

1 Response Paper – Policy S3

Purpose of Policy S3

- 1.1 Policy S3 provides the framework for the MPAs consideration and determination of minerals development proposals in relation to climate change issues.

Summary of Position Prior to March 2021 Regulation 18 (Reg 18) Consultation

- Amendments to both the policy and supporting text around the need for applications to consider landform, layout, building orientation, massing and landscaping
- Policy updated to make clear that the need to ensure effective adaptation and resilience to future climatic changes are for the lifetime of the development (including restoration and aftercare)
- Further amendments proposed to update the planning context
- Section updated to recognise that the move towards zero-carbon development requires comprehensive monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered

Impact of Revisions to NPPF 2021

- 1.2 None of the amendments made to the NPPF in July 2021 had an effect on Policy S3.

Summary of Issues Raised through March 2021 Reg 18 Consultation

- Impacts on the climate, protecting our environment and reducing mineral need
- Aim to reduce emissions
- Community engagement should be encouraged
- Scale and nature of proposals in relation to restoration
- Water recycling, water storage and impacts on the environment
- Queries around monitoring
- Policies S2 - S4 and what they relate to
- A greater understanding of future climate change is needed
- Protecting the climate and environment

Addressing Issues Arising Out of March 2021 Reg 18 Consultation

- 1.3 This section acts to address the issues raised through the March 2021 Regulation 18 Consultation in relation to this policy, as set out above, and subsequently details any changes in approach made through their consideration. These changes of approach will be incorporated within The Draft Essex Minerals Local Plan 2025-2040 Regulation 18 document which will again be subjected to a Regulation 18 public consultation.

- 1.4 There now follows a discussion of each of the main issues raised during the Match 2021 Reg18 Consultation in relation to this Plan section:

Impacts on the climate, protecting our environment and reducing mineral need

- 1.5 Through the consultation questions were raised around how we can protect the climate when using vehicles and processes which harm the environment, and in turn, the climate. Policy S3 states that “applications for minerals development (*including extensions to existing sites*) shall demonstrate how they have incorporated effective measures to minimise *and/or offset* greenhouse gas emissions and to ensure effective adaptation and resilience to future climatic changes, *for the lifetime of the development (including restoration and aftercare)*” and then goes on to set out a list of criteria which must be considered. Therefore, all proposals take into consideration protecting the climate and environment. Furthermore, Policy DM1 sets out a criterion, which includes various environmental impacts, that ensures that “development would not have an unacceptable impact, including cumulative impact with other developments”. The MLP also contains Mineral Monitoring Indicator (MMI) 11 (8) which monitors the provision of land newly restored for habitat creation and the target for this is “to create a minimum of 200 hectares of UK priority habitat through mineral site restoration.”. This indicator is monitored via the AMR process. There is also a possibility that this MMI may be expanded to also incorporate the more holistic concept of ‘natural capital’ provision as part of extraction and restoration proposals.
- 1.6 The operation of minerals development on higher grade agricultural land and how this is justified was questioned through the consultation. The supporting text to Policy DM1 states that since the County contains extensive areas of grades 1, 2 and 3a farmland, “proposals for mineral working on higher grade agricultural land must protect these soils in order to enable the site to have the potential to revert back to productive agricultural use in the future.”. Top-soil and sub-soil are carefully removed, handled with care, and stored separately during the preparation and working of a mineral site. Policy S12 ensures ‘mineral site restoration and after use’ which requires proposals for minerals development to demonstrate that the land is capable of being restored at the earliest opportunity, to an acceptable environmental condition, *to support Local Plan objectives and/or other* beneficial after-uses, with positive benefits to the environment, biodiversity and/or local communities.
- 1.7 Comments received stated that there should be a clear plan to substitute new minerals with recovered or reconstituted gravel and bulk construction materials to reduce mineral extraction. As the MWPA there is a requirement to plan for aggregate need. We have no ability to ensure the use of recycled material over any other type of material, or cite this as a reason to reduce the amount of mineral permitted for extraction. It is almost important to note that technical limitations essentially puts a threshold on the amount of recycled aggregate that can be used in a construction project. The MWPA also cannot prevent future extraction generally as there is a requirement set out in NPPF Paragraph 213 for

the MWPA to ensure that there is a steady and adequate supply of aggregates within its administrative area. National minerals planning policy is clear that any deficiency in land-won allocations versus the established need can be met through sites coming forward off-plan if the shortfall was to cause the sand and gravel landbank to fall below seven years. However, whilst the provision of minerals cannot be reduced as a means to force the use of recycled material, Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment. Therefore, it is not considered appropriate for the MLP to discuss ways to reduce the amount of sand and gravel produced in Essex and replace this with recovered or reconstituted gravel and bulk construction materials.

- 1.8 Through the consultation it was suggested that the MLP should emphasise that reducing the use of minerals may mitigate against negative climatic impacts and reinforce the need for a lower annualised provision target for sand and gravel. Policy S3 and supporting text is to be read as a whole and paragraph 3.19 states that “Approaches to mineral safeguarding and reducing the use of minerals, as articulated in other sections of the MLP, may also mitigate against negative climatic impacts.”
- 1.9 As highlighted above, MWPAs are required to allocate land to meet market demand for minerals. A failure to make provision for the quantified market need would lead to sites coming forward off-plan, potentially in less sustainable locations, to meet the need for aggregate rather than extraction not taking place. The Regulation 18 Consultation on the MLP Review was supported by a document entitled ‘Other Relevant Local Information to Justify Aggregate Provision in Essex 2012-2029, 2021’ (Aggregate Provision Paper) which was published as part of the evidence base supporting the consultation. The assessment carried out by this paper in relation to future housing need was based on the Standard Method.
- 1.10 The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need. From Paragraph 3.14 onwards, the Aggregate Provision Paper compares current rates of housing delivery with future delivery rates which would be required under the Standard Method for forecasting future housing need. It found that for Greater Essex, the standard method indicates an annual provision of 10,683 dwellings between 2020 and 2029, compared with recorded dwelling completions of 5,605 between 2010 and 2019. This represents an expected increased rate of dwelling provision of 90%.
- 1.11 Since 2014 when the MLP was adopted through to 2019 (latest data at the time of the Aggregate Provision report), completions had increased by 42%, but the rate of delivery can be seen to be below the rate required to satisfy demand derived from the Standard Methodology. Planning applications continued to be lodged and approved by LPAs despite the COVID-19 pandemic which suggests housing completions will continue to increase for the remainder of the MLP plan period.

- 1.12 Notwithstanding the above, it was proposed to adopt a new plan apportionment for sand and gravel which equates to an average of the last ten years of sales plus 20%, which would currently be 3.74mtpa. The current apportionment of 4.31mtpa was derived from the 'National and regional guidelines for aggregates provision in England 2005 to 2020' (the Guidelines) which have since expired. As of September 2022, no new Guidelines have been put in place and there has been no indication that the figures in the expired Guidelines are to be 'rolled forward'. As such, a revised apportionment is proposed which considers the methodology set out in NPPF paragraph 213 (2021). The basis for the new sand and gravel provision figure is set out in a separate topic paper which will form part of the evidence base for the revised Regulation 18 MLP consultation document.
- 1.13 Through the consultation it was questioned whether development would consider siting, location and design, site operation and transport arrangements in relation to greenhouse gas emissions. It was also questioned whether sites will account for landform, layout, building orientation etc. and consider on-site renewable, low and zero carbon technologies to reduce energy consumption, incorporate sustainable drainage systems, enhance onsite water etc. and ensure on-site resilience to climate change, including with regards to unexpected events, and consider the potential benefits from site restoration and after use schemes.
- 1.14 The specific site mentioned in relation to the above question, Bradwell Quarry, has been the subject of several extensions and has been considered against all relevant policies of the MLP. Each application has included a restoration scheme, to a combination of agriculture, woodland, water, and biodiversity which is set out in a Masterplan covering all extensions to ensure that the restoration scheme maximises benefits. It is acknowledged that restoration across the later extension has been delayed due to overlap with the Rivenhall Integrated Waste Management Facility, but restoration is now ongoing. The operator Blackwater Aggregates, when making extension applications, has held pre-application exhibitions in the locality, seeking to engage the local community. In addition, the Mineral Planning Authority carries out consultation on all planning applications in accordance with the County's Statement of Community Engagement. With respect to transport of minerals from this site, the proximity of the facility means that direct use of rail or river transport is not practical.
- 1.15 Comments were raised through the consultation around a site being proposed in Coggeshall.
- 1.16 Whilst the MWPA notes the comments received, at the point of the Regulation 18 Consultation in 2021, this was not a site that was being proposed for allocation through the MLP Review. However, land pertaining to a very similar area was submitted through the Call for Sites exercise in March 2022 as a candidate site for future sand and gravel extraction. The site will therefore be assessed under the site selection methodology that all sites received through the March 2022 Call for Sites exercise will be subjected to, and the outcome of that assessment will form part of a second Regulation 18 consultation in 2023 where the Plan end date will be extended to 2040. It is further noted that the evidence supporting this

submission states that a 'planning application for the flood alleviation scheme will come forward during 2022'. This would pre-date the adoption of any new Preferred Site allocations through the MLP Review and the site would therefore be considered to be a proposal on a non-Preferred Site, irrespective of the outcome under the site assessment.

- 1.17 Any application submitted to work a site that is not allocated as a Preferred Site in the MLP will be assessed against the relevant policy framework in the adopted MLP, particularly Policy S6, at the point of any application being submitted. The issues raised in the responses to the Regulation 18 Consultation 2021 would be required to be considered, particularly under Policy DM1. A specific public consultation exercise on any future application would subsequently form part of the determination process for that application, irrespective of whether it was a Preferred Site or not. As of August 2022 an application has yet to be submitted and therefore there is no application before the MWPA to determine.
- 1.18 The MWPA additionally notes that the mitigation of any potential site-specific adverse impacts of a proposed development would be addressed through the planning application process, including those impacts which are cumulative. This includes land use matters which would be determined by the MWPA, and environmental matters regulated by the Environment Agency. Further, conditions attached to the granting of planning permission would be expected to be complied with. Failure to adhere to these conditions would result in enforcement action against the operator.
- 1.19 Through the consultation, it was requested that in order to provide a broad representation of Ministry of Defence (MOD) interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD sites and safeguarded zones, it is requested that the wording of either Policy S3 – Climate Change, or paragraph 3.20 (3.21) – Energy supplies, be amended to include a statement that explains that applications for development that would not compromise, restrict, or otherwise degrade the operational capability of safeguarded zones (and/or an area containing Ministry of Defence (MOD) sites) and assets will be supported. The MWPA consider this to be covered in paragraphs 5.1, 5.14 (5.2) and 5.19 (5.7) under Policy DM. Paragraph 5.1 states that "The planning policy framework provided by this Plan is considered flexible enough to deal with the variety of issues that may arise as well as variations in local circumstances.". Paragraph 5.14 (5.2) states "...the impact of proposals on the environment and amenity must be carefully assessed and considered by the MPA" and paragraph 5.19 (5.7) contains a list of factors which should be taken into account when considering proposals which includes "incompatible land-uses".
- 1.20 With respect to the latter, when a proposal is received by the MWPA they undergo a validation check using GIS software which highlights any land ownership matters within 250m of the proposed development. Therefore, in relation to safeguarded zones (and/or an area containing MOD sites) the relevant bodies will be consulted.

Aim to reduce emissions

- 1.21 It was questioned through the consultation how the MWPA aims to reduce emissions but still allows HGV's to be driven, adding CO2 emissions to the environment. It was further suggested through the consultation that the MWPA should make plans and targets to switch HGVs from using diesel, to hydrogen. With regards to the use of a specific fuel, whilst the MWPA notes the comments received, this is not within the jurisdiction of the MWPA as it would be unreasonable for the MWPA to specify the use of any particular technology. Any such mandate would be required to be issued by Central Government. The 'Road to Zero' can be found on the Government's website which is a document that outlines the Government's long-term strategy to transition to zero-emission road transport by 2030.
- 1.22 Policy S2 also states that there is a requirement for new development to "minimise mineral miles", and this will also be an aim of the overarching MLP Strategy which seeks to allocate mineral sites across the County near to those areas expected to see most growth and therefore the greatest need for minerals. Although HGVs are used to transport the minerals, the MLP promotes sustainable transport and Policy S11 directs HGVs onto suitable routes, optimising the efficient use of the main road network through the application of the route hierarchy. Policy S11 states that "Where the movement of minerals are by road, HGV movements shall not generate unacceptable impacts on highways safety, highways capacity and air quality (particularly in relation to any potential breaches of National Air Quality Objectives and impacts on any Air Quality Management Areas)". Accordance with the route hierarchy is also a factor in the proposed selection of candidate sites.
- 1.23 Further comments received state that the MWPA should aim to reduce emissions in processing plants, reduce the use of new minerals, encourage the use of sustainable technology such as solar panels, and that transport should be sustainable, using renewable energy wherever possible. The MWPA notes that measures to reduce greenhouse gas emissions will vary depending on the circumstances of each mineral development proposal and proposals will be considered under Policy S3.
- 1.24 Further, Paragraph 3.28 (3.29) of the MLP states that proposals for minerals development should demonstrate that they have been designed to ensure that any adverse impact on climate change is minimised, and this includes "mitigating the impact of climate change by designing measures into schemes to offset greenhouse gas emissions and environmental damage such as, but not exclusively, tree and shrub planting, renewable energy sources, habitat creation/ecological enhancement, biomass crop production and SuDS should also be considered."
- 1.25 Paragraph 3.20 (3.21) of the MLP states that "Developers should consider whether the use of renewable and low carbon energy generation on-site is feasible and viable for their mineral development. Proposals may provide the

potential to generate electricity to meet some or all of their energy needs, such as through solar panels, wind turbines and ground source heat pumps.”

Community engagement should be encouraged

- 1.26 Through the consultation it was suggested that residents need to find confidence in high quality restoration schemes. Policy S12 ensures ‘mineral site restoration and after use’ which requires proposals for minerals development to demonstrate “that the land is capable of being restored at the earliest opportunity to an acceptable environmental condition to support Local Plan objectives and/or other beneficial after-uses, with positive benefits to the environment, biodiversity and/or local communities.”. Policy DM1 also ensures that all proposals for minerals development do not have any unacceptable impact on the “appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to local distinctiveness”. Comments received through the consultation were in relation to a specific site and suggested that in the past ECC has allowed original restoration and after-uses to be changed. The specific site mentioned, Rivenhall, does overlap with past areas of mineral working. The Rivenhall IWMF was granted permission by an independent Planning Inspector following a call in Public Inquiry in 2009 and the site is now allocated for Waste Management in the Waste Local Plan (WLP) adopted in 2017. The WLP was subject to full public consultation and an Examination in Public in which residents were consulted. Outside from this specific example, it is the case that applicants can seek to revise a proposed restoration scheme through the planning process. Any such change will be assessed against its conformity with the Development Plan.

Scale and nature of proposals in relation to restoration

- 1.27 Comments received through the consultation raised questions around whether it was true that large workings offer greater opportunity to show greater mitigation and adaptation measures than small-scale mineral proposals. It was argued that the success of restoration was about its design and planning NOT scale. The MWPA notes that the extent that restoration opportunities are greater with larger sites is due to the amount of land there is to restore, and the opportunities that then affords. For example, where restoration is aimed at enhancing biodiversity, the success of this will in part be related to their size. Habitats below a certain size will not be able to support sufficient wildlife to allow them to maintain themselves. If restoration is to provide flood mitigation, then more flood waters can be stored on larger sites. Larger sites can incorporate public amenity, priority habitat and ecological enhancement, providing a mix of benefits on-site.
- 1.28 It is however agreed that the design and planning of restoration schemes is of great importance irrespective of scale. Paragraph 3.28 of the MLP states that “The information supplied and the measures to be incorporated/implemented should be proportionate to the scale and nature of the proposals...”. meaning that an appropriate level of mitigation and adaptation is planned and provided which is proportionate to the scale of the minerals proposal. Where mineral sites

are worked in phases, restoration is likely to be tied to a Masterplan to ensure the restoration plan is integrated and maximises benefits across the entirety of the site.

Water recycling, water storage and impacts on the environment

- 1.29 Through the consultation it was suggested that water should be recycled to improve efficiency and effects on the local community. Concern was raised around water being removed from the local water table leaving them in deficit and in turn effecting farming in the surrounding area. Paragraph 3.21 (3.22) of the MLP states that “Where appropriate, mineral site operators should install plant and devices, make use of water recycling and storage facilities, and use best practice methods to improve water efficiency.”. The appropriateness is assessed on a case-by-case basis.
- 1.30 Appendix Five (Two) in the MLP sets out when a Minerals Resource Assessment (MRA) is required, and the scope and level of detail required of a MRA. This schedule of requirements states that “borehole analysis must note the depth of the water table” therefore, ensuring that there are no significant adverse impacts arising from the proposed minerals development on the water table. Policy S12 also states that “Proposals shall demonstrate that there will not be an unacceptable adverse impact on groundwater conditions...”.
- 1.31 Policy DM1 of the MLP states that “Proposals for minerals development will be permitted subject to it being demonstrated that the development would not have an unacceptable impact, including cumulative impact with other developments, upon: Farming, horticulture and forestry”. Thus, ensuring that farming in the surrounding area will not be affected by the proposed minerals development.
- 1.32 Another comment received stated that minerals development should not drain into the surrounding river system, polluting and destroying the ecosystem. Paragraph 5.33 (5.20) of the MLP states that “When considering proposals for mineral extraction it is expected that due regard will be made to the Water Framework Directive and relevant river basin management plans to ensure that it does not cause deterioration in the status of any water bodies”.
- 1.33 Policy DM1 of the MLP is designed to manage the variety of issues that may arise on a site-by-site basis and force appropriate consideration of their impacts based on local circumstances. The policy states that “Proposals for minerals development will be permitted subject to it being demonstrated that the development would not have an unacceptable impact, including cumulative impact with other developments, upon: The quality and quantity of water (including flood risk) within water courses, groundwater and surface water”.
- 1.34 Through the consultation it was suggested that criteria 7 of Policy S3 be amended to identify the potential for water storage at restored sites for water supply. The MWPA agree with the suggested amendments as this is an after use that should be recognised as a benefit from site restoration.

Queries around monitoring

- 1.35 The strengthened wording of Policy S3 was welcomed through the consultation, however, it was questioned how infrastructure strategies and the benefits to wildlife/habitat creation will be monitored. Mineral Monitoring Indicator 11 (8) monitors the provision of land newly restored for habitat creation and the target for this is “to create a minimum of 200 hectares of UK priority habitat through mineral site restoration.”. This indicator is monitored via the AMR process. However, this is restricted to monitoring the provision of Priority BAP habitat. It is therefore considered that there is merit in assessing the practicality of expanding monitoring to also incorporate the more holistic concept of ‘natural capital’ provision as part of extraction and restoration proposals.

Policies S2 - S4 and what they relate to

- 1.36 Through the consultation it was agreed that policies S2 to S4 inclusive need to relate to new development proposals and extensions to mineral operations. However, it was stated that they should not necessarily relate to ancillary development normally consented through permitted development provisions nor should they apply to applications for non-compliance with planning conditions. Policies S2 – 24 contain strong planning principles which all development should seek to accord with. Considerations will be proportionate to the nature of the development that is being applied for. Applications for non-compliance with planning conditions will be assessed under the development framework as appropriate, on a case-by-case basis.

A greater understanding of future climate change is needed

- 1.37 It was suggested that a greater understanding of future climate change is needed so that future mitigation is appropriate. It was suggested that this could be gained by a geological study of past climate change through the collection of data from sand and gravel deposits as they are exploited, as they themselves are the products of climate change events. Whilst the MWPA notes these comments, they go beyond the requirements of Minerals Local Plan production and do not impact on the requirement to provide a steady and adequate supply of minerals for a period of 15 years from the adoption of the MLP. As such, mineral development is required to take place and the climate change policy as proposed seeks to address the impacts of climate change from and upon mineral developments to the extent allowed by the planning system. With regards to collating data from sand and gravel deposits as they are exploited, the MWPA is unable to grant public access to commercial operations. Whether members of the public would be allowed on site to provide the opportunity to log and sample the mineral deposits as they are revealed during working would be a business decision of the operator. Such requests would be required to be made to the operator directly for access to the site/deposit.

Protecting the climate and environment

- 1.38 A comment received through the consultation stated that Climate change will affect all businesses (after their establishment) and steps will need to be taken in order for them follow revised guidance and operation methodologies as knowledge increases and technology adapts. The response also stated that the minerals industry is no different and ECC should not be taking steps to secure they can carry-on regardless with ever-lasting extraction, processing, distribution; they should complete for all these things within the changing value models applied at the time of demand / use and be subject to the prevailing planning rules.
- 1.39 Policy S3 states that “applications for minerals development *(including extensions to existing sites)* shall demonstrate how they have incorporated effective measures to minimise *and/or offset* greenhouse gas emissions and to ensure effective adaptation and resilience to future climatic changes, *for the lifetime of the development (including restoration and aftercare)*” and then goes on to set out a list of criteria which must be considered. Therefore, all proposals take into consideration protecting the climate and environment.
- 1.40 Furthermore, Policy DM1 sets out a criterion, which includes various environmental impacts, that ensures that “development would not have an unacceptable impact, including cumulative impact with other developments”. The determination of planning applications considers material considerations, as per Policy S1, “Where there are no policies relevant to the application or relevant policies are demonstrably out-of-date at the time of making the decision, the Minerals Planning Authority will grant permission unless material conditions indicate otherwise”. Therefore, applications are subject to prevailing planning legislation at the time of determination which takes into consideration changing values. The NPPF, for example, is a material consideration in the determination of planning applications.

Conclusion

- 1.41 Respondents were broadly in agreement with proposed amendments to Policy S3. A significant number of comments were received around impacts on the climate, reducing emissions and water recycling, water storage and impacts on the environment.
- 1.42 Through the comments received it is proposed to make an amendment to criteria 7 of Policy S3 to identify the potential for water storage at restored sites for water supply. All other issues raised through the consultation which did not result in any additional proposed changes have been discussed above. In some instances this is because it is considered that issues are addressed elsewhere in the Plan. For example, reducing transport emissions is addressed under Policy S11 and the MLP Strategy.
- 1.43 Comments were received around the impacts on protecting the climate and environment when using vehicles and processes which harm the environment.

Policy S3 and Policy DM1 contain criteria in relation to protecting the climate and environment which ensure that all proposals take this into consideration. The MLP also contains Mineral Monitoring Indicator (MMI) 11 (8) which monitors the provision of land newly restored for habitat creation and the target for this is “to create a minimum of 200 hectares of UK priority habitat through mineral site restoration.”. This indicator is monitored via the AMR process.

- 1.44 It was suggested through the consultation that the MWPA should emphasise reducing mineral need. MWPA's are required to allocate land to meet market demand for minerals. A failure to make provision for the quantified market need would lead to sites coming forward off-plan, potentially in less sustainable locations, to meet the need for aggregate rather than extraction not taking place.
- 1.45 Responses states that the MWPA should aim to reduce emissions and switch HGVs from using diesel, to hydrogen. With regards to the use of a specific fuel, whilst the MWPA notes the comments received, this is not within the jurisdiction of the MWPA as it would be unreasonable for the MWPA to specify the use of any particular technology. Policy S2 and Policy S11 contain criteria which aims to reduce mineral miles and ensures accordance with the route hierarchy.
- 1.46 Comments received through the consultation raised questions around whether it was true that large workings offer greater opportunity to show greater mitigation and adaption measures than small-scale mineral proposals. The design and planning of restoration schemes is of great importance irrespective of scale, and where mineral sites are worked in phases, restoration is likely to be tied to a Masterplan to ensure the restoration plan is integrated and maximises benefits across the entirety of the site.
- 1.47 Concern was also raised around impacts to the water environment, including in relation to de-watering impacting on farming as well as the pollution of nearby water bodies. In relation to these issues, the MLP currently states “The process of ‘dewatering’ – whereby water is pumped out of a pit to allow dry working below the water table – must be carefully monitored, to ensure no adverse impacts on surrounding water availability,” and therefore, it is not considered that any further amendments are required.
- 1.48 Through the consultation it was questioned as to how infrastructure strategies and the benefits to wildlife/habitat creation will be monitored. Mineral Monitoring Indicator 11 (8) monitors the provision of land newly restored for habitat creation and the target for this is “to create a minimum of 200 hectares of UK priority habitat through mineral site restoration.”. This indicator is monitored via the AMR process.
- 1.49 It was suggested that the MLP should have a greater understanding of future climate change. Whilst the MWPA notes these comments, they go beyond the requirements of MLP production and do not impact on the requirement to provide a steady and adequate supply of minerals for a period of 15 years from the adoption of the MLP. As such, mineral development is required to take place and the climate change policy as proposed seeks to address the impacts of climate

change from and upon mineral developments to the extent allowed by the planning system.

- 1.50 In some instances, recommendations received go beyond the administrative authority of the MWPA and what the planning system is able to deliver. For example, the MWPA cannot require that HGVs use a certain type of fuel, reduce mineral provision on the basis of requiring the use of recycled material in building projects or require mineral operators to allow for the study of mineral as it is extracted.
- 1.51 A comment was received which stated that steps need to be taken in the mineral industry in order to protect the climate and environment. Through Policy S3 and Policy DM1 all proposals take into consideration protecting the climate and environment and applications are subject to prevailing planning legislation at the time of determination which takes into consideration changing values.
- 1.52

Table 1 - Schedule of Proposed Amendments to Policy S3 following March 2021 Regulation 18 Consultation on MLP Review

Old Ref	New Ref	Proposed Amendment
Criteria 6	Criteria 7	The potential benefits from site restoration and after-use schemes, <u>including those set out in relevant Local Plans and Green Infrastructure Strategies</u> , for biodiversity, and habitat creation, flood alleviation <u>resilience, water supply. Countryside enhancement, green and blue infrastructure</u> and provision of living carbon sinks.”

Table 2 - March 2021 Regulation 18 Consultation Responses to XXXX

ORGANISATION	ON BEHALF OF	POLICY S3	POLICY S3	ECC RESPONSE
Name of Organisation	Are you responding on behalf of another individual or organisation? - If Yes, Who?	1.Do you agree or disagree with the rationale behind the amendments proposed in this section of the emerging Minerals Local Plan? (see Rationale Report)	Please provide any comments below:	
Runwell Parish Council (631132323)	Runwell Parish Council	Agree	N/a	N/A
W H Collier Limited		Agree		N/A

(769297167/ 942768790)				
Blackwater Aggregates (623162177)		Agree		N/A
CEMEX (982058282)		Agree		N/A
Gent Fairhead Aggregates (871678397)		Agree		N/A
Resident (850344129)		Agree		N/A
David L Walker Ltd (559449615)	Brice Aggregates	Agree		N/A
Suffolk County Council (549043477)		Agree	These amendments outline our previous response.	Noted.
Coggeshall Parish Council (598729813)	Coggeshall parish council	Agree (but wish to clarify)	The policy is very accurate in its concerns about climate concerns and adapting all aspects of our lives to try to save the planet as we know it before we tip it over the edge. It is common sense to say that we have to protect what we have. We have little option here.	Noted.
			It is all very well blaming other countries eg Brazilian rainforest, we have to be proactive in what we intend to do not only in Essex but also the whole country must adhere	

			<p>to the same policy policy statements 3.14, 3.15,3.16, 3.17 all express the changes that have happened to our climate which I agree with but how do you protect the climate when using vehicles and processes which harm the environment and hence the climate.</p>	<p>measures to minimise <u>and/or offset</u> greenhouse gas emissions and to ensure effective adaptation and resilience to future climatic changes, <u>for the lifetime of the development (including restoration and aftercare)</u>” and then goes on to set out a list of criteria which must be considered. Therefore, all proposals take into consideration protecting the climate and environment. Furthermore, Policy DM1 sets out a criterion, which includes various environmental impacts, that ensures that “development would not have an unacceptable impact, including cumulative impact with other developments”.</p>
			<p>For example how do you justify tearing up a beautiful piece of grade 1,2,3 farmland to extract minerals?</p>	<p>The supporting text to Policy DM1 states that since the County contains extensive areas of grades 1, 2 and 3a farmland, “proposals for mineral working on higher grade agricultural land must protect these soils in order to enable the site to have the potential to revert back to productive</p>

				agricultural use in the future.”.
			<p>A clear plan to substitute new minerals with recovered and reconstituted gravel and bulk construction materials to reduce materials extraction will ALSO help reduce non-recyclable waste conversion to CO2 via incineration and landfill. In this regard the minerals strategy can potentially make a significant contribution to CO2 reduction in Essex.</p>	<p>As the MWPA we do not provide aggregate for a specific use, we provide it to the market. As the MWPA there is a requirement to plan for aggregate need. We have no ability to ensure the use of recycled material over any other type of material, or cite this as a reason to reduce the amount of mineral permitted for extraction. Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment.</p>
			<p>What plans and targets are in place to switch HGVs from diesel to hydrogen. HGV filling stations on non-strategic lorry routes should be phased out or there is a risk that drivers will divert from appropriate to non-appropriate roads to refuel damaging community relations, road surfaces, verges and small particulate air pollution etc etc</p>	<p>With regards to the use of a specific fuel, whilst the MWPA notes the comments received, this is not within the jurisdiction of the MWPA as it would be unreasonable for the MWPA to specify the use of any particular technology. Any such mandate would be required to be issued by Central Government. The ‘Road to Zero’ can be found on the Government’s website</p>

				<p>which is a document that outlines the Government's long-term strategy to transition to zero-emission road transport by 2030.</p>
			<p>I cannot find any evidence that large workings offer greater opportunity to show greater mitigation and adaptation measures than small-scale mineral proposals – its about design and planning NOT scale. In fact smaller sites may reduce impact on communities, finish more quickly and be restored to a higher standard than never-ending larger operations.</p>	<p>The MWPA notes that the extent that restoration opportunities are greater with larger sites is due to the amount of land there is to restore, and the opportunities that then affords. For example, where restoration is aimed at enhancing biodiversity, the success of this will in part be related to their size. Habitats below a certain size will not be able to support sufficient wildlife to allow them to maintain themselves. If restoration is to provide flood mitigation, then more flood waters can be stored on larger sites. Larger sites can incorporate public amenity, priority habitat and ecological enhancement, providing a mix of benefits on-site.</p> <p>It is however agreed that the design and planning of restoration schemes is of</p>

				<p>great importance irrespective of scale. Paragraph 3.28 of the MLP states that “The information supplied and the measures to be incorporated/implemented should be proportionate to the scale and nature of the proposals...”. meaning that an appropriate level of mitigation and adaption is planned and provided which is proportionate to the scale of the minerals proposal. Where mineral sites are worked in phases, restoration is likely to be tied to a Masterplan to ensure the restoration plan is integrated and maximises benefits across the entirety of the site.</p>
			<p>Agreed lifetime of the operation.</p>	<p>Noted.</p>
			<p>below:</p> <p>Climate change will affect all businesses (after their establishment) AND steps will need to be taken in order for them follow revised guidance and operation methodologies as knowledge increases and technology adapts. The</p>	<p>Policy S3 states that “applications for minerals development (<i>including extensions to existing sites</i>) shall demonstrate how they have incorporated effective measures to minimise <i>and/or offset</i> greenhouse gas emissions and to ensure effective adaptation and</p>

			<p>minerals industry is no different and ECC should not be taking steps to secure they can carry-on regardless with ever-lasting extraction, processing, distribution – they should complete for all these things within the changing value models applied at the time of demand / use and be subject to the prevailing planning rules.</p>	<p>resilience to future climatic changes, <u>for the lifetime of the development (including restoration and aftercare)</u>” and then goes on to set out a list of criteria which must be considered. Therefore, all proposals take into consideration protecting the climate and environment. Furthermore, Policy DM1 sets out a criterion, which includes various environmental impacts, that ensures that “development would not have an unacceptable impact, including cumulative impact with other developments”. The determination of planning applications considers material considerations, as per Policy S1, “Where there are no policies relevant to the application or relevant policies are demonstrably out-of-date at the time of making the decision, the Minerals Planning Authority will grant permission unless material conditions indicate otherwise”. Therefore, applications are subject to</p>
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				prevailing planning legislation at the time of determination which takes into consideration changing values. The NPPF, for example, is a material consideration in the determination of planning applications.
CPRE Essex (665562826)		Disagree (please clarify)	The revised MLP should stress more emphatically that reducing the use of minerals may also mitigate against negative climatic impacts. The announcement this month that the Government would enshrine in law the target of cutting the UK's carbon emissions by 78 per cent by 2035 - 15 years earlier than originally planned - pushes this further up the political and planning agendas. This would reinforce the earlier comment regarding the need for a lower annualised provision target for sand and gravel.	<p>Policy S3 and supporting text is to be read as a whole and paragraph 3.19 states that "Approaches to mineral safeguarding and reducing the use of minerals, as articulated in other sections of the MLP, may also mitigate against negative climatic impacts."</p> <p>As highlighted above, MWPA's are required to allocate land to meet market demand for minerals. A failure to make provision for the quantified market need would lead to sites coming forward off-plan, potentially in less sustainable locations, to meet the need for aggregate rather than extraction not taking place. The Regulation 18 Consultation on the MLP</p>

				<p>Review was supported by a document entitled 'Other Relevant Local Information to Justify Aggregate Provision in Essex 2012-2029, 2021' (Aggregate Provision Paper) which was published as part of the evidence base supporting the consultation. The assessment carried out by this paper in relation to future housing need was based on the Standard Method.</p> <p>The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need.</p> <p>From Paragraph 3.14 onwards, the Aggregate Provision Paper compares current rates of housing delivery with future delivery rates which would be required under the Standard Method for forecasting future housing need.</p>
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				<p>It found that for Greater Essex, the standard method indicates an annual provision of 10,683 dwellings between 2020 and 2029, compared with recorded dwelling completions of 5,605 between 2010 and 2019. This represents an expected increased rate of dwelling provision of 90%.</p> <p>Since 2014 when the MLP was adopted through to 2019 (latest data at the time of the Aggregate Provision report), completions had increased by 42%, but the rate of delivery can be seen to be below the rate required to satisfy demand derived from the Standard Methodology. Planning applications continued to be lodged and approved by LPAs despite the COVID-19 pandemic which suggests housing completions will continue to increase for the remainder of the MLP plan period.</p> <p>1.12 Notwithstanding the above, it was proposed to</p>
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				<p>adopt a new plan apportionment for sand and gravel which equates to an average of the last ten years of sales plus 20%, which would currently be 3.74mtpa. The current apportionment of 4.31mtpa was derived from the 'National and regional guidelines for aggregates provision in England 2005 to 2020' (the Guidelines) which have since expired. As of September 2022, no new Guidelines have been put in place and there has been no indication that the figures in the expired Guidelines are to be 'rolled forward'. As such, a revised apportionment is proposed which considers the methodology set out in NPPF paragraph 213 (2021). The basis for the new sand and gravel provision figure is set out in a separate topic paper which will form part of the evidence base for the revised Regulation 18 MLP consultation document.</p>
Thurrock Borough Council (97704900)	Thurrock borough Council	No comment		N/A

GeoEssex (538324742)		No comment	see below (see respondents comment under Policy S3 Q2)	Noted.
Strutt & Parker (891506607)	G&B Finch	No comment		N/A
Kelvedon & Feering Heritage Society (677892382)		No comment		N/A

ORGANISATION	ON BEHALF OF	POLICY S3	POLICY S3	ECC RESPONSE
Name of Organisation	Are you responding on behalf of another individual or organisation? - If Yes, Who?	2.Do you agree or disagree with the proposed amendments as set out in this section of the emerging Minerals Local Plan?	Please provide any comments and/or alternative wording for this section of the Plan below:	
Runwell Parish Council (631132323)	Runwell Parish Council	Agree	N/a	N/A
W H Collier Limited (769297167/ 942768790) (769297167/ 942768790)		Agree		N/A
Blackwater Aggregates (623162177)		Agree		N/A
CEMEX		Agree		N/A

(982058282)				
Gent Fairhead Aggregates (871678397)		Agree		N/A
Resident (850344129)		Agree		N/A
Suffolk County Council (549043477)		Agree	These amendments outline our previous response.	Noted.
David L Walker Ltd (559449615)	Brice Aggregates	Agree (but wish to clarify)	Section 3 goes onto to set out a number of strategic policies in the scope of which as written are potentially too broad. It is agreed that policies S2 to S4 inclusive need to relate to new development proposals and extensions to mineral operations, however they should not necessarily relate to ancillary development normally consented through permitted development provisions nor should they apply to applications for non- compliance with planning conditions etc.	Policies S2 – 24 contain strong planning principles which all development should seek to accord with. Considerations will be proportionate to the nature of the development that is being applied for. Applications for non- compliance with planning conditions will be assessed under the development framework as appropriate, on a case-by-case basis.
Sturmer Parish Council (1032567387)		Agree (but wish to clarify)	With regards to Policy S3; Climate Change. Whilst we welcome the strengthened wording	Mineral Monitoring Indicator 11 (8) monitors the provision of land newly restored for habitat creation and the target

			<p>regarding infrastructure strategies and the benefits to wildlife/habitat creation, we are unable to see how this will be monitored and would ask that documented monitoring be included to support climate change mitigation.</p>	<p>for this is “to create a minimum of 200 hectares of UK priority habitat through mineral site restoration.”. This indicator is monitored via the AMR process. However, this is restricted to monitoring the provision of Priority BAP habitat. It is therefore considered that there is merit in assessing the practicality of expanding monitoring to also incorporate the more holistic concept of ‘natural capital’ provision as part of extraction and restoration proposals.</p>
<p>Coggeshall Parish Council (598729813)</p>	<p>Coggeshall parish council</p>	<p>Agree (but wish to clarify)</p>	<p>This section poses the question” how can mineral extraction adapt “ the policy numbers 3.20, 3.23,3.24, 3.25, 3.27, 3.28, 3.29 all state the correct answers but how is this going to work in practice? Reduce emissions in transport, processing plants , reduce the use of new minerals, transport should be sustainable, use renewable energy, low carbon, electricity generated by solar etc,</p>	<p>Measures to reduce greenhouse gas emissions will vary depending on the circumstances of each mineral’s development proposal and proposals will be considered under Policy S3. Paragraph 3.28 (3.29) of the MLP states that proposals for minerals development should demonstrate that they have been designed to ensure that any adverse impact on climate change is minimised, and this includes “mitigating the impact of climate change by designing measures into</p>

				<p>schemes to offset greenhouse gas emissions and environmental damage such as, but not exclusively, tree and shrub planting, renewable energy sources, habitat creation/ecological enhancement, biomass crop production and SuDS should also be considered.”. Policy S2 also states that there is a requirement for new development to “minimise mineral miles”. Therefore, although HGVs are used to transport the minerals, the MLP promotes sustainable transport and must also direct HGVs onto suitable routes, optimise the efficient use of the main road network and apply the route hierarchy. Policy S11 states that “<u>Where the movement of minerals are by road, HGV movements shall not generate unacceptable impacts on highways safety, highways capacity and air quality (particularly in relation to any potential breaches of National Air Quality Objectives and impacts on any Air Quality</u></p>
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				<p><u>Management Areas).</u>”</p> <p>Paragraph 3.20 (3.21) of the MLP states that “Developers should consider whether the use of renewable and low carbon energy generation on-site is feasible and viable for their mineral development. Proposals may provide the potential to generate electricity to meet some or all of their energy needs, such as through solar panels- <u>wind turbines and ground source heat pumps.</u>”</p>
			<p>water should be recycled to improve efficiency and effects on the local community therefore recycle and reuse does not mean draw off the local water table leaving them in deficit affecting the water table and farming in the surrounding area.</p>	<p>Paragraph 3.21 (3.22) of the MLP states that “Where appropriate, mineral site operators should install plant and devices, make use of water recycling and storage facilities, and use best practice <u>methods</u> to improve water efficiency.”. The appropriateness is assessed on a case-by-case basis. There are a total of approximately 153 Water Recycling Centres (WRC) across Essex and Southend-on-Sea. More information around WRCs can be found in</p>

				<p>the WLP.</p> <p>Appendix Five (Two) in the MLP sets out when a Minerals Resource Assessment (MRA) is required, and the scope and level of detail required of a MRA. This schedule of requirements states that <u>“borehole analysis must note the depth of the water table”</u> therefore, ensuring that there are no significant adverse impacts arising from the proposed minerals development on the water table.</p> <p>Policy DM1 of the MLP states that “Proposals for minerals development will be permitted subject to it being demonstrated that the development would not have an unacceptable impact, including cumulative impact with other developments, upon: Farming, horticulture and forestry”. Thus, ensuring that farming in the surrounding area will not be affected by the proposed minerals development.</p>
			<p>Also do not drain into the surrounding river system</p>	<p>Paragraph 5.33 (5.20) of the MLP states that “When</p>

			<p>polluting and destroying the ecosystem.</p>	<p>considering proposals for mineral extraction it is expected that due regard will be made to the Water Framework Directive and relevant river basin management plans to ensure that it does not cause deterioration in the status of any water bodies". Paragraph 5.34 (5.21) of the MLP then goes on to state that "Measures must be taken to protect these natural assets from the adverse impact of minerals development by: Preventing the pollution of ground and surface water by chemicals and other contaminants.". Policy DM1 of the MLP is designed to manage the variety of issues that may arise on a site-by-site basis and force appropriate consideration of their impacts based on local circumstances and the policy states that "Proposals for minerals development will be permitted subject to it being demonstrated that the development would not have an unacceptable impact,</p>
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				including cumulative impact with other developments, upon: The quality and quantity of <u>water (including flood risk)</u> within water courses, groundwater and surface water”.
			Also in the case of Coggeshall the quarry comes with the dam across the river or the other way around the dam comes with a quarry. This does not make sense the dam is not needed as the river has an adequate flood plain which with help to clear all the debris like weeds and silt can increase the volume of water the river can hold. Tributary streams can also hold back water and clear debris. If the flood plain is not built on and the sluice gates are opened there will be little pressure on the drainage system.	Whilst the MWPA notes the comments received, at the point of the Regulation 18 Consultation in 2021, this was not a site that was being proposed for allocation through the MLP Review. However, land pertaining to a very similar area was submitted through the Call for Sites exercise in March 2022 as a candidate site for future sand and gravel extraction. The site will therefore be assessed under the site selection methodology that all sites received through the March 2022 Call for Sites exercise will be subjected to, and the outcome of that assessment will form part of a second Regulation 18 consultation in 2023 where the Plan end date will be extended to 2040. It is further noted that the evidence

				<p>supporting this submission states that a 'planning application for the flood alleviation scheme will come forward during 2022'. This would pre-date the adoption of any new Preferred Site allocations through the MLP Review and the site would therefore be considered to be a proposal on a non-Preferred Site, irrespective of the outcome under the site assessment.</p> <p>Any application submitted to work a site that is not allocated as a Preferred Site in the MLP will be assessed against the relevant policy framework in the adopted MLP, particularly Policy S6, at the point of any application being submitted. The issues raised in the responses to the Regulation 18 Consultation 2021 would be required to be considered, particularly under Policy DM1. A specific public consultation exercise on any future application would subsequently form part of the determination process for that</p>
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				<p>application, irrespective of whether it was a Preferred Site or not. As of August 2022 an application has yet to be submitted and therefore there is no application before the MWPA to determine.</p>
			<p>Policy S3 discusses climate change and proposals to offset greenhouse gas emissions by ensuring effective adaptation and resilience to future changes. These words are very accurate but in practice will you :</p> <ol style="list-style-type: none"> 1. Be aware of siting, location and design, site operation and transport arrangements 2.Account for landform, layout, building orientation etc 3.On-site renewable, low and zero carbon technologies, reducing consumption. 4.Sustainable drainage systems, enhance onsite water etc 5. On site resilience to climate change and unexpected events 	<p>The specific site mentioned in relation to the above question, Bradwell Quarry, has been the subject of several extensions and has been considered against all relevant policies of the MLP. Each application has included a restoration scheme, to a combination of agriculture, woodland, water, and biodiversity which is set out in a Masterplan covering all extensions to ensure that the restoration scheme maximises benefits. It is acknowledged that restoration across the later extension has been delayed due to overlap with the Rivenhall Integrated Waste Management Facility, but restoration is now ongoing. The operator Blackwater Aggregates, when making extension applications, has held pre-</p>

			<p>6. Potential benefits from site restoration and after use schemes (we are still waiting in Coggeshall to see what has happened to the old quarries to the East (Bradwell) This all sounds very competent but is this going to happen in reality? The quarry mentioned above has been worked for the 40 years I have lived in Coggeshall and I have yet to see a scheme that local people were included in. They are still using it and transferring resources extracted from the quarry to the north to here for processing then transported in HGVs onto the A120 towards the A12 or being transferred onto the railway at Marks Tey which I have not seen as it is a very congested area.</p>	<p>application exhibitions in the locality, seeking to engage the local community. In addition, the Mineral Planning Authority carries out consultation on all planning applications in accordance with the County's Statement of Community Engagement. With respect to transport of minerals from this site, the proximity of the facility means that direct use of rail or river transport is not practical.</p>
			<p>How can you express your policy of reducing emissions when your lorries are being driven from this site adding co2</p>	<p>Measures to reduce greenhouse gas emissions will vary depending on the circumstances of each mineral's development</p>

			emissions to the environment	proposal and proposals will be considered under Policy S3. Paragraph 3.28 (3.29) states that proposals for minerals development should demonstrate that they have been designed to ensure that any adverse impact on climate change is minimised, and this includes “mitigating the impact of climate change by designing measures into schemes to offset greenhouse gas emissions and environmental damage such as, but not exclusively, tree and shrub planting, renewable energy sources, habitat creation/ecological enhancement, biomass crop production and SuDS should also be considered.”. Policy S2 also states that there is a requirement for new development to “minimise mineral miles”. Therefore, although HGVs are used to transport the minerals, the MLP promotes sustainable transport and must also direct HGVs onto suitable routes, optimise the efficient use of the main road network and
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				<p>apply the route hierarchy. Policy S11 states that “<i>Where the movement of minerals are by road, HGV movements shall not generate unacceptable impacts on highways safety, highways capacity and air quality (particularly in relation to any potential breaches of National Air Quality Objectives and impacts on any Air Quality Management Areas).</i>”.</p>
<p>Defence Infrastructure Organisation (1067972307)</p>		<p>Agree (but wish to clarify)</p>	<p>Policy S3 – Climate Change of the emerging Essex Minerals Local Plan (Regulation 18) contains a provision that supports the use of ‘On-site renewable, decentralised and low and zero carbon energy technologies, where feasible and viable’, this is preceded by the text found at paragraph 3.21 – Energy supplies, which states ‘Developers should consider whether the use of renewable and low carbon energy generation on-site is feasible and viable for their mineral development. Proposals</p>	<p>Through the consultation comments suggested that paragraph 3.20 (3.21) should be amended to include a statement that explains that applications for development that would not compromise, restrict, or otherwise degrade the operational capability of safeguarded zones (and/or an area containing Ministry of Defence (MOD) sites) and assets will be supported. The MWPA consider this to be covered in paragraphs 5.1, 5.14 (5.2) and 5.19 (5.7) under Policy DM. Paragraph 5.1 states that “The planning policy framework provided by this Plan is considered flexible</p>

			<p>may provide the potential to generate electricity to meet some or all of their energy needs, such as through solar panels wind turbines and ground source heat pumps'. In order to provide a more broad representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD sites and safeguarded zones, it is requested that the wording of either Policy S3 – Climate Change, or paragraph 3.21 – Energy supplies, is supplemented with a statement that explains that applications for development that would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets will be supported.</p>	<p>enough to deal with the variety of issues that may arise as well as variations in local circumstances.”. Paragraph 5.14 (5.2) states “...the impact of proposals on the environment and amenity must be carefully assessed and considered by the MPA” and paragraph 5.19 (5.7) contains a list of factors which should be taken into account when considering proposals which includes “incompatible land-uses”. When a proposal is received by the MWPA they undergo a validation check using a GIS software which highlights any land ownership matters within 250m of the proposed development. Therefore, in relation to safeguarded zones (and/or an area containing MOD sites) the relevant bodies will be consulted.</p>
<p>Mineral Products Association (339717535)</p>		<p>Agree (but wish to clarify)</p>	<p>It is suggested that the text for part 7. of the Policy is changed to identify the</p>	<p>Criteria 7 of policy S3 will be amended as follows, “The potential benefits from site</p>

			<p>potential for water storage at restored site for water supply.</p> <p>Proposed Changes (deletions in strikethrough; new text in bold)</p> <p><i>The potential benefits from site restoration and after-use schemes, <u>including those set out in relevant Local Plans and Green Infrastructure Strategies</u>, for biodiversity, and habitat creation, flood alleviation resilience, water supply, <u>countryside enhancement, green and blue infrastructure</u> and provision of living carbon sinks.</i></p>	<p>restoration and after-use schemes, <u>including those set out in relevant Local Plans and Green Infrastructure Strategies</u>, for biodiversity, and habitat creation, flood alleviation resilience, <u>water supply, countryside enhancement, green and blue infrastructure</u> and provision of living carbon sinks.”. The MWPA agree with the suggested amendments as this is an after use that should be recognised as a benefit from site restoration.</p>
GeoEssex (538324742)		Agree (but wish to clarify)	<p>Adapting to Climate Change 3.14 A greater understanding of future climate change so that future mitigation is appropriate, would be gained by geological study of past climate change through the collection of data from sand and gravel</p>	<p>The MWPA is unable to grant public access to commercial operations. Whether members of the public would be allowed on site to provide the opportunity to log and sample the mineral deposits as they are revealed during working would be a business decision of the operator. Such requests would be required to be made</p>

			deposits as they are exploited as they themselves are the products of climate change events.	to the operator directly for access to the site/deposit.
CPRE Essex (665562826)		Disagree (please clarify)	See comments above. (see respondents comment under Policy S3 Q1)	Noted.
Thurrock Borough Council (97704900)	Thurrock borough Council	No comment		N/A
Strutt & Parker (891506607)	G&B Finch	No comment		N/A
Coggeshall Residents Against the Quarry (449012745)		Not Answered	The revised MLP should stress further and more emphatically that reducing the use of minerals may also mitigate against negative climatic impacts (Para 3.18) as this should be a fundamental driver of the strategy.	As the MWPA we do not provide aggregate for a specific use, we provide it to the market. As the MWPA there is a requirement to plan for aggregate need. We have no ability to ensure the use of recycled material over any other type of material, or cite this as a reason to reduce the amount of mineral permitted for extraction. Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment.
			The announcement this month that the	Noted.

			<p>Government would enshrine in law the target of cutting the UK's carbon emissions by 78 per cent by 2035 - 15 years earlier than originally planned - pushes this still further up the political (and planning) agenda. In this context, the comments under Policy S6 relating to a need to revise downwards the Plan's on-going high provision target are particularly pertinent.</p>	
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