

**FD.EVR2**

# **Cambridgeshire and Peterborough Minerals and Waste Local Plan**

## **Policy 2: Providing for Mineral Extraction**

(The Preliminary Draft Plan had Policy 2 ‘Spatial Strategy for Minerals’ and Policy 3 ‘Providing for Mineral Extraction’. These are broadly now combined into a single Policy 2)

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<b>Introduction and National Policy Context</b>	<b>2</b>
Introduction	2
National policy	2
<b>Local Context in Relation to Policy 2: Providing for Mineral Extraction</b>	<b>2</b>
<b>Minerals &amp; Waste Local Plan Policy</b>	<b>2</b>
<b>Alternative Reasonable Options</b>	<b>4</b>
<b>Conclusion</b>	<b>5</b>

# 1. Introduction and National Policy Context

## Introduction

- 1.1. Cambridgeshire County Council and Peterborough City Council are reviewing their joint adopted Minerals and Waste Development Plan and supporting documents. These comprise the following documents (with adoption date):
  - Core Strategy Development Plan Document (DPD) (July 2011)
  - Site Allocations DPD (February 2012)
  - Block Fen and Langwood SPD (July 2011)
  - Location and Design of Waste Management Facilities SPD (July 2011)
  - RECAP Waste Management Design Guide SPD (February 2012)
- 1.2. The two above DPDs are to be replaced by a single Minerals and Waste Local Plan covering the period to 2036. The three SPDs are also being reviewed, potentially with some elements brought into the new Local Plan. The new Local Plan will set the overall spatial framework and development management policies for sustainable mineral and waste management development across the plan area.
- 1.3. This Evidence Report provides a narrative on the development of and justification for Policy 2: Providing for Mineral Extraction in the emerging new Local Plan.

## National policy

- 1.4. A summary of the most relevant national policy applicable to Policy 2 is set out in a separate evidence document available on the website, entitled “Cambridgeshire and Peterborough Minerals and Waste Local Plan: Level of Provision and a Spatial Strategy for Minerals”.

## 2. Local Context in Relation to Policy 2: Providing for Mineral Extraction

- 2.1. The local context for Policy 2 is set out in a separate evidence document available on the website, entitled “Cambridgeshire and Peterborough Minerals and Waste Local Plan: Level of Provision and a Spatial Strategy for Minerals”. Also see the latest published Local Aggregates Assessment.

## 3. Minerals & Waste Local Plan Policy

- 3.1. The Preliminary Draft Plan was published on 16 May 2018 and consulted on over a six week period to 26 June 2018.
- 3.2. At the Preliminary Draft stage, the Plan suggested the inclusion of two policies, one (Policy 2) on the Spatial Strategy for Minerals, and a second policy (Policy 3) on Providing for Mineral Extraction. The first of these was purposefully left blank for further development, though significant amounts of explanatory text was included. The second set out a draft policy for providing sufficient minerals.

- 3.3. During the Preliminary Draft Consultation, there were a large number of representations made on Policy 2 'Spatial Strategy for Minerals' and its supporting text. In summary, the main issues raised were:
- The plan should be flexible, with allocations but also ability to bring forward other sites (eg within nominated 'areas of search').
  - Support for extensions to sites (rather than new sites)
  - Strategic sites which offer important benefits (eg biodiversity) should be retained
  - Potential for biodiversity benefits should steer which sites to allocate.
  - Impact on communities should be minimised
  - A large number of representations relating to, and mostly supporting the retention of, the Block Fen etc allocation and policy proposals
  - A minerals spatial strategy should minimise environmental impacts and deliver landscape scale biodiversity enhancements through restoration, in locations where the most significant opportunities exist.
- 3.4. Similarly, during the Preliminary Draft Consultation, there were a large number of representations made on Policy 3 'Providing for Mineral Extraction' and its supporting text. In summary, the main issues raised were:
- Although the 10y rolling average is in accordance with National Policy, recognition of future development and growth should be reflected within the proposed apportionment figures.
  - Production capabilities across the County should also be maintained through the plan period
  - Be wary in making simplistic long-term growth predictions, as current hyper-growth may not be sustained
  - Need to reduce the risk of extreme under or over provision.
  - Cambridgeshire has large permitted reserves of sand and gravel within a few permissions and so, production capacity should be incorporated within Policy 3 b.iii
  - Policy should include a requirement for proposals to demonstrate no adverse impact to the natural environment / net biodiversity gain
  - Detailed points on specific types of mineral availability (eg commentary on the difficulties in securing limestone supply)
  - The plan must not try to deliver a "national" requirement in an unsustainable manner.
  - It is important that there is continued access to and supply of building material for use in historic building conservation and restoration.
- 3.5. All representations, made under both policies, were carefully considered. Such representations assisted the two councils in preparing other evidence reports now published, in particular the 'Cambridgeshire and Peterborough Minerals and Waste Local Plan: Level of Provision and a Spatial Strategy for Minerals'. Accordingly, many of the points raised are addressed through that evidence report, or through the published site assessment process.
- 3.6. As a consequence of the representations, as well considering new/updated evidence which has emerged, the two previous policies have been merged into a single Policy for the Further Draft Local Plan.

- 3.7. The Policy is supported by a lengthy explanatory text, covering each of the different mineral types, as well as an explanation for the overall strategy of distribution and site selection. The evidence reports provide greater details and explanation.
- 3.8. The Policy then sets provision figures for Sand and Gravel, and Limestone, followed by a list of specific allocations aimed at meeting the required provision for sand and gravel; as well as an allocation to secure a continuous supply of brick clay. It has not proven possible to allocate for future limestone supply, but the end of the policy then sets out 'flexibility' for other sites (including limestone if appropriate) to come forward, but not so flexible as to undermine the plan-led system.
- 3.9. The Councils will respond in detail to any representations made at the Further Draft stage, now the policy framework is considerably more firmed up than at the Preliminary Draft stage.

## 4. Alternative Reasonable Options

- 4.1. The following alternative options have been considered for sand and gravel (including in the Sustainability Appraisal Report):
  - **Option 1:** A similar approach to the adopted plan, focusing sand and gravel extraction in a band running north to south, with around half of new provision coming from the Earith/Mepal area to take account of restoration (biodiversity/floodrisk) opportunities. Allocations will not be made in the Ouse and Nene river valleys. Extensions supported over new sites, in principle. Generally speaking this option is broadly suitable, and very similar to the preferred option, but risks not locating supply close to sources of demand, and could risk putting too much reliance on too few sites which deliver benefits, rather than a range of sites.
  - **Option 2:** An alternative strategy which reflects more recent extraction trends, focussing extraction on locations closer to Cambridge, Peterborough and Huntingdon (i.e. excluding most or all of proposals in more rural locations such as Earith/Mepal). Extensions supported over new sites, in principle. This is rejected, because it is important that the plan not be purely driven by supply and demand, but also what net benefits can be successfully delivered.
  - **Option 3 (preferred option):** A blended approach of Options 1 and 2, which focuses extraction close to sources of need and where the greatest opportunities for restoration can be achieved. This is the preferred option, which meets market expectations, but also delivers substantial wider benefits.
  - **Option 4:** A more flexible approach, with limited or nil allocations, and instead criteria based policy to direct proposals to suitable locations. No preference set for extensions over new sites. This has been rejected due to the likelihood that sites with wider benefits would be neglected, in favour of sites which only deliver the greatest benefits for the market. This option is also likely to lead to a greater number of new sites being opened up, which in turn will require greater infrastructure set up costs and likely greater impact on more communities.

Options for other minerals are not suggested as they are either found in a discrete and limited geological (and therefore geographical) location i.e. limestone; or are extracted in close proximity to the industrial operations they are linked to i.e. brick clay and chalk.

## 5. Conclusion

- 5.1. This evidence report demonstrates the rationale for the inclusion of this policy in the Further Draft Plan, and also demonstrates a summary of the issues raised at the earlier Preliminary Draft stage, and how the Councils have considered those issues raised.
- 5.2. Any representations received at the Further Draft consultation stage will be carefully considered, and this Evidence Report will be updated prior to the third and final consultation stage due in late 2019.