include provision to ensure that the demand for primary aggregates is determined through the most recent LAA, would lead to unnecessary depletion of finite resources and is incompatible with the NPPF's requirement that the planning system should play an active role in guiding development to sustainable solutions (paragraphs 8 and 142).	In order for the Plan to be sound, the second and third parts of Policy MCS2 should read as follows: Warwickshire' total requirement over the 15 year plan period is 8.595 million tonnes at an average production rate of 0.573 million tonnes per annum. The Council aims to achieve this production rate, or such other requirement identified in the most recent LAA throughout the plan period, from existing permitted reserves and by granting planning permission at the sites allocated by Policy SO, where there is a need to ensure that a landbank of permitted reserves is maintained. Planning permission will be granted for sand and gravel working to enable a 7 year land bank of permitted reserves to be maintained. Paragraph 8.6 of the Plan also needs to be altered to reflect the correct total plan requirement, then quantify both the level of existing permitted reserves and the remaining requirement to be provided for in the Plan (of in the order of 1.899 mt), and to reduce the number of sites that need to be identified and provided for in the Plan accordingly. These changes would remedy the failings in relation to the tests of soundness that have been identified at paragraph 14 of the comments in the preceding section 5, and would make the Plan legally compliant in respect of the requirement to have regard to national planning policy.	1	1	Bourton & Draycote Parish Council represents local residents who will be directly affected by the policies of the Plan, and considers that it is very important to be represented at the hearings into the relevant issues, in order to help inform the discussions and ensure that its views are fully taken into account.
MLPpub1 615	1	1	1	1	1	S1	1	1	1	1	1	1	1	1	1	1	1	1	1. For the reasons given under the representations of Bourton & Draycote Parish Council on Policy SO, Site 1 Bourton on Dunsmore should not be allocated for mineral development, and therefore Policy S1 needs to be deleted. 2. The strategy for sand and gravel provision in the Plan, including the proposed allocation of the site the subject of Policy S1, promotes considerable over-provision of the requirement for land-won aggregate and fails the soundness test. 3. In the very unfortunate event that Policy S1 is not deleted, then it is imperative that the site is not restored using imported inert fill, but that restoration is to a wetland after use. 4. Comments relating to the reasons why inert fill should not be brought to the site to effect its restoration were also made on the previous consultation on the Preferred Option and Policies in December 2015. The issues that were raised related to serious concerns about exacerbating flood risk elsewhere and harm to drinking water sources. 5. In summary, the site acts as a catchment reservoir acting as a sponge for rainfall that eventually drains down to the River Leam. The underlying geology of the sand and gravel is impermeable clay, which when the gravel reservoir is saturated additional water cannot pass through and so issues out at the surface of the clay, causing rapid flooding in the local area at times of high rainfall. Backfilling of the site with inert fill, which would have a high clay content, and generally be impermeable in nature, would not replace the reservoir capacity and would increase the likelihood of flooding in the local area. In addition the River Leam is protected for drinking water extraction, and since water drains into it from the site, there is a risk that any contaminants in the fill would cause a risk of pollution to local drinking water. Consequently the Parish Council considers that if the site is to be worked, it must be reinstated as a permanently maintained wetland with suitable water drainage control to as act as a reservoir. 6. The only response to these comments that can be found is in the Summary of Consultation report, and states: "The developer is proposing that the site be restored to agriculture with some wetland and marsh habitat. The amount of inert filling required for restoration has therefore changed significantly". Unfortunately this response does not adequately address the serious concerns that have been raised. 7. Furthermore, more recent information from the proposer of the site states that the latest ALC (agricultural land classification) produced by Natural England suggests that the whole of the site is grade 3. Consequently, if the land is in fact not classified as best and most versatile, then there is no need for it to be restored to agricultural land using imported fill material, and the Parish Council's request in relation to restoration proposals could easily be accommodated thereby reducing the potential threat to the local water environment. 8. In summary Policy S1 is not sound because it is: Not positively prepared. By promoting vastly more provision for primary minerals than is justified, the Plan strategy has not been prepared with the objective of securing their long term conservation or contributing to the achievement of sustainable development. Not justified. It is not the most appropriate strategy, when considered against the alternative of a more sustainable approach that provides for the level of supply that is actually required, and in so doing also minimises the associated adverse impacts of mineral extraction on the local environment and communities. Not effective. It would lead to a considerable over provision of primary aggregate, which is inconsistent with and counter-productive to delivering sustainable development. Not consistent with national policy. The strategy, by failing to account for already permitted reserves, would lead to unnecessary depletion of finite resources and is incompatible with the NPPF's requirement that the planning system should play an active role in guiding development to sustainable solutions (paragraphs 8 and 142).	In order for the Plan to be sound, Policy S1 should be deleted. Failing deletion of Policy S1, the third bullet point of the policy should be amended to read: 'phased working and progressive restoration to wetland nature conservation uses. This change would remedy the failings in relation to the tests of soundness that have been identified at paragraph 8 of the comments in the preceding section 5, and would make the Plan legally compliant in respect of the requirement to have regard to national planning policy.	1	1	Bourton & Draycote Parish Council represents local residents who will be directly affected by the policies of the Plan, and considers that it is very important to be represented at the hearings into the relevant issues, in order to help inform the discussions and ensure that its views are fully taken into account.
MLPpub1 616	1	1	1	1	1	Issue 10	1	1	1	1	1	1	1	1	1	1	1	1	Flood Risk P.30 Key Issue 10 (Flooding and Flood alleviation) – We support this issue and are pleased to see that it now contains reference to "consideration over the lifetime of the mineral extraction to ensure that flood risk is not increased elsewhere". P.37-51 Site allocations – Most of our comments in our letter dated 7 Jan 2016 still stand; additional comments are shown below. For future reference, it would be useful if the authority could provide a GIS layer of the site allocations or a site centered grid reference so that we can locate the sites more easily on our mapping system.		1		
MLPpub1 617	1	1	1	1	1	7.20-7.22 S4 Fig. 1.14	1	1	1	1	1	1	1	1	1	1	1	1	Site 4 forms a bridge between the settlements of Barford and Wasperton and minerals working would be highly disruptive to both communities and to the landscape which forms a rural separation between the two villages. Much of the site is 'best and most versatile' agricultural land. According to local farmers its high quality derives largely from its drainage properties. Inert backfilling would not restore this quality, as evidenced by unsuccessful attempts at restoring previous workings in this area. It is difficult for a layman to form a judgement on whether WCC could have tried harder to identify other sites. However, the approach of issuing a general invitation seems somewhat unfocused and passive, especially as some promising sites were subsequently dismissed simply because of a lack of existing firm evidence of yield or deliverability. Lack of initial market response should not be a reason for planners to relax environmental constraints. If sensible restrictions make extraction more difficult, market prices will adjust until willing landowners come forward. I conclude therefore that the damage that would be done to communities and agriculture by developing Site 4 is not justified. The NPPF requires restoration and aftercare of mineral sites 'safeguarding the long term potential of best and most versatile agricultural land'. As outlined above, the local evidence is that this is not possible on this site and so Policy S4 is not consistent with national policy.	Remove Site 4 from the Plan.	1	1	

MLPpub1 623										1	1						7.20 – 7.22	Policy S4				1			1	1	1	1	1	1	1	1	Not positively Prepared. As a resident of Wasperton and local business owner (Warwick), I have witnessed a huge amount of change during the last 5 -10 years in the immediate area, (both commercially and residentially) and both management of traffic or infrastructure investment seems to be an afterthought and not in keeping with a large increase of population and the associated traffic. Accidents are already common place at both Barford Bypass Junctions (not aided by the absence of an island at these points on cost grounds) The A429 is a major route but has seen an exponential increase in commercial and private vehicle traffic during the last few years, and not just from the immediate JLR effect from Gaydon and their other Warwickshire sites. Church Street Barford, despite the bypass, remains a very busy road as a result of continued development in Warwick, South West Leamington . Bishops Tachbrook and Wellesbourne Both Minerals sites will be a long term project that will bring a major increase in commercial vehicles to the area on Roadways that are not sufficiently robust or wide enough for the current levels. Not Effective / National Policy The proposed sites are of the highest quality Agricultural land in the county, and will NOT be returned to the same status after extraction and backfill with "Inert Material". Returning this grade of land to its original condition will be impossible. Business and the constant challenges faced by larger Companies will mean there is a possibility of contaminated waste being allowed to enter the site amongst the thousands of deliveries that will form the basis of the "Inert waste". Changes to the water table will affect land and properties not just on the boundaries of the site but the wider area of the village. Water run-off and possibly contaminated ground water will make its way to the River Avon at its nearest point to the proposal site, which is closest at the Forge cottage A429. Wasperton Will site security be sufficient to prevent increased fly-tipping and other waste dumped by the more unscrupulous traders.? Requirements for building aggregates have actually reduced over recent years as a result of changes in Construction techniques, so why would a site with the Highest quality land be sought in preference to a lower grade site.? We have already been advised the aggregates and ballast required for HS2 are already allocated nationally so the above application is not required for that infrastructure project. Not Justified The appearance and effects on health from Noise, Dust and other road debris will be felt throughout the year and this will be considerable due to the proximity of the village and prevailing Wind direction. The effects on the Village and also Wasperton will be immense, given the volume of vehicles currently using the A429. Fatalities will result both at the Junctions where Barford bypass meets the old A429 and at key Points along the road such as J & A Growers, Wasperton Village Filter and the proposed Site Entrances.															1													1				Without upgrading some of the A429 near barford and possibly further South to Wellesbourne the proposal is unsustainable in terms of Traffic volumes, primarily from the increase in HGV's. Nothing has been said about improving carriageways relevant to the proposal or indeed the possibility of creating a new road that could go North West from the proposal site linking the Motorway spur from Grays Mallory. This would offset most of the Commercial traffic increase and assist also on future residential development in the area.			
MLPpub1 624										1	1						7.23 – 7.25	Policy S5				1			1	1	1	1	1	1	1	1	Not positively Prepared. As a resident of Wasperton and local business owner (Warwick), I have witnessed a huge amount of change during the last 5 -10 years in the immediate area, (both commercially and residentially) and both management of traffic or infrastructure investment seems to be an afterthought and not in keeping with a large increase of population and the associated traffic. Accidents are already common place at both Barford Bypass Junctions (not aided by the absence of an island at these points on cost grounds) The A429 is a major route but has seen an exponential increase in commercial and private vehicle traffic during the last few years, and not just from the immediate JLR effect from Gaydon and their other Warwickshire sites. Church Street Barford, despite the bypass, remains a very busy road as a result of continued development in Warwick, South West Leamington . Bishops Tachbrook and Wellesbourne Both Minerals sites will be a long term project that will bring a major increase in commercial vehicles to the area on Roadways that are not sufficiently robust or wide enough for the current levels. Not Effective / National Policy The proposed sites are of the highest quality Agricultural land in the county, and will NOT be returned to the same status after extraction and backfill with "Inert Material". Returning this grade of land to its original condition will be impossible. Business and the constant challenges faced by larger Companies will mean there is a possibility of contaminated waste being allowed to enter the site amongst the thousands of deliveries that will form the basis of the "Inert waste". Changes to the water table will affect land and properties not just on the boundaries of the site but the wider area of the village. Water run-off and possibly contaminated ground water will make its way to the River Avon at its nearest point to the proposal site, which is closest at the Forge cottage A429. Wasperton Will site security be sufficient to prevent increased fly-tipping and other waste dumped by the more unscrupulous traders.? Requirements for building aggregates have actually reduced over recent years as a result of changes in Construction techniques, so why would a site with the Highest quality land be sought in preference to a lower grade site.? We have already been advised the aggregates and ballast required for HS2 are already allocated nationally so the above application is not required for that infrastructure project. Not Justified The appearance and effects on health from Noise, Dust and other road debris will be felt throughout the year and this will be considerable due to the proximity of the village and prevailing Wind direction. The effects on the Village and also Wasperton will be immense, given the volume of vehicles currently using the A429. Fatalities will result both at the Junctions where Barford bypass meets the old A429 and at key Points along the road such as J & A Growers, Wasperton Village Filter and the proposed Site Entrances.															1														1				Without upgrading some of the A429 near barford and possibly further South to Wellesbourne the proposal is unsustainable in terms of Traffic volumes, primarily from the increase in HGV's. Nothing has been said about improving carriageways relevant to the proposal or indeed the possibility of creating a new road that could go North West from the proposal site linking the Motorway spur from Grays Mallory. This would offset most of the Commercial traffic increase and assist also on future residential development in the area.		
MLPpub1 627																		Policy S4				1			1	1	1	1	1	1	1	1	BARFORDWASPERTON MINERALS – Site 4. I believe this plan is not legally and commercially sound because no account has been taken of Pollution, Noise, and Traffic problems the Plan will cause. In addition, should the Plan be adopted, then the failure to restore 2a/3 grade highly productive farm land (some of the best in the County) will cause flooding (poor drainage) and an unproductive landscape for a generation. Pollution: The process of extraction will generate pollution to the local community in the form of visible and invisible dust. It is a fact that the latter lodges in the lungs causing Asthma, depleted Oxygen intake and possibly Silicosis, especially for the young and old. You are also proposing to add the Gladman housing estate and others to the mix which are also in a direct line to this dust and noise pollution. We have a large number of children and retired residents in our two dormitory villages that will be at significant risk. The prevailing wind will take both dust types directly over Barford and Barford School and you have only to look at the TIME article (January24-2017) to see how seriously the authorities take air pollution. Traffic: No account has been taken by the Highways authority of the pollution and traffic congestion that will occur by the introduction of heavy diesel lorries to the traffic stream at the proposed rate of one every 4 minutes. The traffic volumes have increased substantially over the last 3 years with the advent of many new industrial estates at Wellesbourne and the surrounding areas. Vehicle traffic has also increased as commercial vehicles/commuters have chosen to take alternative routes to Oxford to avoid problems on the M40 and A30. Traffic Speed has also become an issue with the two Barford turns and the turn into Wasperton becoming very dangerous with several accidents and certainly many 'near misses' caused by reckless driving and impatient overtaking. This traffic increase will be exacerbated by slow moving Lorries causing major queues too and from the M40 junction at Sherbourne. The slightest delay on the 429 already leads to 2 mile queues on the excellent Barford bypass which is already reaching full capacity at certain Times of day. We can see the time when a dual carriageway will become necessary to the considerable cost to the County even without this ill considered Mineral Plan. Destruction of highly productive Farmland: Just because you, as a Council, already own the land on Site 4 does not justify its long term destruction. Indeed the destruction of high quality farmland is not consistent with nation policy. We have witnessed the aftermath of Gravel Extraction further down the A429 (opposite the layby) some 15/20 years ago. It is still boggy and doesn't drain and is only good for sheep in small volumes. These points up the Council's inability and/or its willingness to fully or even partially restore extraction sites with suitable gravel substitutes once the site has been evacuated. This extraction is not justified in this location and given that Planning Permission was rejected back in 1993 on appeal. Site 4 is flat and is within terraced farmland and is currently free draining and in constant cultivation. Bunding and tree planting is alien to this landscape and will not reduce dust pollution. In fact it may encourage the deposit of dust from the extraction sites by slowing slightly the speed of the prevailing wind coming down the A429. In conclusion: Back in 1993 the Secretary of State in considering a similar application concluded that there were significant environmental objection and rejected the application. The facts against this application have now got even stronger with the introduction of Pollution, Noise and traffic issues which were not there in 1993																															1				This Mineral plan, while conceived to meet the gravel and sand requirements of the county, is sited on site 4 and 5, both of which present significant issue of neighborhood Pollution from dust and Traffic. It advocates the destruction of prime 2a/3 grade farmland which is in constant cultivation which will not return to productive use in a generation, if then. The plan also endanger the health of the people of our communities, both children and adults, and the introduction of heavy diesel lorries will undoubtedly endanger lives on the A429 while causing serious traffic congestion leading to both the Motorway junction and to the Wellesbourne conurbation.

MLPpub1 656							1	1											Letter from consultee (see attachment); I wish to object to the inclusion of Salford Priors as a suitable site in the Warwickshire Minerals Plan. I object on the grounds of "sound" and "legally compliant" in that I believe there has been an abuse of process. Abuse of Process You state that following the formal consultation a report was taken to Cabinet on 6th October.	S7									1	1	1	1		1	The selection of Salford Priors is unsound as it has not properly been put forward or considered. The Council has not followed its own guidelines in that the site is small and will not produce a significant amount of gravel in comparison to the upheaval and distress it will cause in the village. The site has clearly only been included due to the land belonging to the Council (so no landowner involved). It has been adopted because the Council stand to gain income from the site not because of its merits as a viable gravel producing site. Other small sites were dropped from the plan due to the obvious disruption that would be caused to the local residents. This site is actually within our parish and would split the hamlet of Iron Cross from the main Salford Priors village. The gravel trucks would actually cross School Road, which leads to the school and is only a few hundred yards away. The site actually surrounds some of the residents' properties. This is an unacceptable burden on the village which would cause noise and particulate pollution and effectively blight our village while the site was active. It contravenes the Minerals Local Plan Sustainable Community Strategy which states: <input type="checkbox"/> Safe environments for all those who live, play, work and visit Warwickshire. <input type="checkbox"/> A natural environment, climate and resources that support and enhance lives for future generations. <input type="checkbox"/> Sustainable economic growth, where jobs are created and retained; and residents are equipped with appropriate skills and competencies. <input type="checkbox"/> The best possible health and well-being for all. Clearly none of these would be achievable. Lorries would split our village in half. The health and well-being of our children and elderly would suffer, the natural environment would be destroyed and any jobs would be very short lived and go to skilled quarry workers not the residents. It contravenes your Vision and Objectives which state: "minerals sites will have been focussed as close as possible to the main settlements of Stratford, Warwick, Kenilworth, Leamington, Rugby, Nuneaton, Bedworth and Atherstone." The site at Salford Priors is not close to any towns. "New quarries will have been located where they are environmentally acceptable" This proposed quarry is clearly environmentally unacceptable. Very close, actually within, the hamlet of Iron Cross and completely surrounding individual houses. It would be a mere few hundred yards from the Park Hall complex and adjacent housing estate and not much further from the village school. "To have full regard for the concerns and interests of local communities and protect them from unacceptable environmental adverse impacts resulting from mineral developments" Clearly no regard has been taken of our concerns as our children will not be protected from the airborne dust and our residents will not be protected from the noise and dirt from the quarry. Our village will be blighted by this quarry which is totally unacceptable as specified in your own documents.	The only way this would be "sound" would be to remove Salford Priors from the plan as not fulfilling your own criteria.	1	1				
MLPpub1 657							1	1											7.20 - 7.22	Policy S4														1	1	1	1	1	I consider the Minerals Plan to be unsound for the following reasons. 1. Not consistent with National Policy A significant proportion of the Site 4 land is classified as grade 2 or 3a, i.e. Best and Most Versatile. Government policy is that local planning authorities should use poorer quality land in preference and yet WCC have excluded other sites with lower grade land. Planning permission to extract gravel on this site was rejected on Appeal in 1993 at which point the Secretary of State conceded that a number of the environmental objections were 'significant' including the fact "that the site includes land of the best and most versatile quality, some of which would be permanently lost to agriculture". 2. Not Justified The site would have a severe visual impact; the land is currently flat and open and offers unobstructed views from the A429 and a number of local footpaths. The proposed bunding and planting would adversely affect this and would be alien to the natural landscape. In the 1993 appeal, the Secretary of State conceded that "the site makes a positive contribution to the pleasant countryside extending either side of the River Avon" and that "there would be some material harm to the appearance of the locality". This hasn't changed with the current plan. There would be significant blight; Barford lies in the direction of the prevailing winds and would suffer considerable noise and dust pollution with associated health risks. Certain properties including XXXXXXXX and others on the south side of Barford would be adversely impacted in the areas of saleability and insurance costs. The plan has not justified the extent to which the land could be restored (see below) 3. Not Effective Land Restoration issues; a key feature of the Site 4 land is its excellent drainage, facilitated by the sub-strata of gravel. If this is replaced with inert fill, the drainage properties will not be restored making a return to best agricultural land impossible. Previous experience with the gravel extraction nearer to Charlecote reinforces this view that, despite what the contractors promise, the land will not be reinstated to anything like BMV. The plan states that inert fill can be difficult to find and Site 4 is one of the largest areas under consideration; this creates a risk of long and protracted period for the restoration phase. 4. Not Positively Prepared The plan does not take adequate account of the Traffic issues in the light of other developments. The huge increase in housing development in Wellesbourne and the surrounding area (current and future) will result in a massive increase in the traffic using the A429 in both directions particularly during the morning and evening commuter periods. The proposed single access point to Site 4 with heavy lorry movements predicted to be as frequent as one every five minutes will create a major accident risk and will exacerbate congestion and traffic issues. This will also put added pressure on the Longbridge roundabout which is already very congested during peak periods.	I do not think that any changes would make this plan sound regarding Site 4. This is not a suitable location for minerals extraction and should be removed from the plan in favour of other sites that have fewer issues or are further away from populated areas.	1	1
MLPpub1 658							1												7.20-7.22 Site4	Policy S4 site 4																	1	1	Please see appendix attached, which also applies to sites 4 and 5 above.			
MLPpub1 659							1												7.23 - 7.25 Site 5 Comments and objections contained in appendix attached as 2 policies and sites are covered by this	Policy S5 site 5 Comments and objections contained in appendix attached, as 2 policies and sites are covered by this																		1	1	Please see appendix attached, which also applies to sites 4 and 5 above.		
MLPpub1 660							1												7.23 - 7.25 Site 5 Comments and objections contained in appendix attached as 2 policies and sites are covered by this	Policy S5 site 5 Comments and objections contained in appendix attached, as 2 policies and sites are covered by this																			1	1	Please see appendix attached, which also applies to sites 4 and 5 above.	

MLPpub1 691	1	1	7.20 – 7.22	Policy S4		1	1	1	1	1	1	1	1	1	1	1	Traffic (Not Positively Prepared) A429 is unsuitable to accommodate additional HGV's. The Highways Authority do not appear to have taken into account the additional traffic due to new housing developments in Wellesbourne, and the increase in traffic due to employees travelling to the Gaydon/JLR sites. The only entrance and exit to Wasperton Village is from the A429 and at peak times currently it can take 15 minutes before you can safely turn right from the village onto the A429. Large lorries entering fast moving traffic a few metres from the entrance to the village can only result in an increase in the number of accidents. Noise/Vibration/Dust/Dirt/Air Quality – Pollution (Not Justified, Not Positively Prepared) The boundary of the proposed mineral working has been adjusted and is now 350m from properties in Barford Village and WDC indicate that at this distance there is unlikely to be any adverse impacts. Wasperton is directly opposite the works and there is only the A429 and earth bunds separating the village from the works. If 350m is considered safe for one village surely the same distance should apply to all. Blight (Not Positively Prepared) Blight has already commenced with the residents of Wasperton' property sales failing due to the potential mineral extraction. Once the works commence property values will fall and residents wishing to move for job relocation or to downsize will be unable to sell. WDC states that the workings are temporary but eleven years plus is hardly temporary. This will also have an adverse impact on the rural aspect of Wasperton Village Land Restoration (Not Effective, Not Justified) It is impossible to restore land to its previous standard when the free draining minerals under the soil have been removed. What makes the land BMV is the gravel. The site opposite i.e. the old Charlecot workings shows how badly the land restoration of gravel sites are left. Health (Not Positively Prepared) Minute particles of dust invisible to the naked eye can affect the upper airways with depleted oxygen reserves resulting in silicosis Conservation Areas (Not Positively Prepared) WCC state that there is property, land and roads between Barford and Wasperton Conservation Areas and the site. Wasperton House the first house in Wasperton Village is not only in the Conservation Area but is a Grade 2 Listed building (308227). Only the A429 separates the boundary of this property from the proposed mineral working. If Site 4 had been rejected it is also possible that site 5 would be rejected and therefore WCC have an 'conflict of interest' as the owners of Site 5 in including Site 4 in the minerals plan.	Remove Site 4 from the Minerals Local Plan.	1	1
MLPpub1 692	1	1	Paragraphs 7.23 – 7.25	Policy S5		1	1	1	1	1	1	1	1	1	1	1	Noise/Vibration/Dust/Dirt/Air Quality – Pollution (Not Justified, Not Positively Prepared) The boundary of the proposed mineral working has been adjusted and is now 350m from properties in Barford Village and WDC indicate that at this distance there is unlikely to be any adverse impacts. XXXXX and XXXXXX however have only been allowed a stand off of 100 metres. If 350 m is considered safe for one village surely the same distance should apply to all residential properties. Land Restoration (Not Effective, Not Justified) It is impossible to restore land to its previous standard when the free draining minerals under the soil have been removed. What makes the land BMV is the gravel. The field across the road i.e. the old Charlecot workings is a good example of defective land restoration of a gravel site. Blight (Not Positively Prepared) The Blight factor is already in existence. The value of property and the prospect of sale have been drastically damaged. The inclusion of this site results in the loss of XXXXX as a WCC agricultural holding denying young farmers an opportunity to startup. Site 5 is too small to develop as a standalone project and would have been excluded if Site 4 had been rejected. WCC's ownership of Glebe Farm results in a 'conflict of interest'.	Remove Site 5 from the Minerals Local Plan.	1	1
MLPpub1 693	1	1	Paragraph 182	Site S4 Wasperton	Fig. 1.11	1	1	1	1	1	1	1	1	1	1	1	The Mineral Plan is neither sound nor legally compliant because: a) Public Health Liability is serious with the prevailing South Westerly wind towards Barford homes causing contamination of the air with Crystalline Silica particulate dust, noise and vibrations from heavy machinery. These pollution hazards cause dangerous and long term physical and mental health issues for the entire population of Barford across the age spectrum despite the 250m amendment. Crystalline Silica is a known carcinogenic invisible to the naked eye which remains in the lungs where the body's defence mechanism encapsulates it causing silicosis, lung cancer and permanent damage. Despite water used in the crushing process, the lorries will be loaded with dry crushed material so the risk of inhaled and (resting on allotments) digested Crystalline Silica cannot be ruled out. Beside the effect on individuals, treatment of these conditions carries a cost implication on hard-pressed health resources b) The necessary infrastructure has not been positively prepared because there will be increased risk of road traffic accidents as large, slow moving vehicles leave and join fast-moving traffic on the A429. This will impact on access to commercial properties near site entrance, traffic flow through the village, the Longbridge roundabout and motorway network c) The plan is unjustified because it would take the best and most versatile agricultural land out of production. We've previous experience of both farm tenancies and an inert materials landfill site – the 'recognised compensation' you quote is inadequate compared with years of loss of income d) On restoration of the site, due to removal of gravel and use of heavy vehicles compacting the topsoil, the quality of drainage will be poor and potential for agricultural use limited. The plan includes information that finding inert material to infill is difficult, so will prolong timespan. e) The plan is not legally compliant because a Hydrology Report by Professor Carolyn Roberts a water resource management specialist quoted at Gresham College, London in 2015 includes 'My scientific analysis showed that the environmental implications of quarrying for gravel..... there would be a reduction in ground water levels locally by 2-3 metres potentially influencing treesas a cone of depression develops around the site....' f) The plan is not legally compliant because Barford's Neighbourhood Plan approved by an inspector includes landscape Design Principles to only permit development on most versatile land for purposes of agriculture and to protect and enhance local green spaces g) The plan is unjustified because ugly bunding is alien to the landscape. Besides destroying natural flora and fauna, Blight on properties in Wasperton and Barford remains.	No changes to the present Minerals Local Plan can be identified on site 4 because any extraction of gravel and sand will lead to the consequences listed in item 5, in particular:- The issues of i) Public Health Liability ii) Permanent damage to the Environment	1	1
MLPpub1 694	1	1	Paragraph 182	Site 5 Glebe Farm Wasperton	Fig 1.12 S5 Glebe Farm Wasperton	1	1	1	1	1	1	1	1	1	1	1	The Minerals Local Plan is neither legally compliant nor sound because; a) The visual appearance of the proposed site is not justified and is inconsistent with the National Policy. Neither the site area nor extraction volumes are justified and have not been acknowledged b) Having experienced an inert material landfill site on our previous farm, I have some knowledge of the land restoration not being as described in the plan. The lowering of the land will not be effective and the loss of free drainage will curtail further agricultural use c) Lack of availability of local inert material will extend the time span of operations on this site d) A considerable percentage of the site being classified as best and most versatile land, the plan will remove the special quality of free drainage present for good. It is therefore not consistent with national policy e) The plan is not justified nor consistent with National Policy due to inevitable damage to existing hedgerows which will destroy flora, fauna and a wildlife friendly habitat f) Ugly bunding is alien to the landscape and the bunds do not address permanent changes Proximity of this site to XXXX, XXXX and XXXX which are in direct path of prevailing wind therefore put people and livestock in these properties at high risk of regular exposure to inhaling and ingesting the highly toxic Crystalline Silica dust air pollution as well hours of noise and vibration from large machinery. This in turn will have serious implications regarding long term both physical and mental health issues	I have no suggestions to make regards changes to the proposed plan for mineral extraction on Site 5. Even with mitigation, the major risks to Public Health and permanent damage to the environment remain in the event of any gravel extraction activity on this site. These risks are evident in point 5 above.	1	1

MLPpub1 6117																							1										1																																													
1								Policy S4 Site 4								because of a) the negative impact on the visual appearance of the area, which is flat and open. Bunding and planting do not belong on terraced farmlands; b) blight, some properties are already severely affected by the mere threat of this plan. Wasperton and Barford properties will be adversely affected both visually and by noise and Barford properties in particular (due to prevailing wind) by dust; c) impossible land restoration, as once top soil has been stored for any length of time it becomes sterile and therefore useless. Drainage cannot be restored 100% to what it is now. Therefore best and most versatile agricultural land will be lost forever. It is not effective, because it will result in loss of best and most versatile land. In spite of Government stating that local planning authorities should preferably use poorer quality land some other sites with lower grade land have been rejected by WCC. Planning permission to extract gravel on this site was rejected on Appeal in 1993. The Secretary of State conceded that a number of environmental objections were 'significant', including that 'visual intrusion would be created', that 'the site makes a positive contribution to the pleasant countryside extending either side of the River Avon', that 'there would be some material harm to the appearance of the locality', and that 'the site includes land of the best and most versatile quality, some of which would be permanently lost to agriculture'. As nothing has materially changed this all still applies. It is not consistent with national planning policy, because it threatens to (ab)use best and most versatile Grade 2 and 3A land when Government expressly states that this should be avoided. Furthermore, the Barford Neighbourhood Development Plan, which has been approved by an inspector and given a full mandate by the villagers of Barford in a recent referendum, states quite clearly that 'The irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture'. The National Planning Policy Framework states the following: 'The adverse impact of mineral workings on neighbouring communities should be minimised'. In the previous consultation stage, many objections were raised with regard to adverse impact on people's health, on future use of the site, and on drainage. WCC claims to have addressed all these comments. However, with regard to health: the amended site boundary (350 m instead of 100 m south of Barford) may have "reduced the likely risk of potential health problems", but it has not eliminated them, therefore these objections stand (it is interesting to note that this change of boundary is more likely to have come about through the owners, St John's College, having withdrawn it in favour of a possible housing development, than through WCC's concern for the wellbeing of Barford residents); with regard to future use: the promoter claims the site will be restored to "agricultural land and nature conservation", however, there is no way they can restore it to the level of agricultural quality it is at present; with regard to drainage, it is claimed that "appropriate mitigation measures" will be taken to ensure any impacts on local water table and local drainage are "kept to a minimum", implying that there will be adverse impacts. This is unacceptable. As for potential contamination, because of site 4's proximity to the river Avon and local farms and villages, the so-called "land restoration", if done badly with contaminated infill, would be catastrophic for the local environment. If migration also took place it would migrate to a very wide area of south Warwickshire.								I believe there are more appropriate sites which could have their use extended or other new ones which could be selected. These other sites will have less detrimental impact on a) best and most versatile land (once it's gone, it's gone; we do actually need to feed people!); b) landscape; c) traffic; d) people's health. I believe this plan is not sound as insufficient consideration has been given to the potentially harmful effects of the increased traffic, particularly as local roads are already congested daily – a problem which is only going to increase with the thousands of new houses being built in the surrounding area. Neither has sufficient research been carried out on the effects of respirable crystalline silica (RCS) on surrounding residents' health, particularly in Barford, as the prevailing wind blows across the village. RCS (too fine a dust to see with normal lighting) is carried a long way by wind and is known to cause Silicosis, Chronic obstructive pulmonary disease (COPD) and Lung Cancer. Those who are already affected by other respiratory conditions (like asthma) may well be seriously at risk of a deterioration of their health. I believe this plan is not sound as not enough research has been done into the effect of the growing use of new building materials and techniques on the future demand for sand and gravel. I believe this plan is not sound as sacrificing the best agricultural land (of which there is not much in the County) clearly does not contribute positively to the need for sustainable agriculture to reduce the county's carbon foot-print.								1								1																																						
MLPpub1 6118																								1									1																																													
1								Policy S5 Site 5								It is not positively prepared, because there is an increased risk of traffic incidents, with slow moving heavy lorries entering the fast moving traffic along the A429. The increased traffic will have a negative impact on traffic at Longbridge Island and the surrounding road network. It is not justified, because of a) the negative impact on the visual appearance of the area, which is flat and open. Bunding and planting do not belong on terraced farmlands; b) incorrect site area and extraction volume: promoted at 300,000 tonnes, but actual volume is only 200,000 tonnes.; c) impossible land restoration, as once top soil has been stored for any length of time it becomes sterile and therefore useless. Drainage cannot be restored 100% to what it is now. Therefore best and most versatile agricultural land will be lost forever; d) dust and noise: XXXX and XXXX lie directly in the path of the prevailing wind. Only a 100 m standoff is planned. WCC has failed to address the objections re. the negative impact of dust, noise and vibration. It is not effective, because it will result in loss of best and most versatile land. In spite of Government stating that local planning authorities should preferably use poorer quality land some other sites with lower grade land have been rejected by WCC. Planning permission to extract gravel on the adjacent Site 4 was rejected on Appeal in 1993. Secretary of State conceded that a number of environmental objections were 'significant', including that 'visual intrusion would be created', that 'the site makes a positive contribution to the pleasant countryside extending either side of the River Avon', that 'there would be some material harm to the appearance of the locality', and that 'the site includes land of the best and most versatile quality, some of which would be permanently lost to agriculture'. As nothing has materially changed this all still applies. It is not consistent with national planning policy, because it threatens to (ab)use best and most versatile Grade 2 and 3A land when Government expressly states that this should be avoided. Furthermore, the Barford Neighbourhood Development Plan, which has been approved by an inspector and given a full mandate by the villagers of Barford in a recent referendum, states quite clearly that 'The irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture'. The National Planning Policy Framework states the following: 'The adverse impact of mineral workings on neighbouring communities should be minimised'. In the previous consultation stage, many objections were raised with regard to adverse impact on people's health, on future use of the site, and on drainage. WCC claims to have addressed all these comments. However, with regard to health: the standoff is still only 100 m so the objections stand; with regard to future use: the promoter claims the site will be restored to "agricultural land and nature conservation", however, there is no way they can restore it to the level of agricultural quality it is at present. It is also interesting to note that on Tuesday 24th January this year, WCC adopted the Warwickshire Energy Plan, which includes a solar farm on this site – agricultural use???; with regard to drainage, it is claimed that "appropriate mitigation measures" will be taken to ensure any impacts on local water table and local drainage are "kept to a minimum", implying that there will be adverse impacts. This is unacceptable. As for potential contamination, because of sites 5's proximity to the river Avon and local farms and villages, the so-called "land restoration", if done badly with contaminated infill, would be catastrophic for the local environment. If migration also took place it would migrate to a very wide area of south Warwickshire.								I believe there are more appropriate sites which could have their use extended or other new ones which could be selected. These other sites will have less detrimental impact on a) best and most versatile land (once it's gone, it's gone; we do actually need to feed people!); b) landscape; c) traffic; d) people's health. I believe this plan is not sound as insufficient consideration has been given to the potentially harmful effects of the increased traffic, particularly as local roads are already congested daily – a problem which is only going to increase with the thousands of new houses being built in the surrounding area. Neither has sufficient research been carried out on the effects of respirable crystalline silica (RCS) on surrounding residents' health, particularly in Barford, as the prevailing wind blows across the village. RCS (too fine a dust to see with normal lighting) is carried a long way by wind and is known to cause Silicosis, Chronic obstructive pulmonary disease (COPD) and Lung Cancer. Those who are already affected by other respiratory conditions (like asthma) may well be seriously at risk of a deterioration of their health. I believe this plan is not sound as not enough research has been done into the effect of the growing use of new building materials and techniques on the future demand for sand and gravel. I believe this plan is not sound as sacrificing the best agricultural land (of which there is not much in the County) clearly does not contribute positively to the need for sustainable agriculture to reduce the county's carbon foot-print.								1								1																																						

MLPpub1 6129				1						1	7.23 - 7.25	S5					1		1	1	1	1	1	Landscape (Not Justified) - Loss of BMV / bunding inappropriate in location / adverse impact on biodiversity Visual Appearance (Not Justified. Not Consistent with National Policy) - Infilling has only been confirmed "in the opinion of the developer" Listed Building (Legal - Does not Comply with National Policy and Legislation) - Negative impact on Barford House Site Area and Extraction Volumes (Not Justified) - There are better sites elsewhere with lower BMV Dust Noise (Not Justified, Not Consistent with National Policy) - Significant negative impact on local people, including young children. Land Restoration - Inert Waste/lowering of land (Not Effective) Land Classification - The Best and Most Versatile Land (Not Effective, Not Consistent with national policy)			1		1			
MLPpub1 6130				1								SO						1		1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton & Draycote PC and residents and with which response I entirely concur.	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton & Draycote PC and residents and with which response I entirely concur.				1		
MLPpub1 6131				1								S1						1		1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents and with which response I entirely concur.	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents and with which response I entirely concur.				1		
MLPpub1 6132				1								MCS1						1		1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent acting on behalf of Bourton and Draycote PC and residents and with which response I entirely concur.	Please see the detailed response given by Suzi Coyne, Agent acting on behalf of Bourton and Draycote PC and residents and with which response I entirely concur.				1		
MLPpub1 6133				1								MCS2						1		1	1	1	1	1	Please see detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents and with which response I entirely concur.	Please see detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents and with which response I entirely concur.				1		
MLPpub1 6134				1							7.20 - 7.22	S4 (Site 4)						1		1	1	1	1	1	The plan is not sound. It is not justified and not consistent with the NPPF for the following reasons: *1) The plan is NOT the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Much of the land in question is of high grade 2 and 3A and therefore not consistent with national policy as lower grade land should be used in preference. As previous workings in Wasperton illustrate this land cannot be reinstated to the same high quality agricultural land upon completion of the gravel extraction. *2) Visual impact would be significant in such an open vista, thus altering "the character of the countryside" (NPPF). *3) Many properties would be greatly affected by dust and noise pollution in both Wasperton and Barford. *4) Effect of the groundwater level and the migration of contamination from the subsequent in-filling on completion of extraction. *5) Access to the proposed site via the A429 would undoubtedly bring added hazard on this already very busy road and exacerbate the existing problems for pedestrian and vehicle access to Wasperton.	This site is not suitable for gravel extraction.				1		1
MLPpub1 6135				1							7.23- 7.25	S5 (Site 5)						1		1	1	1	1	1	The plan is not sound. It is not justified and not consistent with the NPPF for the following reasons: *1) The plan is NOT the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Much of the land in question is of high grade 2 and 3A and therefore not consistent with national policy as lower grade land should be used in preference. As previous workings in Wasperton illustrate this land cannot be reinstated to the same high quality agricultural land upon completion of the gravel extraction. *2) Visual impact would be significant in such an open vista, thus altering "the character of the countryside" (NPPF). *3) Many properties would be greatly affected by dust and noise pollution in both Wasperton and Barford. XXXXX would be particularly affected. *4) Effect of the groundwater level and the migration of contamination from the subsequent in-filling on completion of extraction. *5) Access to the proposed site via the A429 would undoubtedly bring added hazard on this already very busy road and exacerbate the existing problems for pedestrian and vehicle access to Wasperton.	This site is not suitable for gravel extraction.				1		1
MLPpub1 6136				1							7.20-7.22	S4						1		1	1	1	1	1	Wasperton Farm is grade 2 and 3a, yet WCC has ignored other potential extraction sites with lower grade land. In 1993 the Secretary of State rejected the plan to extract gravel on this site, due to the fact that there would be material harm to the appearance of the locality. This remains the case, and the harm would be irreversible. The visual appearance (not justified) - it is clearly visible to the public and within 'terraced farmlands' and from the adjacent A429. Blight (not justified) Wasperton and Barford properties would be impacted visually and with dust, dirt and noise, protracted heavy vehicle movements, resulting in a substantial reduction in amenity and value. Current land classification is 'the best and most versatile land' (not effective and not consistent with national policy). Such land is a national asset, and is irreplaceable. Land restoration (not effective, not justified). Land would not be able to be returned to similar grade agriculture, as soil would no longer be free draining. Finding suitable inert materials to infill for restoration could be problematic, and difficult to police. Traffic (not positively prepared). There will be an increased risk of accidents due to slow lorries entering fast moving traffic, and increased congestion of traffic on an already heavily strained local road network. Extra HGV traffic and associated congestion will cause increased pollution, cost to commercial and private traffic, and highway damage in the area.	There are better sites which could have their use extended. or other new use could be chosen. These other sites will have less detrimental impact regarding: Taking Grade 2 and 3a land out of use - lower grade land elsewhere could be used. Other sites will not cause blight on the landscape as much as this one. It is generally accepted that the land cannot be restored to Grade 2 or 3a, so very good, rare farmland will be permanently lost There is already heavy traffic on local roads, and recent growth especially due to JLR expansion at Gaydon and housebuilding around Wellesbourne. There is no evidence that the impact of increased traffic movements caused by the extraction process has been considered in the Plan. The environs around the existing sites, if they stay in use, will have less impact than sites 4 & 5. Because of sites 4 & 5 being so close to the river Avon and local farms and villages, the 'make good', if done badly with contaminated infill, would damage the local environment and possibly a wider area of south Warwickshire. The Neighborhood Development plan, democratically adopted by the village and presently by Warwick District Council, appears to have been excluded from consideration in the Plan. The detriment to health for the residents of Barford,Wasperton, and Warwick, particularly due to silica inhalation, has not been considered.				1		1
MLPpub1 6137				1							7.23-7.25	S5						1		1	1	1	1	1	Site 5 Visual appearance (not justified) - the site is currently intensively farmed land and openly visible. Land restoration (not effective, not justified). Land would not be able to be returned to agriculture as soil would no longer be free draining, and finding inert materials to infill could mean that restoration takes a very long time. Listed buildings - (does not comply with National Policy and Legislation) - Adequate regard has not been given to the setting of a listed building or heritage asset, which can be harmed by development within its setting. Site area and extraction volumes (not justified) Site volume promoted as 300,000 tonnes when actually it is only 200,000 tonnes. Dust and noise (not consistent with National Policy). XXXXX barn are directly downwind of the site. An inadequate 100m standoff is proposed on this flat open site, which will mean detrimental noise dust and vibration. For this site, land classification is 'the best and most versatile land' (not effective and not consistent with national policy. WCC has ignored other potential extraction sites with lower grade land.	There are better sites which could have their use extended. or other new use could be chosen. These other sites will have less detrimental impact regarding: Taking Grade 2 and 3a land out of use - lower grade land elsewhere could be used. Other sites will not cause blight on the landscape as much as this one. It is generally accepted that the land cannot be restored to Grade 2 or 3a, so very good, rare farmland will be permanently lost There is already heavy traffic on local roads, and recent growth especially due to JLR expansion at Gaydon and housebuilding around Wellesbourne. There is no evidence that the impact of increased traffic movements caused by the extraction process has been considered in the Plan. The environs around the existing sites, if they stay in use, will have less impact than sites 4 & 5. Because of sites 4 & 5 being so close to the river Avon and local farms and villages, the 'make good', if done badly with contaminated infill, would damage the local environment and possibly a wider area of south Warwickshire. The Neighborhood Development plan, democratically adopted by the village and presently by Warwick District Council, appears to have been excluded from consideration in the Plan. The detriment to health for the residents of Barford,Wasperton, and Warwick, particularly due to silica inhalation, has not been considered.				1		1
MLPpub1 6138				1							1.5 - 1.11							1		1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents, with which I fully concur.	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents, with which I fully concur.				1	1	
MLPpub1 6139				1								SO						1		1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents, with which I fully concur.	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents, with which I fully concur.				1	1	
MLPpub1 6140				1								MCS1						1		1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents, with which I fully concur.	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote PC and residents, with which I fully concur.				1	1	

Most of the reasons put forward to object to the allocation of Site 4 are equally applicable to site 5. I will repeat most of them below – but there are some differences. Firstly the plan is unsound because it is not consistent with the NPPF Paragraph 144 which states:- When determining planning applications, local planning authorities should:

- ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
- ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties

----- Planning a large sand and gravel extraction plant close to the existing villages of Barford and Wasperton will inevitably cause adverse impacts on the health of the residents. The prevailing South Westerly wind will carry any dust or noise across the whole village of Barford including the School and newly developed sports facilities on King George's field. The village of Barford has a significant proportion of elderly residents some of whom have existing breathing problems. Recent new housing developments also mean there are more small children who are also sensitive to dust contamination – especially when exercising. The response to this comment is to separate the site from the houses by 350 metres. These dust particles will not settle within this distance and the smaller and more harmful particles can travel for several miles. Fine particulate matter, 10 microns or less in diameter (PM 10) can be inhaled and is considered toxic. Smaller respirable particulate matter, (PM 2.5) with a diameter of 2.5 microns or less, is even more dangerous, lodging deep within the lungs and tissue. There is no biological mechanism for clearing it from the body. To propose a mineral extraction site close to a village or town is unacceptable. Historical Environment Seven Elms farm, Forge Cottage and Wasperton House are all Grade 2 listed buildings. Not only will the gravel extraction process affect them, but the countryside will not be returned to its present state so the settings of these historic buildings will be changed forever. The response to this objection was: 'The proposed mineral working is now 350m from properties in Barford village so there is unlikely to be any adverse impacts. Screening bunds can alleviate noise and dust emissions. The Cottage is located to the west of the A429 so it is not adjacent to the site and any risk of vibration will be from traffic along the A429. This has not addressed the impact on the setting at all and seems to have ignored the fact that the traffic on the A429 will now be increased by many heavy lorries that cause the damaging vibration. Secondly the plan is unsound because it is not consistent with the NPPF Paragraph 112 which states:- Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

----- Site 5 is also Best and Most Versatile land – grade 2a which, according to the WCC plan on page 20, is only present in a few small pockets in the county. This land is high quality because it has good drainage and good topsoil, maintained over many years of careful cultivation. This classification of this land as Best and Most Versatile land will be lost forever. The gravel that gives it drainage will be removed, the inert material refill will be inferior and will not create the drainage necessary for BMV land. The topsoil will be used to create the bunds and will deteriorate over the period of the working. Local Farmers who are experienced in these matters confirm that the land cannot be returned to BMV. The Council Officials who came to make a presentation in 2015 when specifically asked this question would not guarantee that this land could be returned to Best and Most Versatile. Sand and Gravel has been extracted from land at Charlecote and this is now unusable. Light farm Machinery moving over this land has become 'bogged down' even in dry summer conditions. Best and Most Versatile land is needed to grow crops and poorer quality land must be found for mineral extraction sites. The comment that no other sites are being offered is spurious - If greater incentives are offered then more sites will become available. Site 5 additionally affects the listed buildings of Seven Elms and Glebe Farm. The inclusion of this site results in the loss of Glebe Farm as a WCC agricultural holding. This is presently used by young farmers giving them an opportunity to start in business. WCC's ownership of Glebe Farm results in a 'conflict of interest'. Blight (Not Positively Prepared) The response to Blight is: A properly operated and managed mineral site will not create blight. It is a temporary activity. The site will be restored when working has been completed. Blight has already occurred – who would buy a property which may be surrounded by mineral workings for at least 10 years. House Sales in Barford have already been affected as uncertainty about the future of the village is driving potential buyers to discount the village from their options. Thirdly - The Plan is unsound because it is not positively prepared. Transportation of the sand and gravel is proposed via the A 429 – but have the effects of the increased volume of slow moving traffic been evaluated correctly? According to the response to previous comments 'the A429 should be able to accommodate a high volume of traffic and larger vehicles (HGV's). According to the Highway Authority it provides an excellent link onto the A46 and M40, and then onto the wider highway network. Traffic on the A429 is increasing as a result of the new developments South of the proposed site and increased traffic to the offices and factories in South Leamington and Gaydon. This already causes congestion and can only get worse. To add more heavy slow moving traffic to the road network at his point is unsafe. Consider:- The proposal is for 2 million tonnes to be removed. If we assume this will take place over 8 years at 250 days a year this is 1,000 tonnes per day. A 3-axle rigid tipping truck – probably best suited to sand and gravel movement – has a maximum weight of 26 tonnes – that will perhaps give a 15 tonne payload – equating to approximately 130 loaded trucks (and of course 130 empty trucks returning). In an 8-hour day that is over 20 trucks per hour (1 every 3 minutes) added to a road system that already has a capacity problem. At peak hours there are queues from the village to join the bypass and there have been several accidents at the two junctions, including a fatality. A significant increase in traffic will cause more congestion and more frustration for commuters attempting to leave the village. It is inevitable that more accidents and more fatalities will ensue. These trucks will themselves cause noise and that will be carried on the prevailing South West wind across the village adding to the contamination caused by the mining operations.

Please refer to the written representation document submitted with this completed form. The proposed allocation of Glebe Farm (Site 5) fails the key statutory tests of soundness. The evidence presented to support the allocation of Site 5 is neither 'Justified' nor 'Effective', with the extraction of the minerals site directly conflicting with national policy and cannot therefore be seen as representing a sustainable development. Duly the plan has not been 'positively prepared' and is therefore deemed as inadequate on all criteria for the test of soundness. Copy and paste of attachment - missing images, please refer to attached document: Warwickshire Minerals Plan Publication Consultation – December 2016 Representations on behalf of XXXXX January 2017 1 | P a g e 113079 01/02/2017 INTRODUCTION Fisher German LLP have been appointed by XXXXX to submit representations on his behalf to the Warwickshire Minerals Plan and these are duly made in accordance with the 'Regulation 19 consultation'. The following representation are submitted in objection to the draft allocation of Site 5 – Glebe Farm proposed for inclusion within the latest version of the Warwickshire Minerals Plan. The proposed allocation of Glebe Farm has not been fully assessed in terms of its viability and deliverability, nor have the impacts associated with the proposed extraction been fully assessed. As set out in this report and the accompanying duly completed representation form, the proposed allocation of Glebe Farm fails the key statutory tests on numerous points and is as a result unsound and not legally compliant. As the allocation of the site forms part of the Draft Plan, its inclusion compromises the soundness of the Plan, owing to the clear inconsistencies with National Policy. The proposed allocation has no reasoned justification, is not based on sound information or evidence. The allocation of the site would cause irreparable damage to the setting of a statutorily listed building, residential amenity, agricultural land quality and the local landscape. Further material impacts are also cited below which have failed to be considered in the preparation of the Warwickshire Minerals Plan and allocation of the small site which would have substantial adverse impacts. It is concluded that the allocation of Glebe Farm (Site 5) should be withdrawn at the earliest opportunity which would enable the plan to be sound and compliant. SITE CONTEXT As shown in Figure 1, Site 5 (Glebe Farm) is positioned to the east of the A429 approximately 400m east of the settlement of Wasperton. The small 14 hectare site is stated in the Draft Minerals Plan as being capable of delivering 0.3 million tonnes of sand and gravel, which would be extracted in conjunction with the 85 hectare Wasperton site (Site 4), which directly adjoins the northern boundary of the Glebe Farm site. The eastern boundary of the proposed sand and gravel extraction site directly adjoins the curtilage of XXXXX listed residential property Seven Elms, and its associated land. Seven Elms is a Grade II listed building (List Entry: 1035125), which dates to the early 17th Century and is considered to represent a noteworthy example of this period of architecture; constructed of timber framing with rendered infill panels (Appendix 1 Copy of Listing). The residential property is privately owned and sole access for Seven Elms and Seven Elms Barn is taken directly through the centre of the proposed Glebe Farm site. The western boundary of the site adjoins and includes the farm buildings of Glebe Farm, which is understood to be a viable enterprise and currently tenanted by a young farming family. 2 | P a g e 113079 01/02/2017 Figure 1: Glebe Farm (Site 5) proposed site allocation boundary TESTS OF SOUNDNESS The representation below refers to tests of soundness as set out in paragraph 182 of the National Planning Policy Framework and clearly demonstrates that on each point the proposed allocation of site 5 Glebe Farm fails to comply: Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF. POSITIVELY PREPARED It is evident that there has been a distinct lack of engagement with the residents of Seven Elms and Seven Elms Barn in the preparation of the Minerals Plan and the proposed allocation of the Glebe Farm site. This is of particular concern in relation to the resident's right of access directly through the centre of Site 5. There are no alternative access points available to the residential properties at Seven Elms. There have been no discussions regarding changes to the arrangement of access being proposed to the residents of Seven Elms. A right of access across 3 | P a g e 113079 01/02/2017 the proposed minerals site is established and must therefore be maintained. This requirement will fundamentally affect the proposed allocation's ability to extract material and will limit the viability of the site and accordingly its deliverability. The draft Minerals Local Plan presents vague detail of the proposed extraction site, which makes no mention of the right of access across it and appears to remove fully the existing vehicle access for Seven Elms, of which the inhabitants have a legal right of access across. The access also contains a number of above and below ground services for which diversions would be required which would adversely impact the residents of Seven Elms and Seven Elms Barn and must be retained. The existence of this right of access has been omitted from consideration in the draft Minerals Local Plan. There is no basis for the removal of the access across the site, and accordingly the access would have to be retained in situ with an appropriate buffer applied. The retention of the access across the proposed Glebe Farm site would reduce the potential working area and would impede the extraction of sand and gravel from site. In this regard, the plan has not been positively prepared and the failure to engage and recognise the constraints of the site has resulted in the proposed allocation of an undeliverable site. JUSTIFIED AND EFFECTIVE The Glebe Farm site was initially proposed for allocation within the Spatial Strategy and Preferred Site Options as a standalone allocation. It is,

however, outlined within the draft Minerals Plan document that the intention for the site would be to combine its extraction with the larger Wasperton site (Site 4) to the north. It is therefore evident that this site cannot stand alone as an allocation, as it is of insufficient size and resource to be a deliverable allocation and economically viable proposition. The site has constraints along the western, eastern and southern boundaries and an access track through the middle that substantially constrains the area available for working the mineral. The site therefore cannot be allocated as a separate Site 5 and as indicated in the text associated with the allocation, is entirely dependent on the Wasperton site (Site 4) being allocated and subsequently receiving consent for extraction. It is understood that the sites are in separate ownership, which again poses a risk that the Wasperton site could not come forward in the future. It is not known whether an operator is interested in Site 5, which again raises concerns in relation to the deliverability of the site. In the instance, that Site 4 was not progressed then the viability of the Glebe Farm site would be compromised. On this basis, the site cannot be considered as truly deliverable. For the Minerals Plan to be considered effective, Paragraph 182 of the NPPF states that it should be deliverable over the specified plan period. The draft plan is not effective in this regard as site 5 is not deliverable as a standalone allocation, due to its dependency on another third party site coming forward, of which it has no control. The site is too small and has insufficient resource to come forward independently, and is fundamentally constrained by an access track and three residential properties in very close proximity of which one is listed. These constraints mean that the allocation of Site 5 cannot be developed independently of the Wasperton site, and is therefore non-deliverable. As this site is not deliverable alone this compromises the effectiveness of the plan to provide the assessed minerals needs of the County. The Planning Practice Guidance states that minerals planning authorities should plan for the steady and adequate supply of minerals. The guidance for designating specific sites states that they should be allocated "where viable resources are known to exist, landowners are supportive of minerals development and the proposals is likely to be acceptable in planning terms". It is acknowledged that the resource exists and landowners (although those with legal rights have not been considered) are supportive of site 5, but in the final element of this criteria the site fails to comply. The resource exists but is not accessible to the extent stated in the draft plan due to the constraints on 3 boundaries, with the access track through the centre. Due to 4 | P a g e 113079 01/02/2017 these constraints the accessible resources are substantially diminished and would not be viable without the larger site to the north also coming forward for allocation. This separate site is not under the landowner of site 5's control and is therefore undeliverable as an isolated allocation. Most critically, the site is not acceptable in planning terms, it is contrary to the principles of sustainable development, the golden thread that runs through the NPPF; is constrained by heritage designations and landscape factors and consists of good quality agricultural land. Overall, these material considerations weigh against the proposed allocation of the site with a relatively small resource. Further concerns regarding the viability of the site are raised in relation to the reported minerals extraction figures. The site at Glebe Farm is considered to represent a very small site, extending across only 14 hectares. The assessment of the site outlines that just 0.3 million tonnes of sand and gravel could be extracted from the site across its operational period. On these grounds alone, it is deemed that there is no justification for the loss of an established agricultural unit to extract a nominal amount of sand and gravel. Whilst the limited extraction amount should itself provide justification alone for Site 5's non-allocation, it is identified that the reported extraction amount is imprecise, as it does not take into account the site limitations, which substantially reduce the available resource for extraction. The draft allocation has failed to take into account the standoff distances that must be provided around Seven Elms, its residential curtilage, and the applied buffer along the access track. As detailed within the Planning Practice Guidance for Mineral extraction, a buffer zone should be considered as appropriate in specific circumstances, where it is clear that based on site-specific assessments and other forms of mitigation measures, a certain distance is required between the boundary of the minerals extraction area and an occupied residential property. A buffer distance should be established on a site-specific basis and must take into account, the nature of mineral extraction activity; the need to avoid undue sterilisation of mineral resources; location and topography; the environmental effects and mitigation measures that can be applied. At present, the proposed site allocation is suggesting a minimum buffer of 100m from Seven Elms and Seven Elms Barn. The proposed minimum buffer is shown in Figure 2 below. The image also illustrates the proposed 100m buffer around Glebe Farm. As demonstrated, the application of the buffer around the three properties would greatly reduce the land available for extraction. As outlined in green, the annotated image below, demonstrates a 100m 'standoff' from the residential curtilage and a buffer of 10m either side of the access road. With the blue outlined annotation, demonstrating the application of the 100m 'standoff' around the curtilage of Glebe Farm. The proposed 100m standoff buffer is not considered to be acceptable when due consideration is given to the proximity of the residential property, its listed status and its location in the direction of prevailing wind. Taking into account these factors, it is clear that the buffer distance is not adequate and should be extended to a minimum of 250m of which there is evidence that other sites in the UK have adopted. A report produced by the British Geological Survey (A guide to Mineral Safeguarding in England - October 2007), provides guidance on acceptable buffer limits that have been confirmed through industry consultation. The report outlines that for the extraction of soft rock (where blasting is not required) a minimum 250m buffer should be applied for sites of sand and gravel extraction. A technical report produced by the Department of Environment on acceptable buffer zoning for minerals sites, outlines that severe or persistent concerns relating to dust generation are most likely to be experienced closest to the generating dust sources. To alleviate such concerns, standard practice from local planning authorities should be to incorporate policies that require a minimum standoff distance, which are typically applied at between 250-500 metres. 5 | P a g e 113079 01/02/2017 In providing evidence of such compliance, it is cited that the neighbouring authority of Leicestershire specifies a minimum buffer of 500m from any quarries or crushers within its Minerals and Waste Plan. The British Geological Survey outlines within its guidelines, that a 250-500m buffer zone should be applied to limit dust sources from affecting surrounding communities. In accordance with this external guidance, the statutory listed status of the building and comparative policy applied by other neighbourhood authorities demonstrates that the proposed 100m standoff is insufficient and as a minimum a 250m standoff should be supplied. Figure 2: Annotated aerial image showing 'extractable' land, with 100m buffer applied. Furthermore, Thelsford brook follows the southern boundary of the site which requires a buffer zone to protect it from contamination. A 10m buffer zone has been applied in other cases as a minimum buffer for small watercourses. It is noted that the brook is subject to flooding

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Other cases of a minimum buffer for small watercourses. It is noted that the stream is subject to flooding which incurs into the site and therefore, flood protection would also be required which could have adverse flooding impacts downstream. The aerial photograph above has been annotated to provide an indication of the buffer zones and shows the constraints that this would impose upon the site. The working area would be reduced to two separate plots, which would represent an area of only 6.7 hectares. The illustrated reduction in extractable land therefore challenges the viability of the allocation as a standalone extraction site and the accuracy of the calculated 0.3 million tonnes extraction potential. Further concerns relate to the site investigations, which have taken place on the site. It is understood that of the six proposed trial pits, only four were excavated, of which only one was completed due to operational difficulties involving pit collapse. The accuracy of the inferred 2m sand and gravel depth is therefore questioned as this calculated figure has been informed via a single trial pit. 6 | P a g e 113079 01/02/2017 In light of the above information, the amount of resource available is not based on reliable evidence and when the buffers are included the site is further constrained. The evidence base is unsound, the justification for the allocation of the site has not been provided and the allocation is not effective as only a small part of it is actually deliverable when the constraints have been identified.

CONSISTENT WITH NATIONAL POLICY The National Planning Policy Framework outlines that in the preparation of Local Plans, the planning authority should set out environmental criteria in line with the policies of the document, to ensure that any permitted operations including Mineral Extraction, would not have an unacceptable impact upon the natural and historic environment or human health. Consideration should therefore be made towards the affect that a proposed development may have on the applied environmental criteria, which includes the impact of noise, dust and visual intrusion. Environmental and Social Dust The Technical Guidance for the NPPF outlines that, "any unavoidable dust emissions are controlled, mitigated or removed at source". The activities associated with mineral workings and their related dust production varies depending on the extraction techniques employed and the sensitivity of the surrounding land uses to the effect of dust. The Technical Guidance for Dust Emissions outlines that 'Residential Areas' are considered to represent a Medium Sensitivity. The Technical Guidance cites research undertaken by Arup Environmental/Ove Arup and Partners and the University of Newcastle upon Tyne, which outlines that measures to control PM10 particles are necessary, if the actual source of dust emission (e.g. the haul roads, crushers, stockpiles etc.) is within 1,000m of any residential property. The requirement for such measures is on account that PM10 particles (less than 10 µm), emitted from most mineral workings, are only deposited slowly and can travel beyond 1000m. PM10 particles have the potential to affect detrimentally on human health, with long-term exposure leading to respiration issues. Whilst it is noted that dust suppression methods would be employed, such methods cannot fully eliminate this risk. Given the close proximity of Site 5 to Seven Elms, a sensitive receptor and listed building, and Seven Elms Barn and the direction of the prevailing wind, it is considered that there is a demonstrable risk that the allocation of Glebe Farm for the extraction of sand and gravel would have a detrimental effect on the properties and its inhabitants. In identification of this potential risk, the proposed allocation would not be consistent with the direction of the NPPF that outlines in Paragraph 120 that planning policies should ensure that development, which presents a pollution (dust) risk, should be appropriately located to avoid any health impact associated with the produced pollution. Noise The National Planning Policy Framework outlines that planning policies should aim to avoid new development that gives way to noise that has the potential to significantly impact upon health and quality of life. 7 | P a g e 113079 01/02/2017 The draft Minerals Plan provides no evidence to indicate that an acceptable noise limit could be established at Site 5, which would avoid any undue impact on the sensitive receptors Seven Elms and Seven Elms Barn. It is outlined that because of the proposed sites proximity to the residential properties, it would be difficult for the site to operate in accordance with the maximum 55db limit and duly an unacceptable impact on quality of life would be forthcoming, which would not be consistent with the direction of the NPPF. Landscape The Sustainability Appraisal report states that as the site shall be developed in conjunction with Site 4, there will be a significant cumulative effect on the local landscape. On both sites, the cited loss of local landscape features and the visual impact on nearby residential receptors will be notable. Whilst the Appraisal Report does cite the potential for restoration of the site, it is concluded that permanent changes to local landscape shall occur. Warwickshire County Council undertook a desktop landscape assessment which reviewed the landscape significance of each Warwickshire County Council owned proposed minerals site. The assessment of Glebe Farm concluded that the broad area of the site has a landscape character that is of moderate sensitivity and visibility, with the assessment outlining that it would be difficult to effectively mitigate the impact of the minerals development on the local landscape. The surrounding landscape which as detailed with the landscape assessment would be permanently detrimentally effected by the proposed minerals extraction, is considered to be a valued landscape that contributes to the setting of the Grade II listed Seven Elms. Paragraph 11 of the NPPF states that valued landscapes should be protected and enhanced, of which landscapes that contribute to the setting of a listed building being deemed as valuable from a heritage perspective. It is clear from the assessment undertaken by Warwickshire County Council, that the proposed mineral extraction of Glebe Farm cannot be adequately mitigated from a landscape perspective, thereby failing to comply with Paragraph 11 of the NPPF. The conclusion is that it will not be possible to mitigate the impacts, the visibility and inherent rural character are key considerations and the site should not be taken forward as an allocation on this basis. Heritage Setting is defined in the National Planning Policy Framework (NPPF) as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral". In this instance, the listed building is a residential property and as such, the value of the property is primarily its residential amenity. It is therefore clear that the significance of the setting would be compromised by an immediately adjoining site being worked for mineral extraction. In line with the National Planning Policy Framework (NPPF), great weight should be given to the conservation of any heritage assets that has the potential to be impacted upon, by any proposed development. The allocation of the Glebe Farm site and its associated mineral extraction will cause a detrimental and irreversible harm to the setting of the Grade II listed Seven Elms, which has stood in its current location since the 17th Century. Whilst the minerals site will be subjected to a full restoration scheme on completion of extraction, the restoration of the affected landscape to its current condition will not be achievable, as outlined within the Sustainability Appraisal Report conducted on behalf of Warwickshire County Council, 8 | P a g e 113079 01/02/2017 which cites that 'permanent changes' to the landscape are likely to occur. Accordingly, the development of the Glebe Farm will result in permanent harm to the setting of the Grade II listed Seven Elms. As outlined within the NPPF, any harm to a designated heritage asset should require clear and convincing justification, and where substantial harm to a grade II listed building is forthcoming such justification should be exceptional. In respect of this directive, it is considered that there exists no exceptional justification for the allocation of Site 5 (Glebe Farm), on account that the proposed minerals site does not comprise a notably significant amount of sand and gravel, and the presence of other larger and more appropriate sites being available within the County area. The Sustainability Appraisal Report, which includes the assessment of the Glebe Farm site, states within SA Objective 6, that 'to preserve and enhance sites features and areas of historic, archaeological or architectural importance and their settings', all decision making should seek to 'protect and enhance the setting of Conservation Areas, Listed Buildings, SAMs and other features of cultural, historical and archaeological value?'. This assessment of Glebe Farm (Site 5) makes no reference to the presence of the listed Seven Elms. As the assessment has failed to fully consider the overall impact of the minerals allocation, and accordingly does not provide suitable mitigation, it should be considered that the Minerals Plan has not been prepared in an effective and justified manner. Whilst the Sustainability Appraisal Report makes no reference to the listed Seven Elms property, the assessment of the Wasperton site (Site 4) has identified the presence of other listed building upon the site, to which the report assesses that 'significant negative effects are predicted'. Such outcome would be in direct contravention with Objective 6 of the Sustainability Appraisal. Accordingly, it is considered that an allocation of Site 5 for minerals extraction would have a similarly negative effect upon the setting of the listed Seven Elms and is therefore in contravention with national policy. Archaeology No evidence of an adequate consideration of undiscovered archaeological remains has been provided within the proposed allocation of the Glebe Farm site. The land surrounding the site has a known archaeological significance, with a number of historic archaeological land features on site and within proximity, with the remains of the Theilsford Priory Scheduled Monument located 270m to the south west of the proposed minerals site. As detailed by Paragraph 128 of the NPPF, sites for development should at a minimum consult historic environmental records and where necessary any identified heritage assets should be assessed using appropriate expertise. Where a site on which development is proposed includes or has

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MLPpub1 6196				1																	N/A	N/A	1			1								To be fully effective I believe that my lands should be included as part of the leas Marston sand and Gravel site.							1	I would be happy to participate in any oral hearing should it be necessary	
MLPpub1 6197				1																	S4		1			1								I consider that the Minerals Local Plan is not legally compliant and is unsound because of the following points: 1, Traffic hazard due to increased number of large slow moving loads which will increase noise and pollution and risk of accidents. 2, The health of residents especially children will be at risk of accidents. 3, This farming land is some of the best and most versatile in the County which will be gone forever. Any future reinstatement will be inferior quality.	1					1			
																																				Salford Priors Parish Council considers the plan to be unsound because: 1. Pre-determination. The Parish Council are of the opinion that officers of Warwickshire County Council prior to the public consultation undertook a position that could be viewed as pre-determination, officers made contact with the Clerk to the Parish Council seeking agreement for the Parish Council to work closely with the County Council to drive forward a minerals planning application within Salford Priors for the benefit of both parties prior to any decision being made on the Draft Minerals Local Plan. Proving that pre-determination has occurred requires demonstrating that the decision maker has closed their mind to any other possibility than their existing predisposition on a particular matter. The effect being that they are unable to apply their professional judgement fully and properly to an issue or matter requiring a decision. In this case financial gain was offered as an incentive for the Parish Council to support an easier passage of a minerals planning application. The Parish Council base their starting point as Section 25(2) of the Localism Act 2011. This states that a decision maker is not to take or to have had taken, or to have appeared to have had, a closed mind when making a decision just because: a) The decision-maker had previously done anything that directly or indirectly indicated what view the decision-maker took, or would or might take in relation to a matter, and b) The matter was relevant to the decision What the above means in practice is that if an accusation of pre-determination is made, all events and actions taken by the individual leading to the event/decision in question must be taken into account. It is not enough to focus on an individual event/action taken by the individual in isolation. The Officer had clearly set out the County Council's position on this issue. The following is an extract of an e-mail to the Parish Council received from a Senior Officer of the Warwickshire County Council 11/09/2015. "The land in question is owned by Warwickshire County Council, which is managed by the Estates & Smallholdings section. This site is currently rented to agricultural tenants as part of the Smallholdings estate in accordance with our County Farms & Smallholdings Strategy. We have been reviewing the Council's property portfolio to explore proposals that contribute towards our revenue and capital targets. The income from this mineral resource would help relieve pressure on Council budgets and other parts of the Authority where funding is vitally needed. The Council (as landowner) is primarily driving this development from an income generation perspective, but we also have a collective responsibility to consider wider county objectives to facilitate aggregate delivery for local construction industry needs. As the income from this site would be returned to the public purse (as opposed to a private landowner), I hope that the Parish might consider working with us to help prepare a well-designed scheme that minimises impact and enhance the area for the community afterwards". So the very motive of the County Council's reasoning for Site 7 at Salford Priors is to relieve financial pressures on the Council's budgets and primarily driving the development from an income generation perspective, therefore fettering any future decision made through the public consultation process of the draft minerals local plan. The leading piece of case law providing guidance	Appendix 1 August 2016 public consultation with WCC responses to our submission and subsequent submission: ID: 966041 Comments: Statement: Salford Priors Parish Council formally registers its strong objections to the proposals for the inclusion of Site 7 Salford Priors within the Warwickshire County Council Minerals Plan – Preferred Option and Policies 2017-2032. It is the opinion of the Salford Priors Parish Council that the proposed Minerals core strategy introduces the single most destructive possible proposal of activity that this Parish has ever had to contend with. In terms of its long term impact on the wellbeing of parishioners, its certain and significant adverse effect upon the physical and visual environment and ecology of the area, the proposal to include this site on the gateway to the village is unprecedented. 1. Viability Site 7 is described as having potential to release 0.8 million tonnes of sand and gravel from a targeted 62ha area during the plan period. With the exception of a small satellite site, compared to the remaining proposed sand and gravel site locations listed in the County Minerals Plan Preferred Options document, Site 7 shows considerably lower anticipated yield of tonnage for extraction. There are several additional key factors mitigating against optimal extraction of minerals and give rise to serious doubt about the viability of mineral extraction at Site 7. <input type="checkbox"/> Proposals indicate two crossing points for site vehicles to cross School Road to allow the excavated material to be transported from the South West sites (Sites 2, 5 and 6) across to screening and washing facilities on the North East side (Sites 1, 3 and 4). Given the requirement for large articulated dump trucks for transportation. <input type="checkbox"/> This is relevant in that these crossing points are vital to the viability of the entire scheme being the only way to remove the material from the South West site which makes up 40% of the sand and gravel thought to be available. The existing Western Power 33KV electricity mains and a network of other overhead cables, serving the area run through the sites creating restrictions to the extraction area of the proposed site. There will be requirement for safe working zones around the area of line which will effectively restrict the quantity of excavation possible. <input type="checkbox"/> A substantial proportion of the targeted area will not be available for extraction due to a 100m buffer zone around properties lying immediately within or adjacent to Site 7. <input type="checkbox"/> The high cost implications of practical arrangements associated with inter-site access, clearance to avoid	1					1

MLPpub1	6214	1	1	7.23 – 7.25	S5	1	1	1	1	1	1	1	1	1	1	<p>Traffic & potentially life threatening hazards (NOT POSITIVELY PREPARED): I am extremely concerned about the impact on traffic on the A429. Being a resident of the top end of Westham Lane I am aware how difficult it is at peak times to move out on to the A429 and this is without the increase in traffic that the mineral sites would cause. In particular this would be slow moving traffic on to a key commuter road which could cause significant frustration, overtaking and making it hazardous for us to move out on to the road. There has already been an accident where a female driving with 3 children was turning right in to Westham Lane and a vehicle hit her causing significant damage. Currently 'turning right' between 7.45 a.m and 9.30 a.m. and between 4.30 p.m. and 6.30 p.m. on to the A429 is extremely difficult. This proposed mineral site will only had to this unsatisfactory situation and cause potentially life threatening hazards. Dust & Lower water levels (NOT JUSTIFIED) : My research indicates that 'dust' is highly likely to be a consequence of this sand and gravel pit. Given the prevailing south westerly wind, this will mean that the school and nursery will be covered with dust particles that they currently are not being subjected to. Is this fair? Is this right? Where is your research and evidence to prove that this won't be the case? Your response to the previous challenge on this point where you say it is "unlikely" to cause dust in the village is surely not sufficient? 'In addition, properties at Westham House will also suffer from the increase in dust caused.</p> <p>As far as I am aware we have not seen a hydrology report. The original made in 1987 by Prof Carolyn Roberts(A water resource management specialist) includes a quote from his speech in 2015 at Gresham College London : 'My scientific analysis showed that the environmental implications of quarrying for gravel(others than the scenic and traffic matters, which were obviously of significance),were that it was dust prone when machinery ran over it in dry conditions and that there would be a reduction in ground water levels locally by 2-3 metres, potentially influencing trees and well levels. This situation arises because the area would have to be pumped dry of groundwater during the extraction phase, and was calculated after exploration of the characteristics of the surrounding sand and gravel materials, and their ability to transmit water. What is called a 'cone of depression' develops around the site. In addition, there was some possibility of contamination by fertilisers and pesticides from the surrounding intensively used agricultural area being drawn into the workings and later on into the restored lakes.'</p> <p>So in conclusion on this point, WCC have provided no evidence to support that dust WONT be a problem for ALL the residents of Barford and Wasperton. They have also not provided evidence to support that the water table won't be negatively impacted. Finally, there is no evidence to suggest that chemicals will be not be absorbed in the land. The young, elderly and vulnerable will be at greater risk of health hazards as a consequence of this pit. Is WCCC prepared to accept responsibility for a downward spiral in health in this area? Noise and light pollution (NOT JUSTIFIED) : The enhancement of noise and light pollution from the process of mining and the increase of traffic will impact the whole of the surrounding area. We do not consider this to be acceptable. Where are the environment impact assessments? Blight & Usage of Land: The 2015 WCC response saying this is a 'temporary activity' is wholly misleading. Our research indicates that this could go on for 15 years which is hardly temporary. The response also says that "the site will be restored when working has been completed". Restored to what? The agricultural properties of this land are high and the only thing you are going to be able to replace it with is landfill! Which again is environmentally hazardous and a tragedy to the local environment. I also believe relying on 'the developers own report' to quantify the quality of the land is wholly unfair given they will have a biased opinion due to their vested interest in this project. This proposal has gone against the Neighbourhood Development Plans. Barford's own plan has just been approved by an inspector and given a full mandate by the villagers of Barford in a recent referendum. The plan quite clearly states 'The irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture'. There are many references in the NP about farming and farm land that might be useful: - Para 5.17 Para 5.39 (vistas) para 5.44 5.45 5.46 page 27 (policyB9) page28 (paras 5.48, 5.49 5.50). Cultural Heritage (NOT JUSTIFIED, NOT CONSISTENT WITH NATIONAL POLICY): I am simply astounded that WCC think creating such a monstrosity so close to a town that I am led to believe has over 40 listed buildings, is acceptable. In the plan, is there not a requirement to keep an area as close to its cultural heritage as possible? I believe the national planning policy framework requires environmental consideration which protects and enhances our historic environment. I believe your proposed mineral pit goes directly against this. Reasonableness around pool of possible sites and subsequent selection process: Where are the other sites that you have considered? I would suggest that there are flaws in your process. You say you need 9 sites and you have presented only 9 sites. Therefore this whole allegedly 'meaningful consultation' process seems flawed and seems only to be a pre-requisite to a foregone conclusion that you intend to push through without due consideration of the local residents who do not want this mineral pit so close to their homes. Where is the choice? Where are the other options? In particular where are the options that do not sit closely to where people live? There are many 'fields' particularly in the northern parts of the county that are no where near villages, towns and cities. Why choose to mine so close to residents given the negative consequences on their health, daily lives and welfare?</p>	<p>The area is not appropriate for a minerals pit. The only change that would meet all of the above challenges would be not to do it in the Barford, Wasperton area.</p>	1	1	<p>I am concerned about the lack of meaningful consultation and an unfair process which is stacked against the residents. Any opportunity to observe the process would be of interest.</p>
MLPpub1	6215	1	1	S4	1	1	1	1	1	1	1	1	1	<p>Not sound and reasonable because: The land is of the best and most versatile agricultural quality and if subjected to gravel extraction it and the quality would be permanently lost to agriculture. The Government has directed that poorer quality land should be used in preference to top quality land, so the extraction from this land is counter to that policy. The quality is because of the sub level gravel and therefore it would be short term benefit only to allow its removal and a long term loss, that is just an opportunistic short term gain. There is no quota benefit to removing the gravel. Once the gravel has been removed and taken away, the ground cannot by definition be restored to the quality that it is now and it is simply untruthful to suggest that it can. Permission to extract gravel from this site was rejected on Appeal in 1993. One of the consequences of Brexit is that we should grow more food product in this Country; to extract gravel would mean a reduction of food grown on this site. Traffic; there will be a considerable and sustained increase in heavy slow moving traffic as a consequence of extraction which will lead to an increase in accidents, an increase in congestion on the bypass and on Longbridge roundabout, and an increase in diesel and petrol emissions and particulates pollution. The use of heavy vehicles on site for extraction when the land is dry will result in silicon dust rising up and this light dust will sit in the atmosphere and be blown by the prevailing south west wind straight into Barford. This dust is medically dangerous; it is breathed into the lungs and lodges in the lining. There is no escape for it and like asbestos strands it clogs up the lungs and leads to lifetime disablement. The extraction will lead to a reduction by 2 to 3 metres of ground water levels; this will harm surrounding vegetation and particularly trees by depriving them of water. Not legally sound because: No reasons or arguments are made as to why this site should be chosen for extraction over other sites; one concludes that it is just because it is easier to get at and is available from the owner. These reasons do not make the proposal legally sound. This Form 20 is prescriptive such that no Objections can apparently be entertained unless they are presented as an answer to one of its questions; since Form 20 is presented as the only way of responding, it precludes persons who are not accustomed to computers from objecting; limits and restricts objections by limiting and crafting/slanting its questions; does not have a space where one is asked to put ones name and address and yet that is one of your stipulations that one should give ones name and address; finally it is unnecessarily and it seems deliberately made complex.</p>	<p>I consider the relevant tracks of land should be removed from the Minerals Plan. I do not wish to make oral representation</p>	1	1			

I consider the Minerals Local Plan to be UNSOUND for the following reasons: The inclusion of Site 5 is based on inaccurate and contradictory information. The volumes for extraction are not effectively justified or calculated. The plan states that there is 300,000 tonnes of sand and gravel available for extraction at site 5. This figure is based on data from a previous proposal in the 1980's. In this proposal, the standoff from Seven Elms and Glebe Farm was 30 metres and there was no provision for the access track over which residential properties have a legal right of way. The current draft plan states there should be a minimum of 100 metres stand off from the residential properties and the need to retain and protect the access track. As a result, the plan is not effective and the proposal to obtain 300,000 tonnes from Site 5 is undeliverable. This is further re-enforced when considering that 100 metres may well be considered an insufficient standoff as it would not sufficiently mitigate against the impact of damage to the landscape of a listed building in its setting and to guard against the hazards of dust and its damage to human health. Site 5 is very flat and open. Bunding and tree planting would be inappropriate in landscape terms and ineffective in health terms as both Seven Elms and Seven Elms Barn lie directly in the prevailing wind. It is interesting to note WCC's response to the first consultation whereby, by omission they admit that these two properties are adversely impacted: "the northern half of the site is likely to be beyond the prevailing wind", meaning and admitting the properties are directly in the path of the prevailing wind for the southern half of the site and would be significantly impacted thus creating serious hazard to human health. This contradicts Government guidelines. Site 5 (a WCC owned site) is included in the plan as having to be worked in conjunction with site 4 to the North. As site 4 is owned by a different land owner, St Johns' College, Oxford, the owners of Site 5 have no ability to state the deliverability of their site. The deliverability of site 5 is entirely dependent on another. To be included in the plan, landowners have to demonstrate the deliverability within the plan period. WCC Estates Department are unable to do this as the decision for site 4 to progress does not rest with them. Many other, more appropriate sites with less constraints and lower land quality have been discarded from the plan as they cannot guarantee deliverability. Given this consideration, it is impossible for WCC estates Department to demonstrate deliverability and as such render the plan ineffective and undeliverable. Site 5 was put forward for consideration for inclusion to the Minerals Plan with a desktop, Landscape Assessment commissioned by the landowner, WCC Estates Department. This concluded that the site should not proceed as it was not possible to mitigate against the permanent change to the landscape. This has been completely ignored and reference to it left unanswered. The land at Glebe Farm although grade 2 and 3 is still categorized as Best and Most Versatile and should be a treasured resource within the county. The plan talks of re-instating to "close to" original levels. The land at Site 5 is already close to the water table and is susceptible to surface water. The plan fails to provide a definition of "close" leaving the restoration open to interpretation. It also states "suitable inert fill". The only suitable infill to restore the land to free draining, high grade agricultural land would be sand and gravel. If it is restored to a lower level with sub-standard infill, it will be underwater for significant periods of the year. This will result in a County Council, high quality land smallholding resource, being lost forever. I do not consider the plan to be legally compliant as the process itself has been complicated, confusing and has not complied with the Statement of Community Involvement. The inclusion of a site owned by the promoter, decision makers and supporting departments of Warwickshire County Council creates a question of conflict and has prevented consultees from gaining relevant information. The two planning officials who have been at the front of this plan, Paul Wilcox and Tony Lyons have been polite and courteous and attempted to be helpful from the outset. However, the process itself has been flawed, there have been significant difficulties with the way in which information has been provided. The forms themselves are not user friendly or easily answered by the average member of the public, thus making them discriminatory. Information has not been forthcoming and in many cases, has been ambiguous or even misleading. Information has had to be gleaned and clarified by members of the public repeatedly asking for clarification. At three days before the end of this consultation there are still points awaiting clarification and other, crucial information being delayed by the County itself. In recent weeks, the planners are having to consult with the legal department before responding and clarifying. Is this open and transparent? There has been particular issue with information regarding the county council owned Site 5. In order for individuals to gain and clarify information about this proposed site, they have had to work via several County Council departments - Estates, Planning, Legal, Freedom of Information to include EIR. Whereas the county claim that there is no direct conflict between Estates and Planning, the conflict is caused when both Planning and Estates use the same legal department and Freedom of Information departments and it is this conflict which has caused significant issues and in my opinion, prevented this consultation from being a fair, legal and transparent process. Advice from a Senior Planner was that due to individual circumstances of how Site 5 (a WCC owned site) impacted on Seven Elms particularly, we should try to have direct communication with the Council. Despite all our efforts, Warwickshire County Council appear to have "closed ranks" preventing consultees gaining vital information as to the legitimacy of this plan. Several requests under Freedom of Information have been refused and some outstanding. Apart from the very first village meeting (1 at Wasperton and 1 at Barford) when Tony Lyons visited and some site notices being displayed at relevant times, there has been no community involvement other than what individuals have sought for themselves by directly approaching officials. The website is clumsy, very difficult to navigate, information hard to find and in some cases simply not available or updated. Warwickshire County Council's Statement of Community Involvement states: Any site-specific proposals will involve displaying a Site Notice on or near to the land in question and at a location that can be viewed from the public highway, where appropriate. There has been no site notice at site 5 during the 2nd consultation (as was the case for the 1st consultation, thus demonstrating appropriateness) either at the site itself or at the joining point where the access track to the site meets the A429 or indeed at any point on the main A429, near the proposed site, where it could be viewed by the wider population from the public Highway. The site notices for Site 5 have been placed on the tiny NO THROUGH road that forms Wasperton. The public were informed from the outset, at the village meeting that the next stage after the first consultation (which ended in January 2016) would be for the

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intended after use and for the future management of its after use; and unless it has been demonstrated that the site will be reclaimed at the earliest opportunity. In determining planning applications, the Council will take into account the extent to which the proposals can deliver additional restoration benefits to the local community and the environment such as net gains in biodiversity." We note that Policy DM9 does not mention the 'economy' at all nor does it provide flexibility for the restoration of sites. This again is not consistent with what the definition of restoration as set out in the Draft Plan. We have also looked into the definitions that are given in other Minerals Plan to understand how other County Councils have defined 'After-use' and 'Restoration'. These are set out in the table below: The above table shows that a number of other Minerals Planning Authorities provide flexibility within their definitions in their Plans. We believe the Warwickshire Minerals Plan needs to be consistent in terms of the definition of 'After-use' and 'Restoration'. For these to be consistent we recommend that the definition of After use is amended to read: "The long term use that land formerly used for mineral workings is restored to. This use can be agricultural, forestry, public amenity or alternative new uses which benefit the community and/or the economy." Junction 9 Consortium believe that the suggested amendments to the Plan would ensure consistency and ensure that it is found to be sound. We would be grateful if you would acknowledge receipt of our representations to the Warwickshire Minerals Plan Publication Consultation. In the meantime, if you require any clarification of the above please do not hesitate to contact Renu Prashar Prinjha at the above address. Officer Notes: refer to attached document that contains the above mentioned table

Policy S9 – Hams Lane, Lea Marston This policy sets out the following: "Land at Hams Lane, Lea Marston shown on Figure 1.18 is allocated for sand and gravel working subject to the following requirements: • if worked as a stand- alone site suitable access onto Hams Lane and all vehicles turning right to Faraday Avenue. No access through Lea Marston village; • exploring the opportunity to work the site back to Dunton Quarry by overland conveyor; • phased working and progressive restoration to agriculture and nature conservation uses; • A minimum stand-off of 100m from individual properties on Blackgreaves Lane and at Reindeer Park, • Kingsbury Road; • 30m stand off from Dunton Wood; • additional woodland planting; • protected species surveys and the provision of suitable measures to protect and where appropriate • enhance the special features of Whitacre Heath SSSI; • an archaeological evaluation; • preparation of an Environmental Management Plan for the site; • all soils to be stored on site for future use in the restoration of the site; if worked as a stand-alone site mobile plant to be located so as to reduce impact on the openness of the Green Belt; • the working and restoration plan should take into account and contribute to the Tame Valley Wetlands Partnership Scheme and Trent and Tame River Valleys Futurescape project; • taking into account any mitigation approved to minimize the impact of HS2 on Lea Marston village." Whilst our Client appreciates the fact that the land at the moment is in predominantly agricultural use, we do not consider that the text which states "phased working and progressive restoration to agriculture and nature conservation uses" is appropriate, given that the policy later states that the site "taking into account any mitigation approved to minimize the impact of HS2 on Lea Marston village". The proposed HS2 route will be going through the south west of the site covered by Policy S9 and will be changing the baseline position for the site and its surroundings. It would not be appropriate to specify that the site should be restored to agriculture and nature conservation, as this may not be the most beneficial use of the site in the long term, given the location of the site and proposed infrastructure in the area. It would be more appropriate to amend the wording of bullet point three, to state "phased working and appropriate restoration of the site". Within the glossary, the definition of restoration is set out as "Once mineral developments have ceased sites are required to be returned to an acceptable environmental state whether this be a continuation of the existing land use or the creation of a new one". The definition is clear that restoration is not just about returning land to its former use, and for consistency this should also be reflected within the text of Policy S9. We would also recommend an amendment to the wording within the first bullet point to ensure that access issues are covered not just for Hams Lane but also the surrounding A-roads. We recommend that that the bullet point should be amended to read "if worked as a stand- alone site suitable access onto the A446 Litchfield Road, the A4097 Kingsbury Road, Hams Lane and all vehicles turning right to Faraday Avenue. No access through Lea Marston village.". Whilst an amendment in the wording of Policy S9 would make it more consistent there are also other discrepancies in terms of the definitions applied in the Plan, which we consider need to be amended. We have undertaken a review of other adopted Minerals Plans as a reference point to our suggested amendments below. For example, Northamptonshire County Council adopted their Minerals Plan (which replaced the previous Core strategy) in October 2014. This Plan identifies what minerals and waste related development should go where, why it should go there, and how by doing so, it can make other land use and infrastructure systems function better. As well as having the site-specific policies for minerals extraction they also have policies on general management of the County's sites. Whilst the allocated sites detail within Appendix 1 do not refer to 'alternative-uses' in terms of restoration, Policy 28 Restoration and After-use states: "All minerals and waste related development of a temporary nature must ensure that the site is progressively restored to an acceptable condition and stable landform. The after-use of a site will be determined in relation to its land use context, the surrounding environmental character and any specific local requirements, but on the basis, that it: • enhances biodiversity, the local environment and amenity, and • benefits the local community and / or economy. The restoration of minerals and waste sites should meet the following requirements (where appropriate): • sites previously comprising high-grade agricultural land or good-quality forestry use should be restored to the original land use and coupled with a secondary after-use objective, • precedence should be given to the establishment of Biodiversity Action Plan habitat, strategic biodiversity networks, promotion of geodiversity and enhancement of the historic environment and heritage assets where the specific conditions occur that favour such after-use objectives, • sites connecting or adjacent to identified habitat areas should be restored in a manner which promotes habitat enhancement in line with Biodiversity Action Plan targets and green infrastructure plans, • sites located near to areas identified as lacking recreational facilities should be restored in a manner that promotes such opportunities, • sites located within river corridors should be restored to support water catchment conservation and incorporate flood attenuation measures, and • in specific instances, and where fully in accordance with policies in other local plans in Northamptonshire, sites may be restored in a manner that promotes economic opportunities." (our emphasis) The policy does set out that "sites previously comprising high-grade agricultural land or good-quality forestry use should be restored to the original land use and coupled with a secondary after-use objective", "(where appropriate)". This is important and provides flexibility in the Northamptonshire Policies. The respective policy in the Warwickshire Minerals Plan DM9 Reinstatement, reclamation, restoration and aftercare states: "Planning permission for mineral development will not be granted unless satisfactory provision has been made for high quality restoration and aftercare of the site, for the steps to be taken to bring the land up to the required standard for the intended after use and for the future management of its after use; and unless it has been demonstrated that the site will be reclaimed at the earliest opportunity. In determining planning applications, the Council will take into account the extent to which the proposals can deliver additional restoration benefits to the local community and the environment such as net gains in biodiversity." We note that Policy DM9 does not mention the 'economy' at all nor does it provide flexibility for the restoration of sites. This again is not consistent with what the definition of restoration as set out in the Draft Plan. We have also looked into the definitions that are given in other Minerals Plan to understand how other County Councils have defined 'After-use' and 'Restoration'. These are set out in the table below: The above table shows that a number of other Minerals Planning Authorities provide flexibility within their definitions in their Plans. We believe the Warwickshire Minerals Plan needs to be consistent in terms of the definition of 'After-use' and 'Restoration'. For these to be consistent we recommend that the definition of After use is amended to read: "The long term use that land formerly used for mineral workings is restored to. This use can be agricultural, forestry, public amenity or alternative new uses which benefit the community and/or the economy." Junction 9 Consortium believe that the suggested amendments to the Plan would ensure consistency and ensure that it is found to be sound. We would be grateful if you would acknowledge receipt of our representations to the Warwickshire Minerals Plan Publication Consultation. In the meantime, if you require any clarification of the above please do not hesitate to contact Renu Prashar Prinjha at the above address. Officer Notes: refer to attached document that contains the above mentioned table

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Site 4 Wasperton 1. Land Classification – The Best and Most Versatile Land (Not Effective, Not Consistent with national policy) • The best and most versatile agricultural land is defined as grades 1, 2 and 3a. Wasperton Farm is Grade 2 and 3a and only a small percentage (12%) of agricultural land in Warwickshire is grade 1 and 2. • The Government have stated that local planning authorities should use poorer quality land in preference to high grade and yet WCC have excluded other sites with lower grade land. • When planning permission to extract gravel on this site was rejected on Appeal in 1993 the Secretary of State conceded that a number of environmental objections were 'significant', including that 'visual intrusion would be created', that 'the site makes a positive contribution to the pleasant countryside extending either side of the River Avon', that 'there would be some material harm to the appearance of the locality', and that 'the site includes land of the best and most versatile quality, some of which would be permanently lost to agriculture'. Nothing has materially changed and therefore this should still apply 2. Visual Appearance (Not Justified) • Site is within "Terraced Farmlands" • Land is flat and open, with fertile free draining soil • Intensively farmed • Openly visible to public • Bunding and planting are alien to natural landscape 3. Blight (Not Justified) • Certain properties significantly impacted – Forge Cottage, Wellesbourne House • Wasperton and Barford properties impacted due to visual impact, dirt and noise • Barford properties in line of prevailing wind impacted by noise and dust • Saleability • Insurance premiums 4. Land Restoration (Not effective Not justified) • Has county justified that the site can be restored? • Have they demonstrated effective infilling? • Plan States land returned to agriculture contradicted by lack of inert fill and soil no longer being free draining • County claims amount of inert fill is modest and yet Site 4 is one of the largest sites • Plan says that finding inert materials can be hard and therefore restoration can take longer than expected 5. Traffic (Not Positively prepared) • Increased risk of accidents • Lumbering lorries entering fast moving traffic • Impacts of additional loading of heavy traffic on Long bridge roundabout • Impact on immediate Motorway network 6. Neighbourhood Plans Does the County Council take any notice of Neighbourhood Development Plans? Barford has an excellent plan which has just been approved by an inspector and given a full mandate by the villagers of Barford in a recent referendum. The plan quite clearly states 'The irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture'. There are many references in the NP about farming and farm land that might be useful. - Para 5.17 Para 5.39 (vistas) para 5.44 5.45 5.46 page 27 (policyB9) page28 (paras 5.48, 5.49 5.50) The NPPF states 'The adverse impact of mineral workings on neighbouring communities should be minimised' The Site assessment Rationale by CC, question 19, asks 'Would the proposed site be compatible with existing or proposed neighbouring uses or will it create a nuisance that will affect existing residents.' The following comment by the Policy Planning Team of 'Noise, dust, smell, light, vibration, air quality, impact on residents and businesses and neighbouring uses' is surely the answer. These hazards are not acceptable. The Policy Team have also stated in their Assessment Rationale that 'The erection of processing plant and provision of new accesses and screening bunds close by may have a harmful effect on settlements particularly if fixed and for a long duration'. The CC documentation also asks that the 'proximity of local communities and businesses whose amenity may be impacted by development' be taken into account. 'The Exchange' offices will certainly be affected in some way. No mention of this is in the latest documents that I can see. 7. Hydrology We have been promised a hydrology report. There is one in existence. The original made in 1987 by Prof Carolyn Roberts(A water resource management specialist). Quote speech made in 2015 at Gresham College London 'My scientific analysis showed that the environmental implications of quarrying for gravel(others than the scenic and traffic matters, which were obviously of significance),were that it was dust prone when machinery ran over it in dry conditions and that there would be a reduction in ground water levels locally by 2-3 metres, potentially influencing trees and well levels. This situation arises because the area would have to be pumped dry of groundwater during the extraction phase, and was calculated after exploration of the characteristics of the surrounding sand and gravel materials, and their ability to transmit water. What is called a 'cone of depression' develops around the site. In addition, there was some possibility of contamination by fertilisers and pesticides from the surrounding intensively used agricultural area being drawn into the workings and later on into the restored lakes.' This rather points up our concerns that the CC have not really thought through the problems of dust (particularly as our prevailing wind is SW), water reduction levels (how does this affect the water table for example) and the possibility of the absorption of chemicals into the land. NPPF makes it clear that 'unavoidable dust emissions are controlled, mitigated or removed at source. A dust assessment study should be undertaken by a competent person/organisation'. (Technical Guidance to the NPPF framework para23) Surely the original study stands or perhaps no-one has knowledge of it. Site 5 – Glebe Farm (WCC owned site) 1. Visual Appearance (Not Justified) • As per site 4. 2. Listed Buildings (Legal – Does not comply with National Policy and Legislation) Not adequate regard given to setting of a listed building (heritage Asset) • Heritage asset can be harmed by development within its setting • Mitigation (bund) does not address permanent changes 3. Site Area and Extraction Volumes (Not Justified) • Site Volume promoted at 300,000 tonnes, actual volume only 200,000 tonnes • Planning failed to acknowledge 4. Dust Noise (Not Justified, Not Consistent with national policy) • Seven Elms and Seven Elms Barn directly in prevailing wind • Only 100m standoff proposed, flat open site, noise, dust and vibration • County have failed to address objection 5. Land Restoration (Not effective Not justified) • As per Site 4 6. Land Classification – The Best and Most Versatile Land (Not Effective, Not Consistent with national policy) • As per Site 4

We consider that there are more appropriate sites which could have their use extend or other new could be selected. These other sites will have less detrimental impact in regard to: 1. Taking much Grade 2 and 3a land out of permanent use for food production. 2. Houses overlooking the land will have their view blighted for many years. 3. It is not possible for the land be restored to Grade 2 or 3a. 4. The environs around the existing sites if they stay in use, will have less impact than sites 4 & 5. 5. Because of sites 4 & 5's proximity to the river Avon and local farms and villages, the make good, if done badly with contaminated infill, would be catastrophic for the local environment. If migration also took place it will migrate to a very wide area of south Warwickshire. 6. The traffic on the local roads is already too much, and further traffic have a great impact, and it is evident that this has been properly considered in the production of the plan. 7. We do not consider that any consideration has been given in relation to the Neighbourhood Development Plan adopted by the village and by Warwick District Council, in fact we believe it has not been considered 8. We believe that Warwickshire County Council have not considered the health implication for the residents of Barford and Wasperton. We are particularly concerned about the problems with silica, which have been highlighted at a village meeting by a specialist in potential harm of silica. 9. I worry greatly about the impact that the excavations will have on my health as a pregnant woman, my unborn child and future children. 10. I am very concerned about the impact the excavations will have on the health of my mother-in-law and sister-in-law, whose house overlooks the proposed site. 11. The area attracts significant tourist numbers due to its proximity to Stratford upon Avon and Warwick, the other sites which could be used do not have significant tourist numbers. As to providing revised wording or changes to the legal compliance, I do not feel able to do this, as this is the job of the officers.

Site 5, Glebe Farm, Wasperton, is presently in the ownership of WCC and should be withdrawn from the Minerals Local Plan because of a serious conflict of interest on the part of the County Council, who are seeking to gain financially from the mineral exploitation of the site. For WCC to promote this site is contrary to the standard of impartiality that WCC are legally bound to operate within. Therefore, the inclusion of Site 5 is not legally compliant and it should be deleted. Glebe Farm, was purchased in 1921 under the Government's Compulsory Purchase Scheme for small areas of farmland to be publicly acquired to encourage entry into agriculture by returning servicemen from WWI. These "start-up" farms were to be administered by Local Councils on a fair rental basis. During the recent change of tenancy of Glebe Farm in 2016, the advertisement produced a large number of applicants, which shows that the need for such farms remains strong. Thus the special legal status of Glebe Farm has not changed and must remain as a farm. Under the Crielch Down Rules, all nationally "acquired" land has to be returned to the original owner, if the need for its use is no longer there. Thus, WCC's ownership of the land is not outright, as it is dependent on the farming need continuing to exist. There is clearly such an on-going need. Thus WCC is acting contrary to its legal obligations in promoting Glebe Farm for mineral exploitation and Site 5 should be deleted.

Site 5, Glebe Farm, Wasperton, should be deleted from the Minerals Local Plan, as (1) its legal status and (2) the financial interest of WCC, both of which render its inclusion legally non-compliant.

To explain points more fully and to answer any questions.

MLPpub1 6272	1	1	S5	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1

a) It is not adequately thought out, because of the greatly increased risk of traffic causing the greater risk of crashes, accidents and ultimately deaths on the A429 which is already dangerous and overloaded. The A429 will also be impacted by the increase in traffic in the area due to the number of houses and businesses being developed in the area. This will affect Barford, Wasperton and as far as Wellesbourne and the M40 junction which already suffers from congestion. b) It is not supported for the following reasons: 1) There will be a negative impact on the visual appearance of the area, called 'terraced farmlands', this will not be improved in anyway by unfitting bunding and planting. 2) There is a discrepancy on extraction volume. 3) It will be unachievable to restore the land to how it is today. It will take years to bring back the soil to its fertile condition and fit for agriculture. This can be seen today by the soil in Wasperton. The water table changes at each new development in the area. The drainage will never be restored to how it is today causing problems for agriculture in the future. With global warming and population increase agricultural land is going to become more and more vital to this country particularly following the country's exit from Europe. Agriculture is going to become vital to the country's food supply and the environmental impact. 4) There will be noise and dust pollution despite the bunding and planting. Thought has not been given to the predominant wind which will have a direct impact on Seven Elms and Seven Elms Barn. The objections to the damaging effect of the noise, vibration dust and pollution have been not addressed and positively disregarded by the WCC who maintain a 100m stand-off will be suitable for the local public health. 5) This will cause a loss of agricultural land which has been in use for years and has been used until recently for food crops. By the end of this project the land will be of low quality. The WCC did have the choice of site where the land is of low quality but they have chosen to reject these sites. In 1993 the Secretary of State rejected an Appeal for Site 4 on environmental grounds, 'the site makes a positive contribution to the pleasant countryside extending either side of the River Avon', that 'there would be some material harm to the appearance of the locality', and that 'the site includes land of the best and most versatile quality, some of which would be permanently lost to agriculture'. These points apply directly to Site 5 and do not fit in with the National Planning Policy because they threaten to exploit the prime Grade 2 and 3A land which the Government has clearly stated should be avoided. The Barford Neighbourhood Development Plan has been given full validation by the villagers which has been accepted by the WDC distinctly says that, 'The irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture'. The Nation Planning Framework expresses that, 'The irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile land except where it is development for the purposes of agriculture'. Last year there were objections to the impact on people's health, drainage and the future of the site once it has been closed. Although these objections claimed to be dealt with by WCC the objections on health still stand as the 100m stand-off remains. On the matter of future use it is claimed that the site will be returned to 'agricultural land and nature conservation' this will not happen. The land level will drop and the quality of the soil will take decades to recover to be of agricultural quality. WCC have taken on the Warwickshire Energy Plan which plans a solar farm on this site. Improving drainage will have an effect on the water table and local drainage because of its immediacy to the river, farms and villages which is not acceptable today when, with the impact of global warming flooding is more likely. If the land restoration is not done correctly adulterated infill will have disastrous effect on health and the local environment in the local area and the rest of south Warwickshire.

I think there are better placed sites on the list. They are existing sites which have had any problems ironed out or new sites which have a less harmful effect on quality agricultural land, increase in traffic and congestion, pollution and danger to road users, public health, and the visual impact of the area. I think that this plan is not fit for the area as it is lacking in consideration to the increase traffic volumes on the roads over the last 5 years which is set to increase further with the increase in housing in the area. I don't think enough research has been carried out on the effects of RCS (respirable crystalline silica), that will be produced with the mineral extraction, in all the villages particularly Barford, the predominate wind blows in that direction. This dust cannot be seen and causes Silicosis, Chronic obstructive pulmonary disease (COPD) and Lung Cancer. People who are suffering any respiratory problems including Asthma may be affected by the dust and their condition may be worsened. I think that not enough analysis has been carried out into the effect of using sand and gravel in building and where going forward this is going to be found. I think destroying prime agricultural land for sand and gravel extraction has not been thought through. In this time of reducing the carbon footprint of the country is high priority this is not a sound plan.

My understanding, speaking to the local Parish Council is that the proposal for Site 7 – Salford Priors is not based on the requirements to provide sustainable minerals as outlined in the strategy, but as an income generator for the county council. Hence the decision for site 7 is biased and pre-determined. The proposed site is in close proximity to a small, densely populated close knit community and local school. As a Chartered health and safety consultant, I believe the proposed site and logistical arrangements are unsuitable and poses significant risk to the health, safety and wellbeing of the local community. Dust: Despite your weak assumptions, the risk of dust to health is significant – especially in the summer months when there will be little or no moisture suppressant. The risk of silica dusts are well documented by the health and safety executive www.hse.gov.uk and is one of the most common causes of occupational cancer. Only a small amount of dust inhaled can lead to irreversible lung damage. The fact that a primary school with young children and vulnerable groups are close to the proposed quarry should be grounds alone for reconsideration. Construction Traffic: I notice that a number of residents have raised the issue of traffic safety risks along the B4088, School Road and 'C' roads and you seem to be of the opinion that "the developer advises that there will be no reason to use surrounding C roads etc....." and "crossing points will only be active during the campaign" I disagree with your assumptions and reliance on the developer. Every year there are dozens of fatalities and serious injuries due to construction vehicles and HGV movements - and despite the developers/contractors assurances and systems of work, you are still reliant on a driver who is under pressure to load and unload. The site is very close to primary school and slices through a narrow road (School Road) that is frequently used by residents, businesses and buses. A basic risk assessment by a competent person would determine that there is a significant likelihood of a vehicle using an unauthorised route resulting in a significant risk of injury or harm. In addition the risk of slippery mud on the road from construction vehicles will be significant and can lead to road traffic accidents. This can be evidenced by the current works at Marsh Farm plus the sewage works currently undertaken by Severn Trent outside my property. Fines for health and safety breaches are now into the millions and the Council and developer(s) should consider the health and safety risks and whether these risks outweigh the benefits. Noise: Despite your assumptions, there will be significant noise from the quarry site. This can be evidenced by the current Severn Trent works taking place outside my property at this very moment in time. From 8am to 5pm we have construction and HGV vehicles arriving and leaving on a constant basis, the construction vehicles, digging and reversing beacons disturb our enjoyment and quality of life – especially during the summer. The Severn Trent project is only a fraction of the proposed Minerals project and as such will be significant greater and for a longer period of time. Visual impact and wildlife: One of the many reasons for choosing Salford Priors as a place to live and enjoy is the unspoilt views across the open fields and the abundance of wildlife. The proposed quarry will create an eyesore, decrease the desirability of the village, have significant impact on the local ecology and wildlife and may also have a detriment on the value of local properties for years to come. Summary: In summary, this proposal has been ill considered and ill thought out by Warwickshire County Council. If the Council officers took the time to visit and examine the village and surrounding areas properly you would see that the proposed site would have significant impact on the health, safety and wellbeing within the heart and the most vulnerable members of the community. We therefore propose Warwickshire Council formally reject Salford Priors from the minerals plans and choose a site that does not cause harm or detriment to any other communities. Letter: Reference: Proposed Warwickshire Minerals Plan Salford Priors Evesham (Site 7) We would like to formally object to the above proposed Minerals extraction at Salford Priors (Site 7). The proposed site is in close proximity to a small, densely populated close knit community and local school. As a

MLPpub1 6273	1						S7																1	1																1								Chartered health and safety consultant. I believe the proposed site and logistical arrangements are unsuitable and possess significant risk to the health, safety and wellbeing of the local community. Dust: Despite your weak assumptions, the risk of dust to health is significant – especially in the summer months when there will be little or no moisture suppressant. The risk of silica dusts are well documented by the health and safety executive www.hse.gov.uk and is one of the most common causes of occupational cancer. Only a small amount of dust inhaled can lead to irreversible lung damage. The fact that a primary school with young children and vulnerable groups are close to the proposed quarry should be grounds alone for reconsideration. Construction Traffic: I notice that a number of residents have raised the issue of traffic safety risks along the B4088, School Road and 'C' roads and you seem to be of the opinion that "the developer advises that there will be no reason to use surrounding C roads etc....." and "crossing points will only be active during the campaign" I disagree with your assumptions and reliance on the developer. Every year there are dozens of fatalities and serious injuries due to construction vehicles and HGV movements - and despite the developers/contractors assurances and systems of work, you are still reliant on a driver who is under pressure to load and unload. The site is very close to primary school and slices through a narrow road (School Road) that is frequently used by residents, businesses and buses. A basic risk assessment by a competent person would determine that there is a significant likelihood of a vehicle using an unauthorised route resulting in a significant risk of injury or harm. In addition the risk of slippery mud on the road from construction vehicles will be significant and can lead to road traffic accidents. This can be evidenced by the current works at Marsh Farm plus the sewage works currently undertaken by Severn Trent outside my property. Fines for health and safety breaches are now into the millions and the Council and developer(s) should consider the health and safety risks and whether these risks outweigh the benefits. Noise: Despite your assumptions, there will be significant noise from the quarry site. This can be evidenced by the current Severn Trent works taking place outside my property at this very moment in time. From 8am to 5pm we have construction and HGV vehicles arriving and leaving on a constant basis, the construction vehicles, digging and reversing beacons disturb our enjoyment and quality of life – especially during the summer. The Severn Trent project is only a fraction of the proposed Minerals project and as such will be significant greater and for a longer period of time. Visual impact and wildlife: One of the many reasons for choosing Salford Priors as a place to live and enjoy is the unspoilt views across the open fields and the abundance of wildlife. The proposed quarry will create an eyesore, decrease the desirability of the village, have significant impact on the local ecology and wildlife and may also have a detriment on the value of local properties for years to come. Summary: In summary, this proposal has been ill considered and ill thought out by Warwickshire County Council. If the Council officers took the time to visit and examine the village and surrounding areas properly you would see that the proposed site would have significant impact on the health, safety and wellbeing within the heart and the most vulnerable members of the community. We therefore propose Warwickshire Council formally reject Salford Priors from the minerals plans and choose a site that does not cause harm or detriment to any other communities.	Remove site 7 – Salford Priors from your plans														
MLPpub1 6274	1						7.20 - 7.22 S4																1	1																1								We agree with Barford, Sherbourne & Wasperton Joint Parish Council in its findings as to whether the Minerals Local Plan is legally compliant, meets the test of soundness and complies with the duty to cooperate. As such, we believe the MLP does not conform with national planning policy and is inadequately underpinned by technical evidence and have the following comments: 1. We find many of the responses to consultation comments to be stock, inadequate and dismissive. This is particularly the case in regard to site 4 with which we are most closely involved. 2. Specifically with regard to Site 4 the traffic comments are simplistic in the extreme. Aggregate lorries pulling out onto the A429 cannot be other than a hazard - a fact well demonstrated by the chaos caused by seasonal pumpkin sales from the same site which recently brought traffic to a standstill and has caused several minor RTCs. 3. The move to a 350m separation zone is welcomed compared to the earlier 100m version however nearby residents will be significantly impacted and 350m should be considered the minimum separation from all residential properties, including those within the site and those situated on adjacent land south of the site (ie Glebe Farm and Severn Elm properties). The statement that "a standoff of 250m cannot be justified" is unacceptable and will render such properties practically uninhabitable. An assurance that "100m is likely to provide adequate protection" is contrary to most authorities' working practices where separations of at least 200m pertain. 4. The dismissive comments about "blight" are unacceptable. The blight factor is already operating and property values and prospects have already been significantly damaged. 5. The statement that "there is unlikely to be irreversible or permanent loss of BMV land" patently cannot be substantiated. It is widely recognised that land cannot be restored to its former quality even if sufficient inert waste were to be available. A review of the "restored" Charlecote workings, immediately across the A429 would provide a clear example of just how poorly gravel extraction sites are left. The developers should be actively challenged to demonstrate that sites can actually be reinstated to the same levels, both in terms of height and quality. 6. Previous applications on Site 4 failed on initial application and on appeal failed at law based largely on the loss of BMV agricultural land and failure to identify other more suitable sites. 7. The assurance that "a properly managed site is unlikely to have significant impacts on rural locations" cannot be justified given that it will destroy most of the landscape, degrade views and be restored to a different topography. Such development must cause "material harm to the visual appearance of the locality". 8. The earlier Court of Appeal decision and evidence therein casts considerable doubt on the alternative restoration proposals, particularly relating to any water based features. 9. The Council believes that there should be more transparency concerning the presumptions and parameters employed when establishing the "need" for minerals, particularly given that much aggregate us is being replaced by recycled materials and crushed rock products. 10. The Council has concerns that the WCC has a significant "conflict of interest" as the owner of Site 5 and the independency of sites 4 and 5. The Council is concerned that WCC may therefore be "inclined to favour" Site 4 to facilitate the exploitation of Site 5? 11 The Council is concerned that some, often more appropriate, alternative sites on less than BMV land seem to have been eliminated from consideration in favour of promoting Site 4. 12. The Council is most concerned at the proposed loss of Glebe Farm as a WCC agricultural holding, which allows small/young farmers to get started. We strongly agree with the concerns raised as the Barford Residents Community meeting on 19th January reiterating the impact on traffic safety, health environment, local businesses, devaluation of all properties in the surrounding areas and particularly the impact on those residents whose properties will be completely blighted by this proposed plan.	Remove sites 4&5 from the plan!														

MLPpub1 6288	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<p>Please see the appendix attached, which also applies to sites 4 and 5. As discussed and agreed over the telephone with the planning officer, my comments and objections are contained in the appendix attached as they relate to two policies. Appendix: Appendix to Form 20 - containing comments and objection in relation to sites 4 and 5. This appendix has been produced by XXXXX Site 4 Wasperton 1. Land Classification – The Best and Most Versatile Land (Not Effective, Not Consistent with national policy) The best and most versatile agricultural land is defined as grades 1, 2 and 3a. Wasperton Farm is Grade 2 and 3a. Only small percentage (12%) of agricultural land in Warwickshire is grade 1 and 2). 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MLPpub1 6289	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<p>Please see the appendix attached, which also applies to sites 4 and 5. As discussed and agreed over the telephone with the planning officer, my comments and objections are contained in the appendix attached as they relate to two policies. Appendix: Appendix to Form 20 - containing comments and objection in relation to sites 4 and 5. This appendix has been produced by XXXXX Site 4 Wasperton 1. Land Classification – The Best and Most Versatile Land (Not Effective, Not Consistent with national policy) The best and most versatile agricultural land is defined as grades 1, 2 and 3a. Wasperton Farm is Grade 2 and 3a. Only small percentage (12%) of agricultural land in Warwickshire is grade 1 and 2). 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MLPpub1 6290			1					1			S4		1			1		1	1	1	1	1	<p>Mineral extraction from this land is not consistent with national policy . Local planning authorities should use poorer quality land in preference to high quality farm land. These proposals include no sites of lower quality land and include this high quality site. This proposal is further unjustified because it would be visually an ugly blot on the landscape. This natural farmland, within the alluvial plain of the Avon , is flat and open flat and gives a natural vista on the edge of the village. Industrial development is totally alien to the area. Houses will be blighted ,as has already happened. The local authority seems to be in total denial about this problem. The land cannot be adequately restored to its current condition. The land is currently of high quality enabling food crops to be grown through much of the year. Where gravel has been taken locally, the land no longer has this agricultural capability. The Secretary of State in rejecting the previous application in 1993 said that there would be material harm to the appearance of the locality and that some land would be lost to permanent agriculture. The arguments from the Council on the amount of inert fill that will be needed and the methods to achieve free draining soil are superficial and not properly thought through. The development is therefore not justified, nor effective. There will be a negative effect on traffic in the area. There will be large number of lorries exiting and joining the A road into fast traffic creating a significant risk of accidents. There will be additional load at Longbridge roundabout which is already suffering capacity and an impact on the surrounding motorway network. The traffic plan has not been positively prepared. I am not aware of a hydrology survey for the current development. Hydrology surveys in the past have commented that the water table will need lowering to provide access to the gravel. This could have a major impact on the river as the water is taken out of the land and discharged into the river. Also, local vegetable research at one of the premium institutions in the country will be affected if water availability to their bore hole is affected. The plan has not been positively prepared. The plan appears to take no notice of the local neighbourhood plan which rejects the development of agriculture on land for the detrimental effect on the village. Further the National Policy Framework says that the impact on neighbouring communities should be minimised. I therefore object to a gravel pit so close to the village and believe that the plan has not been positively prepared and is not justified.</p>	<p>To make the proposal Sound, WCC should consider other sites in preference to the current site that are of lower land grades, are not adjacent to villages, not near major roads, and are not part of a pleasing visual landscape. This site is not appropriate. Safety issues, including dust hazards, air / diesel fume pollution should be addressed prior to this land even being considered for this use. It is no comfort being told " It does not have to be done until a Planning application is submitted." It seems very unsound that the same local authority who may decide upon the planning success of this proposal has a vested interest in a neighbouring farm, which they own, which also has proposals for similar gravel extraction.</p>		1		1				
<p>NOTE THAT THE BOX PROVIDED IS INSUFFICIENTLY LARGE FOR DETAILED AND PRECISE COMMENTARY, as suggested above This Mineral Plan is unsound, and I have previously written to register objection to it, specifically in relation to the proposals for Site 7, Salford Priors. I have also spoken at a 2016 meeting of Warwickshire County Council's Cabinet that was supposed to debate whether the draft Minerals Plan should be progressed. Moreover, on behalf of a local residents' group, Salford Priors Against Gravel Extraction, I prepared and submitted an extensive environmental analysis based on research undertaken by local residents with technical specialisms covering various aspects of the proposal. This Environmental Impact Report was based only on matters that could be scientifically substantiated, and not on hearsay evidence or matters irrelevant to the planning process. I noted that at the relevant Cabinet meeting, neither the Chair of the meeting nor other Members appeared to be in possession of the details of the intended outcomes of the meeting, or the potential ways of moving forward. The draft Plan was voted through unaltered by Members at that point following a suggestion from the Chair that there would be ample time to make amendments later (in the light of the input from local residents such as myself), whereas in fact only minor amendments would subsequently be permitted. The meeting was video-recorded by the Council, and the Inspector would be able to observe for himself, the Chair searching in vain through the documentation apparently to establish answers to questions amidst this confusion. It would be too strong to say that this was unconstitutional, but it did not appear to me as if it were a fair way to handle issues around community consultation. Multiple copies of our Environmental Impact Report were passed to the Cabinet members on that occasion, and sufficient hard bound copies were then also sent to the Council (at their request) such that every County Councillor would be able to have one. I am sending in a further electronic copy of the Report to you now, as I understand that previous representations and this report will not be carried forward. I also received no communication from the Council to say whether the Report had or had not been passed to all the Council members. I have subsequently noted that Council responses have not been made to all of the technical queries and commentary in our Report, and indeed had previously noted that messages sent out to the Salford Priors Parish Council and others concerning potential ways of residents responding further to the 'consultation', have contained errors both in their substance and in the suggested methodology. This is not consistent with the requirement to engage in appropriate community consultation. For these reasons I also think the proposal is not legally compliant. I understand that further representation on this matter of legal compliance will be presented by Salford Priors Parish Council, although I am not a member of that, nor a specialist on legal matters, and am responding independently. I am a qualified and Chartered (CEnv, CWEM, CSci) environmental scientist, a Fellow of several professional bodies, and a previous Chair of Society for the Environment, and the Institution of Environmental Sciences. I have thirty years' experience of working with developers, local authorities and individuals either on ensuring that developments such as mining, housing and waste disposal take place with minimal adverse environmental impacts, or preferably that they secure overall environmental improvement. I also have previous experience of working for Salford Priors Parish Council, and appeared as an expert witness when the first proposals for sand and gravel extraction were made for Marsh Farm, Salford Priors, in the 1990s. I currently also hold a role as Professor of Environment at Gresham College London (an institution founded in 1597 for the purpose of delivering specialist lectures to the public; former Professors include Sir Christopher Wren and Robert Hooke); I am very familiar with proposals for mineral extraction, and their potentially adverse environmental consequences. On the basis of this experience, I can say with confidence that I have never seen proposals in the UK for sand and gravel extraction that combine such limited opportunities for potential financial gain (a matter to which I will return) with such damaging environmental and health consequences, so close to a settlement. The details of the likely impact are included in the Environmental Impact Report, which covers the following matters in detail, including quantitative or qualitative evidence as appropriate: Transport and Traffic (Pages 7-16 of the Report) Noise and Vibration (Pages 17-21) Utilities ((Page 22) Water and Hydrology (including flooding) (Pages 23-28) Dust (Pages 29-36) Scenery and Visual Intrusion (Pages 37-42) Ecology and Wildlife (Pages 43-46) Public Access (Page 47) Health and Wellbeing (Pages 48-51) Community Life (Page 51).</p> <p>These sections should be read in conjunction with the Introduction sections, Pages 1-6. The second use</p>																																

MLPpub1 6304						1				S9									Policy S9 - Allocation at Site 9 Hams Lane, Lea Marston. This large site (48 ha) to the west of Lea Marston near Junction 9 of the M42 (Dunton Island) comprises two parcels of land. As the site is large, we would require the site promoter to prepare and submit a TA when proposals are brought forward to planning application stage. This should consider the potential impact of HGV movements on the strategic and local road networks in the context of HS2 activity in the area. This will be extended beyond Phase 1 into Phase 2b which is expected to begin construction in 2023 based on current information. We would require the site promoter to use the County Council's S-Params M42/Junction 9 Microsimulation Model to assess HGV impacts on network and junction performance as part of the TA, and to help identify any mitigation measures which may be required.						1				
MLPpub1 6305					1				1	DM5									Policy DM5 - paragraph 9.76. Please note that the latest version of the Warwickshire Advisory Lorry Route Map (2nd Edition) may be accessed at https://apps.warwickshire.gov.uk/api/documents/WCCC-764-38 .							1			
MLPpub1 6306						1				S4						1			The Warwickshire County Council (WCC) Minerals Local Plan is NOT sound because; it has NOT been positively prepared – site not fully assessed; it is NOT justified – due to a lack of evidence it is NOT effective – as the plan is not deliverable, it is fundamentally flawed and not economically or ethically viable and it is NOT consistent with national policy or regulations or duty to co-operate, and as such makes it NOT legally compliant Agricultural land – not effective and not positively prepared. The loss of “the best and most versatile agricultural land” is not justified. There is a limited amount of this quality of land in Warwickshire and its use is against national policy guidelines. Contrary to 1993 Court Decision – no change to the land therefore this still stands. Inert waste – not positively prepared, not effective and not justified. The facts contained in WCC's proposals do not contain accurate statistics or evidence that there is enough inert waste available or that it is economically viable to source and purchase material. It is also NOT possible to reinstate the land to its former state and therefore the plan is unsound. In addition there is no evidence that the land can be restored close to original levels and the increased flood risk is not justified. The inert waste could also expose future generations to dangerous chemicals and there is no evidence presented to suggest that this can be mitigated against. Health - not justified, not positively prepared or deliverable - no health and safety risk assessment has been undertaken. WCC have not provided evidence that there is not a significant health risk to the community and have totally ignored the fact that silica dust is detrimental to health. I like many in the community have a pre-existing condition and there is research to state that exposure to silica dust is likely to further damage my health. I am not alone. WCC should act ethically and responsibly and they have shown no evidence that they have done so. We have a right to have our health and wellbeing protected. Traffic safety - not positively prepared or justified. A429 is already congested and fast moving. WCC have not provided any assessments regarding the impact of slow moving vehicles into fast moving traffic resulting in increased hazards, danger and traffic congestion on road networks Noise and dust – not positively prepared, not justified, not effective. No evidence provided by WCC to justify exposure to people and animals to noise and dust and they have not evidenced that this can be adequately mitigated against and the standoff proposed is against other examples, working sites and guidelines. Buffer zones/Standoffs – not justified, not positively prepared. Inconsistent with other sites nationally and locally against guidelines. The standoffs are further from the road than people/residential homes and is not justified. Economic fragility – not justified, not positively prepared. No evidence provided that the plan will not impact on; tourism (visual appearance), disruption to local lifestyles, conservation areas, areas of historic interest and local businesses/farmers. Hydrology – site already has a high water table and there is no evidence that WCC can mitigate against flooding which will further make the land useless as the best and most versatile agricultural land, and cause risk to property, listed buildings, historic sites. Biodiversity - WCC proposal is not justified as it does not support a healthy and well-functioning ecosystem and will destroy natural habitats forever such as newts and bats. Other sites and innovative alternative materials – not positively prepared.	I do not have the expertise to do this.				1		1			
MLPpub1 6307						1				S7						1			Warwickshire Minerals Plan Site 7. This representation relates to following part of the local minerals plan: Site 7 Paragraph 7.29 – 7.31 Policy number: Policy S7 Policies map element: Figure 1.17 Lower Farm Salford Priors. I strongly object to the inclusion of Salford Priors Site 7 in the Warwickshire Mineral Plan on the grounds. I am aware of and fully endorse the content of submissions made by the Parish Council and Salford Priors Against Gravel Extraction (SPAGE) on behalf of the local community. I will not therefore repeat all of these objections here but request that you add my voice to those issues and objections at whatever forum they are presented. The issue of close proximity to the village and residents is broadly covered in those documents. Since I live in what would be the epicentre of the proposed quarry I will focus my objections here on the direct impact the proposal would have on myself and my neighbours. My comments are relevant to issues of soundness and legality and to sustainability being considered in this consultation. My representation and many of the issues I raised during the previous consultation were not included in the summary of consultation document submitted to Cabinet when they agreed to proceed to this stage. I therefore request that my previous submission be retrieved and considered during this one. The map of site seven in the mineral plan documentation submitted to that October Cabinet showed only one property at the centre of the proposed quarry area. Neither my property or that of our adjacent elderly neighbour was shown nor was our existence mentioned. My other neighbours at Salford Farm House run a bed and breakfast from their home and no explanation has been given in the response to consultation on how this will not be effected. (Please note this is a residential property independent of the surrounding farmland and would be quarry. Omitting our existence gave a misleading impression of the serious impact on the local population. Our three properties are two stories high and adjacent. Our properties would face out onto the quarry on all sides and we would be in closest proximity to the quarry and associated works and transportation activity. The Planning department have contradicted themselves regard stand off – in open forum we were told they would be 100 meters from the centre of each of our properties, in the latest document it states that it usually from the facade. Our gardens clearly extend beyond the facades of our properties. In my case this means the edge of the quarry and presumably the bunds will virtually abut my garden fence. One part of the facade of my property is separated from the road by a narrow single pathway which means that the noise and activity of all of the plant and haulage trucks and congestion associated with the quarry and restoration activity will be on the other side of my living room wall and my son's bedroom. Bunds will not address the visual impact. They will add to the visual intrusion at ground level and will not obscure view of the quarry at second floor level. When we look out of the window at ground level we will see bunds, when we look out at second floor level we will see the quarry. The impact on the physical and mental health of myself my wife and children and my neighbours as a result of noise and particulate dust is outlined in the environmental impact report. My previous submission on these points has not been acknowledged or satisfactorily addressed. Meanwhile my wife's health and wellbeing has already been affected by the prospect of the sheer hell of living in the middle of a quarry. The proposal for a campaign approach does not mitigate these and other considerations. Neither does the "noted" comment in response to the fact that there would be no compensation. A Campaign approach would only prologue the agony. It means that we would have this hanging over our heads. We will be effectively trapped because our house will be rendered unsalable for an open ended period of time.							1		1	
MLPpub1 6308						1				S4						1			The Council have not justified, have not positively prepared and cannot show that the plan is effective. It is also against national policy guidelines. They have not addressed the issues raised from the previous consultation or presented any evidence. - It is not justified to use agricultural land “the best and most versatile agricultural land” and the land should be protected for food for the future - They (the Council) have not evidenced that they can provide safe and enough waste - They have not taken into account or assessed the health, noise and dust issues. - They have not taken into account the road safety concerns. - They have not protected the school, nursery, children or elderly - They have not shown how they will protect protected species - They have not provided evidence there will be no flooding as a result.	I am 16 years old however I want to protect the future. Take it out of the plan please to protect the land, animals, people and villages.							1		1
MLPpub1 6309						1				7.20 - 7.22 S4						1			Destroys best and most useful farmland. Other sites available on poorer quality land. Permission already rejected in 1993 on this objection, and nothing has materially changed. This land most unlikely to be restored. Impact on Barford properties in line of prevailing wind. Visual impact, dust, dirt and noise. Reduced sale-ability of properties. Increased risk of accidents due to slow moving lorries joining fast moving traffic on A429. Plan is contrary to Barford Neighbourhood Development Plan, and other guidelines for mineral evaluation. Reduction in ground water level and impact on local trees.	Abandon plan to extract gravel on this site.							1	1	

MLPpub1 6365	1	1	7.20 - 7.22	S4	1	1	1	1	1	1	1	1	1	1	Please see appendix attached, which also applies to sites 4 and 5 above.	<p>We consider that there are more appropriate sites which could have their use extend or other new could be selected. These other sites will have less detrimental impact in regard to: 1. As an agricultural Engineer, I know that the land on the other side of the A429 was quarried several decades ago and has still not been restored, resulting in lower land levels, poor drainage (due to poor reparations) and it is evident that farm machinery is unable to operate on this land following high rainfall, due to the poor drainage directly as a result of the sand and gravel being removed. The sand and gravel is the component of the land that allows the land to drain. I have no evidence to show that his proposition will not exacerbate what is already a drainage and flooding prone risk. 2. With knowledge that the UK is leaving the EU, it is far more important to protect our prime agricultural land, as importing crops will potentially have much higher costs. The land is of an high agricultural grade, meaning at this point in time we should not risk loosing Grade 2 and 3a Land. Research show that it is not possible to restore it to the same grade. 3. Any potential infill contamination, would cause a catastrophe for a very wide area of south Warwickshire due to spread by the river valley. 4. We do not consider that due defence, or consideration has been taken, in relation to the Neighbourhood Development Plan adopted by the village and Warwick District Council. 5. Warwickshire County Council cannot evidence that the site will not have an impact on the long term health of residents. 6. The traffic impact on already congested local roads would be significant, and we do not believe this has been properly considered in the production of the plan. I have major concerns about this as the recent increase in building work has already caused my wife to have been involved in two potentially fatal incidents caused by careless driving from building site employees - she cycles to work and would be directly affected by the change to traffic flow and congestion. If plans go ahead, I would prefer that she drive to work for her safety, which is contrary to the local and national plan to decrease emissions and increase sustainable transport. 7. No sufficient traffic management studies have been completed on the impact of this change to traffic flow during the planning of the site placement. 8. Existing quarry sites, will have less impact than those proposed sites 4 & 5, if continued. 9. Local businesses will be adversely affected by slower traffic flow and congestion, particularly in light of the number of of distribution centres which are currently based further South on the A429, which already have a significant impact on traffic accident risk and congestion, with huge potential knock-on-effects to a major motorway junction if proposals are put in force.</p>	1	1	I have low confidence in the council's commitment to pursue the representations of our community.
MLPpub1 6367	1	1	7.23 - 7.25	S5	1	1	1	1	1	1	1	1	1	1	Please see appendix attached, which also applies to sites 4 and 5 above.	<p>We consider that there are more appropriate sites which could have their use extend or other new could be selected. These other sites will have less detrimental impact in regard to: 1. As an agricultural Engineer, I know that the land on the other side of the A429 was quarried several decades ago and has still not been restored, resulting in lower land levels, poor drainage (due to poor reparations) and it is evident that farm machinery is unable to operate on this land following high rainfall, due to the poor drainage directly as a result of the sand and gravel being removed. The sand and gravel is the component of the land that allows the land to drain. I have no evidence to show that his proposition will not exacerbate what is already a drainage and flooding prone risk. 2. With knowledge that the UK is leaving the EU, it is far more important to protect our prime agricultural land, as importing crops will potentially have much higher costs. The land is of an high agricultural grade, meaning at this point in time we should not risk loosing Grade 2 and 3a Land. Research show that it is not possible to restore it to the same grade. 3. Any potential infill contamination, would cause a catastrophe for a very wide area of south Warwickshire due to spread by the river valley. 4. We do not consider that due defence, or consideration has been taken, in relation to the Neighbourhood Development Plan adopted by the village and Warwick District Council. 5. Warwickshire County Council cannot evidence that the site will not have an impact on the long term health of residents. 6. The traffic impact on already congested local roads would be significant, and we do not believe this has been properly considered in the production of the plan. I have major concerns about this as the recent increase in building work has already caused my wife to have been involved in two potentially fatal incidents caused by careless driving from building site employees - she cycles to work and would be directly affected by the change to traffic flow and congestion. If plans go ahead, I would prefer that she drive to work for her safety, which is contrary to the local and national plan to decrease emissions and increase sustainable transport. 7. No sufficient traffic management studies have been completed on the impact of this change to traffic flow during the planning of the site placement. 8. Existing quarry sites, will have less impact than those proposed sites 4 & 5, if continued. 9. Local businesses will be adversely affected by slower traffic flow and congestion, particularly in light of the number of of distribution centres which are currently based further South on the A429, which already have a significant impact on traffic accident risk and congestion, with huge potential knock-on-effects to a major motorway junction if proposals are put in force.</p>	1	1	I have low confidence in the council's commitment to pursue the representations of our community.

MLPpub1 6395			1	1				1	1.5 - 1.11						1	1	1	1	1									1	1																					
MLPpub1 6396			1	1				1	1.5 - 1.11						1	1	1	1	1									1	1																					
MLPpub1 6397			1					1	1.5 - 1.11						1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote Parish Council and residents and to which I wholly agree.						1	1																							
MLPpub1 6398			1					1	1.5 - 1.11						1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote Parish Council and residents and with which I entirely concur.						1	1																							
MLPpub1 6399			1					1	1.5 - 1.11						1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote Parish Council and residents and with which I entirely concur.						1	1																							
MLPpub1 6400			1					1	1.5 - 1.11						1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote Parish Council and residents and with which I fully concur.						1																								
MLPpub1 6401			1					1	1.5 - 1.11						1	1	1	1	1	Please see the detailed response given by Suzi Coyne, Agent, acting on behalf of Bourton and Draycote Parish Council and residents and with which I entirely concur.						1																								
MLPpub1 6402			1					1	Sand and Gravel section (5)						1		1	1	1	In assessing future need for sand and gravel, it does not take into account the recent dramatic fall-off in demand or the views of mineral operators that Warwickshire's remaining reserves are of relatively poor quality. The level of supply required has been substantially over-estimated. In paragraph 5.1, it appears that secondary and recycled material has been dismissed as a future source of supply. The potential of the two existing sand and gravel sites in the county to contribute to future supply seems to have been ignored. Four of the new sites proposed are in the Green Belt. The plan does not assess whether they would constitute inappropriate development in the Green belt, and if so whether there are exceptional circumstances justifying this. The sand and gravel proposals seem to ignore their effect on good quality agricultural land.								The scale of sand and gravel workings should be reduced, and sites in the Green Belt should only be proposed if they can be shown to be appropriate development or justified by 'exceptional circumstances'.						1	1															
MLPpub1 6403			1				1	1	SO						1		1	1	1	1. For the reasons given under the separate representations of Bourton & Draycote Parish Council on Policy MCS2 the remaining requirement that the Plan needs to provide for, having taken account of the total provision required over the plan period as determined by the Local Aggregates Assessment (LAA) and the existing permitted reserves, is in the order of 1.899 mt, not 8.022 mt. This figure takes into account the additional 3.4 mt of reserves recently approved in 2016 at Brinklow Quarry. However, if it is considered that these new reserves are not to be added to the landbank, because of the base date of the LAA (of 2015), then they should instead be identified as an allocated site, to ensure that the assessed demand for sand and gravel appropriately takes into account already available sources of supply. 2. Accordingly the proposed allocation of eight sites with reserves amounting to 8.48 mt in Policy SO provides for a huge over-provision of the requirement and is not properly based on the objectively assessed development needs. The policy is therefore entirely inconsistent with the aim of the National Planning Policy Framework (NPPF) that the long-term conservation of this finite natural resource should be secured, and runs directly counter to the key objective of a local plan that it must deliver sustainable development (NPPF paragraphs 142 and 150). 3. Moreover, given that there is no credible evidence to support the advocated need for this level of provision, it is not justifiable for the Plan strategy through Policy SO to be endorsing opening up new quarries with all the associated and often widespread harm to the countryside, local environment and communities that they bring. Even despite planning controls, quarrying operations generate undesirable levels of noise, dust and heavy lorry traffic in otherwise often very tranquil areas. They also typically have a significant impact on local landscape and visual amenity, with the inevitable loss of the intrinsic character of the countryside even upon restoration. 4. Whilst the number of allocated sites will need to be reduced quite significantly, it is considered that in particular Site 1 Bourton on Dunsmore should not be allocated for mineral development in Policy SO, because there are significant question marks over its viability and the quality of the aggregate that will be produced. 5. The original site nomination was for a much larger site than is now proposed to be allocated, and all of the site nomination information was submitted on this basis. However, given the relatively small reserve of 1.15 mt that Site 1 has now been reduced to, it is questionable as to whether this information, and in particular the type of aggregate that the site could produce is still applicable. For example it is extremely doubtful that this quantity of reserve is large enough to make economically viable the cost of installing fixed processing and washing plant and associated infrastructure that would be necessary to produce high quality (silt free) aggregates. This supposition appears to be supported by the reference in the site specific Policy S1 to the use of mobile plant (only). If this is the case then the aggregate that would be produced from the site would be "as dug" and therefore only suitable for limited uses, such as low grade fill. 6. As identified under separate representations on the introductory paragraphs to the Plan and Policy MSC1, the Parish Council considers that there should be much more emphasis on making provision for the supply of alternative aggregates before considering and in place of primary extraction in the Plan, in order for it to be consistent with national policy. These comments were also made on the previous consultation on the Preferred Option and Policies in December 2015, and the Council's general response (in the summary report on Question 14) has been that recycled aggregates whilst a major source of construction material cannot be counted in the LAA as a replacement for primary aggregates. Paragraph 5.1 of the Plan then pursues the same line by stating that the requirement for aggregate will be met by providing sand and gravel site allocations, as it is not practicable to make the provision through use of secondary and recycled aggregates due to their limitations. The conclusion that is to be drawn from this approach is that the site allocations must provide a better product without the limitations that are attributable to recycled or secondary materials. However, that does not appear to be the case with proposed Site 1, which it would seem from the available evidence may well not produce a product that would be any better than recycled aggregate. 7. The Parish Council's representations on Policy MSC1 are that provision for the supply of alternative aggregates should be included in the Plan in order for it to be consistent with national policy, and in the absence of the level of provision having been assessed through the LAA, an appropriate figure having taken account of the most recent national and sub-national guidelines, would be a minimum of 644,000 tonnes per annum (tpa). 8. This figure would provide for at least about 2 million tonnes of additional alternative aggregate over the Plan period, given that the LAA identifies current levels of recycled aggregate production as at about 510,000 tpa. In light of this alternative source of aggregate production, which the NPPF requires MPAs to make full use of as a resource before turning to mineral extraction (paragraphs 143 and 163), there is no need to identify Bourton on Dunsmore as an allocated site. 9. Policy SO and the strategy for sand and gravel provision, by promoting considerable over-provision of the requirement for sand and gravel supply fails the soundness test. 10. In summary Policy SO is not sound because it is: Not positively prepared. By promoting vastly more provision for primary minerals than is justified, the policy has not been prepared with the objective of securing their long-term conservation or contributing to the achievement of sustainable development. Not justified. It is not the most appropriate strategy, when considered against the alternative of a more sustainable approach that provides for the level of supply that is actually required, and in so doing also minimises the associated adverse impacts of mineral extraction on the local environment and communities. Not effective. It would lead to a considerable over provision of primary aggregate, which is inconsistent with and counter-productive to delivering sustainable development. Not consistent with national policy. The policy, by failing to account for already permitted reserves, would lead to unnecessary depletion of finite resources and is incompatible with the NPPF's requirement that the planning system should play an active role in guiding development to sustainable solutions (paragraphs 8 and 142).															In order for the Plan to be sound, Policy SO and its supporting text must be amended to reduce the number of sites proposed to be allocated, so that the total volume of reserves that they would provide meets the remaining requirement that the Plan needs to provide for, of in the order of 1.899 mt, not the total plan requirement as has been the case. In order to do this Site 1, Bourton on Dunsmore, should be removed from the proposed allocations, and if the additional reserves recently approved in 2016 at Brinklow Quarry are not to be added to the landbank, because of the base date of the LAA, then they should instead be identified as an allocated site. A re-assessment of the remaining sites should then be carried out to determine which are the most suitable to be selected for the reduced number required. To ensure that the Plan's vision and objectives are best fulfilled the sites will need to be re-assessed in terms of: • Location (closest to main settlements); • Quality and quantity of mineral resource; • Protection of the water environment; • Conservation of the historic environment; • Protection of local communities from potential impacts; • Minimisation of heavy traffic impacts; and • Preservation of best and most versatile agricultural land. These changes would remedy the failings in relation to the tests of soundness that have been identified at paragraph 10 of the comments in the preceding section 5, and would make the Plan legally compliant in respect of the requirement to have regard to national planning policy.													1	1	Bourton & Draycote Parish Council represents local residents who will be directly affected by the policies of the Plan, and considers that it is very important to be represented at the hearings into the relevant issues, in order to help inform the discussions and ensure that its views are fully taken into account.

MLPpub1 6419	1	1	6.4 item v	1	1	1	1	1	1	1	1	1	1	1	1	1	1	Restoration The plan is not effective and has not been altered from my original objections "the council has shown that is incapable of enforcing the return of A grade land to its original form as shown from its past performance after gravel extraction from south of Wasperton village and therefore it is reasonable to assume that grade A land destroyed will not be replaced. This I believe is at odds with the high court ruling still in place. Also the summary of previous objections under restoring states "developer believes volumes of inert waste needed is modest.", if it is intended to remove three million tons of gravel and replace with modest infill I would suggest that the site cannot be returned to its original condition. And conflicts with para 6.4 item x . Suitable Access The A429 is by definition carrying most traffic the nearer it gets to the M40 (both directions) and while not currently full to capacity other than rush hours, the Highways Agency must know that with further warehousing and housing development towards Wellesbourne and beyond the road will become ever more congested. Should the plan considered then the traffic flows should be based on projected increases over the next 15 years. The Highways agency believed traffic flows in Wellesbourne required 3 islands to be built to handle local traffic on a road carrying less traffic. Exits from both Wasperton and Barford are already beginning to be problematic. At minimum an island should be installed to allow lorries access to a right turn and slow vehicle speeds. I am sure no one wishes to see any lives lost when additional facilities could be provided under para 9.10 of the plan. Blight This has been inadequately addressed. I have a real issues that the plan is not sound in the regard as the council sees the answer to concerns about increased blight to be mitigated by the comment and I quote " It is a temporary activity" Does anyone believe 15 years is a temporary activity most Wasperton residents will be dead in 15 years hardly temporary to us. Considerably more work on mitigation (and proof of concept) should be provided to if the council wishes to proceed. Local Community This development plan flies in the face of the Barford Local Plan backed by government to allow locals a voice concerning development in their community, designed by locals to protect us from just this type of development. Combined with recent housing development proposals that are also in direct conflict with the wishes of local people, one wonders if the huge effort made to create the plan was worth the effort. Comments on para 9.50 not justified The last sentence is totally backwards and should read However planning permission will only be granted where specific, objectively proven impacts are demonstrated to have no unacceptable adverse impact on viability of nearby business, local amenity or health of local communities or residence. Th onus to prove no adverse impact on local communities should surely be with the potential polluter	See last comments above. It is not for the community to be responsible for ensuring that the council produces legally compliant plans. It is their (the council and councillors) responsibility to represent the needs and wishes of their community in the face of both government and businesses pressures (or at least it should be).	1	1
MLPpub1 6420	1	1	9.12	1	1	1	1	1	1	1	1	1	1	1	1	1	1	Restoration The plan is not effective and has not been altered from my original objections "the council has shown that is incapable of enforcing the return of A grade land to its original form as shown from its past performance after gravel extraction from south of Wasperton village and therefore it is reasonable to assume that grade A land destroyed will not be replaced. This I believe is at odds with the high court ruling still in place. Also the summary of previous objections under restoring states "developer believes volumes of inert waste needed is modest.", if it is intended to remove three million tons of gravel and replace with modest infill I would suggest that the site cannot be returned to its original condition. And conflicts with para 6.4 item x . Suitable Access The A429 is by definition carrying most traffic the nearer it gets to the M40 (both directions) and while not currently full to capacity other than rush hours, the Highways Agency must know that with further warehousing and housing development towards Wellesbourne and beyond the road will become ever more congested. Should the plan considered then the traffic flows should be based on projected increases over the next 15 years. The Highways agency believed traffic flows in Wellesbourne required 3 islands to be built to handle local traffic on a road carrying less traffic. Exits from both Wasperton and Barford are already beginning to be problematic. At minimum an island should be installed to allow lorries access to a right turn and slow vehicle speeds. I am sure no one wishes to see any lives lost when additional facilities could be provided under para 9.10 of the plan. Blight This has been inadequately addressed. I have a real issues that the plan is not sound in the regard as the council sees the answer to concerns about increased blight to be mitigated by the comment and I quote " It is a temporary activity" Does anyone believe 15 years is a temporary activity most Wasperton residents will be dead in 15 years hardly temporary to us. Considerably more work on mitigation (and proof of concept) should be provided to if the council wishes to proceed. Local Community This development plan flies in the face of the Barford Local Plan backed by government to allow locals a voice concerning development in their community, designed by locals to protect us from just this type of development. Combined with recent housing development proposals that are also in direct conflict with the wishes of local people, one wonders if the huge effort made to create the plan was worth the effort. Comments on para 9.50 not justified The last sentence is totally backwards and should read However planning permission will only be granted where specific, objectively proven impacts are demonstrated to have no unacceptable adverse impact on viability of nearby business, local amenity or health of local communities or residence. Th onus to prove no adverse impact on local communities should surely be with the potential polluter	See last comments above. It is not for the community to be responsible for ensuring that the council produces legally compliant plans. It is their (the council and councillors) responsibility to represent the needs and wishes of their community in the face of both government and businesses pressures (or at least it should be).	1	1
MLPpub1 6421	1	1	9.18	1	1	1	1	1	1	1	1	1	1	1	1	1	1	Restoration The plan is not effective and has not been altered from my original objections "the council has shown that is incapable of enforcing the return of A grade land to its original form as shown from its past performance after gravel extraction from south of Wasperton village and therefore it is reasonable to assume that grade A land destroyed will not be replaced. This I believe is at odds with the high court ruling still in place. Also the summary of previous objections under restoring states "developer believes volumes of inert waste needed is modest.", if it is intended to remove three million tons of gravel and replace with modest infill I would suggest that the site cannot be returned to its original condition. And conflicts with para 6.4 item x . Suitable Access The A429 is by definition carrying most traffic the nearer it gets to the M40 (both directions) and while not currently full to capacity other than rush hours, the Highways Agency must know that with further warehousing and housing development towards Wellesbourne and beyond the road will become ever more congested. Should the plan considered then the traffic flows should be based on projected increases over the next 15 years. The Highways agency believed traffic flows in Wellesbourne required 3 islands to be built to handle local traffic on a road carrying less traffic. Exits from both Wasperton and Barford are already beginning to be problematic. At minimum an island should be installed to allow lorries access to a right turn and slow vehicle speeds. I am sure no one wishes to see any lives lost when additional facilities could be provided under para 9.10 of the plan. Blight This has been inadequately addressed. I have a real issues that the plan is not sound in the regard as the council sees the answer to concerns about increased blight to be mitigated by the comment and I quote " It is a temporary activity" Does anyone believe 15 years is a temporary activity most Wasperton residents will be dead in 15 years hardly temporary to us. Considerably more work on mitigation (and proof of concept) should be provided to if the council wishes to proceed. Local Community This development plan flies in the face of the Barford Local Plan backed by government to allow locals a voice concerning development in their community, designed by locals to protect us from just this type of development. Combined with recent housing development proposals that are also in direct conflict with the wishes of local people, one wonders if the huge effort made to create the plan was worth the effort. Comments on para 9.50 not justified The last sentence is totally backwards and should read However planning permission will only be granted where specific, objectively proven impacts are demonstrated to have no unacceptable adverse impact on viability of nearby business, local amenity or health of local communities or residence. Th onus to prove no adverse impact on local communities should surely be with the potential polluter	See last comments above. It is not for the community to be responsible for ensuring that the council produces legally compliant plans. It is their (the council and councillors) responsibility to represent the needs and wishes of their community in the face of both government and businesses pressures (or at least it should be).	1	1

MLPpub1 6422	1	1	9.5					1	1	1	1	1		Restoration The plan is not effective and has not been altered from my original objections "the council has shown that is incapable of enforcing the return of A grade land to its original form as shown from its past performance after gravel extraction from south of Waspterton village and therefore it is reasonable to assume that grade A land destroyed will not be replaced. This I believe is at odds with the high court ruling still in place. Also the summary of previous objections under restoring states "developer believes volumes of inert waste needed is modest.", if it is intended to remove three million tons of gravel and replace with modest infill I would suggest that the site cannot be returned to its original condition. And conflicts with para 6.4 item x . Suitable Access The A429 is by definition carrying most traffic the nearer it gets to the M40 (both directions) and while not currently full to capacity other than rush hours, the Highways Agency must know that with further warehousing and housing development towards Wellesbourne and beyond the road will become ever more congested. Should the plan considered then the traffic flows should be based on projected increases over the next 15 years. The Highways agency believed traffic flows in Wellesbourne required 3 islands to be built to handle local traffic on a road carrying less traffic. Exits from both Waspterton and Barford are already beginning to be problematic. At minimum an island should be installed to allow lorries access to a right turn and slow vehicle speeds. I am sure no one wishes to see any lives lost when additional facilities could be provided under para 9.10 of the plan. Blight This has been inadequately addressed. I have a real issues that the plan is not sound in the regard as the council sees the answer to concerns about increased blight to be mitigated by the comment and I quote " It is a temporary activity" Does anyone believe 15 years is a temporary activity most Waspterton residents will be dead in 15 years hardly temporary to us. Considerably more work on mitigation (and proof of concept) should be provided to if the council wishes to proceed. Local Community This development plan flies in the face of the Barford Local Plan backed by government to allow locals a voice concerning development in their community, designed by locals to protect us from just this type of development. Combined with recent housing development proposals that are also in direct conflict with the wishes of local people, one wonders if the huge effort made to create the plan was worth the effort. Comments on para 9.50 not justified The last sentence is totally backwards and should read However planning permission will only be granted where specific, objectively proven impacts are demonstrated to have no unacceptable adverse impact on viability of nearby business, local amenity or health of local communities or residence. Th onus to prove no adverse impact on local communities should surely be with the potential polluter	See last comments above. It is not for the community to be responsible for ensuring that the council produces legally compliant plans. It is their (the council and councillors) responsibility to represent the needs and wishes of their community in the face of both government and businesses pressures (or at least it should be).	1	1	
MLPpub1 6423	1	1	S4					1	1	1	1	1		Restoration The plan is not effective and has not been altered from my original objections "the council has shown that is incapable of enforcing the return of A grade land to its original form as shown from its past performance after gravel extraction from south of Waspterton village and therefore it is reasonable to assume that grade A land destroyed will not be replaced. This I believe is at odds with the high court ruling still in place. Also the summary of previous objections under restoring states "developer believes volumes of inert waste needed is modest.", if it is intended to remove three million tons of gravel and replace with modest infill I would suggest that the site cannot be returned to its original condition. And conflicts with para 6.4 item x . Suitable Access The A429 is by definition carrying most traffic the nearer it gets to the M40 (both directions) and while not currently full to capacity other than rush hours, the Highways Agency must know that with further warehousing and housing development towards Wellesbourne and beyond the road will become ever more congested. Should the plan considered then the traffic flows should be based on projected increases over the next 15 years. The Highways agency believed traffic flows in Wellesbourne required 3 islands to be built to handle local traffic on a road carrying less traffic. Exits from both Waspterton and Barford are already beginning to be problematic. At minimum an island should be installed to allow lorries access to a right turn and slow vehicle speeds. I am sure no one wishes to see any lives lost when additional facilities could be provided under para 9.10 of the plan. Blight This has been inadequately addressed. I have a real issues that the plan is not sound in the regard as the council sees the answer to concerns about increased blight to be mitigated by the comment and I quote " It is a temporary activity" Does anyone believe 15 years is a temporary activity most Waspterton residents will be dead in 15 years hardly temporary to us. Considerably more work on mitigation (and proof of concept) should be provided to if the council wishes to proceed. Local Community This development plan flies in the face of the Barford Local Plan backed by government to allow locals a voice concerning development in their community, designed by locals to protect us from just this type of development. Combined with recent housing development proposals that are also in direct conflict with the wishes of local people, one wonders if the huge effort made to create the plan was worth the effort. Comments on para 9.50 not justified The last sentence is totally backwards and should read However planning permission will only be granted where specific, objectively proven impacts are demonstrated to have no unacceptable adverse impact on viability of nearby business, local amenity or health of local communities or residence. Th onus to prove no adverse impact on local communities should surely be with the potential polluter	See last comments above. It is not for the community to be responsible for ensuring that the council produces legally compliant plans. It is their (the council and councillors) responsibility to represent the needs and wishes of their community in the face of both government and businesses pressures (or at least it should be).	1	1	
MLPpub1 6424	1	1	S5					1	1	1	1	1		Restoration The plan is not effective and has not been altered from my original objections "the council has shown that is incapable of enforcing the return of A grade land to its original form as shown from its past performance after gravel extraction from south of Waspterton village and therefore it is reasonable to assume that grade A land destroyed will not be replaced. This I believe is at odds with the high court ruling still in place. Also the summary of previous objections under restoring states "developer believes volumes of inert waste needed is modest.", if it is intended to remove three million tons of gravel and replace with modest infill I would suggest that the site cannot be returned to its original condition. And conflicts with para 6.4 item x . Suitable Access The A429 is by definition carrying most traffic the nearer it gets to the M40 (both directions) and while not currently full to capacity other than rush hours, the Highways Agency must know that with further warehousing and housing development towards Wellesbourne and beyond the road will become ever more congested. Should the plan considered then the traffic flows should be based on projected increases over the next 15 years. The Highways agency believed traffic flows in Wellesbourne required 3 islands to be built to handle local traffic on a road carrying less traffic. Exits from both Waspterton and Barford are already beginning to be problematic. At minimum an island should be installed to allow lorries access to a right turn and slow vehicle speeds. I am sure no one wishes to see any lives lost when additional facilities could be provided under para 9.10 of the plan. Blight This has been inadequately addressed. I have a real issues that the plan is not sound in the regard as the council sees the answer to concerns about increased blight to be mitigated by the comment and I quote " It is a temporary activity" Does anyone believe 15 years is a temporary activity most Waspterton residents will be dead in 15 years hardly temporary to us. Considerably more work on mitigation (and proof of concept) should be provided to if the council wishes to proceed. Local Community This development plan flies in the face of the Barford Local Plan backed by government to allow locals a voice concerning development in their community, designed by locals to protect us from just this type of development. Combined with recent housing development proposals that are also in direct conflict with the wishes of local people, one wonders if the huge effort made to create the plan was worth the effort. Comments on para 9.50 not justified The last sentence is totally backwards and should read However planning permission will only be granted where specific, objectively proven impacts are demonstrated to have no unacceptable adverse impact on viability of nearby business, local amenity or health of local communities or residence. Th onus to prove no adverse impact on local communities should surely be with the potential polluter	See last comments above. It is not for the community to be responsible for ensuring that the council produces legally compliant plans. It is their (the council and councillors) responsibility to represent the needs and wishes of their community in the face of both government and businesses pressures (or at least it should be).	1	1	

Salford Priors, Lower Farm, Site 7 - County Mineral Plan Response to Warwickshire County Council Minerals Plan Consultation Site 7 (9th Dec - 3rd Feb 2017) A partition was presented to Warwickshire County Council (WCC) on 22nd September 2016 relating to the objection of the Salford Priors, Lower Farm, Site 7, being included in the County Mineral Plan. The partition has been signed by over 1000 people, being a significant number of the local residents of Salford Priors. I attended a Salford Priors Parish Council Extraordinary Meeting, held on 4th November 2015, which was also attended by representatives of Warwickshire County Council's (WCC's) Principal Planning Officer's Department. The representatives pointed out that any Site was required to be "legally compliant, have soundness in preparation, be positive, be justified and effective". It became clear throughout that meeting, and also following subsequent detailed consideration of all matters affecting, and affected by, this Site, that this criteria did not, and has not, been applied by WCC to Site 7. It should also be borne in mind that there is a very serious ethical situation regarding the Site 7, in that there is a clear conflict of interest with Warwickshire County Council being both landowner and planning authority. Further, the economic viability and the whole feasibility of Site 7 is questionable. While I understand that there is a national need for aggregates to support construction activities where recycled materials are insufficient or unavailable, the potential yield of sand and gravel from Salford Priors Site 7 is very small compared with other sites under consideration across the county and in the region. This modest output needs to be weighed against the disproportionately high impact on villagers, wildlife, ecology and local community, both from the initial designation and any subsequent extraction. The proposed site is extremely close to the village of Salford Priors and I have reiterated this concern in the points below. I understand you have agreed with Salford Priors Parish Council, that residents can respond to the Mineral Plan consultation by a letter to yourself. I have therefore indicated below my own objections to inclusion of Site 7 in the County Mineral Plan. My comments and observations are based on consideration of all issues and matters relating to Site and also as listed in my previous on-line objection. I am aware of other detailed objections that have been prepared by other residents of Salford Priors. 1. The economic considerations for the viability of the use of Site 7 as part of the Minerals Plan and its impact on the locality, cannot be justified. This taking into account the limitations of the resultant limited area for effective sand and gravel excavations and use, due to the surrounding and very close vicinity of residential properties within and adjacent to the proposed site. The effective reduction in area for excavation being considerably reduced by the incorporation of perimeter "screening bunds", clearance "stand-off" distances from residential areas and also the location and route of high voltage (11,000 volt) power lines crossing the site in a number of locations. In my opinion, the resultant smaller quarry area of available land for aggregate excavation is unlikely to be of economic interest to a minerals operator given the several limitations and restrictions of site access constraints, environmental issues and health and safety considerations. 2. The Site is located on a busy thoroughfare traffic route. School Road is used by local Parish residents, a high level of commuters and is a regular half-hourly bus route. The Plan indicates quarry vehicular plant routes across School Road. These will have an impact on the traffic using School Road and result in congestion, 'backing-up' of road traffic into Salford Priors and onto the junction with the B4088. Any anticipated traffic light control at the School Road crossing will exasperate the traffic problem. WCC's representatives advised that "no access plan was set in stone". It is likely that commuters will use Tothall Lane as a diversion to avoid the plant crossing, with the resultant congestion and increased accident risk with such a restricted vehicular route, and most likely causing danger and hazard to Dunnington School. 3. Dust will be a primary and serious problem resulting from use of the proposed Site. Whilst WCC's representatives previously stated that "dust is not a problem from experience", this is not validated from the experience of the previous Marsh Farm quarry site. Dust will cause pollution and contamination affecting the local area and residential properties and also Salford Priors village. People with respiratory health problems will suffer by virtue of the proposed location of Site 7. Others will be affected. Prevailing winds in the area will add to the major problem of air borne and ground settled dust pollution. 4. Noise and vibration pollution will also cause a problem to the area. Heavy quarry vehicle traffic use on the Site and gaining access to and from the Site, will result in high noise and vibration levels. In addition, the excavation and process operations on the site will be a considerable source of high noise and vibration levels. WCC's representatives have previously confirmed that "aggregate processes would take place on Site 7". 5. Light pollution will be apparent when the proposed Site is in use out of daylight hours. WCC's representatives previously advised that the Site would likely be "in use from between 7:00am to 6:00pm". This is clearly unsustainable in such an exposed rural area very close to residential properties and Salford Priors village. Considerable effect and impact will result on local residents and the surrounding countryside from the use of high levels of artificial lighting in the quarry areas. 6. Other environmental issues will occur with such a quarry development as proposed. Local ecology, wildlife and flora/fauna will be dramatically affected. Two local water courses will be immediately next to the Site and contamination will occur. Loss of flow and level variation will also occur due to the impact of the quarry. WCC's representatives were previously unable to confirm where the water source would originate to serve the quarry processes and operations. No consideration had been given to this for Site 7. Flooding of the local water courses is also likely and affecting local properties and landscape. Part of one section of the quarry will drain towards and into the local water course (Ban Brook). WCC representatives have not given any consideration on how such a risk would be mitigated. 7. The excavation depth of the Site could not be previously verified by WCC's representatives. The statement has been made by the Council that the Site would be "restored to agriculture at reduced levels". No indication has been given on what the resultant reduced levels would be or indeed if sufficient "insert fill"/"quality soils" would or could be available. The overall result will be that the site will remain as a deep excavated area for some considerable time, after the Site has been exhausted. The 'eye-sore' of the landscape will remain in the rural area in much the same way as presently experienced on the previous Marsh Farm site. The likely lack of sufficient "inert" in-fill, as previously suggested by the WCC's representatives would be the case, will prolong any period to return the quarry back to agricultural land. The likely "life" of the quarry was indicated to be in excess of 8 years. This prolongs even further any intent to restore the site either in sections or as a whole. WCC's representatives previously indicated that any restoration period would

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sections of a whole. WCC representatives previously indicated that any restoration period would depend on details to be proposed by a prospective minerals operator, but that less in-fill could be possible. The restoration was advised by WCC representatives, to be "long term, not short term". 8. The formation of the 3m high "screening bunds" will block the countryside views in the area and in particular for local residents affected, will cut-off all their landscape views from their properties. The "screening bunds" also effectively reduce the available area for quarry use and excavation. WCC's representatives previously advised that the "screening bunds would remain until restoration of the quarry is complete". 9. Site 7 is, it seems, dependant, as previously advised by WCC's representatives, on a particular Planning submission from a minerals operator, but it seems that until that point, no guidance, indication or reassurance can be given by WCC on the likely effects or implications to residential properties and the surrounding area and countryside of the proposed quarry. It appears that there has been a conflict between WCC's Planning Department and the department responsible for preparing the Mineral Plan. This leaves little confidence on what is likely to be proposed for any quarry site. 10. The Plan does not take into account other development proposals for Salford Priors village. For example, the recent 'Orchard Farm' development proposal to build new houses and amenities within relatively close distance to the proposed quarry site. At the above mentioned Extraordinary Meeting, WCC's representatives had no knowledge of such proposals and the likely social and health issues that would be affected by the quarry. The vicinity of the local school has also not been considered. Site 7 proposals has not been fully considered as a whole by WCC. 11. From information on WCC's future Minerals Plans, Site 7 appears to form part of a future larger proposed quarry site. This will have further and wider implications on all of the issues raised in this objection. 12. The economic impact on Salford Priors and the surrounding area will also be affected. The value of property will reduce and saleability dramatically affected. The desire to improve Salford Village, as indicated in item 10 above, will be severely undermined. The primary objective to develop Site 7 has been formally stated by WCC, to be to their gain by "income generation" from rent and royalty payments from a minerals operator. The above matters have not been adequately addressed by Warwickshire County Council and in many cases have been disregarded or ignored. No response or feedback at all has been provided to me by Warwickshire County Council, either since my previous on-line objection or to my direct letters to the four Councillors, including the Chair of the Cabinet. I find this situation most undemocratic, discourteous and totally unacceptable. In my view, a clear and fair democratic process does not appear to have been followed by Warwickshire County Council. Warwickshire County Council do not appear to have considered or recognised the issues and implications of Site 7 devastating impact on Salford Priors village as a whole, local people, the surrounding countryside and environmental and ecological matters and issues. Warwickshire County Councils intent to include Site 7 in their County Mineral Plan has the potential to undermine other policies and local plans, including planned housing development and consequently the viability of Salford Priors Church of England Primary School and local businesses. In summary, my objections to inclusion of Site 7 in the County's Mineral Plan are set out in my comments in this letter. The environmental, dust, noise, vibration, light pollution, ecological, health, safety, social, traffic and economic impacts and the short and long term implications, as examples, on Salford Priors village and the surrounding area have not been fully considered or taken into account by Warwickshire County Council for Site 7. I would request please, your consideration and support to the objection of Site 7 being included in the County Mineral Plan and I look forward to receiving your reply and comments in this matter. Can you also please forward it to the Cabinet Members of Warwickshire County Council and any other involved members of the Council, prior to the closure of the consultation period on 3rd February 2017. I also look forward please, to receiving your acknowledgment of receipt of this letter and that my above requests and matters raised will be formally recorded. This is in order that in the event of any Independent Government Inspector being appointed, then full and detailed information will be available to ensure that Site 7 is refused, this on the assumption that WCC Cabinet and elected members of the Council consider taking their proposal forward to the Secretary of State. In view of all of the compelling evidence against the suitability of the Site 7 proposal, it would be anticipated that the proposal for Mineral Extraction in Salford Priors will be withdrawn by Warwickshire County Council.

Site 4 & site 5 – the Plan, and the response published to earlier representations, is wholly unsatisfactory in its treatment of visual appearance / blight, and of traffic impacts / safety. The assertion that "proper management" of the site is some kind of complete and unquestionable mitigation against the very real risks associated with noise/dust pollution, and of the degradation of our countryside and village assets, is not justified, and highlights the inadequate preparation underpinning WCC's proposals. "Proper management" is not a phrase which should be adopted to absolve WCC of its obligations to properly consider alternative sources of mineral extraction. The concerns and objections of residents in these respects, as REAL impacts, obligate WCC to carefully and objectively consider alternative sources against each of the points raised. For example, the physical and mental health of residents, and the specific impacts of dust and noise, should be explicitly assessed prior to any recommendation or approval being granted. As such, the results of the impact assessment should be set out and ranked as per each alternative extraction site. Assessments of this type cannot be undertaken as simple 'desktop' exercises, but rather as meaningful and accurate exercises, involving detail of the local demographic and interviews with those likely to be most affected. Further, proper traffic assessment would involve simulation of traffic conditions at peak time, and specific hazard scenarios such as those involving slow moving HGVs, which again will be unique for each proposed mineral site. The volume, make-up and speed of traffic must be fully understood, the detail of which varies massively during the day, and which cannot be assumed to comply with simple flow models assuming compliance with speed limits, for example. Real traffic data must be used. Also, the general impact on the village and surrounding area, must account explicitly for the opinions and views of those who enjoy it for recreational purposes, in addition to those of us who live here. The nature of what we consider to be 'countryside' is changed massively by a development of this type – the current landscape is cherished and enjoyed by thousands, and this landscape will be downgraded by the Plan, to one of semi-industrial blight. Dismissing these impacts as somehow unimportant or secondary is something which shouts loudly from the pages of the Plan. A proper, full, and transparent assessment is clearly lacking for each of the examples listed above, resulting in the Plan being neither 'positively prepared' nor 'justified'. The impacts of the proposed sites 4 & 5 on the village and surrounding area would be significant. The alternatives, which do exist, have simply not been properly considered, and due weight to the impacts on Barford and its residents has not been granted.

geometry of the designated crossing point. Minerals would be placed in a hopper and conveyed across School road to a stockpile at the northern site. As the conveyor would operate well above ground level to allow buses to pass underneath, the noise and visual intrusion impacts would be very high. As this type of conveyor system is bespoke the costs would be very high and almost certainly prohibitive. Double handling of the minerals so as to use a conveyor would result in additional operational costs. The construction costs of a suitable culvert under School Road together with the attendant earthworks to bring a conveyor up to ground would also be considerable but less than an overhead conveyor. A conveyor under School road would require a 2 metre by 2 metre or similar concrete culvert founded in or just below sand and gravel with a high water table requiring almost constant pumping and high operational costs. In addition significant local safety measures such as fencing and signing will be necessary for the safety of the operation and the public using School Road. Noise from both the conveyor and extended pumping would result in excessive nuisance to nearby properties. In summary, both overhead and underground conveyors are likely to prohibitively expensive options in terms of construction, operation and maintenance costs. An at-grade road crossing is likely to be preferred and its details, including impacts, discussed below. Road Crossing(s) The crossing would need to comply with the Highways Design Manual, particularly Chapter 8 Traffic Signs as sketched on the attached drawing (See Appendix 1 Possible School Road Crossing Layout). School Road would need to be widened from the existing 5.2metres to a minimum of 6.75 metres at the location shown on the early WCC Consultation Plan Salford Priors Minerals Site Diagrams 1. This would allow 2.6 metre wide buses to pass safely with sufficient clearance from each other and the adjacent kerbs. Widening would be preferably required on the south side as, contrary to the north side, there is not a footpath requiring deviation. Full widening should be applied over approximately 45 metres and generated with 1 in 20 tapers in accordance with TD 42/95 30mph Table 7/3 design criteria. Part time traffic signals would be necessary as part of a crossing in accordance with the layout in Traffic Signs Manual Figure 3.4 Haul route crossing. 3.70 metre 'y' or approach visibility splays would also be required for the 30mph speed limit. The necessary signage would affect School Road over a distance of approximately 100 metres to either side of the crossing. The cumulative effect of this crossing, together with traffic signals, height control posts, fencing and the crossing itself with the resultant loss of hedgerows will be particularly significant. A concrete protection pad would be necessary across the full width of the crossing to protect underground services including drainage and provide a durable road surface. To safely accommodate other road users using the footpath, typical measures at the southern side of School Road such as those shown on the attached sketch would be required. (See Appendix 2 Possible School Crossing Details). These maintain the footway outside the site to facilitate safe crossings along School Road with the quarry traffic in operation. As there no footpath on the south side the site boundary would be to the back of highway verge. There would clearly be an impact on all users of School Road including • Disruption and delays to vehicular traffic, including buses • Loss of hedgerows in vicinity of the crossing • Likely mud on School Road • Safety concerns to all School Road users • Visual intrusion of fencing, posts, signals and signage • Noise from dump trucks crossing and School Road vehicles temporarily stopped NOISE Noise is technically a series of pressure waves which normally cause nuisance when received by the human ear. With particularly high noise levels physical pain can be experienced but this is very unlikely outside the boundaries of the particular site. During the formation and operation of the quarry there will be several noise generators. • Construction plant forming the primary access and link to the processing plant • Formation of the processing plant • Topsoil stripping and formation of the 3 metre screening bunds • Provision of Security measures and fencing • Extraction of sand and gravel • Site vehicles transporting sand and gravel for processing • Reversing 'bleepers' from vehicles and plant • Operation of the processing plant • Operation of the crossing point(s) on School Road • Formation of drainage attenuation and drainage ponds • Restoration of the site including removal of bunds and import of inert material. Noise from a particular source is attenuated by the following factors • Ground absorption between the source and the receptor • Distance between source and receptor • Surface gradient • Path difference of the sound as a result of it passing over a barrier such as a screening mound. At properties, noise is further attenuated to interior rooms by window glass, particularly double glazing. For the many properties located adjacent to the site there will be a worst case of combination of separate noise sources. At present these properties are in a reasonably quiet rural location untroubled by noise, probably at an average of 45-50dB(A) L10 noise level between 6am and midnight. For there to be a significant increase in noise level there has to be an increase of 10dB(A), equating to a perceived doubling of noise level. (Noise calculations below are based on the DTP's Calculation of Road Traffic Noise). For the several properties 100 metres distant from the start of quarrying, there would be the following impact during the construction of the bunds, the centre of which would be approximately 4.93 metres from the houses assuming 1 in 2 to 1 in 2.5 bund side slopes. A typical machine to form the early part of the bund construction would be a bulldozer with a 'box', typically with a noise level of 88dB(A) at 15 metres from the machine. The attenuation for level ground absorption at 93 metres distant would be 4dB (A) with a distance correction 8.5dB(A) giving 75.5dB(A). A similar noise level would be experienced when the bunds were removed during restoration. After the bunds have been completed a front end loader/excavator would soon have excavation down to a 1 metre depth typically 25 metres away to the rear of the bunds. This machine would also generate 88dB(A) at 15 metres distant. The attenuation for level ground absorption 125 metres from the properties would increase to 5dB(A) and the distance correction 10dB(A). However there would then be further attenuation of 13dB(A) from the screening bund giving 60dB(A). As there would be dump trucks serving the excavators with the processing plant in operation as well, addition noise would be generated taking noise at the critical properties to 60dB(A) from excavations within most of the working site. In conclusion, the early construction and later removal of the screening bunds construction plant would generate substantial increases to 75dB(A) at nearby properties equivalent to a loud radio. During the working of mineral in most areas of the quarry it is likely that nearby properties would receive 60dB(A), perceived to be at least a doubling of noise levels and similar to noise levels of conversational speech or ambient noise levels in a restaurant or department store. In summary the quarry would have a significant noise impact on the adjacent area to the quarry, particularly those identified properties within 100 metres. SUSTAINABILITY and FINANCIAL VIABILITY WCC Sustainability Appraisal Report On pages 8and 9 a series of objectives are identified to guide the Spatial Vision of the Minerals Plan. In particular, Objective 'v' 'To have full regard for the concerns and interests of local communities and protect from unacceptable environmental adverse impacts resulting from mineral developments' Subsequent in para 10.64 referring to Site 7 Salford Priors 'The site is in

MLPpub1 6439	1	1	1	S7	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
																				<p>close proximity to residential properties on the B4088, School Road and Tothall lane. Development of this site for mineral extraction is considered to have significant negative effects on SA Objective 5 (to conserve and enhance the quality of the landscape and townscapes). However the policy requires the exclusion of land at the eastern end of the southern parcel and minimum 100metre landscape buffer to help minimise any visual impacts, reducing the effect to minor negative and not significant. The policy also requires the retention of trees and hedgerows where possible... The last statement would clearly be unsound if the site were to become operational, say over 8 years according to WCC. This is due to the buffer being only fully present around nearby buildings on School Road, Tothall lane and the B4088. This buffer is often much less to property boundaries. Also this key protection buffer is not present on large stretches of School Road and Tothall lane. During restoration and afterwards this statement is likely still to be unsound with low grade agriculture at a lower level and possibly ineffective perimeter landscaping. Also, long stretches of School Road and Tothall lane would be adjacent to low grade agricultural land at a lower level. Hardly a 'minor negative and not significant impact!' Plan Objective 'V' detailed on pages 210 and 211 gives sub-ordinate objectives to achieve the Plan Objective. There is no indication on any of WCC documentation that this would be achieved. Finally on page 237 (Appendix p125), Salford Priors Assessment and location Map: 5 Regarding Access and Routing it is stated 'Safe access is available'. Without an Agreement with the Marsh Farm Access Road this would not necessarily be the case. A new access location using the available B4088 frontage would require road widening and is totally unsuitable as it is both in a dip and on a bend. This junction would have below standard features and may not ultimately be acceptable to the highway authority. Regarding Landscape Character it is stated 'Stand off zone required. Existing hedgerows and hedgerow trees should be retained'. The latter would be impossible to be achieved in proximity of the School Road crossing to allow for visibility splays and also the link road near Ban Brook to the preferred prime access location via the Marsh Farm Access. Moreover, if an Agreement with the Marsh Farm Access owner could not be reached and the new access built, most of the hedgerow on the site's B4088 frontage would be lost. Conclusion: The Minerals plan cannot be considered legally compliant as The Sustainability Appraisal is unsound as it is not based on sound evidence in the context of its appraisal of the Salford Priors site. The sustainability of the Salford Priors site cannot be considered justified by the Sustainability Assessment Report. In addition, sustainability and financial viability are necessarily interlinked. This site cannot strictly be considered sustainable if the quarrying of sand and gravel would not be financially viable. The major factors that would make the site unsustainable in financial terms are discussed below. Average depth approx. 2 metres of gravel WCC advise that there are 800,000 Tonnes of sand and gravel available within the 6 phases of excavation shown on Salford Priors Minerals Site Diagram 1. As these phases affect only 22Ha, less than half the site area of 50Ha, the average depth of sand and gravel must be just less than 2 metres at 1.9 metres assuming a density of 1.9 tonnes per processed cubic metre. As such the site is not very productive and is likely not to be financially viable when considered against the particular difficulties and 'extra-over' costs of this site. High initial, operation and maintenance costs The following 'extra-over' costs for this site relative to straight forward, unproblematic sand and gravel extraction and restoration costs • Primary access To construct a safe junction at the site's B4088 frontage will be relatively high given the unsuitability of the location. The landscape and environmental impact will be high. Alternatively the site could access the existing Marsh Farm access road to use the existing Marsh Farm B4088 junction. This would require approximately 500 metres of access road from the site to cross Ban Brook and intersect on high ground to the north. This will be the much preferable option as the existing junction, proven to be safe, would be used. However there will still be significant costs from the site access road connection and possibly high costs arising from a long term Agreement with the existing Marsh Farm access road owner. In summary, the provision of a primary access is very likely to be relatively expensive however it is achieved. It will also have an adverse environmental impact. • School Road crossing Assuming the workable quarry site is approximately 10.3 Hectares out of a total workable site area of 22 hectares, it is estimated that 37,500 tonnes will need to cross School Road to the primary access. It is further assumed that on the possible 'campaign' basis stated in para 7.30 most of the north side mineral would have been worked by the time the north side working becomes productive. Therefore the timescale is such to necessitate a part-time traffic signal controlled junction if an underground conveyor is proven to be too expensive. 6 • Screening bunds These are to be 3 metres high with probable side slopes of 1 in 2 to 1 in 2.5. These will need to be constructed over a length of approximately 2500 metres requiring up to 55,000cubic metres of fill. As the site should yield 22hectares of a 300mmm minimum topsoil strip, most of the fill will be topsoil. As there will be a possible excess of topsoil, the bunds could be beneficially increased in size or suitable storage provided. Nonetheless the significant cost of forming such bunds will be incurred before sand and gravel sales can be made. • Processing plant facilities To minimise haulage costs, these will be best placed in the northwest corner of the site within the area of the site not shown for mineral working on Salford Priors Minerals Site Diagram 1. However Salford Priors Minerals Site Diagram 2 shows 'a potential wetland area for biodiversity gain' near the north western boundary. Clearly such a biodiversity area cannot be sustainable with the quarry in operation with its attendant processing plant settling ponds nearby. The latter may well be expensive as they will need to be lined on the side slopes in sand and gravel and require significant earthworks due to the sloping ground. • Security Measures Due to the proximity of the site to the village, the school, the surrounding public access routes and its residents, a high level of security and security fencing will be required. This will be particularly costly and will be very visually intrusive. Finally the environmental impact is very significant due to the proximity of the site to the village and its adjoining land and buildings. This impact is detailed by others except for the following: Sustainability of the restoration to low grade agriculture from existing Grade 2 As the site is Grade 2 agricultural land the average topsoil depth will be at least 300mms and locally 400mm. Assuming a further 300-400 mms of clay overburden the base of the finished quarry will be on average at least 2.5 metres below existing ground level. The excavated site will be surrounded by higher ground containing sand and gravel which will lead to high water tables in the restored site from pore water migration. This in turn will restrict the workability of the restored site and the ability to cultivate the restored soils. Very low grade agricultural land will result with a lesser landscape value. Conclusion: The Minerals Plan cannot be considered 'sound' in the context of the Salford Priors site as the Minerals Plan has not been justified in terms of sustainability and is not effective in its delivery. APPENDICES Appendix 1 Possible School Road Crossing Layout. Appendix 2 Possible School Crossing Details Appendix 3 Possible Site Ghost Island Junction</p>	Change. Remove Site 7 From the Draft Minerals Plan. Please see attachment 'Barlow Consultation Response'																																									

MLPpub1 6445				1																	SO			1									Not Legally Compliant: Fails to consider the NPPF's requirement to using alternative materials in preference to primary materials. Incompatible with the requirement that the planning system should play an active role in guiding development to sustainable solutions. Not Positively Prepared: It is not sound, by promoting vastly more provision from primary materials than is justified. Has not been prepared with the objective of securing long term conservation or contributing to sustainable development. Not Justified: Because it is not the most appropriate strategy, it should be a more sustainable approach. Not Effective: Because over supply of primary materials and the unnecessary depletion of finite resources.				1																												
MLPpub1 6446				1																		S1			1								For the reason given above in SO, Policy S1 should be deleted as over provision of the requirement for land won aggregates fails the soundness test. If Policy S1 is not deleted, it is imperative that the site at Bourton on Dunsmore is not restored using inert fill but should be restored to wetlands due to the unacceptable risk of flooding and contamination of drinking water. These and other concerns have been discussed fully in the Parish Council response of December 2015 which included an independent report by a qualified geo-physicist confirming the serious risk of flooding elsewhere and beyond the immediate site as a direct result of minerals extraction.				1																												
MLPpub1 6447				1																			MCS1			1							Not Positively Prepared: By promoting vastly more provision from primary materials than is justified. Has not been prepared with the objective of securing long term conservation. Not Justified: Because it is not the most appropriate strategy, it should be a more sustainable Approach, contributing to sustainable development. Not Effective: Because of oversupply of primary materials and the unnecessary depletion of finite resources. Not legally Compliant: Fails to consider NPPF's requirement to consider using alternative materials in preference to primary materials and incompatible with the requirement that the planning system should play an active role in guiding development to sustainable solutions.				1																												
MLPpub1 6448				1																		Introductio n – Paragraph s 1.7 and 1.8			1								Paragraph 1.7 states that the landbank for sand and gravel is 8 years. The 2016 LAA identifies it as 7.2 years. Paragraph 1.8 is misleading. Whilst the crushed rock landbank appears more than sufficient to cater for the NPPF requirement of 10 years, there is only one active and operational crushed rock site within Warwickshire. We have provided more detail on the figures contained within the Local Aggregate Assessment as part of our written submission dated 2nd February 2017 (reference 004/TAR-007-M/JC).	The above provides a point of clarification (paragraph 1.7). The amendments to the crushed rock paragraph are explained in greater detail within the submission for Policy MCS3.				1						1				To provide further explanation and clarification to the Inspector.																	
MLPpub1 6449				1																			MCS2			1							I question WCC calculations of requirement during the plan period which were highlighted as inaccurate in our Parish Council's response of December 2015 and I believe are still unsound, based on a flawed evidence base and promoting massive over provision of a finite natural resource. NPPF paragraph 145, the already permitted reserves-or landbanks--provide the basis for indicating the additional provision that needs to be made in the plan for new aggregate extraction and alternative supplies. WCC has failed to take account of the existing landbank of 3.869mt and further, the late addition of the agreed extensions in June 2016 to an existing quarry at Brinklow which has additional reserves of 3.4mt which together gives permitted reserves of 6.696mt. The remaining requirement that the plan needs to provide for is 1.899mt (0.573mt x 15 years minus existing reserves). If the additional reserves approved at Brinklow quarry are not to be added to the landbank, then they should instead be identified as an allocated site to safeguard against doubling up of this new supply that is already available. There is no requirement or justification to make provision beyond the end of the plan period at all, let alone by this significant amount. The strategy is fundamentally unsound because it is based on a flawed evidence base, the development needs have not been properly or objectively assessed. This has resulted in Policy MCS2 promoting massive over provision of a finite natural resource, contrary to NPPF's aim that long term conservation should be secured and runs directly counter to the key objective of a local plan that it must deliver sustainable development (NPPF paragraphs 142 and 150). It is reckless to open up a brand new virgin site Bourton on Dunsmore with all the associated risks in respect of flooding and contamination of drinking water and promote the unnecessary depletion of finite resources. The site at Bourton on Dunsmore should not be an allocated site and should be removed from the preferred sites list.				1																												
MLPpub1 6450				1																		5.1			1								We would support the MPA in ensuring that identified need for sand and gravel is met through the provision of sand and gravel allocations within the Plan. The contribution made by secondary and recycled aggregates is of benefit but the volumes of aggregate generated cannot be a substitute for the provision of primary land won sand and gravel.	More detail on this is provided within our comments on Policy MCS4 – Secondary and Recycled Aggregate. We consider that the contribution made by secondary and recycled aggregate to overall aggregate supply should be recognized. However, due to the quality and availability of these resources they should not be seen as a substitute to primary aggregate but their role supported in the overall aggregate supply mix. Please see our formal letter of representation dated 2nd February 2017 – reference 004/TAR-007-M/JC				1																											
MLPpub1 6451				1																		5.2			1								We have made comments above on the Local Aggregate Assessment and the sales data used to forecast the Plan requirement within our main letter of representation dated 2nd February 2016. We have raised concerns over whether the Plan is being positively prepared to meet future demand and whether it will provide an effective strategy. As we have identified, it is considered that the historic sales data is not reflective of the likely demand over the next 15 year Plan period. This is evidenced by the level of development, infrastructure and construction projects planned for within the County in addition to the picture from neighbouring Authorities which are evidencing an increase in demand for aggregate. In addition, the past 3 years sales data is reflective of operational capacity from only 2 sites being active.	We consider that the previous use of a 10% buffer (as advocated within the previous Mineral Local Plan Draft) was justified and allowed flexibility in the event of increased aggregate demand. In addition there should be some policy flexibility for sites outside of the identified allocations. More detail on this is provided within our comments in regards to Policy MCS2 and MCS3.				1																											To provide clarification or further detail to the Inspector at the Examination.
MLPpub1 6452				1																		Issue 2 - Future Production			1								We would not support the view that the quality of the resource being the prime factor influencing decline in sand and gravel production in Warwickshire. The sand and gravel resource within Warwickshire is generally more scattered and variable in thickness and quality than other parts of the region, but the importance of these minerals will grow in time as other historically relied upon resources in the region decline. In addition, the level of demand from planned development within the County may assist in resources becoming more economical and viable to work.	Remove reference to the quality of the resource being the prime factor influencing decline in sand and gravel production.				1												To provide further clarification/explanation of required by the Inspector.															
MLPpub1 6453				1																		Issue 4 - Avoiding and Mitigating the Impacts			1								The first sentence of this paragraph is negatively worded. It is not the case in all circumstances that minerals development has a 'significant adverse impact on society, the economy and the environment'.	It is suggested this issue is reworded to read, 'Mineral development has the potential to have both positive and negative impact upon society, the economy and the environment. Any unacceptable impacts should be satisfactorily mitigated'				1									To provide further clarification/explanation of required by the Inspector.																		
MLPpub1 6454				1																		Issue 7 - Restorati on and potential for promoting Green Infrastructu re			1						Restoration of mineral sites is a balance between the longer term needs of the landowner and the Mineral Planning Authority. If land is in an economically beneficial use – i.e agriculture- it is unlikely that large areas of the land will be returned to alternative 'environmental' afteruses.	Amend the following sentence, 'once restored, mineral workings usually enable large areas to be used for environmentally beneficial uses which may include nature conservation and recreation and green infrastructure' to read, 'as part of restoration, mineral workings have the potential to incorporate elements of nature conservation and recreation and green infrastructure'.				1									To provide further clarification/explanation if required by the Inspector.																				
MLPpub1 6455				1																		Issue 9 - Transportat ion			1								It should be acknowledged that minerals can only be worked where they are found and geology will dictate the location of mineral sites. Given the historic difficulties within the County of sites coming forward as planning applications and becoming active mineral workings, sites should not be viewed negatively based upon their location and the potential need for HGV traffic to use minor roads. A Planning Application and Environmental Impact Assessment will consider the potential for impact upon the local highway network and address where necessary any shortfalls or adverse impacts which may need to be modified/improved (subject to necessary consents and legal agreements etc).	We would suggest the removal of the following sentence would be appropriate, 'transportation of minerals can be a potential problem if quarries are located away from the main trunk and 'A' road system. Generally, mineral extraction sites are not approved if they require lorries to travel through minor roads and centres of population including both towns and villages. Any site submissions with predicted transport/highway problems will be rejected unless it can be demonstrated that the issues can be satisfactorily mitigated.'				1																				To provide further clarification/explanation if required by the Inspector.							

MLPpub1 6456				1				1		1.5 - 1.11				1		1					1	1	1	1								1							Paragraphs 1.5 - 1.11 Not Legally Compliant: Not consistent with National Policy because it does not make provision for use of re-cycled materials and relies on primary materials when it should use re-cycled aggregates as a priority over primary materials. Not Justified: Due to over-reliance on primary aggregate which is inconsistent with delivering sustainable development. Not Effective: Due to being not sound because it is at odds with the objective of reducing the demand for primary extraction.
MLPpub1 6457				1				1		SO				1		1						1	1	1	1														Not Legally Compliant: Fails to consider the NPPF's requirement to using alternative materials in preference to primary materials. Incompatible with the requirement that the planning system should play an active role in guiding development to sustainable solutions. Not Positively Prepared: It is not sound, by promoting vastly more provision from primary materials than is justified. Has not been prepared with the objective of securing long term conservation or contributing to sustainable development. Not Justified: Because it is not the most appropriate strategy, it should be a more sustainable approach.
MLPpub1 6458				1				1		S1				1		1						1	1	1	1														For the reason given above in SO, Policy S1 should be deleted as over provision of the requirement for land won aggregates fails the soundness test. If Policy S1 is not deleted, it is imperative that the site at Bourton on Dunsmore is not restored using inert fill but should be restored to wetlands due to the unacceptable risk of flooding and contamination of drinking water. These and other concerns have been discussed fully in the Parish Council response of December 2015 which included an independent report by a qualified geo-physicist confirming the serious risk of flooding elsewhere and beyond the immediate site as a direct result of minerals extraction.
MLPpub1 6459				1				1		MCS1				1		1						1	1	1	1														Not Positively Prepared: By promoting vastly more provision from primary materials than is justified. Has not been prepared with the objective of securing long term conservation. Not Justified: Because it is not the most appropriate strategy, it should be a more sustainable Approach, contributing to sustainable development. Not Effective: Because of oversupply of primary materials and the unnecessary depletion of finite resources. Not Legally Compliant: Fails to consider NPPF's requirement to consider using alternative materials in preference to primary materials and incompatible with the requirement that the planning system should play an active role in guiding development to sustainable solutions.
MLPpub1 6460				1				1		MCS2				1		1						1	1	1	1														I question WCC calculations of requirement during the plan period which were highlighted as inaccurate in our Parish Council's response of December 2015 and I believe are still unsound, based on a flawed evidence base and promoting massive over provision of a finite natural resource. NPPF paragraph 145, the already permitted reserves-or landbanks--provide the basis for indicating the additional provision that needs to be made in the plan for new aggregate extraction and alternative supplies. WCC has failed to take account of the existing landbank of 3.869mt and further, the late addition of the agreed extensions in June 2016 to an existing quarry at Brinklow which has additional reserves of 3.4mt which together gives permitted reserves of 6.696mt. The remaining requirement that the plan needs to provide for is 1.899mt (0.573mt x 15 years minus existing reserves). If the additional reserves approved at Brinklow quarry are not to be added to the landbank, then they should instead be identified as an allocated site to safeguard against doubling up of this new supply that is already available. There is no requirement or justification to make provision beyond the end of the plan period at all, let alone by this significant amount. The strategy is fundamentally unsound because it is based on a flawed evidence base, the development needs have not been properly or objectively assessed. This has resulted in Policy MCS2 promoting massive over provision of a finite natural resource, contrary to NPPF's aim that long term conservation should be secured and runs directly counter to the key objective of a local plan that it must deliver sustainable development (NPPF paragraphs 142 and 150). It is reckless to open up a brand new virgin site Bourton on Dunsmore with all the associated risks in respect of flooding and contamination of drinking water and promote the unnecessary depletion of finite resources. The site at Bourton on Dunsmore should not be an allocated site and should be removed from the preferred sites list.
MLPpub1 6461				1				1		1.5-1.11				1		1						1	1	1	1														Paragraphs 1.5 - 1.11 Not Legally Compliant: Not consistent with National Policy because it does not make provision for use of re-cycled materials and relies on primary materials when it should use re-cycled aggregates as a priority over primary materials. Not Justified: Due to over-reliance on primary aggregate which is inconsistent with delivering sustainable development. Not Effective: Due to being not sound because it is at odds with the objective of reducing the demand for primary extraction.
MLPpub1 6462				1				1		SO				1		1						1	1	1	1														Not Legally Compliant: Fails to consider the NPPF's requirement to using alternative materials in preference to primary materials. Incompatible with the requirement that the planning system should play an active role in guiding development to sustainable solutions. Not Positively Prepared: It is not sound, by promoting vastly more provision from primary materials than is justified. Has not been prepared with the objective of securing long term conservation or contributing to sustainable development. Not Justified: Because it is not the most appropriate strategy, it should be a more sustainable approach.
MLPpub1 6463				1				1		S1				1		1						1	1	1	1														For the reason given above in SO, Policy S1 should be deleted as over provision of the requirement for land won aggregates fails the soundness test. If Policy S1 is not deleted, it is imperative that the site at Bourton on Dunsmore is not restored using inert fill but should be restored to wetlands due to the unacceptable risk of flooding and contamination of drinking water. These and other concerns have been discussed fully in the Parish Council response of December 2015 which included an independent report by a qualified geo-physicist confirming the serious risk of flooding elsewhere and beyond the immediate site as a direct result of minerals extraction.
MLPpub1 6464				1				1		MCS1				1		1						1	1	1	1														Not Positively Prepared: By promoting vastly more provision from primary materials than is justified. Has not been prepared with the objective of securing long term conservation. Not Justified: Because it is not the most appropriate strategy, it should be a more sustainable Approach, contributing to sustainable development. Not Effective: Because of oversupply of primary materials and the unnecessary depletion of finite resources. Not Legally Compliant: Fails to consider NPPF's requirement to consider using alternative materials in preference to primary materials and incompatible with the requirement that the planning system should play an active role in guiding development to sustainable solutions.
MLPpub1 6465				1				1		MCS2				1		1						1	1	1	1														I question WCC calculations of requirement during the plan period which were highlighted as inaccurate in our Parish Council's response of December 2015 and I believe are still unsound, based on a flawed evidence base and promoting massive over provision of a finite natural resource. NPPF paragraph 145, the already permitted reserves-or landbanks--provide the basis for indicating the additional provision that needs to be made in the plan for new aggregate extraction and alternative supplies. WCC has failed to take account of the existing landbank of 3.869mt and further, the late addition of the agreed extensions in June 2016 to an existing quarry at Brinklow which has additional reserves of 3.4mt which together gives permitted reserves of 6.696mt. The remaining requirement that the plan needs to provide for is 1.899mt (0.573mt x 15 years minus existing reserves). If the additional reserves approved at Brinklow quarry are not to be added to the landbank, then they should instead be identified as an allocated site to safeguard against doubling up of this new supply that is already available. There is no requirement or justification to make provision beyond the end of the plan period at all, let alone by this significant amount. The strategy is fundamentally unsound because it is based on a flawed evidence base, the development needs have not been properly or objectively assessed. This has resulted in Policy MCS2 promoting massive over provision of a finite natural resource, contrary to NPPF's aim that long term conservation should be secured and runs directly counter to the key objective of a local plan that it must deliver sustainable development (NPPF paragraphs 142 and 150). It is reckless to open up a brand new virgin site Bourton on Dunsmore with all the associated risks in respect of flooding and contamination of drinking water and promote the unnecessary depletion of finite resources. The site at Bourton on Dunsmore should not be an allocated site and should be removed from the preferred sites list.

MLPpub1 6466																				SO	1														To be read in context with the overall written submission (letter dated 2nd February 2017). In order to be consistent with national policy (paragraph 146 of the NPPF), the Plan should identify provision for 'at least 8.022 million tonnes' of sand and gravel.												1																			To provide further clarification and information as required by the Inspector.											
MLPpub1 6467																				Spatial Vision	1																		Currently the spatial vision is contradictory, we support the statement that minerals can only be worked where they are found. However, it is not appropriate for mineral sites, 'to have been located as close as possible to the main settlements... to support sustainable development'. It is accepted that it is more sustainable for mineral sites to be located in close proximity to end markets. However, it is the economic viability and environmental considerations of the resource to be worked that will determine the location of the site.	We would suggest removal of the following sentence, 'to have been located as close as possible to the main settlements... to support sustainable development'.											1																		To provide further clarification/explanation if required by the Inspector.								
MLPpub1 6468																				7.9	1																		A Planning Application has been submitted for the allocations at Shawell Quarry (Site 3/32) – reference RBC/17CM002. The wording of paragraph 7.9, 'the following policies set out requirements for the acceptable development of each of the allocated sites', indicates that without these elements, the allocation or a Planning Application would be unacceptable. Whilst it may be desirable for the MPA to see the identified requirements, it cannot enforce them or dictate that an application would be unacceptable without them. This would be for the Planning Application to determine weighing in other factors such as the wishes of the landowner, aftercare and operational justifications. Ultimately the objective is to secure the mineral resource in a sustainable and environmentally acceptable manner.	The wording should be amended to seek 'where appropriate'. In the case of the Planning Application for Shawell it can be demonstrated that a number of the requirements are not justified (see comments on paragraph 7.18 – Sites 3/32 Shawell).											1																							To provide further clarification to the Inspector as required.			
MLPpub1 6469																				7.18 and 7.19	1																		A Planning Application has been submitted for the areas proposed for allocation. The following provides some clarification on matters identified which are addressed within the Application. Paragraph 7.18 The site will be worked in phases. However, perimeter hedgerows are the only hedgerows proposed for retention during operation. Field hedgerows are to be reinstated as part of the restoration scheme. This should be clarified within the MLP. There is no advance planting proposed on the junction of the A5/A426. The Landscape and Visual Impact Assessment concluded that the level for potential adverse impact upon residents on the A426 was moderate adverse during construction of the screening bunds and post restoration the impact would be negligible or minor beneficial. Paragraph 7.19 To clarify, processing/production facilities at Shawell have been operating recently at close to 600,000 tpa. Output from the allocations at Shawell will be processed at the existing plant site situated within Leicestershire.	The comments above seek clarification/amendments to points of detail.																																		1			
MLPpub1 6470																				S3	1																		The Planning Application for the areas proposed for allocation (reference RBC/17CM002) demonstrates that there is no justification for a number of the requirements.	The following requirements should be removed, • a minimum standoff of 100 metres from properties on the north side of the A426; • Advance planting at the junction of the A5/A426 • A 30 metre stand off from Coton Spinney and Newton Spinney • The provision of suitable measures to protect and where appropriate enhance the special features of interest of Cave's Inn Pits SSSI • Retained hedgerows to be managed in the traditional Midlands-style hedge laying technique (would be unenforceable by the MPA) • The development does not directly impact/remove any 'woodland belts'; • Public rights of way are to be temporarily diverted and reinstated. Restoration does not include improved public access between Gibbet Lane and the A5.																																			1		To provide clarification or further information to the Inspector as required.
MLPpub1 6471																				MCS1	1																		Policy MCS 1 is Unsound as it has not been positively prepared and does not reflect the NPPF. The NPPF paragraph 143 identifies that local planning authorities should, 'as far as practicable take account of the contribution that substitute or secondary and recycled minerals and waste would make to the supply of minerals'. We would support the MPA in maintaining a supply of materials from these sources, but it should be emphasised that they make 'a contribution' and due to the quality and location are unlikely to be a practicable replacement for primary aggregate. The support for these processes should not prejudice Applications for mineral extraction. Paragraph 143 of the NPPF identifies the statutory requirement of local planning authorities to identify and include policies for extraction of mineral resource of local and national importance in their area. This statutory duty should be reflected in the Policy and 'will seek to ensure that during the plan period there is sufficient supply of minerals...' replace with 'will ensure'. In accordance with Paragraph 145, 'Mineral Planning Authorities should plan for a steady and adequate supply of aggregates by making provision for the maintenance of landbanks of at least 7 years for sand and gravel and 10 years for crushed rock'. This statutory duty should be reflected in the Policy and 'will seek to' replace with 'will maintain'.	The policy wording should be amended as follows, 'The County Council will support the supply of materials from substitute or secondary and recycled materials and mineral waste', Paragraph 143 of the NPPF identifies the statutory requirement of local planning authorities to identify and include policies for extraction of mineral resource of local and national importance in their area. This statutory duty should be reflected in the Policy and 'will seek to ensure that during the plan period there is sufficient supply of minerals...' replace with 'will ensure'. In accordance with Paragraph 145, 'Mineral Planning Authorities should plan for a steady and adequate supply of aggregates by making provision for the maintenance of landbanks of at least 7 years for sand and gravel and 10 years for crushed rock'. This statutory duty should be reflected in the Policy and 'will seek to' replace with 'will maintain'.																																			1		To provide further clarification to the Inspector as required.
MLPpub1 6472																				MCS2	1																		Policy MCS 2 does not currently provide any flexibility in the event that there is an upturn/increase in demand. Both the Local Plan requirement and the requirement to maintain a 7 year landbank as advocated by the NPPF should be minimum requirements. As stated within the justification at paragraph 8.7, the County has been a net importer of aggregate due to the limited number of sites operational and those that are operational having limited operational capacity. The Planning Practice Guide suggests (paragraph 008 ref ID 17-008-20140306), 'designating sites in minerals plans provides the necessary certainty on when and where development may take place'. Given the history of sites failing to come forward, it would be prudent to include sufficient site allocations in addition to some level/degree of flexibility in the event that sites again fail to come forward.	As per the comments on Policy MCS1, the MPA has a statutory duty to plan for a steady and adequate supply of aggregates. The policy should be amended to remove reference to 'seek to' and replace with 'will'. The policy should state, 'Warwickshire's minimum local plan requirement is 8.022 million tonnes' and, 'the Council will maintain at least a 7 year landbank of permitted reserves'. In addition, the final paragraph should be amended to support sand and gravel extraction outside the allocated sites where there is a demonstrated need and recognised shortfall in production capacity to meet production rates and/or landbank. The final paragraph should be reworded to read, 'proposals for sand and gravel extraction outside the allocated sites will be supported where the proposal demonstrates a need for production capacity and/or resource to meet annual apportionment/production rates and that operational, transport, environmental and restoration impacts are acceptable'.																																			1		To provide clarification/explanation to the Inspector as required.
MLPpub1 6473																				MCS3	1																		Whilst it is accepted that there are significant permitted reserves within the County we have concerns regarding the long term provision of crushed rock. Further explanation on this is provided within the section on the Local Aggregate Assessment within our covering submission dated 2nd February 2017. There is currently only one active hard rock quarry within the County at Mancetter. The remaining sites whilst containing permitted mineral reserves have been inactive for a considerable length of time and the MPA raise questions over the deliverability of these sites in the near future. With Mancetter removed, Warwickshire would not currently be providing any crushed rock. Mancetter only has permitted reserves until 2025 and not to the end of the Plan period. Therefore, the importance of crushed rock supply from this quarry should be recognised in the Plan and any further extensions to this quarry safeguarded. Given the position and lack of active workings and the need to ensure security of supply, we consider there should be greater emphasis and support for crushed rock development. There should not be a requirement to address criteria but there should be a priority element/emphasis on sustainable extensions to existing workings in the event that other sites containing permitted crushed rock reserves do not come forward for development. We would support an additional/separate criteria in this policy for the continued supply of specialist crushed rock such as high grade PSV given the national importance of the reserve for infrastructure projects.	As per the comments on Policy MCS2, the MPA has a statutory duty to plan for a steady and adequate supply of aggregates. The policy should be amended to remove reference to 'seek to' and replace with 'will'. We would suggest the second paragraph be amended as follows: 'Proposals for the winning and working of crushed rock as extensions to existing operations will be supported. Proposals for the winning and working of crushed rock in alternative locations will be supported where the proposal demonstrates a need and operational, transport, environmental and restoration requirements are acceptable'. We would support an additional/separate criteria in this policy for the continued supply of specialist crushed rock such as high grade PSV given the national importance of the reserve for infrastructure projects.																																			1		To provide further explanation/clarification to the Inspector as required.
MLPpub1 6474																				MCS4	1																		We support the MPA's positive approach to secondary and recycled aggregate and the importance of these facilities in managing waste higher up the waste hierarchy. However, we would emphasise that secondary and recycled aggregate provides a limited contribution to aggregate supply demands and should be viewed in addition to the need/demand for primary aggregate and not as a substitute.	The policy should be amended to read, 'Proposals for the reception, processing, treatment and distribution of waste materials in order to produce recycled and secondary aggregates will be supported where the proposals will promote the sustainable management of waste in accordance with the principles of the waste hierarchy'.																																		1		To provide further explanation/clarification to the Inspector as required.	

I write on behalf of Salford Priors Against Gravel Extraction (SPAGE) in response to the current consultation on the proposed Warwickshire Mineral Plan. SPAGE is a neighbourhood action group formed following the previous 2015/16 consultation on the Warwickshire Mineral Plan. We object to inclusion of Salford Priors Site 7 in the Mineral Plan Following the stage one consultation we have: Delivered a petition containing over 1000 signatures gathered over just weekend which we submit as part of this consultation (attached). Produced and delivered a factual environmental survey to Cabinet on behalf of residents and business owners which details the rationale for objections contained with that petition which we submit for consideration on as part of this consultation (attached). Made verbal representations at the County Cabinet meeting which approved progression of the proposed Mineral Plan to the current stage two consultation with a large contingent of local people there to support us. No other sites chose to do so. We strongly object to the inclusion of Salford Priors Site 7 in the proposed Mineral Plan on the grounds of legality and soundness. The aims of the sustainability plan are not met by this proposal. In particular, the requirement to have full regard for the concerns and interests of local communities and protect them from unacceptable adverse impacts including human health from mineral developments. Issues and objections submitted by Salford Priors Parish Council during the first consultation have failed to be addressed or have not been adequately addressed. The Parish Council have expanded on those they have raised so we will not go into these here. There is inevitably overlap with issues previously and currently raised directly by individual members of the community and SPAGE and we fully endorse the Parish Council previous and current submission. We therefore request that objections raised during the first consultation and subsequently be reviewed as part of this second stage consultation and by the independent inspector if appointed, particularly in view of conflict of interest and issues of predetermination outlined below. Soundness issues previously raised relating to soundness include the following and are largely outlined in the attached petition and detailed in the attached Environmental Survey. These include: Damage to the health and wellbeing of local residents caused by airborne particulate pollution, stress and noise, in particular to children attending Salford Priors Church of England Primary School, the elderly and those whose homes are located on the edge and epicentre of the quarry; Increase in risks from large industrial vehicles and heavy equipment crossing local traffic on School Road, in immediate proximity to a rural residential area; Serious long term consequences to local ecology and watercourses; Potential increased risk of flooding downstream, with loss of floodplain and aquifer storage; Loss of high grade agricultural and horticultural land which is a source of local employment; Negative impact on pedestrians, private and public transport, affecting access to and from Salford Priors; Loss of the land as a local amenity; Visual impact across a wide area; Damage to the future viability of the community and local businesses arising from years of uncertainty; Viability of the proposal One aspect which we have raise and which needs more emphasis now is the impact of vibration, increased risk of flooding on adjacent properties and the potential consequences for insurability and insurance premiums and the impact of flooding to newly constructed housing located on flood planes lower down in the village. WCCs summary report did not sufficiently reflect the range and nature of issues raised by SPAGE, the Parish Council and individual contributors and not all issues were addressed. Issues relating to proximity of the quarry to the village, homes and businesses include those which abut the quarry or would be engulfed by it and health implications in particular. Where issues were mentioned in Appendix A Summary of responses these were largely either inaccurate or insufficient; Dust – They acknowledge dust is an issue in other proposed developments and in some cases make significant changes to their plans as a result. However dust in Salford Priors is dismissed as not an issue; "The developer advises that sand and gravel has a natural moisture content so excavation does not generate dust. The principal source of dust will be from the active site roads and they will be dampened when in use." This is patently not an acceptable or adequate response – see references to particulate dust and accepted research regarding this within the SPAGE Environmental Report. The local population has suffered the effects of a quarrying and associated activity for 25 years on the adjacent outskirts of the village, has significant long term direct experience of the impact of dust and knows that focusing on specific areas of excavation within the overall area will not significantly diminish these impacts. Adopting a campaign approach will not significantly mitigate these impacts, particularly as excavated soil will be stored on site and soil bunds are proposed. It will serve to exacerbate issues associated with ongoing uncertainty regard timescales which have already been raised in previous consultations. Adequacy of soil bunds is mentioned as an issue but like many others is not addressed. We have no confidence that "good operational practices" which are mentioned but not set out "should minimise the risk of dust events." We know through common sense and the experience of the Marsh Farm Quarry Committee that given the proximity to residential and other buildings attempts to put in place good operational practices will not address this issue. Watercourses and ditches – "The mitigation that "the developer advises" is insufficient as set out in the SPAGE Environmental Report, the Parish Council response and by individual contributors. Marsh Farm Quarry – This response entirely misses the point which is that all of the adverse impacts listed have happened despite having a Liaison Committee. The experience of the committee is factual and no mitigation has been offered to suggest that Salford Priors Site 7 would be any different – rather much worse given proximity to the village, businesses and local housing, straddling the main road through the village. Reassurances in this document that land levels will be restored to the previous levels are not reflected in the Mineral Plan. The implications of this in respect of drainage, potential flooding, local housing and public safety (particularly of local children) still remains. Traffic – Not all of the traffic and associated issues were addressed. Those that were were not adequately addressed and proposed mitigations give rise to further safety and other issues which other contributors to this consultation will expand on. Ecology and wildlife – Again no attempt is made to address many of the issues mentioned by SPAGE and other contributors from the previous consultation and these still stand. Asserting that "important hedgerows and trees" will not be affected offers no reassurance to the issue of the removal of hedgerows which seems likely given the unsuitability of the narrow road. To dismiss the various issues raised regarding wildlife by saying there will be a survey and is unlikely to be loss of habit for protected species is not acceptable or sufficient. Vibration – noted. So what? Bunds will contribute to the loss of amenity – particularly for homes which face directly on to them or surrounded by them in the case of homes at the centre of the quarrying area. What about double or higher story properties which constitute the majority of properties looking directly out onto the quarry and properties at higher levels eg Cock Bevington? Campaign working will simply extend the period of loss of amenity rather than address it. Devaluation of properties and no provision for compensation – just noted. Add to that prolonged inability to sell and

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Response to Warwickshire County Council Minerals Plan Consultation Site 7 (9 th Dec – 3 rd Feb 2017) I understand you have agreed with Salford Priors Parish Council that residents can respond to the Mineral Plan consultation by letter. I am one of over a thousand local people who signed a petition objecting to the proposed inclusion of Salford Priors/Site 7 in the forthcoming Warwickshire County Mineral Plan. Please include this letter as a response to consultation and include it in any subsequent submission to the Secretary of State. Please also forward it to the Cabinet Members of Warwickshire County Council, any other involved members of the Council, prior to the closure of the consultation period on 3rd of February. We understand the national need for aggregates to support construction activities where recycled materials are insufficient or unavailable. However, the potential yield of sand and gravel from the Salford Priors site is very small compared with other sites under consideration across the county and in the region. This modest output needs to be weighed against the disproportionately high impact on villagers, wildlife, ecology and local community, both from the initial designation and any subsequent extraction, because the proposed site is extremely close to the village. Residents have already experienced the damage that over twenty years of sand and gravel extraction has had elsewhere in the parish, and know that the long term potential impacts of this new proposal will include: Damage to the health and wellbeing of local residents caused by airborne particulate pollution, stress and noise, in particular to children attending Salford Priors Church of England Primary School, the elderly and those whose homes are located on the edge of the quarry; Increase in risks from large industrial vehicles and heavy equipment crossing local traffic on School Road, in immediate proximity to a rural residential area; Serious long term consequences to local ecology and watercourses; Potential increased risk of flooding downstream, with loss of floodplain and aquifer storage; Loss of high grade agricultural and horticultural land which is a source of local employment; Negative impact on pedestrians, private and public transport, affecting access to and from Salford Priors; Loss of the land as a local amenity; Visual impact across a wide area; Damage to the future viability of the community and local businesses arising from years of uncertainty. The Environmental Impact Assessment submitted by Salford Priors Against Gravel Extraction expanded on many of these issues which have not been adequately addressed. Elements added to the Mineral Plan since the previous consultation serve to exacerbate rather than alleviate issues previously raised eg. Mining the land in parcels as and when required will extend the period of quarrying potentially indefinitely. Including Site 7 in the County Mineral Plan also has the potential to undermine other policies and local plans, including planned housing development and consequently the viability of Salford Priors Church of England Primary School and local businesses. It is also our belief that in addition to the devastating impact on local people, evidence shows that the complexities of mining in this specific location, and the relatively low yield from doing so, are likely to make the site unfeasible and uneconomic. Beyond these tangible impacts, there is a clear conflict of interest with Warwickshire County Council being both landowner and planning authority.

We write in respect of the consultation on the Warwickshire Minerals Plan. Further to the response we offered in December 2015 we remain deeply concerned about the proposals for sites at Bourton on Dunsmore (site 1) and Lawford Heath (site 2) Flood & Flood Alleviation We welcome the requirement (p37) for a "flood risk assessment covering both the site and elsewhere" but have concerns that the ambiguity of this statement could lead to major omissions in any assessment undertaken. The significant watercourses in this part on the landscape are nothing more than field edge streams and a change in the topology of site 1 will significantly affect drainage patterns and timing. We have, from experience, learnt that even agricultural clearing of watercourses upstream of the village centre leads to differences in the timing of peak levels within Stretton Brook and this development would dwarf normal agricultural changes with the widespread loss of absorbent vegetation and topsoil. During heavy rainfall and with the land already saturated, surface water runs off the fields from Bourton down to Stretton on Dunsmore causing flooding on the Fosse Way/Brookside. The watercourses that run from this site down to Stretton on Dunsmore are classed as Flood Zone 3 on the Environment Agency's Plan. This has caused flooding on the Fosse Way/Frankton Lane as well as within the centre of Stretton Village. In the current plan WCC and their agents, Atkins, have considered flood risk at the immediate site but not elsewhere. They have assessed the risk of flooding as 'Neutral' as there are no significant water courses on the site itself and have failed to assess the risk 'elsewhere and beyond' which they are properly required to do. In addition, the major asset to be stripped from the site (the sand and gravel on the heathland) currently operates as a giant sponge holding back an estimated 1 million m3 of water, if this holding reservoir is removed, and the land subsequently reinstated at a lower level, water will flow through and off site subjecting the village of Stretton on Dunsmore to the serious and almost certain risk of persistent flooding. Restoration Policy DM7 states that: "Planning permission for minerals development will not be granted unless satisfactory provision has been made for high quality reinstatement and unless it has been demonstrated that the site can be reclaimed at the earliest opportunity" There is an acknowledged shortage of inert fill due to the success in re-cycling these materials as secondary aggregates (key issue 6 - Shortage of inert fill for restoration to agriculture) so infill will not be done quickly causing a blight on our communities for many years with all the associated, recorded and accepted health risks. Reinstating at a lower ground level may be practical but leaves an unsightly general vista and less useable agricultural land as it is subject to pooling and poor drainage. Landscape Minerals extraction proposals should demonstrate that valued landscapes should be preserved and that there should be no unacceptable adverse impacts on the quality and character of the landscape. This area is classified as one of only 4 regional character areas in Warwickshire and in the Green Belt. The proposals at site 1 and site 2 will lead to permanent, significant and damaging changes as a result of excavation and restoration by lowering the land and it would be detrimental to environment and visual amenity. It would also be detrimental to the amenity and health of residents due to dust, pollution, noise and increased traffic and this would last an unacceptable amount of time as due to prolonged restoration as a result of lack of inert infill. Traffic "Transportation of minerals can be a potential problem if quarries are located away from a main trunk 'A' road system, generally mineral extraction sites are not approved if it requires lorries to travel through minor roads" Whilst we welcome the policy S1 (p38) that traffic from site 1 and site 2 will be routed via the A45 we remain concerned about the rigour with which this policy will be enforced against the backdrop of local sand and gravel need in both the developments planned for Rugby and demand from the south of the region which is not directly reachable from the A45. There will be significant pressure for operators to route HGV traffic along the B4453 as the most cost effective route. We would welcome the Council's response upon how this risk could be managed in the real world. Failure to consider the effects of adjacent sites Stretton on Dunsmore Parish Council would like to point out that the Bourton on Dunsmore site (site 1) and the proposed site at Lawford Heath (site 2) appear as distinctly separate locations in the current plan whereas in practice they are adjacent, separated only by a small strip of land accommodating the A45 and garden centre. If they were considered together the forecasts of environmental impact would be significantly greater than is currently stated. Specifically, with respect to air and noise pollution, heavy traffic and plant movements. It wouldn't be unreasonable to think that a site with the combined profile of both would be seen to have a much more significant impact upon the local area. We believe it is disingenuous not to formally link them (or at least note their proximity and environmental interaction) in the plan.

MLPpub1 6578			1					1	S7											Response to Warwickshire County Council Minerals Plan Consultation Site 7 (9 th Dec – 3 rd Feb 2017) I understand you have agreed with Salford Priors Parish Council that residents can respond to the Mineral Plan consultation by letter. I am one of over a thousand local people who signed a petition objecting to the proposed inclusion of Salford Priors/Site 7 in the forthcoming Warwickshire County Mineral Plan. Please include this letter as a response to consultation and include it in any subsequent submission to the Secretary of State. Please also forward it to the Cabinet Members of Warwickshire County Council, any other involved members of the Council, prior to the closure of the consultation period on 3rd of February. We understand the national need for aggregates to support construction activities where recycled materials are insufficient or unavailable. However, the potential yield of sand and gravel from the Salford Priors site is very small compared with other sites under consideration across the county and in the region. This modest output needs to be weighed against the disproportionately high impact on villagers, wildlife, ecology and local community, both from the initial designation and any subsequent extraction, because the proposed site is extremely close to the village. Residents have already experienced the damage that over twenty years of sand and gravel extraction has had elsewhere in the parish, and know that the long term potential impacts of this new proposal will include: • Damage to the health and wellbeing of local residents caused by airborne particulate pollution, stress and noise, in particular to children attending Salford Priors Church of England Primary School, the elderly and those whose homes are located on the edge of the quarry; • Increase in risks from large industrial vehicles and heavy equipment crossing local traffic on School Road, in immediate proximity to a rural residential area; • Serious long term consequences to local ecology and watercourses; • Potential increased risk of flooding downstream, with loss of floodplain and aquifer storage; • Loss of high grade agricultural and horticultural land which is a source of local employment; • Negative impact on pedestrians, private and public transport, affecting access to and from Salford Priors; • Loss of the land as a local amenity; • Visual impact across a wide area; • Damage to the future viability of the community and local businesses arising from years of uncertainty. The Environmental Impact Assessment submitted by Salford Priors Against Gravel Extraction expanded on many of these issues which have not been adequately addressed. Elements added to the Mineral Plan since the previous consultation serve to exacerbate rather than alleviate issues previously raised eg . Mining the land in parcels as and when required will extend the period of quarrying potentially indefinitely. Including Site 7 in the County Mineral Plan also has the potential to undermine other policies and local plans, including planned housing development and consequently the viability of Salford Priors Church of England Primary School and local businesses. It is also our belief that in addition to the devastating impact on local people, evidence shows that the complexities of mining in this specific location, and the relatively low yield from doing so, are likely to make the site unfeasible and uneconomic. Beyond these tangible impacts, there is a clear conflict of interest with Warwickshire County Council being both landowner and planning authority.				1				
MLPpub1 6579			1					1	S7											Response to Warwickshire County Council Minerals Plan Consultation Site 7 (9 th Dec – 3 rd Feb 2017) A Quarry in the heart of a village a 2 min walk from a school? Your own councils Respected Fire Service warn of quarries! Just 1 example of litter on Quarry road - highlighting total disregard by Quarry for environmental hazards to wildlife & area. View from my lounge window - Quarry would start at hedge across - apparently 'I wouldn't see it/hear it' Councillor John Horner for community safety states there would be a 100m clear break ... as you can see it's not far!!! School bus ensures children can be tempted to play here after close - why would danger signs keep them out? I understand you have agreed with Salford Priors Parish Council that residents can respond to the Mineral Plan consultation by letter. I am one of over a thousand local people who signed a petition objecting to the proposed inclusion of Salford Priors/Site 7 in the forthcoming Warwickshire County Mineral Plan. Please include this letter as a response to consultation and include it in any subsequent submission to the Secretary of State. Please also forward it to the Cabinet Members of Warwickshire County Council, any other involved members of the Council, prior to the closure of the consultation period on 3rd of February. We understand the national need for aggregates to support construction activities where recycled materials are insufficient or unavailable. However, the potential yield of sand and gravel from the Salford Priors site is very small compared with other sites under consideration across the county and in the region. This modest output needs to be weighed against the disproportionately high impact on villagers, wildlife, ecology and local community, both from the initial designation and any subsequent extraction, because the proposed site is extremely close to the village. Residents have already experienced the damage that over twenty years of sand and gravel extraction has had elsewhere in the parish, and know that the long term potential impacts of this new proposal will include: • Damage to the health and wellbeing of local residents caused by airborne particulate pollution, stress and noise, in particular to children attending Salford Priors Church of England Primary School, the elderly and those whose homes are located on the edge of the quarry; • Increase in risks from large industrial vehicles and heavy equipment crossing local traffic on School Road, in immediate proximity to a rural residential area; • Serious long term consequences to local ecology and watercourses; • Potential increased risk of flooding downstream, with loss of floodplain and aquifer storage; • Loss of high grade agricultural and horticultural land which is a source of local employment; • Negative impact on pedestrians, private and public transport, affecting access to and from Salford Priors; • Loss of the land as a local amenity; • Visual impact across a wide area; • Damage to the future viability of the community and local businesses arising from years of uncertainty. The Environmental Impact Assessment submitted by Salford Priors Against Gravel Extraction expanded on many of these issues which have not been adequately addressed. Elements added to the Mineral Plan since the previous consultation serve to exacerbate rather than alleviate issues previously raised eg . Mining the land in parcels as and when required will extend the period of quarrying potentially indefinitely. Including Site 7 in the County Mineral Plan also has the potential to undermine other policies and local plans, including planned housing development and consequently the viability of Salford Priors Church of England Primary School and local businesses. It is also our belief that in addition to the devastating impact on local people, evidence shows that the complexities of mining in this specific location, and the relatively low yield from doing so, are likely to make the site unfeasible and uneconomic. Beyond these tangible impacts, there is a clear conflict of interest with Warwickshire County Council being both landowner and planning authority.				1				
MLPpub1 6580			1					1	S7											We send you this email, to object to the proposed Quarry (Site 7), being opened on School Road, Salford Priors. When we bought our cottage in 2005, we were of the understanding that the existing quarry was coming near completion, if this new site is sanctioned, we feel it would greatly depreciated the value of our property, the name of our cottage would cease to exist, as we would be overlooking the site. The council have already imposed new builds within the area, with a view of encouraging younger people to move into the area and the surrounding hamlets, no one in there right mind would buy a property with a quarry on there door step, we have had to put up with the 32 ton trucks pounding up and down the road, for many years, taking your life into your own hands pulling off our drive, as they hurtle around the bend in the road, when i take my daughter to school at Dunnington they speed in and out of the entrance, with total disregard to other road users. We feel that we have had enough, excavation works carried out in the area, and its time for some other area to bare the brunt, we will fight tooth and nail for this not to go forward.				1				

MLPpub1 6581	1	1	S7	<p>I wish to place on record our OBJECTIONS to the inclusion of this site in the Warwickshire County Councils Minerals Plan and would be obliged if you could take them into account when making your decision in this matter. We have lived in the village of Salford Priors for 22 years and love the place. We enjoy very much walking around the village and surrounding area. We also enjoy the facilities provided, in particular the bus service and our local pub The Queens Head as well as our very convenient Post Office. The public house is very popular with villagers and visitors alike and would be greatly affected by a quarry across the road from their premises. Patrons will not want to visit for refreshments with a noisy dusty site opposite, especially in the summertime when visitors enjoy sitting out in the garden. We do not want to lose this valuable eating house it is essential to the heart of our village, both economically and socially. As my partner suffers from Alzheimers dementia it is a God send to be able to go out walking freely and enjoy our village and also our bus trips. It is a lifeline for me also as it is a means of well being for both of us. To have two accesses from the suggested quarry over School Road would be a nightmare. We understand that the X18 bus service may have to be diverted for fear of hold ups due to these activities, therefore we would not be able to enjoy this very popular facility, which indirectly we pay for through our Council Tax. Villagers with asthma and other respiratory problems will suffer greatly from dust and fumes emanating from such activities, as the Marsh Farm site proved, not to mention the noise. I cannot understand how anyone in their right mind would suggest quarrying so close to residential properties. Marsh Farm is, incidentally, still very very active. Lorries still thunder across Tot Hall Lane, nose to tail at times, we know as we experience this activity frequently and have to jump on the grass verge. To have this across School Road would be unbearable and quite unacceptable. Quarrying in our village will also affect the watercourses and the flora and fauna surrounding them, this in my mind would be sacrilege. It would also cause division within the village itself, something which is to be avoided at all costs. Another point worth considering albeit trivial, is the fact that bottles, cartons and food wrappers are thrown out of lorries on to the verges causing a litter problem. As this subject is very prominent in the media at the moment I think it worth a mention. In concluding I would ask that ALL villagers health and wellbeing be the major factor here in removing this site from your plan, with access to the village for work and recreation being a very close second. We are not NIMBY's but ordinary law abiding citizens requesting a healthy environment in which to live our lives to the full. Too much to ask - I don't think so!</p>	1
MLPpub1 6582	1	1	S7	<p>I understand you have agreed with Salford Priors Parish Council that residents can respond to the Mineral Plan consultation by letter. I am one of over a thousand local people who signed a petition objecting to the proposed inclusion of Salford Priors/Site 7 in the forthcoming Warwickshire County Mineral Plan. Please include this letter as a response to consultation and include it in any subsequent submission to the Secretary of State. Please also forward it to the Cabinet Members of Warwickshire County Council, any other involved members of the Council, prior to the closure of the consultation period on 3rd of February. We understand the national need for aggregates to support construction activities where recycled materials are insufficient or unavailable. However, the potential yield of sand and gravel from the Salford Priors site is very small compared with other sites under consideration across the county and in the region. This modest output needs to be weighed against the disproportionately high impact on villagers, wildlife, ecology and local community, both from the initial designation and any subsequent extraction, because the proposed site is extremely close to the village. Residents have already experienced the damage that over twenty years of sand and gravel extraction has had elsewhere in the parish, and know that the long term potential impacts of this new proposal will include: Damage to the health and wellbeing of local residents caused by airborne particulate pollution, stress and noise, in particular to children attending Salford Priors Church of England Primary school, the elderly and those whose homes are located on the edge of the quarry; Increase in risks from large industrial vehicles and heavy equipment crossing local traffic on School Road, in immediate proximity to a rural residential area; Serious long term consequences to local ecology and watercourses; Potential increased risk of flooding downstream, with loss of floodplain and aquifer storage; Loss of high grade agricultural and horticultural land which is a source of local employment; Negative impact on pedestrians, private and public transport, affecting access to and from Salford Priors; Loss of the land as a local amenity; Visual impact across a wide area; Damage to the future viability of the community and local businesses arising from years of uncertainty The Environmental Impact Assessment submitted by Salford Priors Against Gravel Extraction expanded on many of these issues which have not been adequately addressed. Elements added to the Mineral Plan since the previous consultation serve to exacerbate rather than alleviate issues previously raised e.g. Mining the land in parcels as and when required will extend the period of quarrying potentially indefinitely. Including site 7 in the County Mineral Plan also has the potential to undermine other policies and local plans, including planned housing development and consequently the viability of Salford Priors Church of England Primary School and local businesses. It is also our belief that in addition to the devastating impact on local people, evidence shows that the complexities of mining in this specific location, and the relatively low yield from doing so, are likely to make the site unfeasible and uneconomic. Beyond these tangible impacts, there is a clear conflict of interest with Warwickshire County Council being both the landowner and planning authority.</p>	1

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I object in the strongest possible terms to this proposal citing the reasons highlighted on the following pages. Background and conflicts within the proposal. In July 2015 Stratford on Avon DC published its Strategic Environmental and Habitat relations assessments in response to the Salford Priors Neighbourhood Development Plan. The neighbourhood planning process was commenced by Salford Priors Parish Council in early 2014 following which they submitted the first draft of the NDP to Stratford on Avon district council. The purpose of this process is to allow the final NDP to take into account comments made during this process to assist them in the development of the submission draft of the NDP going forward. The process is required to determine if the impacts of the proposals put forward may require further examination through a more detailed process becoming the subject of a full Screening Environmental Assessment SEA. On every count, at this point in the process, the NDP was approved by Stratford District Council to move forward to the next stage without being subject to a further SEA Assessment. At this stage in the process there was no suggestion or knowledge of a proposed mineral development within the Parish boundaries, it was not included in any plans available to the public and there was no reason for any member of the Parish to be concerned, in fact quite the contrary, it was recognised as a good plan which had canvassed the village giving them a chance to have a say in the future and focussed clearly on the sustainable future of the village. The plan has been seen to fulfil the requirements of the Stratford on Avon Core Strategy and complied with the requirements of the Schedule 1 of SEA with no requirement for the NDP process to be subjected to a further SEA report. The proposals of the NDP include such matters as: The provision of housing in excess of that required within the Core Plan. The creation of green open space areas which are recognised in the SEA screening document as being "vital to the health and well being of residents providing a stronghold for biodiversity in the area including features which provide an opportunity for improvement in the long term". The SEA recognises that: "the preservation of Grade 2 and 3 agricultural land as an important natural resource being vital to sustained development" and their recommendations also include Salford Priors: "taking the right decisions about protecting this area from inappropriate development". Following this, and without prior notice, the proposal for Site 7 was put forward at a Community Forum Meeting held in Bidford on Avon in September 2015 approximately 20 months after the commencement of work by Salford Priors on the development of the NDP. The quarry proposal process was commenced by WCC independently and without consultation or recognition of the plans and proposals already put forward in the Salford Priors NDP. Within our community we have extensive experience of living alongside Sand and Gravel workings and have done so for many years with the Marsh Farm development. It must be said however that this proposal is different, more severe, and with vastly greater environmental impacts on the Salford Priors residents than anything hitherto experienced and I would like the following differences to be considered. "See attached table which is text to be inserted here." The Strategic Environmental Assessment and Habitats Regulation Assessment was published in July 2015 and stated that, in respect of the SEA Assessment of Salford Priors draft NDP that: "due to the scale and location of proposed development significant environmental impacts are not expected to occur" and "it will not have significant effects in any of the criteria set out in Schedule 1 of the SEA Regulations, and therefore does not need to be subject to a Habitats Regulation Assessment. In summary, the timescale to reach this point of the process was: Salford Priors Parish Council commenced work on the NDP in January 2014 The NDP was approved as complying with the Core Strategy in July 2015 First indication of the Site 7 Mineral proposal in September 2015. The Government introduced the Localism Act in 2011 to give new powers for people to make Neighbourhood Plans with reduced inference from central government. These new powers were meant to give a say to local people in setting the priorities for local development through Neighbourhood Planning. The Government required local planning authorities to draw up clear Local Plans which conformed with the planning policy frameworks, met local development needs and reflected local people's views of how they wish their area to develop. The Government stated that "people are to be encouraged and enabled to influence decisions about new and modified buildings and facilities in their area and have the right to get involved in development decisions that affect them and to have a meaningful say". The Site 7 proposal and the way in which it has been managed to date by the WCC completely undermines everything that has gone before, including the wishes of Central Government, and places in jeopardy proposals within the Parish Council has put forward as being central to their NDP. It cannot be desirable to create substantial housing developments in an area where live quarrying activity will be carried out for many years, in addition to this, the proposed green open spaces are within the proposed mineral extraction area, and will therefore be lost, and substantial areas of Grade 2 Farmland will also be lost for ever. The entire situation is quite remarkable in that it completely flies in the face of the policy to give people a say in the future of their community and undermines the Neighbourhood Development Planning process where years of pre planning, consultation and hard work by representatives of the community can be overridden by a higher level of authority within the planning hierarchy namely Warwickshire County Council. Should this proposal have been put on the table after the village had put its efforts into the production of a sustainable NDP proposal? Can it be said that this proposal, has to date, been managed as part of a democratic process? Have WCC officers considered the devastating impacts of this proposal before putting it forward? It seems that common sense has simply gone out of the window, as a result of which the residents are being forced to fight against a proposal which is unviable and renders all of the work put into the development of the NDP completely at risk, invalidating all of the hopes and aspirations of the village for the future. If this plan is allowed to proceed, given all of the circumstances, it will have a huge negative impact at a time when the nation is trying to assert itself in supporting the nation to have more of a say on how the country is run. The WCC stated primary objective of delivering the proposal for profit The Salford Priors site is one of nine sites selected by WCC for mineral extraction out of 26 original proposals and there can be little doubt that this site has been selected primarily because it is in the ownership of WCC and has the potential to earn revenue to return to the Council to relieve pressure on Council budgets. The initiative has been brought forward by the WCC Estates and Smallholdings Department. on the basis of revenue generation and not on the basis of sound minerals generation within the County. We consider the entire process to date to be flawed and that there are better alternatives within the County, within normal considerations, which will not create income for the County. An extract from the WCC Estates communications re the proposals for Salford Priors states: "We have been reviewing the Councils property portfolio to explore proposals that contribute towards the revenue and capital targets. The income from the mineral resource would help

contribute towards the revenue and capital targets. The income from the mineral resources would help relieve pressure on Council budgets and other parts of the authority where funding is vitally needed. The council (as landowner) is primarily during this development from an income generation perspective, but we also have a collective responsibility to consider wider county objectives to facilitate aggregate delivery for local construction industry needs". There can be no doubt about why this proposal has been brought forward and we question the validity of the selection process when compared to other potential sites which do not contribute revenue to the council. This is a desperate measure by the Estates Dept. and one which we do not believe will stand the scrutiny of either an Independent Planning Inspector or the Planning process should it ever be submitted as part of an application. We also understand that members of the Cabinet of WCC have expressed that they would be unwilling to support this proposal if it is proven that it has been driven by the need to raise capital for the Council to relieve pressure on council budgets. The WCC Planning Dept. stated objection to the proposal as being too dispersed and causing maximum landscape impact. In our objections to this proposal we have previously used the quotation from Mr. Tony Lyons the Principal Planning Officer with the WCC Planning Dept. that "the proposed site is too dispersed with areas which may not yield a lot of mineral but will cause maximum landscape impact" We have also raised this issue in writing to the Leader of Warwickshire County Council and received a response from the Head of Transport and Economy who has not denied the comment but stated that "an issue was raised because officers were concerned that the site comprised a number of small parcels of land at that stage which were unlikely to be viable as they were too dispersed". We have looked into this to try and identify these "small parcels of land" and are unable to locate any such parcels within Salford Parish boundaries having requested information from WCC, the Parish Council and the Land Registry. We conclude that, as is evident from the proposal, that the proposal is indeed dispersed, separated by the main access road into the village, and will definitely cause the maximum landscape impact, an opinion shared by WCC Planners and ourselves. We are convinced that the difficulties and questionable viability of this site have been recognised by officers of WCC. The Salford Priors site is not an ideal mineral development site being one which is fraught with difficulties, challenges and additional costs for any mineral developer one of the main factors being that it so close to the village itself and it will cause the maximum amount of stress and risk to the village residents exaggerating the impacts of this type of activity which, if the proposal is allowed to proceed, will become a continual and unsolvable problem. It is recognised by WCC Officers that the impacts of the proposal upon the local community need to be minimized by the preservation of trees and hedgerows. If access from the proposed site onto the B4088 is pursued, in order to deliver adequate sight lines at the access location, it will require the removal of a substantial sward of mature trees and hedges adjacent to the B4088 from Limebridge to Iron Cross, a length of circa 200 metres, and a depth of growth between 8 and 10 metres. This plus other intrusions like the crossing of School Road with dumptrucks are only two examples of the likely devastating visual and other impact on the village which will be caused by this proposal. The double threat to Salford Priors of the development of the Quarry and the potential closure of Salford Priors Primary School. The Salford Priors Primary School has already been placed under special measures with pupils on roll now down to just 48 is threatened with closure. If this is allowed to happen, in conjunction with the quarry proposal going ahead, it will signal a continuing decline in the viability of the village and ultimately the loss of its status as a Service Village. Both possibilities, if they are allowed to proceed, will damage the village beyond repair. Ironically these challenges have come along at a time when the village should be looking forward with new housing development currently under way for the construction of 60 new houses and further proposals within the Neighbourhood Development Plan for the improvement to the centre of the village with a new village green and the further construction of up to 100 new houses within the centre of the village and elsewhere within the Parish. In time, if both of these challenges can be overcome, Salford Priors will be a thriving new community improved by new housing and new residents, having a very positive impact on future pupil numbers at the school. The neighbourhood Development plan, as it stands at present, will be able to be delivered and the village will be able to look forward to a great future. We need real support from our elected political leaders to ensure that these joint threats are overcome, the repercussions of failure to deal with these threats will make Salford Priors a far less attractive place in which to buy a new house and will jeopardise the entire future of the village. Further development of Environmental Impact objections The overall estimated quantity of sand and gravel makes up just less than 7% of the overall required tonnage of 11.6 million tonnes in the WCC proposal. Of that 37,000 tonnes of gravel, less than 3% of the total, is expected to be recovered from the Southern holding and 43,000, 4% of the total, is expected from the Northern holding. The overall recovery of useable material is very small in the context of the overall requirement and disproportionate to the level of impact which will be caused by the operation. Allowing for some wastage the contractor will need to cross school road to transport with circa 40,000/45,000 tonnes of material for processing in the Northern Holding. In addition to this there will be service vehicles and other plant needing to cross the road over a period of 3 to 4 years. An average number of road crossing required will be in the order of 40/50 per day over 3 to 4 years duration. This in itself will create an enormous reduction in amenity value of access from the village centre to the western areas of woodland and open country available to them plus restrictions in access for the less able and impacts upon cyclists and equestrians. All detailed within our Environmental Impact Report. Our research into the Noise and potential Traffic impacts, as a result of this proposal, are ongoing. In addition to the potential closure issues with the school we have confirmed that there is a very real risk to the local Bus Service being able to be maintained in its current form plus the increased difficulty of access to regular school buses to take pupils to local secondary schools. This truly is a potential disaster for the village of Salford Priors if all of these impacts on the village are allowed to arise within close proximity of each other. The place will become a difficult and unpleasant place to live with difficult transport connections, no local primary school and suffering the continual disruptive effects from the proposed quarry workings which are sighted completely adjacent to the village.

