

## **Worcestershire Minerals Local Plan**

### **Publication Version Representation Form**

#### **Response from Charlton Parish Council dated 26.9.19**

##### Box 3.

The Parish Council is of the view that the Plan as drafted with proposals for a separate DPD for site specific allocations and preferred areas is flawed and therefore not legally compliant. Furthermore, this approach together with the principal policies as drafted creates uncertainty. It is an open invitation for developers to exploit mineral working sites over vast tracts of land within the strategic corridors without properly taking account of fundamental issues such as the impact on villages and local communities, the wider landscape, local highway networks, flooding, etc. The local communities need certainty as to where sites are to be located and their impact on settlements and the wider landscape.

The wording of MLP1 and MLP4 is far too rigid. It is inappropriate to state that "planning permission will be granted" if other material considerations indicate otherwise. With regard to these principal policies no account is taken of the impact on local communities as outlined above. MLP4 – relating to sand and gravel – states that "planning permission will be granted" if the development contributes to the delivery and enhancement of green infrastructure priorities – such an inflexible approach does not take account of the many decades it would take to achieve network of green infrastructure. In the meantime the local communities will be subject to many years of extraction and related activities to achieve the afteruse. Clearly there is an over reliance for the creation of green infrastructure inherent in the drafted policies. Whilst restoration of mineral sites is important, green infrastructure priorities should be a secondary factor in identifying preferred sites after other criteria are taken into account, such as physical constraints, development management policies and local impacts.

Greater emphasis should be given to competing land uses in these uncertain times. For example food production and self-sufficiency need to be taken into account when considering the use of agricultural land – much of the productive land in this part of the Avon Valley is best and most versatile – grade 1 and 2 and should be protected against any working. Restoration of mineral workings with imported infilling material will not be possible in this part of the river valley. Land lost to infrastructure afteruse will be lost permanently for food production.

The Plan does not include any policy provision for the inclusion a 'cordon sanitaire' around mineral working sites to protect villages, local communities and individual properties.

The plan appears to omit any mention of the need to upgrade existing strategic routes to cope with the inevitable increase in traffic, especially heavy good vehicles.

The plan omits to mention that the river Avon is noted for its recreational use. In addition, no consideration appears to have been given to:

- The adverse effects that the mineral workings would have on the recreational users
- The dangers resulting from the use of heavy barges to move minerals on the river on recreational and other existing users.

#### Box 4.

The Plan requires fundamental changes and re-drafting to include site specific allocations and preferred areas. Such areas should be clearly defined and judged against all criteria such as physical constraints, development management policies and local impacts. Much more certainty needs to be given to local communities.

The assertion that “planning permission will be granted for mineral development.....” should be changed to a form that complies more closely with established planning application principles whereby each application is considered on its merits without any presumption regarding the outcome.

The principal policies MLP1 and MLP4 (and others) need to be re-drafted and less rigid so that a more flexible approach in determining proposals for minerals extraction within the areas of search. Again, more certainty for the local communities is needed.

Policies should reflect less reliance on green infrastructure and provide more protection for best and most versatile land thereby ensuring the balance is achieved for long term food production.

The plan should specifically include a review of the need to upgrade existing strategic routes to cope with the inevitable increase in traffic, especially heavy good vehicles.

The plan should specifically include the need to review and mitigate:

- The adverse effects that the mineral workings would have on the recreational users
- The dangers resulting from the use of heavy barges to move minerals on the river on recreational and other existing users.

Finally, the Council proposes that provision should be made for the inclusion of ‘cordon sanitaire’ such that there are no local settlements within 1 mile of any proposed mineral working sites.